

Dear Nick Small

I am writing to formally respond to your letter of objection (dated 4 June 2021). As you know when making a change to our Traffic Orders we have a legal obligation to consult and to carefully consider any objections before deciding whether to proceed. The Council consulted on changing these traffic orders with stakeholders and has received one objection to the proposed changes. That objection was from Stagecoach.

Your objection has been carefully considered and we held a meeting with you on Friday 18 June with myself and our car parking manager Colum Nooney. At that meeting we explored your objection and sort clarification on statements you made in your letter of objection. We considered all your concerns and set up a meeting on 19 November for you to discuss your concerns with our Planning team & the County Council transport planners.

As you know we have considered the points you made in Stagecoach's objection to changing the following Traffic Orders

1. **Proposed Revocation of Cherwell District Council (Off Street Parking Places) (Compton Road, Banbury) (Coach Park) Order 2000**
2. **Proposed Cherwell District Council Banbury Bus Station (Amendment) Order:**

We have set out our response in a number of meetings we have held with yourselves to discuss your objections but, I felt it would be helpful to formally respond to your letter of objection.

I shall answer your objections point by point:

However, we have to stress that we have long been frustrated at the studied indifference of public sector stakeholders to the role bus has and should expect to play in meeting the mobility needs of the town and its extensive retail and service catchment in a more sustainable way. To the extent that the District and County Council has actively intervened in transport matters it has more often than not been with a clear and often explicit rationale to further favour motorists and facilitate the most convenient possible journeys by private car, to parking facilities provided as cheaply and as close to the destination as possible. The current proposals are, obviously, entirely consistent with this rationale

The Council disagrees with your viewpoint. The proposed change does not actively increase car usage. The proposal offsets some of the reductions in the Council's car parking spaces which have been lost from the Castle Quay development. The proposal accommodates the existing capacity for parking PCVs as currently exists but at alternative locations. Survey work we have carried out shows the number of spaces being used by PCVs rarely exceeds six. The users are associated with school transport and the number of users outside school term is usually zero. The use of Horsefair will be for 2 PCV spaces and up to four spaces within the bus station. It is however expected that the number of coaches using the bus station will be low, occasional in nature and will only be during school terms. Car Parking facilities are not 'provided as cheaply and as close to the destination as possible'. Charges

rose by 25% in August 2021, with a further 10% rise in summer 2022. The parking charges are not cheap and are compatible with other nearby town.

Were this to be achievable in the context of practically unlimited highways capacity offering free-flowing safe travelling conditions to all road users, including pedestrians, cyclists and bus users, that might be justifiable. However, this is evidently far from being the case. Demand for finite highways capacity in and around Banbury town centre, and on its wider approaches, has consistently exceeded capacity such that parts of the town have air quality problems that are amongst the worst in the UK, especially around Hennef Way/Southam Road; quite apart from the effects of chronic delay and severance on individuals and businesses. These delays affect our business probably more than any other single stakeholder.

Any measure that has, at its heart, the facilitation of large numbers of extra car journeys causes us great concern if only for that reason

The proposal does not facilitate large number of additional car journeys. The proposal increases car parking spaces by 35-40 which is less than the 80-90 lost as a result of the Castle Quay development. There is no evidence that the proposed changes will facilitate additional car journeys.

However, it seems particularly perverse that the Council should be seeking to reduce facilities for PCVs in Banbury town centre – the only place in the entire District where public transport can provide a relevant offer to a large number of visitors, and maximise the agglomeration effects demanded by town centre uses without having serious environmental and amenity impacts. We explain later in more detail how the proposals to close Compton Street Coach Park and move longer term bus and coach parking to Banbury Bus Station and Horsefair serve to materially reduce the level of infrastructure available to support the operation of regular bus service, and seriously truncate any possibility of seeing any expansion of local bus and longer-distance services in the future.

As previously explained the Council has not reduced facilities for PCVs. The Coach park is rarely used by coaches outside school term time. Those coaches which use the facility are largely associated with school travel often travelling to use sports facilities at Spiceball. Some of the firms which use this facility have a depot located in the town. Stagecoach does not use the Compton Road facility and no objections have been received from the coach companies which use the current facilities. The alternative facilities will match the current usage and will provide drivers with a better facility for waiting, by being closer to the Town Centre facilities.

1. Stagecoach Objection, and its basis

The proposed Revocation of Cherwell District Council (Off Street Parking Places) (Compton Road, Banbury) (Coach Park) Order 2000 (1.) serves to remove Compton Road as a Bus and Coach Park, to allow its use as a public car park. The proposed Cherwell District Council Banbury Bus Station (Amendment) Order (2.) serves to re-provide longer-term bus and coach parking facilities by setting aside space in the existing operational bus station of this purpose.

In so doing, facilities that support the operation of public passenger-carrying vehicles serving Banbury and its environs are proposed to be substantially curtailed. These facilities support the rational and efficient operation of a wide variety of bus and coach services and operations, ranging from registered local bus services offered on a scheduled basis to the public, express coach services, private hires and charters, contract coaches and buses to serve statutory and non-statutory home-to-school requirements, rail replacement services, demand-responsive bus/minibus services, community transport services and coach tours

We do not believe this will be the case. The bus station has nine bays, only four bays are regularly used. Three bays are not used at all and the two bays used by National Express are rarely used especially since National Express has ceased services since the pandemic.

We have carried out extensive monitoring of the current coach waiting facility and it is hardly used during school holidays and used to varying degrees during school term times. We strongly believe there is sufficient capacity at Horsefair & the Bus Station for coaches to wait.

2. Further Contextual Representations and Observations

We note your observations regarding the bus station but do not necessarily agree with them.

By consolidating all bus and coach waiting and parking in a single already under-sized and seriously compromised facility, this is likely to greatly reduce the space available to efficiently support current local bus services, with the added difficulty that ad-hoc long-term coach parking in particular, by its nature is peaky and quite unpredictable. This is likely to lead to unforeseen clashes where insufficient stand space is available

As previous highlighted there are empty bays in the bus station. The usage of the current coach facility has been monitored and there is virtually no usage outside school term time. During school term time there is usage from mid-morning until early afternoon and there is sufficient capacity at Horsefair and the Bus Station. We do not agree with your observation.

At least 5 bays are required for local bus services today, which leaves a maximum of four that could address other PCV parking requirements. It has to be stressed at during the Banbury Fair town bus services are also obliged to use the bus station, meaning that it is full. This is exactly the kind of event that also attracts touring coaches and charters. While the Council suggests that Horsefair could serve these purposes, it is entirely unclear how the management of the very limited space available would be undertaken by the Council or any other party. In fact, the proposals seriously hinder the ability of the town to best capitalise on special events and festivals, for which accommodating peak visitor volumes will never be possible in car parks.

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During the Banbury Fair we will ensure suitable arrangements are in place as we do each year. We do not agree with your comments regarding special events & festivals. At such events we ensure sufficient plans are in place to deal with changes and we ensure users of the bus station are aware of changes that have to be made for that limited period.

Additional pressure on the Bus Station for longer periods will certainly require the presence of a banksman for a longer period and on more days, to allow the bus station to operate safely. This represents a significant additional cost that will need to be borne, and we are not clear that the Council is intending to do this aside from further lifting charges to operators. This further erodes the ability of all operators to sustain their business. It can be added to the ever-increasing costs arising from a number of sources, principal among which congestion in the local network which demands additional vehicle resource to compensate for declining vehicle productivity. In Banbury much of this congestion is the direct result of motorists circulating around the town centre to find the most advantageously-sited surface parking spaces, and avoid using the multi-storeys.

The departure charges made at the bus station are competitive with other bus stations and they do not fully cover the costs of the banksman. Improvements in vehicle technology including camera systems and radar systems means that these technologies are low cost & effective to reduce the risk of collision. The banksman is present to try and stop pedestrians entering the reversing area despite the signage warning pedestrians of the potential danger and to assist drivers when reversing their vehicles. With the departure of Debenhams there are limited delivery vehicles entering this area.

The Council is unaware of any evidence which supports your assessment of vehicles circulating Banbury looking for car parks. Cherwell District Council has car parks located at a large number of points around the town centre so there would appear to be no need for cars circulating looking for a car park.

At least as important, what limited "surplus capacity" might putatively be considered to exist at the Bus Station is likely to be required for significant operational growth by this and potentially by other bus operators, such as Johnsons or Stagecoach Midlands.

We would not agree with your assessment of there being limited surplus capacity at the bus station. Less than 50% of the capacity of the bus station is used. The Council would welcome significant growth in bus services and would support releasing capacity to meet any significant growth in demand

Cherwell and all the adjoining local authorities represent areas of recent, continuing and future levels of employment and demographic growth that are among the greatest in England. This is reflected in the Cherwell District Council Local Plan Part 1 Adopted in 2015. At least one entirely new bus service is anticipated serving the Salt Way Allocation BAN16. Frequency uplift is anticipated for the 488 to 2 buses/hour in the reasonably near term. Likewise the S4 route group is also likely to see a frequency increase within the next 4 years, and this might be associated with a new supplementary rural route serving off-line villages. The proposed measures will serve to seriously hinder, and potentially all but remove the potential to see these and other potential new and improved services delivered

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We would happily work with Stagecoach and other bus providers if a greater use of the bus station is needed. We would ensure that we work collaboratively to accommodate such expansion. However, currently and for several years the bus station has had significant spare capacity and we wish to use that spare capacity for coaches to wait for short periods.

With regard to the use of an existing bus stop on Horsefair to accommodate coach set down and pick up, Stagecoach has no great objection. The site is reasonably advantageously sited on the other, western side of the town centre core, and pedestrian permeability into the town is good. The area benefits from a high quality of townscape and the facility will present a strong sense of arrival. It must be stressed though, that the capacity this offers for coach operators is very limited indeed, whatever the nature of their operation. At busy times it is, again entirely unclear how demand for this stop can practically be managed as this is an on-street facility and is not liable to control by the District Council. In fact this aspect, in common with the whole proposal appears to be scantily thought-through, and the evidence has not been presented as to what the demand for coach facilities might be, especially at busy times.

We have thoroughly researched our proposal as we do before we embark on new projects. We carried out usage survey in Compton Road to help support our planning application regarding change to a car park. We have been able to use that information to help plan the overall project. We welcome your acceptance of use of the Horsefair bus stop. We have a high degree of confidence that the usage of some of the spare capacity at the bus station will provide better access for drivers to take a break in the town centre. We also believe a relatively small number of coaches will use this new location.

Finally, the benefit to motorists and the Council itself as proprietor of the new car park, cannot be considered to be great. It is not clear what the capacity of the car park will be but it is highly unlikely to exceed 50 spaces. The space does not lend itself well to being set out as a car park, thus the capacity may be rather lesser. It is severed by Castle Way from the main leisure and retail venue. This turns its back to the road, which is elevated on a substantial embankment, making walking routes to the Castle Quay development and the rest of the main central venue relatively convoluted and unattractive. Set against the disbenefits to public transport other PCV operations and coach-based tourism this gain seems entirely insufficient to justify the proposals

We note your comments about the car park. The car park will be for around 35-40 spaces, it will be long stay car parking and allow Bolton Road car park to move to short stay. The change is important to our strategy. We have listened to your comments and believe the change is positive and will have no adverse impact on bus & coach facilities. Once again, we have received no objections other than this one from Stagecoach.

Accordingly we can be expected to make vigorous formal objections to the proposed Amendment to the Banbury Bus Station Order 1999, the Revocation of Cherwell District Council (Off Street Parking Places) (Compton Road, Banbury) (Coach Park) Order 2000, and such other associated legal instruments that may be published in due course, should the Council elect to proceed as proposed.

We nevertheless trust that these and further specific comments we might make in future, will be given due weight in the consideration given to the making/revoking of the Orders by the Council

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We have listened to your comments and arranged meetings with yourself. We have put you in contact through meetings with Oxfordshire County Council Transport Planners. We have considered your comments and have delayed our projects whilst we sort solutions to satisfy the issues mentioned in your letter of objection.

After giving full consideration to your letter of objection and having set out our reason for rejecting your arguments, it is our decision that we intend to amend the traffic orders as planned. We will fully engage with all stakeholders during this period of change which will commence once the proposal has been considered by our Council Executive.

Yours sincerely