

Local Plan Submission 30th October 2020 reference Chalgrove Airfield.

STRAT 7

Request. I request that the proposed Chalgrove Airfield housing allocation is removed from the South Oxfordshire Local Plan

Justification. The site is not deliverable and has no reasonable prospects of delivery within the next five years, in the terms set by the NPPF due to a sitting tenant with a very long lease.

General Comments.

1. The NPPF states that to be considered as a Strategic Site the land must be more or less available for development now. See my submissions dated 17th February 2019, 26th June 2020 & 28th July 2020 regarding the evidence from Mr Anthony Clean QC dated 12th March 2018. Use of this land is therefore not consistent with the NPPF.
2. The site was never considered in SODC's thinking until very late in the new emerging Local Plan process. This area of South Oxfordshire was considered by members and officers to be an unsuitable unsustainable rurally isolated area serviced by only a single B category rural road. Chalgrove Airfield was put into the emerging Local Plan at a very late stage following the Government making MOD land available for housing development. The land may be available subject to satisfying Martin Baker's operational requirements, but, given SODC's original thinking it does not make sound planning reasons for inclusion in the Local Plan. The only site considered in this area of South Oxfordshire by officers and members was the site known as Harringtons, this being more or less the same site as the one called Stone Bassett near the M40 motorway which was turned down by the former Environment Secretary of State Nicholas Ridley MP in 1989. This was also rejected by members and officers in the discussions surrounding the emerging current Local Plan.
3. The issue of public transport proposed by Homes England at four buses per day in the peak hours which would only serve approximately 200 people is laughable as recently confirmed by the three major bus operators the Oxford Bus Company, Stagecoach & Thames Travel who have rubbished the plan as being not feasible (see copy of their letter attached). Homes England's submission at the EIP has been shown to be flawed in the extreme. Given the limited new employment land on the site the vast majority of new employment aged residents would have to travel to work. The site will therefore be a car dominated one and against the emerging Local Plan itself which states homes and jobs should be positioned alongside each other. There is also no available Local Transport Plan from Oxfordshire County Council to accompany the emerging Local plan.
4. I realise that regulations and the particular number of homes required will produce difficulties in the Local Plan but as you say these can be achieved by increasing housing densities on other sites. The benefit coming from this would be housing with fewer bedrooms and therefore better matching the perceived actual need in South Oxfordshire.

Comments on Preliminary Report (Land at Chalgrove Airfield)

Item 4.62. "The Local Plan safeguards land for Martin Baker's continued employment" is clearly not correct. Given the as yet unsolved noise and safety issues which need to be solved to maintain their operations without complaint from future residents and the Civil Aviation Authority (CAA). In

addition, I feel that the statement by the Transport Minister and Chair of the Parliamentary Aviation Committee Mr Grant Shapps MP that he has great concern about the loss of airfields should be canvassed before issuing the final Local Plan report. Mr Shapps has visited the site and was I understand supportive of Martin Bakers position in his discussions with Mr James Martin the Managing Director of Martin Baker.

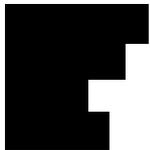
Item 4.63 I contest that RAF Benson were consulted. Please see my previous submissions where I confirm that the former Station Commander knew nothing about the plan when I spoke with him on 6th July 2016. This was the day by coincidence when the land was transferred into the ownership of Homes England. My long-standing Freedom of Information request to see the papers the Minister saw before agreeing the transfer has been continually rebuffed by the MOD confirming my view that no consultation took place with RAF Benson.

Item 4.65. I maintain that this is in contravention of the NPPF and would produce planning blight in the area for at least five years. In addition, it will cast doubt on investment plans by Martin Baker. Their business requires ongoing very significant investment to maintain their position as World leaders in aviation technology and subsequently as a major multi million pounds export earner. Now is the time to remove the Chalgrove Airfield from the Plan so that the development plans of Martin Baker can continue.

Item 4.66. The airfield is not predominantly “previously developed land.” It is approximately 90% grass land and is still used for agricultural purposes in particular sheep grazing.

Item 4.68. The site has considerable fluvial flooding issues with multiple under surface water courses. See the latest Environment Agency Maps. The site regularly in bad weather produces flooding of the B480 and water runs downhill via Chapel Lane and Marley Lane into Chalgrove where it swells the brook and floods homes. Homes England claim they will provide swales to stop this. I maintain that this will never be successful when two periods of heavy rain follow each other in a short period of time with the water simply going over the top and flooding Chalgrove. This problem will quite obviously be far worse when the airfield is covered over in buildings and concrete as more water will flow away from the airfield site downhill into Chalgrove. To build on the airfield will take no account of the “Climate Change Act” which I understand is a must in planning terms. You can access the details of two major events in 2008 and 2014 when major issues took place and Chalgrove homes were flooded.

David Turner
South Oxfordshire District Councillor (Chalgrove Ward)



Tel [REDACTED]
Mob [REDACTED]
Email. [REDACTED]

RECEIVED 30 SEP 2020

[REDACTED]

South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Milton
ABINGDON
OX14 4SB

28 September 2020

[REDACTED]

Chalgrove Airfield – Bus Operator Representations

1. Summary of the Representation and Bus Operators' Position

- Go-Ahead Group, operating as the Oxford Bus Company and Thames Travel; and Stagecoach in Oxfordshire, have been active participants in the progression of the emerging South Oxfordshire Local Plan 2035. We are aware that within the last week, Her Majesty's Planning inspectorate has found the Plan sound subject to certain modifications. The proposed allocation of the site has thus been confirmed as sound.
- Notwithstanding this, as the County's major bus operators, we have consistently expressed fundamental concerns over the ability of this site to sustain an attractive bus service, or public transport offer in the round. It lies well off-line any existing corridor that has established volumes of passenger transport provision or use. By reason of its relatively remote location, and distance from existing corridors, establishing what amounts to all but an entirely new public transport offer requires a very considerable amount of operating resource, and costs, to be borne over an extended development period, well in excess of the 8 years that is the default position taken by the County Council in seeking such funding.
- This remoteness from credible high quality Public Transport corridors is equally reflected in the sites' distance from surrounding rail stations; Culham is the nearest 10km away via a quite poor cross country route offering limited rail frequencies and even more limited parking. Other rail stations are considerably further distant, and all require extended drives across relatively unimproved rural roads.
- The location of the site also makes it inevitable that demands for travel off-site will be split in a number of directions, as the application concedes at Table 5.2 of the Transport Assessment (TA) and the Technical Note at Appendix F, which detail Trip Assignment. This undermines the viability of any passenger transport offer, at any given point in the development trajectory, because the level of demand for any given route is a fraction of the whole. All routes would be affected by this problem – even that to Oxford. This split of demand is reflected in the proposals to provide for a service not only to Oxford, but also to Didcot..

- The natural corridor for which bus use is likely to offer by far the most attractive mode choice as set out in Section 5 of the TA is Oxford via B480 Garsington Rd. This is forecast to generate just 168 peak hour outbound trips. This about 11% of total morning peak travel demands at full buildout. A proportion of City centre demand that would access via Abingdon Road in a car (140), would in all probability use the bus service. But even this lifts the total bus trip potential to Oxford along the route that would offer a relevant choice to perhaps 20 or 25% of the total trip generation from the site at most. Much demand forecasted to Oxford would be seeking off-line destinations, most notably in the Headington area. Currently over 90% of trips into the area from beyond the ring road area car-borne, reflecting that there are few if any relevant choices other than driving. Given the lack of a natural P+R interception point from the Chalgrove site (accessing Thornhill Park and Ride is relatively circuitous, and therefore unlikely to be very attractive as an alternative to driving via the B480) it is most reasonable to assume this problem will be aggravated by the development. Even assuming exceptionally high bus mode shares, the revenue potential is thus quite modest. While 30% have destinations within the City, most of this demand is relatively dispersed, most of it well off-line of the direct bus route corridor. It is therefore essential that any service provided to meet policy requirements does not fall away through lack of revenue support before the development is entirely built out.
- While confirmed LP2035 policy is clear that a half-hourly service to Didcot should be provided from the site, we note the TA does not believe that trips will assign towards Didcot **by any mode**. Irrespective, while development needs to comply with this requirement, it is clear to the bus operators from first principles that the business case for a bus service to this destination from the site in the short or longer term, is exceptionally challenged. For any such service to have a reasonable chance of success and longer-term sustainability will also demand that revenue support is applicable for the entire build-out period.
- The proposals also make mention of the Oxford Tube service operated by Stagecoach running along the M40 between Oxford and London, also calling at Lewknor junction 6 of the M40 (TA Para 3.7.2) 14 km away. It is not clear how the development proposals relate to this service, positively or otherwise. These stops are also used by the "Airline" service to Heathrow and Gatwick airports, operated by Oxford Bus Company. These services could only realistically be accessed by car, whereas parking facilities at the Lewknor stops are limited, and currently under intense pressure. There are no proposals submitted to accommodate any additional use of the coach stops at Lewknor arising from the development. We invite the applicant, and the County and District Councils, to consider this.
- Park and Ride on the A4074 Corridor – nominally at Sandford – has formed a part of the current 2015 Local Transport Plan (LTP) Policy Suite, known as "Connecting Oxfordshire". A site is also reserved within the current Draft South Oxfordshire Local Plan to 2035, under examination. The LTP is currently under review, as the "Oxfordshire Local Transport and Connectivity Plan" (LTCP). This review includes the existing LTP proposals for Outer P+R sites. The application makes reference to the Sandford P+R facility. It is entirely unclear how this, if delivered, will have any material relevance for car-borne journeys arising from the site. Indeed, to the extent that accessing the site is most likely to involve car borne journeys from the site to transit both the Golden Balls Roundabout and Nuneham Courtenay village, both areas where chronic and acute congestion is experienced and, in the latter case, where no mitigation has been proposed by either the applicant or the County Highways Authority, the proposals would serve only to aggravate already severe delay on the A4074 in this area. The logic of accessing a Sandford P+R via Grenoble Road, involving approaching the site from the north to then ride on a bus back towards the north, involves a degree of

circuitry and delay that is not in any way credible as a choice, even in relatively free-flowing highway conditions – for example, off peak.

In Summary, this site is manifestly remote, and by virtue of its location is unavoidably dependent on personal motorised transportation.

We are disappointed that the opportunity has not been taken in the Local Plan 2035 to meet the needs on alternative sites which could credibly meet the assessed requirements in places where the need to travel is much less, in terms of distances involved, and where sustainable alternatives, including attractive, high-frequency bus services, are overwhelmingly easier and more cost-effective to provide.

The Chalgrove site is one for which realistic and attractive choices about the means of travel off the site as an alternative to car use, are limited to bus journeys to the City of Oxford, and within that trip assignment, realistically only for those to the City Centre and to destinations that are directly accessible on foot off the main B480. This does include employment destinations which lie either side of the Oxford Outer Ring Road, including BMW, and the Oxford Business Park. While these are substantial employment sources, these do not represent the bulk of employment in the Eastern Arc.

However, demand for bus services even on this corridor, arising both from the completed site and the stimulation of demand from the existing villages on the route, require exceptionally ambitious assumptions about mode shift from existing development, and mode share from the proposals, to sustain an attractive frequent service on a commercial basis in the longer term. Using the assumptions in the TA, the totality of demand from which revenue can be drawn is sufficient to support a service running no more frequently than about every 30 minutes.

This being the case, the bus operators continue to consider that this site is inherently unsustainable, and in terms of providing a credible transport choice as is required by Paragraph 102-3 of NPPF, and very substantial questions remain as to how far it can be made sustainable.

Equally, we continue to have serious concerns that development of a new town at Chalgrove is rather more likely to have a disproportionate impact on the safe, efficient and reliable operation of the wider local highways network, without more vigorous measures to restrain the use of cars to reach destinations in and around the City of Oxford. In particular the proposals can be expected to significantly and materially undermine the reliable efficient and effective operation of important inter-urban bus services on the A4074 (X38-X40 "River Rapids" route group operated by Thames Travel) and at and around the Golden Balls and Berinsfield areas, at the Garsington Road Interchange and sections of the A423/A4142 Oxford Ring Road between Kennington and Green Road junctions in particular. These corridors and junction on them are already under substantial stress at peak periods, and a significant number of existing important bus services operate not just on or through them but in the immediate vicinity. It should be noted too that both Oxford Bus Company and Stagecoach have Operating Centres that lie on or very near the B480, in the immediate area of the key corridor that will feel a great deal of the residual unmitigated traffic impacts of the development proposals, on the edge of the City.

To be exceptionally generous, the site proposals therefore lie at the most extreme margins of what could credibly be considered sustainable in transport terms. The proposals therefore have an inherent tendency to cause unacceptable transport and traffic impacts across a wide area as a result, that only a much more robust public transport strategy could begin to materially address.

For these and other reasons, notwithstanding the current planning status of the site we consider that meeting the housing and employment needs arising from within the City of Oxford at this site demands substantially more commitment on the part of the applicant towards demonstrating deliverability of a realistic public transport strategy from the site, accompanied by an appropriate, adequate revenue support budget; and significantly more detail about how traffic arising from the development will demonstrably not undermine the efficient and reliable operation of bus services on the B480, A4074, and the key junction on the A4142 Oxford Ring Road.

The Bus Operators for this reason object to the proposals, in line with our objections to the Draft Local Plan 2035. Notwithstanding the confirmation of the broad principle of development, these specific proposals fall significantly short of demonstrating compliance with the National Planning Policy Framework, and the emerging LP2035, to overcome what is essentially an unsustainable development location.

2. Development Proposals and Mix

We note the proposals involve the development parameters set out as follows below.

- **3000 dwellings**
- **Of which 40% affordable tenures**
- **Of which 600 are flats – of which 400 (66%) will be affordable tenures**
- **300 C2 Extra Care units**
- **1872 2-3 bed houses**
- **528 4-5 bed houses**
- **2 x 2FE Primary School,**
- **1 x 8FE Secondary School (Nominal NOR = 1200) 300-place post-16 (“sixth form”) provision, including relocation of existing 4FE provision from Watlington**
- **5 Ha Employment**
- **“Town Centre”**

As such we note and recognise the intention to provide for as high a level of self-containment as possible for trips arising in the site, most notably for education up to the age of 18; and for convenience and some grocery shopping. Given the practical impossibility of limiting the uptake of new jobs only to those living on the site or in Chalgrove, local employment would assist self-containment to some extent. It would serve at least as much, to make the development a destination for car-borne journeys.

Likewise the secondary and post-16 education provision on-site leads to the wholesale reconfiguration of home-to-school pupil movements, making the site a significant peak trip destination, though we equally recognise that the centre of gravity of the future school catchment moves to Chalgrove itself by virtue of the proposals themselves (the development and the existing village will be the largest settlements in catchment by a very substantial margin) and to that extent, overall, the impact of this will be relatively modest.

In particular, it is proposed to relocate the existing secondary education provision serving the wider area from Watlington to the site, including a new post-16 provision. We also note that this is to be delivered early; in phase 1. This establishes a statutory requirement for school transport to the site, including from Watlington itself. This will involve a substantial number of school bus movements that the Secondary School site needs to make provision for. However it is equally likely that, in the morning peak in particular,

students will be taken by parents to school on many occasions as part of a car-borne journey to work.

We also note from the TA that 75 places of the post-16 education demand is accounted for from within the development: 225 places therefore will be filled from off-site. This is a significant potential source of car-borne movements, and while some will no doubt arrive by foot or by cycle from the existing village, and equally on public or contract buses from Watlington, the rural nature of the District makes it highly likely many origins will be very diffuse. Where distances are under three miles, the County as Local Education Authority has no statutory duty to provide for these demands on buses provided under contract.

3. Emerging SODC Local Plan 2035 and Infrastructure Delivery Plan

The level of public transport provision expected in support of the appropriate delivery of the proposed Strategic Allocation at Chalgrove forming the basis of what is proposed by the applicant is not very specific. The level of service expected by the County Council and LPA in the evidence to the Local Plan Examination is largely implicit, certainly in terms of frequencies and hours of operation, as far as what is publicly visible in the Examination Library.

It must be stressed that the level of bus operator input into the evidence presented to the Local Plan or in that supporting this application has been negligible.

These are set out in the Post-submission Document PSD 27 Infrastructure Delivery Plan Update dated April 2020.

These reflect the latest County advice with reference to local transport matters including public transport provision to each of the proposed Strategic Allocations, including Chalgrove, as we understand it.

The requirements are set out at section 5.2 and Appendix 2.2.

The overarching aspiration and requirement to provide "*High quality public transport infrastructure and service(s)*" from the site is as far as the IDP goes within the body of the main text. This might quite properly be described as a statement that is as vague as it is aspirational.

Appendix 2.2 of the IDP sets out the funding requirements, that are based on additional operating resource – 11 additional buses - rather than any specific evidenced service design : "*Cost identified by OCC based on pump priming eight buses on a service Chalgrove-Oxford and three buses on a service Chalgrove-Science Vale (these possible services and the £720,000 per bus are subject to change)*". This figure has been used by the County since the Vale of White Horse Local Plan Part 1 Examination in 2015, and has not been subject to indexation since.

We should make clear as follows:

- The County assumes a bus operating cost of £180,000 per annum. This at current prices is about 3600 operating hours per annum per vehicle. Simple arithmetic shows that this represents about 12 hours per day, Monday to Saturday. **The costs set out therefore do not include either an early morning, evening or Sunday service.**
- The County assumes that £20,000 per annum of revenue **per bus** will accrue incrementally as the development builds out. In the case of Chalgrove, this is quite a heroic assumption, that is very unlikely to be achieved even under the

most optimistic of scenarios. It would demand a revenue growth model that exceeds anything we have ever experienced from new development in the County, and on sites where high-quality bus services are available the outset, where about 150 dwellings are occupied per annum and each household spends about £140/annum/household on a **single bus service**, operated with a **single additional bus**.

- It needs a single bus to be added to the existing service 11 cycle **merely to provide an hourly frequency service to Oxford City Centre**. Such a frequency would be insufficiently attractive to achieve anything close to this level of use assumed by the County. The relevance of hourly services from remote new settlements, constructed on former airfields, into Oxford can be immediately evidenced by the experience of service 250 (former 25A) from Upper Heyford, in Cherwell District, where peak mode share by bus is minimal – less than 2% of journeys, and boardings are accordingly scant. Interestingly, over the last 4 years since the development has sustainable significant levels of occupations, there has been negligible growth in patronage on the route.
- A further two buses (for a total of three) are needed to provide a half-hourly service to Oxford City Centre – the minimum frequency needed to start to be relevant to residents. For this to become self-sustaining, before evening services are considered, would demand additional incremental revenue of about £60,000 per annum to arise from demand between the site and the Oxford Ring Road, including from the existing village of Chalgrove which would also be served.
- **To provide a half-hourly service between Watlington, the site and the City would demand four additional buses**. The level of off-peak demand for an hourly daytime service was insufficient to sustain this frequency. Though a certain level of stimulation would no doubt then arise from Watlington itself, this is from a low base level, and recent experience is not in the least promising. The laws of demand and distance decay would apply to at least as much an extent as Chalgrove, compounded by the fact that car ownership and activity rates are both exceptionally high. Watlington is still further distant from the City than Chalgrove. It is a significantly smaller settlement which, even with planned growth, is not anticipated to grow much beyond another 600 dwellings. This, when added to the existing dwelling stock is little more than half the final projected size of the Chalgrove development. The very limited size of Watlington and its distant location from Oxford, coupled with relatively easy car-borne journeys to the M40 and to Reading, stretch the assumption that such a service would benefit from sufficient demand to be self-sustaining in the longer term.
- **Based on the discussion above, even the minimum level of service offer to be relevant - a 30-minute frequency service to Oxford, needing four extra buses - would demand an uplift in public transport demand on the corridor between Watlington and the City that would be at least three-fold (adding four buses to the current 2-vehicle resource on the service) to be credibly sustainable in the longer term, at the point where the development was fully built out**. This is credible, but only barely. The existing Sunday service on the route commenced on 30th August 2020 but County revenue funding has come for a source with only a year's duration, so its sustainability is open to question. Without an evening or Sunday service – adding significantly to operating costs – it really is extremely hard to see this level of patronage arising. This is despite the fact that as a bus destination, Oxford is among the most attractive in the UK, especially given the policies of car-restraint that have been and continue to be applied.
- **The support period assumed by the County is 8 years. The applicant assumes a 12-year development build-out** from first occupation. The support period would thus need to be extended by at least 50%, even accepting the applicant's somewhat "bullish" delivery assumptions. Without adjusting the

County's assumptions in any way, each additional bus required demands nearly £1.1m in revenue support. **Just to deliver a basic core half-hourly Monday-Saturday daytime service**, with hourly evening and Sunday provision then, implies costs of **around £7.8m** over a 12-year build-out period before indexation.

- Supporting eleven additional buses from demand foreseeable both from the site, and arising beyond it on the corridors served, represents something many would consider lies in the realm of fantasy.
- Based on our long operating experience in the County, we must stress that a 15-minute frequency uplift between the site and Oxford would struggle to materially generate much off-peak demand in particular and the additional stimulation from within Chalgrove and the new development would be likely to demand that a much less generous assumption of revenue build-up would be appropriate. Assuming four additional buses in the cycle, Monday-Saturday, (no additional evening and Sunday provision) is likely to demand an additional support budget, over 9 years, **in the order of £6.5m** before revenue stimulation – which would be modest. Uplifting the evening and Sunday provision to run every half-hour to the site (hourly beyond) requires a further **£1.53m** in costs to be defrayed over a 9-year period.
- For the Didcot service in particular, the level of demand accruing will be especially hard to assess. At a full cost at least a **further £11.7m** needs to be found to ensure this is available throughout the life of the development, assuming a 12-year build-out, and a reasonable level of evening service (running until at least 8.30pm on the daytime frequency and hourly thereafter not least to cater for shift workers and rail commuters) and hourly Sunday operation with some uplift during core shopping hours.
- In the absence of any trip assignment to Science Vale from the site the inclusion of a half-hourly service to "Science Vale" involving at least three vehicles stretches the relevance and proportionality tests in the sense of the CIL Regulations 2010 (as amended) at Regulation 122, any case.

The challenging economics of providing even the minimum credible level of bus service between the site and Oxford reflect both the distances involved, and the sparse population in the corridor as a whole. Fixed costs are high. The impact of the service will be muted. Given the levels of patronage required to defray these elevated costs, the sustainability of even this level of provision in the longer term, all other things being equal, demands exceptionally high levels of use of this basic provision.

Such a scenario arises directly from the location of the development. It is typical from remotely sited new settlements of this kind, that are off-line any existing established passenger transport provision.

For the avoidance of doubt "demand-responsive" minibuses involve costs of operation, per vehicle, that are comparable with scheduled buses. Both locally, nationally and globally, there is no evidence whatever to demonstrate that demand responsive bus services can become commercially self-sustaining in their own right. Rather, evidence suggests that revenue support would be required in perpetuity. We would point to the experience of Oxford Bus Company's Pick Me Up service, which is among the most comprehensive service offers ever rolled out in the UK, to substantiate this assertion. Among the many factors affecting the economics of operation is the need to replace vehicles after 6 years, rather than the 15 year life of full-sized buses. The laws of time and space would suggest an even higher level of resource cost to provide a relevant service to most destinations including connections at Berinsfield, with no clear sense that such provision would be more attractive or relevant than the scheduled service to Oxford described in the IDP, the proposals submitted by the applicant and that

more limited level of service discussed above. Indeed, we see no prospect that it would be even before detailed operational scoping is considered.

This presents the Planning and Local Highways Authorities with a significant dilemma. From the discussion above there seems no clear way that a policy-compliant level of public transport provision could be initiated, much less sustained, using the conventional pump-priming model for revenue funding.

Helpfully, exactly this scenario has equally been tested, for a remote airfield redevelopment in Southern England within the last few years: a new settlement at Dunsfold Aerodrome (now known as Dunsfold Park) in Surrey, recovered by the Secretary of State for his determination under Section 77 of the 1990 Town and Country Planning Act and subject to a Public Inquiry¹. The Inspectors Report (IR) outlines how the sustainability of the site and its transport impacts were among the most critical issues around which the determination turned. A near identical amount of bus operating resource was also deemed necessary to make the proposals acceptable in planning terms: 10 or 11 Peak vehicles, running to multiple destinations. The promoter was forced to concede that, even assuming extraordinary levels of usage, this level of service would never become commercially self-sustaining and therefore an “innovative” method to create a support fund in perpetuity was proposed.

This nature of this innovation was, alas, not described. Paragraphs 64ff. of the IR describe the position agreed with the County Highways Authority for that site: a deficit of up to £677,000 per annum, but that summed a fairly conventional fares structure. Notwithstanding the appellants comments characterised in para 66, we do not recognise any scenario in England that justifies the assumptions made by a transport planning consultant with no bus operating experience whatever.

We are somewhat surprised that the service was to be secured under s106 covenants on which various statutory tests under CIL Regulation 122 bear. There, as here, there are legal tests including proportionality and reasonableness. A perpetual demand for developer funding is by definition, limitless, and *prima facie* cannot be assessed as reasonable, as it is infinite. Typically any imposition of such obligations by the Planning Authority would be challenged as illegal. Here of course, the appellant offered itself up to be thus bound, and the Secretary of State, predictably in these particular political circumstances, found it inexpedient to demur.

However, the case for the appellant set out in the Inspectors' report at paragraph 43, and accepted by the Secretary of State was that the terms of NPPF would only be met if the service was “secured in perpetuity”. Applying our own considerable specialist expertise in this area, we can only surmise that some kind of annual public transport fee would be chargeable to all households (including affordable dwellings) in return for which residents would have free or very heavily discounted access to all the services thus provided from the site by the County Council, and depending on the contracted operator, their wider commercial bus network. However, while the Secretary of State was content to allow this appeal, in March 2018, it is notable that it has yet to be implemented.

We invite both the Local Planning Authority and the County Highways Authority to consider this matter, and the Dunsfold Park evidence, very carefully, alongside these representations, before any determination is made.

4. The application public transport proposals

¹ Land at Dunsfold Park, Stovolds Hill, Surrey PINS Ref APP/R3650/V/17/3171287 issued by the Secretary of State 29/3/18.

These are set out at para 4.4.4 of the FTP, and within the TA at Section 8.3.14-15 and page 19 of the Site IDP and Phasing Strategy.

- Up to four buses per hour to/from Oxford City Centre, of which two would be extended to provide connections to/from Watlington ("Premium Transit")
- Two buses per hour running east-west to/from Abingdon in the first instance, diverted to Didcot once the Culham River Crossing project is delivered. It should be noted that at Para 7.2.8 of the FTP only one bus per hour is proposed to Didcot. However most of the references across the suite of submitted documents refer to a half-hourly service.

This is as high level of service, exceptionally so considering current levels of service reflecting relatively sparse populations scattered over a very large number of small settlements in this part of Oxfordshire. The frequency proposed reaches or exceeds that of most of the busiest inter-urban corridors in the County, that benefit from greatly higher levels of population on-line shared between several substantial settlements.

The service level proposed demands something that is indeed likely to involve at least 11 additional vehicles at an annualised operating cost of about 11 x £180K per annum (OCC assumption, see above), before revenue, being just under £2m per annum:

- +1 PVR to create an hourly service Oxford-Watlington
- +3 PVR to deliver half-hourly Oxford-Watlington
- +4PVR to create a further half-hourly overlaid Oxford-Chalgrove service
- +3PVR to create a new half-hourly Chalgrove-Didcot service (may need additional peak PVR)

However to provide evening and Sunday services as the application suggests, lifts these costs significantly.

To the City, assuming a half-hourly service until about 2300h 6 days/week would lift the costs by at least £280,000 per annum. An hourly Sunday service between Oxford, the site and Watlington (no service to Science Vale) involving 2 buses each running 16 hours would add at least a further £80,000 per annum.

This sets up an annual bus operating costs expenditure of a minimum of about £2.35-2.49m.

Assuming each and every household had a regular bus user this would imply a spend of approaching £800/annum on bus travel for this level of service to be sustainable on the basis of patronage from the development.

There is relatively little additional demand on the lines of the routes concerned that would be stimulated, to help offset these costs through additional patronage and farebox revenue arising off-site.

Indeed within the City along the Cowley Road an additional 4 BPH on a route which already benefits from at least 23 BPH to and from the City centre, it would unavoidably to abstract revenue from existing bus services.

However, the trip assignment in the TA sets up the parameters against which these costs might be assessed against potential revenue.

- Morning Peak Trip assignment (0800-0900)
 - A415 West Abingdon 120
 - M40 SE from j6 121
 - M40 NW from j8a 68
 - Oxford via B480 Garsington Rd **168**
 - Reading A4074 South 136
 - **Didcot** **NIL**
 - TOTAL 1489 trips

The demand seeking to use the B480 into Oxford represents about 11% of total morning peak travel demands, but in reality much of this will be seeking final destination somewhat off-line of the bus route. A competitive end-to-end bus-based proposition may not be achievable for many of these journeys.

It is entirely unclear what the target mode share for bus from the site is, from the FTP. However, based on this trip assignment, perhaps **150 adults might avail themselves of regular peak bus use, we would assume on the B480 corridor. This would be a near 100% peak bus mode share for the corridor. Average revenue yields would optimistically suggest this would generate just over £205,000 a year in peak revenue.**

Even if this is *trebled* by stimulation from other existing and foreseeable development off-site (and including off-peak use which itself likely to be very modest) from first principles, the level of service proposed comes nowhere near becoming sustainable at full build-out. The most optimistic *prima facie* assumptions suggest that about a quarter of the costs would be covered by patronage: say, £615,000 per annum of the nominal £2.49m annualised operating costs.

If an annual public transport charge is levied, as we suggest above then a simple process of arithmetic suggests that **each household should expect to pay about £750 per annum** for free use of the buses; more sophisticated methods would charge per bedroom, avoiding the burden falling disproportionately on smaller units including those in affordable accommodation. Adjustments could be made by tenure. Having bought in to such an arrangement, much as one does in their commitment to owning a car, it is reasonable to assume actual usage of the services would be substantially higher also.

The focus of the bus provision is unsurprisingly and quite appropriately, Oxford City, given that the site is expected and allocated largely if not entirely to meet housing needs arising in the City.

Within the Transport Assessment (TA) at paragraph 8.4.12 the applicant highlights that *"Oxford itself represents between 30% and 40% of forecasted total development journey assignment during peak hours and therefore is significant demand available for targeted mode-share change to public transport."* In other words, at the outset 60-70% of all peak trip demand from the site has destinations elsewhere, the vast majority of which could not be substituted with bus use, except perhaps counter-peak to Watlington.

Of the 30-40% of trips that are predicted to have destinations within the City, only those which are within a relatively easy walk of the B480 would be substitutable by bus with an attractive convenience and journey time proposition when compared with car use. A large number of other City destinations would remain more attractive to reach by car – including destinations in the Headington portion of the Eastern Arc, such as John Radcliffe Hospital and Brookes University.

The overall attractiveness of the bus route even along the B480 will also be eroded relative to car use by the need to divert through the existing villages on some or all journeys, as acknowledged by the paragraph 8.4.24 of the TA: *"Buses will continue to use the route through the centre of Stadhampton and Chiselhampton to ensure that these communities are served by bus routes."* This would create a level of perceived delay that in our understanding of our customers' perception, typically exceeds the real delay. Indeed, intentional measures are designed in to the highways proposals within the villages to incentivise the use of the proposed bypass – a scheme which falls outwith of the development "redline" but is an integral part of the mitigations proposed - that seek to make the use of the bypass much more advantageous. Accordingly, the "Premium Transit" services currently envisaged could not be described as "Express", or even "limited stop".

Thames Travel and its parent were not consulted prior to the application on the applicant's behalf by its client team on this matter. We would irrespective, caution against the assumption in the submission that bus services would continue to route through Stadhampton.

We have to conclude, therefore, that:

- The trip assignments from the site do not lend themselves to allow bus services to represent a credibly relevant option for most residents, even considering the much higher level of public transport provision proposed on the service 11 corridor.
- This very greatly reduces the demand from which bus services at the site can draw.
- This, when set against the very elevated fixed costs of running the enhanced provision, makes the commercially sustainable level of service a fraction of that implied by the application, or set out in evidence to the Local Plan Review, based on a conventional model.
- Even on the key direct public transport link to the City along the B480, substantial road improvements will accelerate car journeys substantially, while buses continue to serve the villages en-route.
- Based on the evidence in the TA and operating experience in the locality and wider County, the best level of service to Oxford from which the development could credibly benefit in the longer term is about every 30 minutes. Frequencies from Watlington might be sustainable every hour, when plan-led growth there is also considered. There is simply insufficient demand from which to draw to sustain a very attractive frequency. This is an inherent problem of the location of the site that cannot be realistically addressed. Set against the flexibility offered by car use, it is not credible to argue that the site could ever sustain a high public transport mode share overall.
- Evidence within the TA substantiates our view that the provision of a new half-hourly service to Didcot addresses limited existing or foreseeable levels of demand from Chalgrove itself, and cannot be financially sustained at any stage without very substantial ongoing revenue support.

5. Phasing and Infrastructure Delivery

The development phasing and delivery trajectory is highly material first to how far convenient bus services can be offered to residents from the earliest stages of development occupation, and then to the rate at which demand from the development evolve. A more rapid rate of development from first principles, ought to reduce the length of financial support required by new or improved bus services, assuming of course that

the provision is likely to ever be credibly commercially sustainable looking at the wider bus network in the round.

We note as follows:

- 12 year delivery period. This involves sustaining delivery rates of up to 300 dwg/annum. This contrasts with the SODC Local Plan Review that considered 235/annum to be more realistic based on local past experience.
- First 5 years: Only 500 dwellings in total are anticipated for delivery in the first five years from first occupation. This is a very modest quantum. Providing a relevant service for so little additional potential demand will make significant additional demands on a necessarily limited public transport support budget. For the avoidance of doubt: the bus operators are well aware of the legislation set out at Reg 122 of the Community Infrastructure Levy Regulations 2010 (as amended) that demand that all funding must pass statutory tests of reasonableness and proportionality.
- Provision of bus services “as early as possible”. This is especially relevant having regard to the point made above. There is no commitment made as to when this should be. We suggest no later than the 50th occupation, for, at the very least, a half-hourly service to Oxford.
- Phasing dependent on delivery of Watlington Edge Road and Cuxham Bypass to improve site construction access to support higher rates of delivery from phase 2 (year 6) onwards. It is notable how much attention is paid to tying delivery to major off-site highways schemes with nothing explicit said about the delivery of public transport improvements.
- Early delivery of Secondary School
- Site to be built out broadly West to East. This is rational and in the round does suit the logic of improving bus services, especially where additional frequencies are to be provided from which the existing settlement would also benefit, whatever the detailed triggers for this ultimately are.
- Implied phased delivery of bus service improvements. (IDP page 34-36) However, we note that nothing is specified. There is a separate clear dependency on the delivery of the entire bus spine road through the site. We propose that this is tied to the point at which more than 50 dwellings are occupied lying more than 300m from stops on the route available before that time on the B480.
- £72,200,000 for “offsite highways and transport” – we note that no separate PT funding head is identified, which is a concern.
- Stadhampton/Chiselhampton Bypass, Cuxham Bypass, Oxford Gateway B480 scheme, contributions to Watlington and Benson Edge Roads – all in Phase 1 – at very considerable public expense.
- Improved car journey times from Watlington and Chalgrove arising from major road improvements perversely tend to relatively improve conditions for Single-Occupancy Vehicles compared with bus use, both for existing and new residents. We will not labour this point but it is an exceptionally important one.

This contrasts significantly with the District Council’s assumptions on delivery, in particular in the early years. Appendix 1.2 of the IDP reproduces the housing trajectory for the strategic allocation including Chalgrove, where 850 homes are assumed to be occupied within the first five years of delivery.

6. Urban Design

This is largely covered in Fig 4.4. and 4.5 of TA.

Paragraphs 4.5.3 and 4.5.4 of TA set out the manner in which buses are intended to route past and through the site in such a way that the synergies between through services from Watlington, with local services terminating in Chalgrove can be realised. This is very important. In particular for service from the site, each stop should benefit from the maximum effective frequency having regard to the routing pattern. All inbound buses to Oxford should thus serve the same stops in the same order, as far as possible. This must drive the routing logic. Returning buses are less sensitive as passengers alight from any bus where it is convenient and rational to do so, relative to their true destination.

Mostly what is proposed is pretty well-considered and rational. Leaving the very fundamental issues of the actual car-dependent and remote location of the development, it is hard to take great issue with the specific proposals within the redline.

However good the urban design however, this cannot by itself meaningfully address the transport problems that arise from the inherently unsustainable nature of the site's location.

7. Concluding Comments

In conclusion, we remind you of our continuing and substantial concerns in relation to this development. Over a sustained period of time bus operators have made clear their grave concerns over the proposed development on this site to sustain an attractive bus service with any chance of being commercially viable following conclusion of any funding period. The site is remote from credible public transport corridors, especially considering that demand for travel off site will be split in a number directions.

The reasoning and business case for a bus service to Didcot, required by emergent policy at an advanced stage of Examination, is especially unproven. We agree that it can and probably should be provided, as the strategic case is boosted substantially by the other Strategic Allocation at Berinsfield and Culham which it will also pass, and the fact it will also directly serve rail services at Culham Station which is anticipated to be improved substantially and with it, no doubt, the level of service frequency available. Culham itself is a substantial employment centre, which is anticipated to grow. How the very substantial cost of establishing and maintaining this service in the long term will be met is a significant question with a very great number of dependencies, not least on development phasing, the provision of appropriate bus priority around the Berinsfield and Clifton Hampden areas, and the initiation and rate of delivery of housing an employment on the other Strategic Allocations.

As presented, the site is therefore unsustainable in transport terms with people relying on private transport modes that will have a disproportionate impact on the wide local highway network. These factors demonstrate our ultimate concern, that to seek to meet the housing and employment needs of the City of Oxford at this site is both inappropriate and irrational. This is even more concerning where alternative sites clearly exist to accommodate this growth.

There is no budget proposed by the applicant to provide the bus services required by policy to the site, though this requirement is acknowledged. We note that developer contributions nationally have increased from £5,064m in real terms to £6,007m between 2005-2006 & 2016-2017, while transport and travel contributions arising from development have declined by 70% from £467m to £132m over the same period. The highways-led approach taken by the applicant exemplifies this with a total of £72.2m for off-site highways and transport with no specific budget ring-fenced to bus services. A great deal of time and money has evidently been spent establishing the feasibility, costs

and deliverability of major highways schemes, but virtually nothing in connection with bus services. This disparity is telling.

While we recognise that the principle of this allocation is progressing and is considered to be sound by the Planning inspectorate, all stakeholders should be left under no illusions that the long-term effectiveness and sustainability of the public transport strategy for the site as proposed, is highly questionable and needs a great deal more sober evaluation. We trust that the discussion above assists all parties in establishing a realistic baseline for this evaluation.

We note that a 15-minute frequency is now considered the minimum level of provision to Oxford, in proposed Main Modifications to the emerging policy suite for the site. This would strongly imply that the public transport strategy needs further significant adjustment and elaboration to suit this requirement. The funding period needs to be specified to support this level of service from a very early stage – say the 50th occupation – to guarantee the service will operate for at the minimum period, 6 months beyond the final beneficial occupation taking place on the site, or twenty years from inception, whichever is the sooner. It also needs to be clear what level of evening and Sunday provision is appropriate – without which the utility of any service will be greatly diminished.

We suggest that a 30-minute service to Oxford should be in place at the 50th occupation, and then, from a point no longer than 3 years after that, the full level of service required in policy. An annualised full-cost budget of £675,000/annum would be applicable from the 50th occupation for 12 years, and a further cost commitment of £890,000 for a 9-year period. Such an arrangement would in our estimate **demand a budget of just over £15m, index linked**. Clearly dependent on the approach taken to secure revenue and patronage, this would be mitigated to some extent or other from revenue arising from occupations on the development, and to a much lesser one, by wider stimulation of demand on the route as a whole. However the only credible way to ensure that the costs of running a service could be defrayed in perpetuity, would be for some kind of fee chargeable per household for use of the service, in return for some kind of annual pass useable by all residents. This would also of itself, support the highest possible levels of service take-up.

Provision of a service to Didcot running on a similar basis every 30 minutes, with a reasonable evening and Sunday provision would demand a separate full-cost budget of £975,000, per annum before revenue to be certain of this mitigation being available over the whole development build-out, without dependency on other sites coming forward. Assuming a 12 year support period this would represent **an additional £11.7m commitment**, against which farebox revenue and potentially substantial funding from the other strategic allocations would no doubt be offset. It is not for us to suggest the best way to apportion the assignment of this. However given these dependencies there is a clear case to split this off under a separate s106 funding head.

Even this would be far from guaranteeing that unacceptable highway impacts would not arise from the development, in our reading of the evidence.

We recognise that the foregoing will no doubt make sober reading. However, we had already made quite plain to the Planning Authorities, and County Council at the point this site was proposed for allocation, that creating relevant and attractive choices that secured both the mode choice required by national policy, and material mitigation of traffic impacts from the site on the wider highways network, would be extremely difficult. In the spirit of positive and pragmatic collaboration we offer above much input to support the formulation of a deliverable policy-compliant public transport strategy for the site – policy which arises from the County's advice as Highway Authority and not ourselves. In

common with our usual stance in such situations, we are happy to maintain a collaborative dialogue with all parties going forward.

On behalf of both companies we are

Yours sincerely



Phil Southall
Managing Director
Oxford Bus Company and Thames Travel



Chris Coleman
Managing Director
Stagecoach in Oxfordshire