

PT/DP3498

15 November 2019

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Dear Ms O'Hanlon,

**CATALYST BICESTER - LAND ADJACENT TO PROMISED LAND FARM, WENDLEBURY ROAD
PLANNING APPLICATIONS REFERENCES: 19/01740/HYBRID & 19/01746/OUT**

We write on behalf of our client, Bicester Nominees Limited, Bicester Nominees II Limited and Value Retail Management (Bicester Village) Limited (collectively 'Value Retail'), as owners and management company of Bicester Village Retail Outlet Centre.

Value Retail wish to object to the above two planning applications relating to the Catalyst Bicester proposals on highways grounds. As you will be aware, Bicester Village is a leading Designer Outlet centre, located on the southern edge of Bicester, providing a number of retail outlet shops alongside a selection of restaurants, cafes and eateries supporting this specialist role. As the owners of Bicester Village, Value Retail has developed the centre over the last 20 years and therefore have a distinct and long-established knowledge and understanding of the changing retail traffic issues and implications, which are relevant to the changes proposed as part of this application.

In support of this objection, a technical note prepared by Value Retail's highways and transportation consultants, Motion, is enclosed and sets out a detailed critique of the proposals and the work submitted in support of the application. This note sets out why the Transport Assessment produced to support the scheme (these two applications) provides insufficient data to accurately assess the impact of the development on the surrounding road network. In the absence of an accurate assessment, the Transport Assessment does not demonstrate that the development would not result in a severe impact on the highway, and that it is therefore contrary to the NPPF.

I hope that these are self-explanatory and trust that you will keep us updated on the progress of this planning application as you move towards determination.

Yours sincerely,

A handwritten signature in blue ink that reads 'DP9 Ltd'.

DP9 Limited

Encs.

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Our ref. 1909043/bvmon1/DM

17th October 2019

Dear Sir/Madam,

**'Catalyst Bicester', Promised Land Farm, Wendlebury Road, Bicester
Review of Submitted Transport Assessment**

This letter has been prepared as part of an objection to two current planning applications relating to the above site, known as 'Catalyst Bicester'. It should be read in conjunction with a Technical Note (dated 17th October 2019), also prepared by Motion.

Two separate planning applications have been submitted to support the development of the site, consisting of:

- A hybrid application (part outline and part full) for a racquets club and highway works (full) and B1 floorspace (outline) on a section of land known as 'Site A'; and
- Outline application for B1 floorspace on site B.

Key flaws in the Transport Assessment (TA) are set out below:

- The TA caps the maximum quantum of B1a office at 35% of the gross B1 floorspace. The specific wording of Bicester 10 in the Local Plan makes no reference to a cap, and therefore the assessment is not consistent with the Bicester 10 policy;
- A worst-case scenario would assume all B1(a) uses on site as this use would generate the highest level of traffic flow during weekday peak periods. If there is no cap placed on B1(a) floorspace then the analysis greatly underestimates traffic impact;
- The TA considers the trip attraction of a science park as an alternative to a generic B1 employment site, however it relies on only one site for assessment purposes which is not comparable to that of the Bicester 10 allocation. The site has a much lower staff to floorspace ratio than compared to the expectations of the Bicester 10 allocation, which results in the traffic impact being underestimated;
- An accurate assessment using B1(a) trip rates would show a significant increase in vehicle trips close to **200% higher** than assessed in the TA;
- There are two errors contained within the census data that combined invalidate the assessment methodology and resulting traffic impact assessment. An alternative assessment using appropriate

data would show a higher number of vehicle trips, as well as a revised distribution of vehicles on the network;

- The proposed health and racquet club would accommodate 246 parking spaces. The provision of 246 parking spaces for the Leisure and Racquet Club suggest an expectation that the club will attract a high number of cars at any one time, although the vehicular trip attraction associated with the club contained within the TA is relatively low;
- The junction modelling assessment of the surrounding road network fails to incorporate relevant committed developments that will impact on the immediate surrounding road network;
- The baseline traffic model greatly underestimates 2026 baseline traffic flow, effectively 'losing' traffic flow on the network. This raises serious doubts as to the accuracy of the junction modelling carried out in the TA; and
- The assessment fails to assess the impact of the development site on the surrounding road network during the Saturday peak. Whilst it is acknowledged that any employment use will attract less trips on a weekend, the David Lloyd has the potential to attract a reasonable traffic flow over a weekend.

Overall, the TA produced to support the scheme provides insufficient data to accurately assess the impact of the development site on the surrounding road network. In the absence of an accurate assessment, the TA does not demonstrate that the development would not result in a severe impact on the highway, and is therefore contrary to the NPPF.

Yours sincerely



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Project: Catalyst Bicester Transport Review
Prepared by: David McMurtary
Approved by: Phil Bell
Date: 17th October 2019

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Introduction

- 1.1 Motion has been instructed by Value Retail to provide a review of the highways input in respect of a development site known as 'Catalyst Bicester', located at Promised Land Farm on Wendlebury Road, Bicester. The proposal forms part of the Bicester 10 allocation, albeit additional development is being sought on adjoining land.
- 1.2 Two separate planning applications have been submitted:
 - ▶ A hybrid application for a racquets club and highway works (full) and B1 floorspace (outline) on a section of land known as 'Site A'; and
 - ▶ Outline application for B1 floorspace on site B.
- 1.3 Four development scenarios have been considered, comprising of:
 - 1) B1 across site A (23,400 sqm);
 - 2) B1 (16,800 sqm) and a health and racquet club across site A;
 - 3) B1 (33,600 sqm) across both sites A and B; and
 - 4) B1 (27,000 sqm) and health and racquet club across both sites A and B.
- 1.4 The Transport Assessment (TA), prepared by David Tucker Associates, and the Planning Statement, prepared by Quod, make it clear that the proposals would seek an open B1 use that could include B1(a) office, B1(b) research and development, and/or B1(c) light industrial. A limit has however been suggested on B1(a) floorspace at 35% of the floorspace.
- 1.5 The development is to occupy the land allocated as 'Bicester 10' in the July 2015 Cherwell Local Plan. The policy states:

"Policy Bicester 10: Bicester Gateway

Development Area: 18 hectares

Development Description: Knowledge economy employment development to the south of the existing retail area (Wyvale Garden Centre), adjacent to the A41.

Employment

Jobs created – approximately 3,500. Site constraints may reduce numbers slightly

Use classes – B1 Business uses: high tech knowledge industries.

Infrastructure Needs

Open Space – structured open spaces and planting that provide a strong landscape setting, support SUDs and improvements to the microclimate

Access and Movement – M40, Phase 2 improvements to Junction 9. Contributions to improvements to the surrounding local and strategic road networks, including safeguarding land for future highway improvements to peripheral routes on this side of the town."
- 1.6 The remainder of this technical note includes a review of the TA submitted, commenting where relevant on the implications of the proposal on the surrounding highway.

2.0 Background Information

South East Perimeter Road

- 2.1 Cherwell District Council (CDC) is currently investigating the implementation of a South East Perimeter Road to support the significant housing and employment growth in Bicester. Two options connecting to the A41 have been considered, one of which would pass through the Bicester 10 development plot. CDC has stated a preference for a second route that would connect to the A41 south of the Bicester 10 plot, and therefore it would appear unlikely that the development of Bicester 10 would impact on the deliverability of the South East Perimeter Road.

Bloombridge Application

- 2.2 The Bloombridge planning application to the immediate west of the site (application reference 16/02586/OUT) was approved in July 2018. The proposal includes hotel and employment development, along with works to improve and upgrade capacity at the roundabout junction to the west of the site, connecting with Vendee Drive.
- 2.3 The improvement works to the roundabout have been incorporated into the junction modelling exercise undertaken by the transport consultant acting on the Catalyst Bicester application.

Review of Transport Assessment

Employment Trip Generation

- 2.4 With various potential forms of development being considered, the TA should robustly focus on the highest trip generator when considering the impact of the site on the wider road network. This would consist of either the full B1 use or mixed uses across both sites for scenarios 3 and 4 (set out in paragraph 1.3 above).
- 2.5 Paragraph 4.1.3 states that the maximum quantum of B1a office has been capped at 35% of the gross B1 floorspace, which paragraph 4.2.3 states is the maximum level of office use sought by the applicant. The specific wording of Bicester 10 in the Local Plan makes no reference to a cap; a worst-case scenario would assume all B1(a) uses on site as this use would generate the highest level of traffic flow during weekday peak periods. A limit on the amount of B1(a) floorspace would need to be enforced by way of an appropriately worded condition to ensure it is not exceeded.
- 2.6 Paragraph 4.2.11 of the TA suggests that only 27.8% of the proposed floorspace will be assessed as B1(a), as trip rates for B1(c) will already include some B1(a) use (assumed to be 7.2%). B1(a) office trip rates are shown within Table 5 of the TA, which reflect those set out in the TA produced by Motion for the nearby Bicester 4 site (planning reference 17/02534/OUT).
- 2.7 Whilst it is accepted that B1(c) uses do include offices, they are typically ancillary to the light industrial use and therefore reducing the amount of B1(a) assessed would underestimate trip rates and resultant traffic flow. When comparing the trip rates for B1(a) office set out in Table 5 in the TA to the B1(c) trip rates set out in Table 8, the difference is clear.
- 2.8 Consideration has also been given to the trip attraction of a science park as an alternative to a generic B1(a) and B1(c) split. Only one site has been selected; a science park in Cambridge which incorporates a total floorspace of 142,687 square metres, which is significantly higher than that proposed. It is not generally advised to rely on one site, particularly when the site is notably larger than that proposed.
- 2.9 It is also evident from the TRICS output that the Cambridge Science Park employs some 5,000 people. The wording of the Bicester 10 site in the Local Plan (as set out above in paragraph 1.5) is that it may attract up to 3,500 jobs. The science park attracts one staff member per 28 square metres of floorspace, although the Bicester 10 site could (using the highest floorspace in paragraph 1.3 above) attract staff on a ratio of one per 9.6 square metres. This staff to floorspace ratio is akin to a B1(a) use.

- 2.10 Tables 2.1 and 2.2 below summarise the potential traffic attraction associated with a B1(a) use based on 33,600 square metres of floorspace, using the trip rates set out in Table 5 of the TA. This is compared to the trip attraction set out in the TA for scenario 3.

Morning Peak Hour – TA Traffic (Based on Scenario 3 – 33,600sqm)			Morning Peak Hour – Revised Based on B1(a) Trip Rates – 33,600sqm		
Arrivals	Departures	Total	Arrivals	Departures	Total
281	35	316	514	47	561

Table 2.1 – Revised Traffic Flow Based on 100% B1(a) Use – Morning Peak Hour

Evening Peak Hour – TA Traffic (Based on Scenario 3 – 33,600sqm)			Evening Peak Hour – Revised Based on B1(a) Trip Rates – 33,600sqm		
Arrivals	Departures	Total	Arrivals	Departures	Total
11	184	195	37	538	575

Table 2.2 – Revised Traffic Flow Based on 100% B1(a) Use – Evening Peak Hour

- 2.11 Tables 2.1 and 2.2 clearly show how the site could attract significantly higher levels of traffic than predicted in the TA.
- 2.12 It is also pertinent to note that the trip assessment contained within the TA (in respect of all proposed uses) splits vehicular and total person trips based on the TRICS sites. In some cases, this can result in an underestimation of total trips; for example, the use of the science park trip rates to estimate the traffic flow associated with the employment use underestimates trips by car. During the morning peak hour, car trips make up 64% of total trips, whilst during the evening peak hour car trips make up only 52% of total car trips. This reflects the characteristics of the Cambridge Science Park and not that of the Bicester 10 site.
- 2.13 Census data relating to the surrounding super output area – middle layer (Cherwell 016) shows that 80% of people working within the output area drive by car. This would clearly increase overall traffic flow if using the Cambridge Science Park trip rates (which in itself is shown to be questionable).
- 2.14 Tables 2.3 and 2.4 below summarises the difference between the traffic flow in the TA and the revised assessment using accurate car driver mode split for the morning and evening weekday peak hours.

Morning Peak Hour – TA Traffic (Based on Scenario 3 – 33,600sqm)			Morning Peak Hour – Revised Based on Census Data (Based on Scenario 3 – 33,600sqm)		
Arrivals	Departures	Total	Arrivals	Departures	Total
281	35	316	352	62	414

Table 2.3 – Revised Science Park Traffic Flow – Morning Peak Hour

Evening Peak Hour – TA Traffic (Based on Scenario 3 – 33,600sqm)			Evening Peak Hour – Revised Based on Census Data (Based on Scenario 3 – 33,600sqm)		
Arrivals	Departures	Total	Arrivals	Departures	Total
11	184	195	29	256	285

Table 2.4 – Revised Science Park Traffic Flow – Evening Peak Hour

- 2.15 Tables 2.3 and 2.4 show how traffic flow for a science park would increase by 98 two-way movements in the morning peak hour and 90 two-way vehicle movements in the evening peak hour. This is a significant increase, and one not tested in the TA. Irrespective, it is clear that use of this specific Science Park to predict traffic flow could significantly underestimate likely employees on site when compared to the Local Plan requirement for up to 3,500 staff.

Proposed Health & Racquet Club

- 2.16 The proposed health and racquet club would accommodate a 1.6 hectare portion of the overall site, and accommodate 246 parking spaces. The travel demands generated by the club have been estimated using the TRICS database.
- 2.17 The provision of 246 parking spaces for the Leisure and Racquet Club suggest an expectation that the club will attract a high number of cars at any one time. Anticipated vehicular trip attraction associated with the club is shown within Table 15 in the Transport Assessment, which is relatively low when considering the parking provision proposed.
- 2.18 Whilst the TA does not specifically reference the intended leisure and racquet club operator, it is clear from additional supporting information (in particular the architectural plans) that the intended operator is David Lloyd, which could result in a higher than average trip attraction compared to other operators.
- 2.19 It is accepted that one David Lloyd site has been included within the assessment set out in the TA, although a more comprehensive set of surveys based on comparable David Lloyd sites would provide a more realistic estimation of traffic flow. There are numerous David Lloyd sites within the TRICS database, although most fall either outside of England or are comparatively old surveys (in excess of 15 years old). It would therefore be expected that surveys of comparable David Lloyd sites be undertaken to ensure the TA does not underestimate the overall traffic flow of the proposal. This is particularly relevant when considering the remainder of the employment uses on site have been underestimated in trip attraction terms.

3.0 Wider Junction Modelling

- 3.1 Appendix H attached to the TA contains census journey to work data, which TA paragraph 4.43 states reflects the same methodology as adopted on adjacent sites (namely Bicester 4). What is evident having reviewed Appendix H is that this is incorrect. Whilst the TA produced by Motion for Bicester 4 does utilise journey to work census data, it accurately reflects the workplace population by distributing vehicle trips to the site based on where people live.
- 3.2 TA Appendix H includes incorrect census data by showing all residents living within the Cherwell 015 E02005935 super output area as opposed to those who live elsewhere and work in this location. For example, if Appendix H was interpreted as the TA suggests, it would show that 13 people live with the City of London and commute to the above output area, which is clearly incorrect. What Appendix H actually shows is the various destinations that people living within the output area commute to. This would be accurate if the TA for Bicester 10 had been prepared to support a residential development, but it has not.
- 3.3 As noted above, the TA produced by Motion for Bicester 4 correctly identifies the locations that people working the super output area commute from.
- 3.4 The above incorrect methodology raises significant doubt as to the accuracy of the distribution of vehicle trips on the surrounding network, and the validity of the resultant junction modelling outputs.
- 3.5 Appendix H also incorporates data for all modes of travel, when if assessed correctly should focus solely on car driver trips only. Census data is being utilised to predict the location where people driving a car or van come from, which will include destinations further afield than for those who commute on foot. Including all modes will give a bias towards local trips; in this case a higher proportion of trips within Bicester which the TA and Travel Plan argue can be shifted to alternative modes of travel. In reality many of those living in close proximity will already be travelling by more sustainable modes of travel.
- 3.6 It is clear that the assessment of trip distribution is flawed such that it does not currently distribute traffic on the surrounding road network. It is likely that Table 20 within the TA is incorrect, and downplays potential impact further south on the M40.
- 3.7 The above is particularly relevant when considering the Bicester 10 policy seeks improvements to the M40 junction 9. No improvements or assessment work at this junction has been undertaken in the TA. The TA should include a revised assessment of trip generation and distribution before giving consideration to its impacts at the M40 junction.

Junction Modelling

- 3.8 Oxfordshire County Council (OCC) commissioned a traffic assignment model for Bicester to forecast future travel demand patterns arising from planned developments within the Bicester Area. The TA includes the baseline data within the assessment to form a baseline with which to assess the impacts.
- 3.1 The traffic flow data from the Bicester Traffic Model (BTM) includes vehicle trips associated with committed development in the local area. However, as part of recent discussions between Motion and OCC, OCC has identified numerous committed or submitted development schemes in the local area which should be considered as part of the analysis comprising:
 - ▶ BSA sports facility in Chesterton (Planning Ref: 19/00934/F);
 - ▶ Alchester Park, Chesterton (Planning Ref: 12/00305/OUT); and,
 - ▶ Audley Gardens (Planning Ref:14/01737/OUT)
- 3.2 The above sites are not included in the model carried out at part of the Bicester 10 TA, and therefore the model will underestimate baseline traffic flow on the network.

- 3.3 Arguably the most fundamental concern with the TA is the flawed base traffic flow data utilised as part of the junction modelling assessment. Appendix E attached to the TA contains the OCC traffic flow data for 2026 and 2031. As an example of the flaws in the data, for 2026 it illustrates 1,228 vehicles travelling along the A41 northern arm to all arms on the Vendee roundabout during the morning peak hour. It also shows 1,572 vehicles from all arms of the Vendee roundabout to A41 north during the morning peak hour.
- 3.4 The baseline traffic flows are incorrect, greatly underestimating the correct 2026 baseline traffic flow. This has become apparent through recent liaison between Motion and OCC in respect of a hotel development site know as Great Wolf, towards the south-west of Bicester. The BTM model is flawed in that it has 'lost' traffic flow on the network that had previously been included in the model.
- 3.5 For the avoidance of doubt, the work undertaken by Motion as part of the Bicester 4 site illustrated notably higher traffic flow on the surrounding network, with 2,020 vehicles from the A41 north to all arms at the Vendee roundabout, and 2,160 vehicles from all arms to A41 north during the morning peak hour. This is substantially higher than the data included in the Catalyst Bicester 10 TA.
- 3.6 For the evening peak hour, the Bicester 10 TA shows a total of 1,465 vehicles from the A41 north to all other arms on the Vendee roundabout, and 1,735 vehicles from all arms to the A41 north. The Bicester 4 TA prepared by Motion shows 2,762 vehicles from the A41 north to all other arms and 2,159 vehicles from the from all arms to the A41 north during the evening peak hour.
- 3.7 The difference between the two sets of traffic data is substantial, and raises serious doubts as to the accuracy of the junction modelling carried out in the TA. This is compounded by the aforementioned commentary in respect of trip generation and distribution which would appear to be underestimated.
- 3.8 It is also noteworthy that the assessment fails to assess the impact of the development site on the surrounding road network during the Saturday peak. Whilst it is acknowledged that any employment use will attract less trips on a weekend, the David Lloyd has the potential to attract a reasonable traffic flow. This is relevant as the surrounding road network operates with heavy traffic flow on a Saturday due to the close proximity of the site to large retail sites such as Bicester Village. Any revised assessment should consider the impact of the development on the surrounding road network on a Saturday.

4.0 Summary

- 4.1 Motion has been instructed by Value Retail to provide a review of the highways input in respect of a development site known as 'Catalyst Bicester', located at Promised Land Farm on Wendlebury Road, Bicester. The proposal forms part of the Bicester 10 allocation, albeit additional development is being sought on adjoining land.
- 4.2 This report demonstrates that:
- ▶ The maximum quantum of B1a office has been capped at 35% of the gross B1 floorspace, whereas a worst-case scenario would assume all B1(a) uses on site. This would generate the highest level of traffic;
 - ▶ Consideration has been given to the trip attraction of a science park as an alternative to a generic B1(a) and B1(c) split, although this is reliant upon only one site. The site in question (Cambridge Science Park) has a much higher floorspace than when compared to the Catalyst Bicester site and is not comparable in respect of staff to floorspace ratio;
 - ▶ The science park attracts one staff member per 28 square metres of floorspace, although the Bicester 10 site could attract staff on a ratio of one per 9.6 square metres. This staff to floorspace ratio is akin to a B1(a) use;
 - ▶ Census data relating to the surrounding super output area shows that 80% of people working within the output area drive by car. This would increase overall traffic flow if using the Cambridge Science Park trip rates, as the mode split for this site attracts notably fewer car trips;
 - ▶ It would be expected that surveys of comparable David Lloyd sites be undertaken to ensure the TA does not underestimate the overall traffic flow of the proposal;
 - ▶ The TA includes incorrect census data, which raises significant doubt as to the accuracy of the distribution of vehicle trips on the surrounding network, and the validity of the resultant junction modelling outputs. The assessment also incorporates data for all modes of travel, when if assessed correctly should focus solely on car driver trips only;
 - ▶ Various committed development sites are not included in the assessment, and therefore the model will underestimate baseline traffic flow on the network;
 - ▶ The baseline traffic flows are incorrect, greatly underestimating the correct 2026 baseline traffic flow. This has become apparent through recent liaison between Motion and OCC in respect of a hotel development site know as Great Wolf, towards the south-west of Bicester; and
 - ▶ The assessment fails to assess the impact of the development site on the surrounding road network during the Saturday peak, when traffic flow is known to be high due to nearby retail sites.
- 4.3 It is evident that the TA produced to support the above scheme provides insufficient data to accurately assess the impact of the development site on the surrounding road network. A more robust assessment should be undertaken giving accurate estimates of trip attraction and resultant impact on the road network. In the absence of this data, the TA does not demonstrate that the development would not result in a severe impact on the highway, and is therefore contrary to the NPPF.