

Overview of Evidence Documents for the North West Bicester Alliance (NWBA)

Provided as part of the NWBA proofs of evidence submission, 9 May 2023

A. Main Evidence

The following are the main pieces of evidence which NWBA will make use of during the Inquiry.

‘EV-1 Viability and Costs Assessment’

This analysis has been written by E. Toutain, a Land Evaluation financial professional. As the main part of the detailed explanations are ~3,000 words, an Executive Summary is provided on the first page. This evidence describes flaws in the land and sales evaluation methodologies, the omission of water efficiency measures, and shows that a scheme meeting Code for Sustainable Homes Level 5 equivalent and 30% Affordable Housing provision would be viable and meet NPPF guidance. It further questions the validity of using viability assessment as an excuse to avoid key requirements of the Ecotown, including sustainable build level, infrastructure and affordable housing.

‘EH-1 Highways and Access Evidence of DMMason’

Due to the critical significance of the Highways and Access related issues, NWBA engaged an independent, highly regarded Highways and Access Consultancy to produce an independent assessment regarding the Appellant’s highways and access strategy. This report was written by David Mason of D. M. Mason Consulting (<https://dmmason.co.uk/>) – and it produces many critical pieces of evidence supporting the ‘reasons for refusal 2 and 3 of the planning application’, regarding inadequate modelling, unrealistic/unreliable results, concluding that planning consent to the Appeal development should not be granted without changes to the proposed design and more robust modelling. Regarding NPPF paragraph 111, it concludes that the impacts of the traffic congestion caused would be “very probably severe.”

‘EH-2 Summary of Report - Evidence of DMMason’

As EH-1 is a long document (over 10,000 words, and 70 pages), as per the CFI Appendix B instructions, this is an ‘extractive summary’ – literally a copy of the Conclusions (section 10) of EH-1 which has been edited purely for brevity to the most critical points.

‘ET-1 Evidence for Charlotte Avenue Distance Measurements’

This analysis has been written by R. Fellows, a data analysis professional. This short document shows proof that the Appellant’s proposed designs for modifications of Charlotte Avenue contain errors rendering them technically infeasible. Furthermore, removing the build-out crossings would reduce safety for pupils/pedestrians crossing the road. Photographs show the key measurements.

‘ET-2 Measurements and Analysis Regarding Proposed Access E’

This analysis has been written by R. Fellows, a data analysis professional. Measurements, analysis, plus overlaid drawings and photographs, show that there are errors on all four drawings submitted by the Appellant regarding proposed Access E. If visibility splay lines were shown correctly, the drawings supplied by VTP show that Access E could be entirely suitable for permanent access.

‘ET-3 The Impact of Gagle Brook School Parking Requirements’

This analysis has been written by R. Fellows, a data analysis professional. The purpose of this document is to demonstrate clearly, by simple diagrams and photographs, that one-way flow for almost all of Charlotte Avenue is not just words in a report – but is clearly borne out by reality: this is shown by photographs and marked-up plans. NB: VTP modelling assumes two-way flow throughout the length of Charlotte Avenue. The new homes make the impacts of traffic “very probably severe.”

‘ET-4 The Impact of Overloading Charlotte Avenue’

This analysis has been written by R. Fellows, a data analysis professional. This report explains in detail *why* the impacts caused by the increased congestion along Charlotte Avenue would count as ‘Severe’ – i.e. that they extend beyond just creating delays along the Elmsbrook Spine Road; that they increase risks to life and limb, via safety of cyclists/pedestrians and impact on Emergency Vehicle access, along with significantly increased pollution (not good, for our exemplar ecotown).

‘ET-5 Evidence regarding Masterplan Creep and its impacts’

This document shows examples of the “incremental creep” of the Masterplan’s design parameters and the risks of allowing schemes which ignore its Key Development Principles. The principles of creating a Masterplan should be upheld; the “watering down” of requirements, such that the development contributes further to carbon emissions, rather than leading the Ecotown *towards* Net Zero 2050, is argued to be a ‘most important’ issue, for the UK as a whole, not just NW Bicester.

‘ET-6 Regarding a Sustainable Plan and Funding for Bus Services’

This document briefly compares the proposed development’s Bus Service strategy and financial contribution with those of the Exemplar Phase, and notes the significant disproportionality.

‘ET-7 Adoption of Elmsbrook Side Roads’

This brief document provides evidence regarding the Exemplar Phase Section 38 history, purpose and conclusions regarding adoption of side roads which would be required for the permeability assumed the proposed development.

‘ET-8 ONS Data for Traffic Levels prior to during and since Covid-19’

This brief document provides evidence regarding the Appellant’s claim that conducting surveys of actual traffic levels was not possible during the duration of this application, due to Covid-19.

B. Cross-reference Tables

The following are 4x useful Excel spreadsheet documents, created by NWBA to aid with visualising the connections between Statements of Case, Statements of Common Ground, National and Local Policies considered to be “in play”, Evidence Documents and Core Documents (where relevant). They are provided as additional documents along with the evidence, in case they are useful to the Planning Inspectorate and/or other parties to enable rapid cross-referencing of points with evidence.

‘XL1 - Crossreferencing NWBA SoCG points’

This contains four worksheets identifying, for the Highways and Access, General Matters and Viability Statements of Common Ground (SoCGs, which NWBA are a part of), which evidence documents

cover each statement. For the Zero Carbon SoCG, the statement types are identified, along with references to other statements and brief comments regarding compliance.

‘XL2 - National and Local Policies in play’

This contains two worksheets, identifying ‘By Document’ and ‘By Topic’ which National and Local Policies/clauses NWBA believe to be contravened (directly or by reference) by the Appellant’s proposals, and the reasons for this are also stated for each.

‘XL3 - Evidence Matrix’

This contains four worksheets, one for each section of the NWBA Statement of Case, identifying the statement type, and noting evidence references for the statement stipulating evidence. There is then a fifth worksheet combining only the evidence-type statements of the first four, which then also identifies the topic and statement cross-referencing by topic, for each. The sixth/final worksheet cross-references the EH1 evidence report Conclusions (section 10) statements with the points of disagreement in the Highways and Access SoCG between NWBA and the Appellant.

‘XL4 - ETPG Objections points’

This contains one worksheet: it summarises, briefly (mostly one-line cells), the key points raised in the four Objection reports submitted by the Elmsbrook Traffic and Parking Group (ETPG) during 2021 and 2022, plus the “most significant remaining unresolved issues” submitted to OCC Highways in February 2023 by a local councillor, on our behalf. For each line/point, it notes whether an actual answer was ever received, or if circumstances have changed since. (NB: a few items since identified as raised or stated in error have been omitted for brevity, but will be honestly acknowledged if they arise during the Inquiry!)

C. Statements from NWBA’s member organisations

Two of our consortium’s eight member organisations/groups have submitted a statement to express their views regarding this application/appeal.

Others may also submit statements later on – the school’s Headmistress, Chair of Governors and Head of Grounds are meeting later this week to prepare a draft, for example: this/these will be too late for this evidence submission, so will instead be read out as part of NWBA’s opening or closing statements.

Statements are submitted here on behalf of:

- Perch @ the Eco Business Centre
- Elmsbrook Community Organisation

D. Supplementary Evidence

The following are related documents, which have previously been shared with one or more out of the Appellant/their consultants, CDC Planning and OCC Highways: we do not believe that any of these should be needed during the Inquiry, and we do not currently intend to make use of them. However, as they contain a range of specific studies and analyses, it may be necessary to refer back to them, if we are challenged on points which they might strengthen or confirm.

Excel Spreadsheets of Traffic Monitoring and Survey data/analysis:

ES-1 Mode Transport data shared with ETPG - Vehicle Data Sept-Dec 2019

ES-2 Mode Transport data shared with ETPG - Ped and Cycle Data Sept-Dec 2019

ES-3 ETPG and Mode Survey Analysis 2019-21

ES-4 ETPG 2023 March Traffic Surveys

PDFs of Word Documents analysing the above:

ES-5 ETPG Combined Gagle Brook School Travel Surveys 2018-21

ES-6 ETPG Elmsbrook Traffic Surveys and Monitoring Analysis Autumn 2019 and June 2021

Assessment of Traffic Survey by 3rd party:

ES-7 Mode Transport 220303 323473 TP Monitoring Report v1.1

Travel Plan: (a member of NWBA was involved in the writing of this)

ES-8 Gagle Brook School Travel Plan Final

PDFs of Powerpoint presentations made to CDC Planning and OCC Highways in 2019 and 2020

ES-9 2018 PPT - Components to Parking and Traffic on Elmsbrook

ES-10 2020 PPT - GB School and Eco Business Centre Parking

E. Appendices Document

This contains two Appendices: (1) Email comms between OCC Highways and ETPG, 2021-2023, and (2) Email comms between VTP and ETPG, 2021. These are also included "just in case" proof of "what was stated, and when" were to be required: we have no intention to use it otherwise.

ET Appendices - Emails between 1 ETPG and OCC Highways - 2 ETPG and VTP