

**Job Name:** Bicester Gateway Phase 1B Residential  
**Job No:** 46463  
**Note No:** TN005  
**Date:** 28/01/2019  
**Prepared By:** Francois Chate  
**Subject:** **Review of the revised Transport Assessment dated 24<sup>th</sup> December 2019 in support of Albion Scheme (ref:19/01746/OUT and 19/01740/HYBRID)**

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## 1. Introduction and Context

- 1.1. Stantec has been commissioned by Bicester Gateway Ltd to provide highways and transport planning advice in relation to development proposals at the Bicester Gateway Phase 1 site in Bicester. The Bicester Gateway Phase 1 site forms part of the wider Bicester 10 site allocated within Cherwell District Council (CDC) Local Plan. Stantec supported Bloombridge in gaining planning consent for development on the Bicester Gateway Phase 1 site in 2017. Bloombridge is now part of Bicester Gateway Ltd.
- 1.2. Albion Land submitted, in August 2019, two planning applications relating to the development of the Bicester 10 land to the east of Wendlebury Road, and including the Lakeside Chicken Farm to the south of the Bicester 10 site (an unallocated addition to employment land supply and therefore welcomed by Bicester Gateway Ltd). Both applications were supported by a Transport Assessment dated 14<sup>th</sup> August 2019, prepared by David Tucker Associates. This Transport Assessment covered 4 potential development scenarios meant to accommodate the various consent permutations that could be the outcome of the two applications submitted by Albion Land.
- 1.3. Our review of the 14<sup>th</sup> August 2019 Transport Assessment was submitted to Cherwell District Council by Bicester Gateway Ltd as a consultation response to the two applications. This initial review is appended to this note as it is still relevant to the applications with issues, and therefore a highways objection, outstanding.
- 1.4. A revised Transport Assessment, dated 24<sup>th</sup> December 2019, was subsequently submitted, to replace the original Transport Assessment. This revised Transport Assessment covered only 2 of the 4 scenarios originally assessed, as the applicant considered that only 2 scenarios were now possible 'in response to site constraints including flood risk'.
- 1.5. The Albion Land schemes are substantially larger in scale and of significant relevance to the Bicester Gateway Phase 1 development and therefore Bicester Gateway Ltd have asked Stantec to undertake a review of the revised material submitted by Albion Land in support of the applications and pertaining to transport and highway matters.
- 1.6. This note provides a review of the 24<sup>th</sup> December 2019 'revised' Transport Assessment (referred to below as the Revised TA). This note refers to paragraphs in the Revised TA where relevant.
- 1.7. In the context of general support for the Albion proposals, this Technical Note points out that the majority of the significant concerns expressed in the initial review have not been addressed by the Revised TA. This is despite the Revised TA stating at paragraph 1.7 that the Revised TA *"has been informed by discussions with Oxfordshire County Council (OCC) as the local highway authority within a formal pre-application process including Scoping Notes, consultation responses and meeting note. This report has been further updated to respond to consultation response and reflect amendments agreed with Oxfordshire County Council."*

1.8. This Technical Note therefore needs to be registered as a further **OBJECTION** to Albion's planning applications, and a request for dialogue with both the applicant and Local Highway Authority to resolve the outstanding issues. We cannot see how planning permission can be granted in light of the outstanding issues not addressed by the Revised TA.

## 2. Outstanding Issues not Addressed by the Revised TA

2.1. Stantec's review of the Albion TA, as set out in the initial note submitted (see appendix) concluded that the assessment presented did not provide an accurate or reliable assessment of the likely transport implications of the Albion Land schemes:

- The Albion TA did not test the full extent of potential development, in terms of land use mix and quantum that could result from the schemes put forward being consented. The same comment is raised in relation to the Revised TA. The description of development has not changed. It still refers to 'B1a and/or B1b and/or B1c' in describing the proposed employment development. The Revised TA still tests employment trip generation on the basis of a 'knowledge industry' land use mix with a maximum 35% of B1a office provided or as a 'Science Park' considered to include up to 50% of B1a office. It also states at paragraph 4.1.3 that 'in all cases, the maximum quantum of B1a office floorspace is capped at 35% of the gross B1 floorspace to be delivered'. The description of development could lead to 100% of B1a office development on site. As such the Revised TA significantly underestimates the potential trip generation from the Albion Land proposed development.
- The Albion TA included throughout a number of inconsistencies, errors and illogical arguments that all lead to an underestimation of the likely vehicular trip generation of the proposed development, an underestimation of the baseline traffic conditions for the purpose of assessment and an overestimation of the available capacity of the local road network, all of which together raised significant concerns on the ability for the local road network to accommodate the Phase 2 Bicester 10 development coming forward, notably in relation to access to the A41. The Revised TA does not address fully these concerns. For example:
  - The combined trip rate for 'Knowledge Industry' shown in Table 10 for Arrivals in the AM peak is still 0.694, whereas Stantec calculates from the information provided in Table 5, Table 9 and the suggested land use split in paragraph 4.2.2, that this should be 0.701.
  - The Revised TA persists with applying a discount on the area of B1a office considered in the assessment which reduces the percentage of B1a from the 35% stated at paragraph 4.2.2 to 27.8% as indicated in paragraph 4.2.14. As detailed in our initial review, this discount mechanism is illogical and leads to an underestimation of the likely trip generation from the proposed development.
- In its assessment of the capacity of the A41/Vendee Drive roundabout, the Revised TA uses the 'FLAT' traffic profile in the Junction 9 models presented, whereas the original Albion TA used the 'ONE HOUR' traffic profile. The effect of this is to eliminate any potential 'peak within the peak' in the assessment and therefore, unless it can be demonstrated using observed data that the profile of traffic at the junction within the peak hour is 'flat' (i.e. a similar amount of traffic at the junction at any time within the peak hour), using the 'FLAT' traffic profile overestimates the capacity of the junction.
- These are significant concerns to Bloombridge as they potentially impact negatively on the commercial attractiveness of the Bicester Gateway Phase 1 development and also of Bicester as an overall destination for the knowledge economy.

- 2.2. Stantec's initial review requested that Oxfordshire County Council (OCC) raise these concerns in order that the Albion TA be fundamentally revised. It appears from the Revised TA that discussions have been held between the applicant and OCC, considering consultation responses, as set out in paragraph 1.7. However, none of the communication between the applicant and OCC are available for review on Cherwell District Council's website, therefore it is not possible to confirm if the points raised by Stantec have been discussed. This is an issue and does not allow full scrutiny of the proposals put forward. Stantec requests that Cherwell District Council make correspondence between the applicant and OCC public.
- 2.3. In its initial review, Stantec expressed the view that the Albion Land proposals in relation to pedestrians, cyclists and bus use fall short of what would be expected to serve a development of the size and nature proposed by Albion Land. The Revised TA does not fully address the concerns raised and introduces potentially further issues:
- Albion Land still rely entirely on the infrastructure improvements committed as part of the consented Bicester Gateway Phase 1 scheme. If these committed improvements provide strong direct sustainable access to the Phase 1 plots, they do not relate as strongly to the Albion Land sites.
  - There is a doubt as to whether Albion Land would have the ability to deliver the convoluted and substandard pedestrian and cycle facilities they put forward within their TA. The Revised TA provides clearer drawings illustrating the proposed footway/cycleway and the text of the Revised TA clarifies that the proposed facility 'would be 3.0m wide (narrowed to 2.5m minimum where highway boundary constraints dictate)' (see paragraph 5.1.2). Unfortunately, the scheme drawings provided in Appendix J of the Revised TA do not provide any dimensions, therefore it is not possible to verify where the narrow sections of the proposed facilities would be. The Revised TA refers to a Road Safety Audit of the proposed scheme that highlights the need for the provision of a guardrail along the proposed footway/cycleway for the section adjacent to the application site boundary. The provision of a guardrail would reduce the effective width of the footway/cycleway proposed and potentially lead to a facility 2.25m wide in places, which would be substandard. Substandard provision for pedestrians and cyclists should not be deemed acceptable by OCC.
  - The initial review highlighted the lack of consideration for cyclists travelling from Wendlebury Road (south) along the NCR in the original proposals. This seems to have been addressed in part with the revised scheme providing a facility for cyclists travelling southbound to re-join the carriageway. However, no facility is proposed for cyclists travelling northbound.
  - The Revised TA still discounts the important role that the Vendee Drive (link) has to play in the sustainable accessibility of the Albion Land sites. Vendee Drive (link) will form the desire line for most vulnerable road users accessing the Albion Land sites and by not providing for these users along this link, the Albion Land proposals create a road safety issue for vulnerable road users. The importance of Vendee Drive (link) as a pedestrian and cycle desire line is reinforced by the revised proposals, as detailed in the Revised TA, that both include the Health Club. The Health Club plot seems to lack permeability for pedestrians and cyclists and therefore the majority of walking and cycling trips in and out of the wider Albion Land development will be made via the proposed site access roundabout at the junction of Wendlebury Road and Vendee Drive (link), directing vulnerable road users towards the Vendee Drive (link). Yet, the revised Albion Land scheme does not propose any improvements on that link.
  - The initial review commented that the Albion Land proposals failed to put forward any improvements to the local bus network, which would be contrary to the Cherwell District Council Local Plan policy for the Bicester 10 site. This issue is addressed in part in the Revised TA that indicates in paragraph 6.7.1 what the applicant expects OCC to request in terms of transport contributions, including contributions to local bus services and towards the provision of a new bus stop. A commitment to these contributions is stated in paragraph 7.3. However, this raises a number of additional concerns that are detailed further in **Section 3** of this note.



- £350,000 towards bus service improvements; and
  - £10,000 towards a new bus stop.
- 3.2. The Revised TA at paragraph 5.2.1 indicates that the expectation is that local bus services would be diverted along Wendlebury Road southbound, providing a clockwise service through the Bicester 10 allocation site. In addition, the Revised TA indicates that OCC's preference would be for a new bus stop to be located on Vendee Drive (link) but it states that Wendlebury Road would provide a better location for a stop, due to the current lack of pedestrian facilities on Vendee Drive (link).
- 3.3. The issues here relate to the fact that although the Revised TA identifies potential public transport contributions, it does not provide any indication of how the improvements to be financed by the proposed contribution could be delivered in practice:
- There is no information in the Revised TA, or any record of correspondence with OCC on the Cherwell District Council planning webpages, that indicate how the £350,000 contribution has been calculated, or which service improvement it relates to. There is no information demonstrating that this level of contribution would be sufficient to deliver an extended bus service into the Bicester 10 site with a 'reasonable prospect' of being viable in the long term. It is therefore highly possible that if the contribution was to be used to support a bus service extension into the Bicester 10 site, this service would be supported for only a limited amount of time and could disappear when the contribution runs out, to the detriment of the Bicester 10 site, Cherwell District Council and OCC.
  - The suggestion in the Revised TA is that the new bus stop to be contributed to would be located on Wendlebury Road. This stop, to serve a clockwise bus service extension, would need to be located on the eastern side of Wendlebury Road and north of Vendee Drive (link). Furthermore, in order to be a reasonable distance of the majority of the Albion Land development (400m), Stantec estimates that this new stop would need to be located close to Vendee Drive (link) and therefore on the frontage of the proposed Health Club. The apparent lack of permeability across the Health Club plot further increases walking distances from the Albion Land site to the potential new bus stop. However, providing a new bus stop including shelter and flag in such a location would conflict with the already constrained footway/cycleway proposed by Albion Land along this section of Wendlebury Road. In addition, the location of the stop would have to account for the location of the access into the Bicester Gateway Phase 1a Hotel as well as the proposed access into the Health Club, and the proximity to the proposed new Albion Land site access roundabout. There is no demonstration in the Revised TA that such a stop could be delivered. Albion Land have not demonstrated that a suitable location can be identified on Wendlebury Road for the identified new bus stop. Unless they do so, it can only be concluded that the suggested contribution does not address the need, the problem, the policy requirement and/or the opportunity related to the Albion development and the wider Bicester 10 allocation. Of course, Vendee Drive (link) could potentially form a suitable location for such a stop, if designed appropriately, despite being discounted as such by Albion Land.
- 3.4. It follows that, at this stage, the contributions put forward to address the concerns raised in terms of public transport accessibility to the Albion Land development, in line with the Bicester 10 Local Plan policy, may never lead to the delivery of any actual bus service improvements to the development site as the delivery of the improvements intended is not demonstrated. Equally, the deliverability of a bus stop in proximity of the Phase 2 site is still to be demonstrated. It is concluded therefore that there is no demonstration by the applicant of how the contributions put forward can relate to the proposed development. Therefore, the contributions put forward currently fail the test set in paragraph 56 of the National Planning Policy Framework, as the contributions identified are not 'directly related to the development'.

3.5. Stantec’s view remains that the best location for a new bus stop serving the Albion Land site and the wider Bicester 10 allocation site is on Vendee Drive (link). To resolve this matter/objection, we suggest that OCC request that Albion Land put forward proposals for the delivery of the identified new bus stop and demonstrate that the contribution towards the extension of the local bus service can support a sustainable service to the Bicester 10 site.

**4. Summary**

4.1. In summary, the Revised TA submitted by Albion Land in support of their application for development on the Bicester 10 Phase 2 site and the Lakeside Chicken Farm does not address the fundamental and significant concerns raised by Stantec in their review of the originally submitted Albion TA:

- The Revised TA still underestimates the potential traffic impact of the proposed development. It is therefore again requested that OCC raise these concerns in order that the Albion TA be fundamentally revised to fully reflect the likely transport impacts of the Albion Land schemes, the ability for Phase 2 of the Bicester 10 allocation to come forward, and the necessary additional mitigation (around Vendee Drive in particular) that may be required to achieve this.
- The access strategy put forward by Albion Land is considered as unsuitable to serve the type and size of development proposed, introducing highway safety concerns for vulnerable roads users, in particular.
- The Revised TA suggests a set of developer’s contributions to address the proposal’s failure to meet the requirements of the Cherwell Local Plan Bicester 10 policy on public transport accessibility. However, there is no demonstration of how these identified contributions can relate to the Phase 2 development and therefore fail the NPPF paragraph 56 test on planning obligations.

**DOCUMENT ISSUE RECORD**

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
46463/5502/TN005	-	28/01/2020	FC	FC	FC	NT

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**APPENDIX – Review of the 14<sup>th</sup> August 2019 Albion TA**

# TECHNICAL NOTE

**Job Name:** Bicester Gateway Phase 1B Residential  
**Job No:** 46463  
**Note No:** TN004  
**Date:** 17/10/2019  
**Prepared By:** Francois Chate  
**Subject:** Review of Transport Assessment submitted in support of Albion Scheme  
**(ref:19/01746/OUT and 19/01740/HYBRID)**

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## 1. Executive Summary

- 1.1. Peter Brett Associates, now Part of Stantec, (PBA) have been commissioned by Bicester Gateway Ltd to provide highway and transport planning advice in relation to development proposals at the Bicester Gateway Phase 1 site in Bicester. The Bicester Gateway Phase 1 site forms part of the wider Bicester 10 site allocated within Cherwell District Council (CDC) Local Plan. PBA supported Bloombridge in gaining planning consent for development on the Bicester Gateway Phase 1 site. Bloombridge is now part of Bicester Gateway Ltd.
- 1.2. Albion Land submitted, in August 2019, two planning applications related to the development of the Bicester 10 land to the east of Wendlebury Road, and including the Lakeside Chicken Farm to the south of the Bicester 10 site (an unallocated addition to employment land supply and therefore welcomed by Bicester Gateway Ltd). Both applications are supported by a Transport Assessment prepared by David Tucker Associates. This Transport Assessment, referred to in the rest of this note as the Albion TA, covers a number of scenarios meant to accommodate the various consent permutations that could be the outcome of the two applications submitted by Albion Land.
- 1.3. The Albion Land schemes are larger in scale and of significant relevance to the Bicester Gateway Phase 1 development and therefore Bicester Gateway Ltd have asked PBA to undertake a review of the Albion TA and development proposals.
- 1.4. In the context of general support for the Albion proposals, this Technical Note presents the outcome of the review carried out by PBA. It raises a number of significant concerns with the Albion TA as summarised below. This Technical Note therefore needs to be registered as an **OBJECTION** to Albion's planning applications (and a request for dialogue).

## DOCUMENT ISSUE RECORD

Technical Note No	Rev	Date	Prepared	Checked	Reviewed (Discipline Lead)	Approved (Project Director)
46463/5502/TN004	-	21/10/19	FC	FC	FC	NT

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## TECHNICAL NOTE

1.5. Overall, PBA's review of the Albion TA concludes that the assessment presented does not provide an accurate or reliable assessment of the likely transport implications of the Albion Land schemes:

- The Albion TA does not test the full extent of potential development, in terms of land use mix and quantum, that could result from the schemes put forward being consented. As an example, the application could result in all proposed Employment use coming forward as B1a, leading to a significantly higher vehicular trip generation than considered in the Albion TA.
- The Albion TA includes throughout a number of inconsistencies, errors and illogical arguments that all lead to an underestimation of the likely vehicular trip generation of the proposed development, an underestimation of the baseline traffic conditions for the purpose of assessment and an overestimation of the available capacity of the local road network, all of which together raise significant concerns on the ability for the local road network to accommodate the Phase 2 Bicester 10 development coming forward, notably in relation to access to the A41.
- These are significant concerns to Bloombridge as they potentially impact negatively the commercial attractiveness of the Bicester Gateway Phase 1 development and also of Bicester as an overall destination for the knowledge economy.

1.6. PBA request that Oxfordshire County Council (OCC) raise these concerns in order that the Albion TA be fundamentally revised to fully reflect the likely transport impacts of the Albion Land schemes, the ability for Phase 2 of the Bicester 10 allocation to come forward, and the necessary additional mitigation that may be required to achieve this. Should this require additional mitigation beyond that originally identified in support of the allocation, this should be delivered through the Albion Land permission/s.

1.7. PBA's view is that the Albion Land proposals in relation to pedestrians, cyclists and bus use fall short of what would be expected to serve a development of the size and nature proposed by Albion Land:

- Albion Land rely entirely on the infrastructure improvements committed as part of the consented Bicester Gateway Phase 1 scheme. If these committed improvements provide strong direct sustainable access to the Phase 1 plots, they do not relate as strongly to the Albion Land sites.
- There is a doubt as to whether Albion Land would have the ability to deliver the convoluted and substandard pedestrian and cycle facilities they put forward within their TA. In addition, the lack of consideration for cyclists travelling from Wendlebury Rd (south) along the NCR needs addressing to provide safe access for these vulnerable road users.
- The Albion TA discounts the important role that the Vendee Dr (link) has to play in the sustainable accessibility of the Albion Land sites. Vendee Dr (link) will form the desire line for most vulnerable road users accessing the Albion Land sites and by not providing for these users along this link, the Albion Land proposals create a road safety issue for vulnerable road users.
- The Albion Land proposals do not meet the requirements of the Bicester 10 Local Plan policy in terms of bus penetration. PBA would expect Albion Land to consider the provision of a bus stop on Wendlebury Road (north) or Vendee Dr (link) as suggested by OCC at scoping. If a bus stop was to be located on Vendee Dr (link), this road link would have to be widened to provide safe and convenient pedestrian access to a bus stop of the appropriate type and quality, in line with the size and nature of the Albion Land proposed schemes. In that particular location, on the exit to Bicester gateway, a bus layby would form a potential solution avoiding congestion and safety issues at peak hours.

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- It must be remembered that Bloombridge have always recognised the importance of Vendee Dr (link) to the accessibility of the wider Bicester 10 allocation site (i.e. the Albion Land sites), and in their Phase 1 submission clearly show how Vendee Dr (link) should be widened to deliver an access gateway fitting to the development planned for the Bicester 10 allocation as a whole. Bloombridge even went further in safeguarding land on the Phase 1 plots, losing valuable developable land, so as not to prejudice the future delivery of the wider Bicester 10 allocation.
- 1.8. Our clients are concerned that the much larger Phase 2 site (twice as much B1 Class space is proposed) is not committing to its fair share of infrastructure, accessibility and public transport investment. The public transport accessibility of Phase 2 is poor (relative to potential), given there is nothing proposed within the phase itself, contrary to Policy Bicester 10. Our clients are clear that this is not reflective of the needs of a first-class knowledge economy in Bicester.
- 1.9. PBA expect that OCC will request that Albion Land revise significantly their access proposals and improve (or contribute proportionally towards the improvement of) Vendee Dr (link) to enable safe and acceptable access for the Bicester 10 allocation, including the Albion Land sites. PBA consider that the proposed access infrastructure improvements put forward by Albion Land fall short of what would be required to make the Albion Land schemes acceptable in planning terms.
- 1.10. Finally, OCC are currently dealing with a significant road safety issue at the A41/Vendee Dr Roundabout. The forthcoming Bicester Gateway Ltd proposals for the Bicester Gateway Phase 1B plot should have a beneficial impact on this issue by reducing the traffic impact of the Phase 1 development at the junction. However, the Albion TA is dismissive of the safety issue at the junction despite the Albion Land schemes leading to an increase in traffic through the junction. Therefore, PBA would expect Albion Land to be asked to contribute towards safety improvements at the junction. Bicester Gateway Ltd would be happy to collaborate on this issue.

## TECHNICAL NOTE

### 2. Introduction and Context

- 2.1. Peter Brett Associates, now Part of Stantec, (PBA), have been commissioned by Bicester Gateway Ltd to provide highway and transport planning advice in relation to development proposals at the Bicester Gateway Phase 1 site in Bicester. PBA has been supporting the developer of the site (Bloombridge LLP at the time, now working with a third party investor as part of an SPV) for a number of years, helping with gaining consent for the development of the site back in 2017 (ref:16/02586/OUT). This consent covered the delivery of a Hotel on plot Phase 1A and B1a use on plot Phase 1B. The consented Hotel is now being implemented. However, the developer is currently promoting an alternative scheme for Phase 1B. They have entered pre-application discussions with Cherwell District Council and OCC and are aiming to submit a planning application before the end of the year.
- 2.2. The Bicester Gateway Phase 1 site forms part of a wider Bicester Gateway site, part allocated for employment use within Cherwell District Council's Local Plan (ref: Policy Bicester 10). The Bicester 10 allocation site straddles Wendlebury Road and includes the Bicester Gateway Phase 1A site and part of Phase 1B, as well as land to the east of Wendlebury Road (Phase 2, Albion Land).
- 2.3. Albion Land submitted in August 2019 two planning applications related to the development of the Bicester 10 land to the east of Wendlebury Road, and including the Lakeside Chicken Farm to the south of the Bicester 10 site. The two applications are:
  - Ref: 19/01746/OUT - Outline planning application (with all matters reserved excluding access) for up to 10,200sqm of B1 development (B1a and/or B1b and/or B1c); access and associated landscaping and infrastructure works – This relates to the Chicken Farm.
  - Ref: 19/01740/HYBRID - 'Hybrid' planning application comprising: - Outline planning permission (all matters reserved except for access) for up to 23,400sq.m of B1 development (Use Classes B1a and/or B1b and/or B1c); highway works (including provision of a new roundabout at the junction between Vendee Drive and Wendlebury Road); creation of a wetland and landscaped areas and associated infrastructure works. - Full planning permission for a health and racquets club, associated access and car parking, outdoor tennis courts, air dome, outdoor swimming pool, spa garden and terrace, and associated landscaping – This relates mainly to the Bicester 10 Phase 2 land.
- 2.4. Both applications are supported by a Transport Assessment prepared by David Tucker Associates. This Transport Assessment, referred to in the rest of this note as the Albion TA, covers a number of scenarios meant to accommodate the various consent permutations that could be the outcome of the two applications submitted by Albion Land.
- 2.5. The Albion Land schemes are of significant relevance to the Bicester Gateway Phase 1 development and therefore, Bicester Gateway Ltd have asked PBA to undertake a review of the Albion TA.
- 2.6. This Technical Note presents the outcome of the review carried out. It raises a number of significant concerns and suggests a number of actions for OCC as Local Highway Authority and CDC, as Local Planning Authority, to take while determining the applications submitted by Albion Land. The issues raised by this review are threefold:
  - There is potentially a significant disconnect between the development scenarios tested within the Albion TA and a general lack of clarity in the information submitted in the Albion TA that leads PBA to consider the Albion TA to not robustly assess the potential transport implications of the Albion Land proposals.

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- There are significant shortcomings with the pedestrian, cycle and bus access proposals put forward in the Albion TA.
- The Albion TA is dismissive of the severe road safety issue at the A41/Vendee Drive roundabout, the main point of connection between the Albion Land scheme and the road network. There have been two recent fatalities at this junction and Albion Land should consider this issue in their submission, and identify suitable mitigation in line with emerging proposals for the allocation.

2.7. Each of these points is considered in turn in the rest of this note.

### 3. Underestimation of Traffic Impacts

3.1. The most significant issue with the Albion TA is that it does not provide a worst-case scenario assessment of the Albion Land proposals. This comment relates to the way the proposed Employment element of the development is considered:

- The two applications lodged by Albion Land and supported by the Albion TA include in outline a potential total of up to 33,600sqm of '**B1 development (B1a and/or B1b and/or B1c)**'. The development being proposed is described in a way that would allow for up to 33,600sqm of B1a development to be delivered on site. This would represent a significant office development generating large demand for movement by both private car and sustainable modes.
- However, the Albion TA tests development quantum described as 'Knowledge Industry' or 'Science Park'. The vehicular trip generation for the 'Science Park' use is based on data extracted from the TRICS database for the Cambridge Science Park. The Albion TA states that this equates to a Land Use Class mix of 50% B1a and 50% B1b. The 'Knowledge Industry' use assumes a split that includes only 35% of B1a development (and therefore 65% of B1b/B1c). B1b and B1c have significant lower vehicular trip generation rates than B1a (as illustrated in the Albion TA at Tables 5, 6 and 8).
- Therefore, a development of 100% B1a, which could be an outcome of the proposals applied for, would generate significantly more traffic, the impacts of which have not been assessed nor potential necessary mitigation identified. To illustrate the point, the worst-case considered in the report in relation to Employment development vehicular trip generation is Scenario 3 (33,600sqm of 'Science Park'), predicted to generate 316 two-way trips in the AM peak 2-way. Using the trip generation rates declared in the Albion TA, the same 33,600 sqm of development, assuming it to be 100% B1a, would be predicted to generate 561 vehicular trips 2-way in the AM peak, so 77.5% more than considered the worst-case in the Albion TA.
- On that basis, PBA consider that the Albion TA does not robustly assess the transport implications of the Albion Land schemes and significantly underestimates the potential impacts of these schemes.

3.2. The issue related to the robustness of the Albion TA goes further. There are a number of errors and a general lack of consistency throughout the Albion TA. Whilst, individually, these may not appear significant, together they raise significant concerns as to the validity of the assessment results and conclusions:

- Section 4.1 of the Albion TA describes the development scenarios considered in the report. At paragraph 4.1.3 it clearly states that 'In all cases, the maximum quantum of B1a office floorspace is capped at 35% of the gross B1 floorspace to be delivered'. Not only is this not reflective of the development applied for as detailed above, the assessment clearly assumes a 50% B1a mix when looking at the 'Science Park' use to describe the development (see paragraph 4.2.5 of the Albion TA), in contradiction with paragraph 4.1.3.

## TECHNICAL NOTE

- Seemingly, the 35% B1a cap is only used when considering the 'Knowledge Industry' use as a description of development. However, the Albion TA follows an illogical process when deriving its 'Knowledge Industry' vehicular trip rates, described in paragraph 4.2.11. This process discounts the proportion of B1a floorspace assumed (from the 35% stated to 27.8%) on the basis that the B1c development also considered would include an element of office space. This is illogical for two reasons:
  - Again, if the aim of Albion Land is to deliver only 35% of B1a development on site, then the full 35% of B1a development should be accounted for. If Albion Land obtain a consent for Employment use including 35% of B1a use and 65% of B1c use, they will be able to build the 35% worth of office building and 65% of B1c building, which, as all other B1c facilities, will include its own ancillary office space. The discounting process is artificial and does not reflect the reality of the buildings to be delivered.
  - The TRICS trip rates for the B1c land use is based on observation of movements in and out of B1c facilities, which include an element of office space. It is unlikely that the person conducting the TRICS surveys will have asked people going in and out of the building surveyed if they are going to use the building's office space or the building's industrial workshop space. This to say that the office space in a B1c facility is intrinsic to this B1c facility and should not be discounted.
- Still in relation to the 'Knowledge Industry' use, the trip rates shown in Table 9 do not seem to have been calculated correctly. Taking the 27.8%/72.2% B1a/B1c split applied to derive the rates shown in Table 9 and using the rates in Table 5 for B1a and Table 8 for B1c, PBA calculates that the AM Inbound vehicular trip rate should be 0.701 and not 0.694. However, the resulting trip generation presented then in Table 10 use the 0.694 value. This type of error is likely to have been repeated for other peak periods and movements and throughout the assessment. PBA therefore has to query the accuracy of the assessment presented in the Albion TA.
- There are a number of mistakes in the information presented in the Albion TA. For example, Table 29 is meant to show the total vehicle trip generation for the various development scenarios considered. The number presented for the Scenario 4 'Science Park' should include the sum of the predicted trip generation for the Employment element of this scenario (254 2-way AM peak trips from Table 13), plus the predicted trip generation for the Health and Racquet Club (76 trips 2-way AM peak trips from Table 15), totalling 330 2-way AM peak trips. The table shows 254 2-way AM peak trips only. Another example is how the outcome of the capacity assessments for the 2031 base scenario in Table 34 do not match the results reported for the same scenario in Table 35.
- PBA has not attempted to pick up every reporting error and mistake in the report, but it is suspected that there may be more than the two examples outlined above. These errors impact the overall clarity of the assessment carried out and reported and lower the level of confidence that one could have in the conclusions reached.
- Finally, and more generally, it is typical for Transport Assessments to present a series of turning flow diagrams showing how the turning movements accounted for in the junction capacity assessment work have been derived. These provide an easy and convenient way to follow the assessment carried out. The Albion TA does not provide this type of diagrams adding to the general lack of clarity of the document.

3.3. PBA also carried out a review of the junction capacity modelling work presented in the Albion TA. The focus of the review has been the A41/Vendee Drive roundabout junction modelled in Junction 9 (Arcady):

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- The Albion TA uses a set of geometric parameters that are borrowed from the earlier Transport Assessment prepared in support of the Bicester 4 development. It is understood that the Bicester 4 development benefits from a 'resolution to grant subject to Section 106 agreement'. It is expected that in such a situation, OCC have confirmed that the parameters used in the Bicester 4 assessment and carried over to the Albion TA are agreed. It would however be useful for OCC to confirm this is the case.
- The geometric parameters used by the Albion TA are different from the parameters used by PBA in the Bicester Gateway Phase 1 TA, despite the fact that the highway layout tested in the Albion TA is the mitigation layout proposed as a result of the Bicester Gateway Phase 1 assessment. The Albion TA parameters derive a higher level of capacity than the parameters used by PBA. In that respect, PBA consider that the Albion TA overestimates the capacity of the Bicester Gateway Phase 1 mitigation scheme. It must also be pointed out that the committed improvements at the roundabout tested in the Albion TA are related to the delivery of the Bicester Gateway Phase 1B for which a revised development proposal, generating significantly less traffic, is about to be submitted to planning. With the revised Phase 1B scheme, it is unlikely that the committed improvements at the A41/Vendee Dr roundabout identified as part of the extent consent on Phase 1B would be required and delivered. These improvements may therefore need to be secured through the Albion Land permission/s.
- The traffic flows used as a basis for assessment in the Albion TA have been provided by OCC from the current version of OCC's strategic model. These flows are generally lower than the OCC sourced flows used by PBA in the Bicester Gateway Phase 1 TA. However, as the flows used in the Albion TA are more recent, they are considered as the most up-to-date basis for assessment.
- However, it is noted that the Albion TA capacity tests assume that traffic flows are entered in PCUs, whereas it seems that the vehicle values have been used from the OCC traffic flow data. This has the effect of underestimating traffic flows through the junction and overestimating the capacity of the junction. This particularly true of employment developments, which generate a larger proportion of HGV movements than, for example, residential schemes. PBA can only conclude here again that the Albion TA does not present an accurate assessment of the transport implications of the schemes applied for.
- In fact, the Albion TA predicts that the A41/Vendee Drive roundabout junction is likely to operate close to capacity in some of the scenarios tested with development (RFC of 0.87 on Vendee Dr in the Scenario 4 Science Park 2031 + Dev scenario). If all the issues identified above were considered and addressed (underestimated development trip generation, under-represented baseline flows, overestimated junction capacity), it is likely that a revised assessment would show that the A41/Vendee Dr junction would operate above capacity.

3.4. Overall, PBA's review of the Albion TA concludes that the assessment presented does not provide an accurate or reliable assessment of the likely transport implications of the Albion Land schemes:

- The Albion TA does not test the full extent of potential development, in terms of land use mix and quantum, that could result from the schemes put forward being consented. As an example, the application could result in all proposed Employment use coming forward as B1a, leading to a significantly higher vehicular trip generation than considered in the Albion TA.

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- The Albion TA includes throughout a number of inconsistencies, errors and illogical arguments that all lead to an underestimation of the likely vehicular trip generation of the proposed development, an underestimation of the baseline traffic conditions for the purpose of assessment and an overestimation of the available capacity of the local road network, all of which together raise significant concerns on the ability for the local road network to accommodate the Phase 2 Bicester 10 development coming forward, notably in relation to access to the A41.
- These are significant concerns to Bloombridge as they potentially impact negatively the commercial attractiveness of the Bicester Gateway Phase 1 development and also of Bicester as an overall destination for the knowledge economy.

3.5. PBA expect that OCC will request that the Albion TA be fundamentally revised to fully reflect the likely transport impacts of the Albion Land schemes and identify necessary mitigation.

### 4. Shortcomings in the pedestrian, cycle and bus access strategy

4.1. The access proposals detailed within the Albion TA in support of the Albion Land schemes rely heavily on the infrastructure improvements that Bloombridge (Bicester Gateway Ltd) committed to deliver as part of the Bicester Gateway Phase 1 consent. For completeness these commitments include:

- Phase 1A – Hotel – being delivered, opening in September 2020: shared footway/cycleway along the plot frontage on the A41, a new southbound bus stop on the A41 connecting to the P&R bus services and local Bicester bus services, a new pedestrian crossing across the A41 to the north of the junction with Vendee Drive to provide pedestrian access to the A41 northbound bus stop and the networks through the Kingsmere development.
- Phase 1B – Office – not delivered, and shortly to be subject to a revised planning application: shared footway/cycleway along the plot frontage on the A41, junction improvements at the A41/Vendee Drive roundabout and at the Wendlebury Rd / Vendee Dr (link) junction.

4.2. Although it is typical for schemes to seek to rely on the existing and committed infrastructure improvements in their vicinity, it must be noted that the Albion Land schemes do not offer any financial contribution towards the delivery of these schemes, or further improvements to the local highway and public transport networks (apart from an additional footway/cycleway, more on this below), despite being significantly larger in size to the Bicester Gateway Phase 1 development. Furthermore, as explained above, revised proposals are about to be put forward for the Phase 1B site which will not require the delivery of some of the improvements attached to the consent on the Phase 1B land. Therefore, Albion Land should not rely on the Bicester Gateway Phase 1 infrastructure delivery. The changing planning context is such that the forthcoming Phase 1B application will in effect be considered concomitantly with the Albion Land applications. In this context, PBA would expect that OCC would require Albion Land to review their proposals and consider proportional contributions to the overall package of traffic mitigation and multi-modal access infrastructure improvements necessary to support the Bicester 10 allocation commensurate with their development proposals.

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4.3. In relation to the improvements actually put forward by Albion Land through their TA, the following is noted:

- The Albion TA puts forward a proposed 2.5m-3m shared footway/cycleway along Wendlebury Road north of Vendee Drive (link). This would then connect to a new pedestrian link across highway land available north of the Hotel plot linking with the A41 and the committed bus stops and pedestrian crossing there. There are a number of potential issues with these proposals:
  - 3m is the typically accepted minimum width for a shared footway/cycleway (ref: LTN1/12) although it is accepted that OCC would allow a minimum width of 2.5m for such a facility. However, the Albion TA presents the outcome of a Road Safety Audit (RSA) of the proposed facility. This RSA suggests that the proposed footway/cycleway should be flanked by a barrier or land between the footway/cycleway and the site regraded accordingly. The Albion TA accepts this recommendation (see paragraph 5.5.3 in the Albion TA). If a barrier is proposed at the back of the footway/cycleway this will impact the effective width of the cycleway, and, in this context, it would be recommended that the minimum overall width of the shared footway/cycleway be set at 2.75m. The question therefore arises on whether Albion Land would be able to deliver such a facility within the land available to them and local physical and environmental constraints. PBA would expect OCC to request suitably detailed scheme drawings showing this facility incorporating the RSA suggested changes, to provide sufficient certainty of deliverability.
  - The same RSA queries whether Wendlebury Road south of the proposed Albion Land access roundabout would be used by cyclists. The Albion TA responds by suggesting they are not providing for cyclists on the southern approach into the roundabout (see paragraph 5.5.4 in the Albion TA). This is odd as Wendlebury Road to the south is part of the National Cycle Network. Therefore, it is likely that some cyclists accessing the Albion Land schemes will come from Wendlebury Road south (i.e. from the direction of Oxford). PBA would expect OCC to request that Albion Land make provision for cyclists on Wendlebury Road to the south of the proposed site access.
  - The proposed shared footway/cycleway on Wendlebury Road (north) would probably form the most direct route for users of the Albion Land schemes located at the northern end of the Albion Land sites, assuming they can access the facility directly and without having to travel to the proposed new access roundabout (something which is not guaranteed given the impermeable design of the proposed Health and Racquet Club). For all other site users, the most logical pedestrian and cycle route out of the Albion Land site and to the facilities on the A41 is via Vendee Drive (link). PBA considers this route to form the most likely desire line for most site users. PBA would expect OCC to request that Albion Land reconsider their access strategy to recognise the important role that Vendee Drive (link) plays in the accessibility to the Albion Land schemes, notably in relation to the potential for a shared route for cyclists and pedestrians alongside that link.
- Paragraphs 5.1.4 and 5.2.2 provide a possible explanation for the Albion Land access proposals avoiding Vendee Drive (link) despite its obvious benefits. The Albion TA in these two paragraphs mis-interprets the discussions between Bloombridge and OCC stating *'in line with the strategy agreed by OCC with Bloombridge, it is not proposed to provide a footway on the southern side of the Vendee Drive link road'*:

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- The Bicester Gateway Phase 1 pedestrian and cycle access strategy focuses on the A41 as the Phase 1 plots directly front this important movement corridor. The strategy for Phase 1 is therefore to improve facilities on the A41 corridor and provide direct access from the Phase 1 plots to this corridor. In this context, there is no need for the Phase 1 development to improve pedestrian and cycle facilities on Vendee Drive (link). These are for the wider (Phase 2) allocation to provide to serve their access requirements.
  - The Bicester Gateway Phase 1 scheme however offers a vision of what a suitable access strategy into the entire Bicester 10 allocation should be (i.e including the Phase 1 development and the Albion Land site, Phase 2). The material submitted in support of the Phase 1 application includes UMC drawing 16084-P103-P2 that shows that Bloombridge's vision for the wider Bicester 10 allocation is for this wider site to benefit from an entrance including a widened Vendee Drive (link) flanked by 3m wide shared footways/cycleways with a 0.5m segregation strip. This is the type of access that should be expected for an overall employment development of the size and nature of what is allocated at Bicester 10. And this clearly emphasises the importance of the Vendee Drive (link) as the most direct link between the Albion Land sites and the A41 corridor along the desire line for pedestrians and cyclists traveling to and from the Albion Land sites. The consented Bicester Gateway Phase 1 development reserves land on both sides of Vendee Dr (link) to allow for the appropriate access gateway into the wider Bicester 10 site to be delivered. This should be recognised by OCC and Albion Land and required in the s106 as a necessary part of the Phase 2 applications.
  - Overall, whilst Vendee Drive (link) does not play a role in the pedestrian and cycle accessibility to the Bicester Gateway Phase 1 development, the points raised above show how important this link is for the accessibility of the wider allocation and to the Albion Land sites. Being the desire line for most vulnerable road users to and from the Albion Land sites and given the current relative narrowness of the link and the lack of pedestrian and cycling infrastructure along it, it is expected that OCC will require Albion Land to consider delivering the appropriate improvements along this link, in particular on the ground of road safety for all users. The case here is made more pressing by a TA that under-represents the potential amount of B1a or, conversely, the number of HGVs associated with more B1c.
- 4.4. In relation to bus accessibility, again the Albion Land schemes fully rely on the infrastructure committed and delivered as part of the consent on the Bicester Gateway Phase 1A plot, including a new bus stop on the A41 southbound and a new pedestrian crossing across the A41. Whilst these improvements provide appropriate bus accessibility to the Phase 1 plots, due to these plots directly fronting the A41, the proposed bus stops are more remote from the Albion Land sites. The issue of bus penetration into the Bicester 10 allocation site, serving the Albion Land sites, is covered within the Cherwell District Council Local Plan policy related to the allocation. This expects the Bicester 10 development to cater for the 'accommodation of bus stops to link the development to the wider town'. PBA believe that this forms the policy basis for OCC requesting Albion Land at the scoping stage to accommodate a bus stop within or close to their sites, with the Vendee Dr (link) a possible location. Yet the Albion TA is silent on this point and does not propose any means of improving bus penetration into Bicester 10. PBA would expect OCC to request Albion Land to consider means of providing a bus stop within the Bicester 10 allocation site (likely to be on Wendlebury Road (north) or Vendee Dr (link)). Without this, the proposals are not policy compliant.

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- 4.5. However, the nature and design of this bus stop is key here. It is understood that the Bicester 10 policy requirement would translate into providing a new stop within the Bicester 10 allocation site to allow for a 'clockwise' town bus service to serve the Albion Land sites. This bus would travel from the A41 southbound, along Wendlebury Rd (north) and then Vendee Dr (link) westbound to rejoin the A41. Therefore, if located on Vendee Dr (link), this proposed new stop would be on the southern side of Vendee Dr (link). This would raise two issues:
- There are no pedestrian facilities on the southern side of Vendee Dr (link) at the moment connecting to a potential bus stop there. Pedestrian facilities would have to be delivered along the southern side of Vendee Dr (link) and be of sufficient width to accommodate a bus stop of sufficient quality to match the significant development proposed by Albion Land.
  - The carriageway on Vendee Dr (link) would need to be widened to provide for a safe bus stop. Given the short length of the link between the A41 and Wendlebury Road and the narrowness of the carriageway, it is likely that a bus stopped on the southern side of the link would lead to drivers of cars and HGVs exiting the Albion Land sites attempting to overtake the stopped bus and come into conflict with vehicles entering Vendee Dr (link) from the A41, creating a safety hazard.
- 4.6. To respond positively to the Bicester 10 Local Plan policy, it is expected that OCC will require Albion Land to propose to deliver a suitable bus stop within the Bicester 10 allocation site and deliver the accompanying pedestrian connections to serve this new bus stop.
- 4.7. In conclusion, PBA's view is that the Albion Land proposals in relation to pedestrians, cyclists and bus use fall short of what would be expected to serve a development of the size and nature proposed by Albion Land:
- Albion Land rely entirely on the infrastructure improvements committed as part of the consented Bicester Gateway Phase 1 scheme. If these committed improvements provide strong direct sustainable access to the Phase 1 plots, they do not relate as strongly to the Albion Land sites.
  - There is a doubt as to whether Albion Land would have the ability to deliver the convoluted and substandard pedestrian and cycle facilities they put forward within their TA. In addition, the lack of consideration for cyclists travelling from Wendlebury Rd (south) along the NCR needs addressing to provide safe access for these vulnerable road users.
  - The Albion TA discounts the important role that the Vendee Dr (link) has to play in the sustainable accessibility of the Albion Land sites. Vendee Dr (link) will form the desire line for most vulnerable road users accessing the Albion Land sites and by not providing for these users along this link, the Albion Land proposals create a road safety issue for vulnerable road users.
  - The Albion Land proposals do not meet the requirements of the Bicester 10 Local Plan policy in terms of bus penetration. PBA would expect Albion Land to consider the provision of a bus stop on Wendlebury Road (north) or Vendee Dr (link) as suggested by OCC at scoping. If a bus stop was to be located on Vendee Dr (link), this road link would have to be widened to provide safe and convenient pedestrian access to a bus stop of the appropriate type and quality, in line with the size and nature of the Albion Land proposed schemes. In that particular location, on the exit to Bicester gateway, a bus layby would form a potential solution avoiding congestion and safety issues at peak hours.

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- It must be remembered that Bloombridge have always recognised the importance of Vendee Dr (link) to the accessibility of the wider Bicester 10 allocation site (i.e. the Albion Land sites), and in their Phase 1 submission clearly show how Vendee Dr (link) should be widened to deliver an access gateway fitting to the development planned for the Bicester 10 allocation as a whole. Bloombridge even went further in safeguarding land on the Phase 1 plots, losing valuable developable land, so as not to prejudice the future delivery of the wider Bicester 10 allocation.
- 4.8. Our clients are concerned that the much larger Phase 2 site (twice as much B1 Class space is proposed) is not committing to its fair share of infrastructure, accessibility and public transport investment. The public transport accessibility of Phase 2 is poor (relative to potential), given there is nothing proposed within the phase itself, contrary to Policy Bicester 10. Our clients are clear that this is not reflective of the needs of a first-class knowledge economy in Bicester.
- 4.9. PBA expect that OCC will request that Albion Land revise significantly their access proposals and improve (or contribute proportionally towards the improvement of) Vendee Dr (link) to enable safe and acceptable access for the Bicester 10 allocation, including the Albion Land sites. PBA consider that the proposed access infrastructure improvements put forward by Albion Land fall short of what would be required to make the Albion Land schemes acceptable in planning terms.

### 5. Road Safety at the A41/Vendee Dr Roundabout

- 5.1. The road safety at the A41/Vendee Dr roundabout is a significant issue for OCC, following a recent traffic collision that led to two fatalities. Bicester Gateway Ltd discussed this issue with OCC at a pre-application meeting on 19<sup>th</sup> September 2019. Although the forthcoming revised proposals for Bicester Gateway Phase 1B plot would lead to a reduced impact of development on the local highway network, given that the Phase 1B site fronts the A41/Vendee Dr roundabout, Bicester Gateway Ltd offered to support OCC as far as they are able with the safety improvement scheme that OCC would put forward.
- 5.2. In contrast, the Albion TA does refer to the road safety issues at the A41/Vendee Dr roundabout, including the recent two fatalities (see paragraphs 3.9.4 and 3.9.5) but dismisses the issue. The Albion TA undertakes a calculation of recent collision numbers at the junction (2.2 per year) compared to the number of collisions expected at the same type of junctions (3.8 per year), according to DMRB, and concludes '*the junction is therefore performing better than average and the relatively high severity rate is skewed by other contributing factors*'.
- 5.3. The DMRB expected severity at the junction would be 7.1% of fatal or serious collisions. Based on the information provided in the Albion TA, and accounting for the additional recent fatal collision, the junction has seen 12 collisions including 3 serious or fatal collisions. The severity of the collisions at the junction returns a 25% rate of fatal or serious collisions.
- 5.4. OCC is correct in considering road safety at the A41/Vendee Dr junction as an issue, and given the likely traffic impact of the Albion Land schemes, PBA would expect that OCC would ask Albion Land to contribute to safety improvements at the junction in a commensurate and proportional manner.