

Response to Planning Application 21/04289/OUT

Lower Heyford Parish Council wishes to object to the above application. It would not be responsible to approve this application until the current flaws in the Bicester Saturn Model for the Heyford Park Masterplan (18/00825/HYBRID) have been resolved. It is particularly important that the traffic impact of this major strategic site is properly assessed in view of its very significant impact it will have on a sensitive rural area.

The Bicester Transport model forecast that a built out Heyford Park will reduce traffic on the B4030 in 2031. This is not credible in view of the fact that the B4030 is next door and on a main route to the site. The BTM forecast -1 vehicles through Lower Heyford, the TEMPro model it replaced forecast +858 – this is a huge differential which requires an explanation.

We first queried this in July 2020 and the traffic consultants said that they would provide an explanation. OCC also assured us that we would receive an explanation and that they would pursue the forecasts with the traffic consultants and the consultancy which operate the model on OCC's behalf. However, to date no explanation has been forthcoming. In the absence of a response from CDC, OCC and the traffic consultants, we undertook a review of the Traffic Assessment and Model Validation Review. This has uncovered the following:

1. The Traffic Assessment relies on observed counts dating back to 2013 (the entry junction to the development site dates from this year). The Model Validation Review for the Bicester Transport Model relies on observed counts which are generally lower than the TA counts. This does not comply with government guidance on TAs and Local Model Validation Reports and is particularly relevant on roads which have seen an increase in traffic from recent expansion at Bicester and Heyford Park.

(See govt guidelines: Traffic Assessments should include 'data about current traffic flows on links and at junctions').

('Models should be compared against independent observed data for the current or recent year to demonstrate that the model is of sufficiently good quality (model validation) to form the basis from which to calculate future forecasts' (tag M1.2 Data Sources).

2. The Bicester Saturn Model does not validate within the criteria on the B4030 through Lower Heyford (underestimates traffic by over double the acceptable validation level in am peak). The implications of this have not been recognised or pursued.
3. The Local Model Validation Report by WYG (2018) provides the evidence base for the Bicester Saturn Model but is missing as a supporting document for the Heyford Park Masterplan application. There is a need to demonstrate how the forecasts have been arrived at. There is little information on how future traffic will use the local road network as the supporting traffic flow maps in the study area were made redundant by the new modelling. This is also true of parts of the Environmental Assessment.

4. The only supporting document presented as evidence for the fitness of the Bicester Saturn Model is a Model Validation Review. This document contains calculation errors; the observed counts appear to be out of date; the counts have been assigned to roads in the wrong direction and the lack of validation on the B4030 has not been pursued. The errors are matters of fact, not opinion, and can be demonstrated.

The errors; unexplained forecasts and lack of validation, non-compliance with government guidance; lack of supporting evidence; disparity between models and the fact that peak hour modelling alone is unfit for its intended purpose are all urgent issues which need resolving.

Lower Heyford Parish Council have made officers at OCC and CDC aware of the errors and omissions in the Traffic Reassessment for the Heyford Park Masterplan. It is deeply concerning that we have not received a response and that OCC continue to use the Bicester Transport Model in its current form.

This model has been used to assess the impact of a major development site on an area which is particularly sensitive to traffic. It is vital that unrealistic forecasts and lack of validation have been understood and that the faults listed above have been corrected before it is used to support further development.

In addition to the issues raised above, Lower Heyford Parish Council fully supports the points that have been submitted in the objection from the Mid-Cherwell Neighbourhood Plan Forum.

NB. The data from the Bicester Transport Model (See Appendix A: BTM Turning Movements) which supports the Reference Case for this application is unreadable because the traffic flow numbers are missing digits and do not calculate.