Planning Regulation
Oxfordshire County Council
County Hall
New Road
Oxford
OX1 1ND

5 June 2018

BY EMAIL

Dear Sir/Madam,

MW.0028/18 Oxford Flood Alleviation Scheme – response of Oxford Bus Company

Thank you for the opportunity to comment on the above application. This letter represents a formal response by the City of Oxford Motor Services Ltd. (T/A Oxford Bus Company), Thames Travel (Wallingford) Ltd. and Carousel Buses Ltd.

Oxford Bus Company (OBC) are supportive of the aim to reduce flooding in Oxford as flooding can affect the operation of bus services. However, we have significant concerns that the proposed development will negatively impact upon the number of passengers using the City35 and Redbridge Park and Ride in the short term during construction period but also in the long term when alternative travel habits will have been formed as a result of the disruption and congestion. The proposed development will adversely affect Oxfordshire’s Local Transport Plan 2015-31 objectives specifically the following to:

- ‘Reduce the proportion of journeys made by private car by making the use of public transport, walking and cycling more attractive’;
- ‘Increase journey time reliability and minimise end-to-end public transport journey times on main routes’; and
- ‘Maintain and improve transport connections to support economic growth and vitality across the county’.

OBC have had discussions with the Environment Agency in late 2017 and we hope that this liaison will continue as a number of details within the application have been revised since the pre-app discussions such as the length of closure of Old Abingdon Road/Kennington Road junction and the size of the compound on the Redbridge Park and Ride site which has heightened our concerns. We will seek to continue these discussions with the EA in the hope of resolving our concerns but in the meantime, with the deadline for comments due by 14 June, we formally lodge an OBJECTION to the development but also suggest mitigation measures.
Objection 1: Impact upon City35 bus service in the short and long term and impact upon other local bus schedules

The proposed development would close Old Abingdon Road/Kennington Road junction for a total period of up to 15 months as stated in the Transport Assessment (TA) (section 6.4) requiring the City35 to re-route and lengthen its journey times. The proposed development would be contrary to Oxford Core Strategy Policy CS14 which seeks to "improve the ease and quality of access to and between the city and district centres" Policy CS14 as it would worsen the 'ease and quality of access' to Oxford city centre from east Abingdon, Radley and Kennington.

Mitigation for the diversion of the bus service is set out in Table 7.1 of the TA which states that "Route will involve looping around both the Hinksey Hill interchange and the Kennington roundabout. There is likely to be a marginal extension to journey times".

It is unclear what is deemed 'marginal' in this sense and whether 'marginal' is being equated to 'acceptable'. OBC would strongly contest that the extension to journey times would not be marginal nor acceptable nor one that Oxford Bus Company would simply be able to absorb within an already financially challenging route. The diversion looping round both Hinksey Hill interchange and Kennington roundabout at peak times would be significant enough to require an amendment to bus timetables as buses would not be able to maintain existing schedules.

The road closures would mean that OBC would have no option but to amend the bus timetables of the City35. The diversion will add costs due to the extra mileage and driver hours and will result in the need for an additional bus on the City35 route to maintain its frequency of service. It is not an option to reduce the frequency of the City35 as this would cause abstraction of bus passengers due the reduced convenience of a less frequent service.

Not only will the buses need to negotiate the already extremely congested Hinksey Hill interchange, but the interchange will also see a significant increase in traffic flow as a result of the Old Abingdon Road closure. Figure 6.3 in the TA shows that there will be an additional 7,684 vehicles using Hinksey Hill interchange heading east along the A423 Southern by-pass and an additional 3,172 vehicles entering Hinksey Hill from the Southern by-pass. This will have a knock on effect on other buses using the southern by-pass in particular the X3, X13, X2, X32 and X34. It is highly likely that these routes will suffer severe disruption to schedules and therefore we would seek S106 contribution to enable us to maintain the current frequency of these services.

Our concern in relation to the re-routing of the City35 bus should not be viewed merely as an issue during the construction period. If passengers change their travel habits due to the unreliability of bus schedules or a reduced frequency of buses, these passengers may not return to use the bus after the development is complete having formed alternative less-sustainable travel habits. If this issue is not mitigated then it has long term implications for the viability of the route and the wider objective of the County Council to reduce the proportion of journeys made by private car.

Proposed mitigation to comply with policy the following conditions/developer contributions should be applied by the County Council:
• S106 contribution to mitigate the additional mileage, driver hours and additional bus requirements to maintain the current frequency of service of the City35 bus. The amount will be calculated based on the closure of the Old Abingdon Road/Kennington Road junction for a period of 15 months.

• S106 contribution to maintain the current frequency of service on routes X3, X13, X2, X32 and X34 including driver hours and any additional bus requirements.

Any enhancement for bus services should be clearly set out by the County Council and included in the Section 106 Agreement as part of any planning consent.

We also seek temporary dispensation for the X2/X32 services to turn using Queen Street rather than The Plain during this period.

Objection 2: Impact upon the availability of spaces at Redbridge Park and Ride

Oxford Core Strategy Policy CS14 seeks to “improving the capacity and attractiveness of Park and Ride”. The TA (para 4.3.4) refers to 30 spaces being temporarily displaced at Redbridge Park and Ride. The term ‘displacement’ is used in the TA suggesting that the spaces will be moved somewhere else but it is unclear where they will be moved to. Nevertheless, this figure must be a typographical error as Appendix D to the TA (Part 3 - Drawing 4010) shows a significantly larger compound on the site potentially losing more like at least 300-400 spaces. The haul route/working area itself would take up more than 30 spaces during the construction let alone the area for the compound.

This significant reduction in parking spaces is total unacceptable in terms of its impact on the ability for people to access the Park and Ride facility and will leave the facility lacking in capacity to deal with regular and peak demand. The TA does not state how long this compound would be required. Section 4.4 of the TA says that construction of the compound areas would be between Feb-May 2019. Figure 4.1 suggests that the constriction of Area 4 would last until the end of 2021. This potentially means that the compound would be in place on Redbridge Park and Ride for almost 3 years. We understand through discussions with the EA that the size of the compound may vary over the duration of the construction phase but there are no details of this in the application so we are unable to comment on this.

According to the Oxfordshire County Council website the Park and Ride has 1,070 spaces. The number of passengers boarding the main buses at Redbridge (Park and Ride 300 and the X3/X13) is shown on the graph in Appendix 1 to this letter. It is accepted that a proportion of boarders will not be single occupants of cars but there is also a proportion who park but use a bicycle or walk to the city centre or who walk to pick up the Science Transit Shuttle at Chatham Road rather than take the 300 or X3/X13 buses. The figures of boarders versus spaces required, whilst not directly comparable, still give a broad indication of scale of demand. The loss of in the region of 300-400 spaces would mean demand would regularly and significantly outstrip available spaces.

We expect the applicant to submit as part of the application a detailed assessment of the impact of the loss of parking spaces at the Redbridge Park and Ride and OBC should be able to comment on the findings. We are happy to provide boarding data to assist.
Proposed mitigation to comply with policy the following conditions/developer contributions should be applied by the County Council:

- Require the construction of a temporary decked car park at Redbridge Park and Ride site to replace all car parking spaces lost as result of the compound (similar to the temporary Oxpens car park or the Foxhall Road car park). The decked car park should be completed and operational prior to the construction of the compound.

Further operational concerns:

- The duration of the closure of Kennington Road and Old Abingdon Road was indicated to OBC in Dec 2017 to be about 6/7 and 6 months respectively with an overlap of about a month totally 12/13 months. The TA now states overall closure to be up to 15 months. It is concerning that the closure period has increased and so we would question whether alternative methods of construction could be identified to reduce the period of time which the roads will need to be closed for. Any additional time taken to re-open the roads would result in us seeking a greater S106 contribution to mitigate against the impact on the City35 service to maintain its service.

- A proposed Recycling Transfer Station on the Redbridge Park and Ride site has been referred in the TA to but it is unclear whether the applicant has had discussions with the City Council on this as it is likely to render the plan for a compound at the northern end of Redbridge Park and Ride site unworkable. This raises a concern as to whether further spaces will look to be taken for the compound in the southern end of Redbridge.

- Section 4.6 of the TA states in relation to Seacourt Park and Ride “As construction traffic will share the access with bus services, HGV movements will be carefully controlled so as not to interfere with public transport efficiency and punctuality. However, should any conflicts arise, bus services will always take priority over site traffic.” We are pleased that this is recognised as an issue but no detail has been provided as to how this will be achieved in practice. For example, if HGVs are queued waiting to exit the Park and Ride site there is no space for them to move aside for buses so it is unclear if this is a deliverable aim.

Summary

It is our view that the proposed mitigation measures of the S106 contribution towards maintaining frequency of the City35 service and the decked car park would overcome our two main objections.

Oxfordshire’s Local Transport Plan 2015-2031 confirms that such mitigation would be appropriate. Policy 34 states that Oxfordshire County Council will:

- ‘secure transport improvements to mitigate the cumulative adverse transport impacts from new developments in the locality and/or wider area, through effective Travel Plans, financial contributions from developers or direct works carried out by developers’;
• 'seek support towards the long term operation and maintenance of facilities, services and selected highway infrastructure from appropriate developments, normally through the payment of commuted sums';
• 'secure works to achieve suitable access to and mitigate against the impact of new developments in the immediate area, generally through direct works carried out by the developer'.

I trust that these comments are helpful and we are happy to discuss any of these matters further with an aim to resolve our objections.

Yours sincerely,

Laura Higgins

Strategic Development Manager
Oxford Bus Company, Thames Travel and Carousel Buses
Appendix 1 – Passengers boarding Park and Ride 300 and X3/X13 buses (Oxford Bus Company)

Redbridge boarders April 16 to May 18