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Our ref . 1909043/bvmon1/DM

18th February 2020

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' (application references 19/01740 and 19/01746). It provides an update to a previous letter and Technical Note (dated 17th October 2019), also prepared by Motion, and submitted by DP9 planning consultants on behalf of Value Retail on 15th November 2019.

This letter comments on a revised Transport Assessment (TA) dated 24th December 2019, prepared by David Tucker Associates to support revisions to the development proposal. Of particular relevance is the reduction in the number of development scenarios being assessed from four to two, namely:

- ▶ B1 (16,800 sqm) and a health and racquet club across site A;
- ▶ B1 (27,000 sqm) and health and racquet club across both sites A and B.

Several key flaws were identified in the original version of the Transport Assessment (TA) that are still unaddressed within the revised TA. On this basis, the conclusion previously drawn that the TA does not demonstrate that the development would not result in a severe impact on the highway is still relevant.

Further detail in relation to each aspect is set out below.

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Limit on B1a Floorspace

The revised TA continues to suggest a cap on 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. Whilst a condition can be placed on any planning permission restricting the level of B1a floorspace, this would then not accord to the wording of the Bicester 10 policy. If there is no cap placed on B1(a) floorspace then the analysis greatly underestimates traffic impact.

Use of Suitable TRICS Sites

The revised TA continues to rely on only one Science Park as an alternative to a generic B1 employment site, although for reasons set out in Motion's previous Technical Note (October 2019) this is not comparable to that of the Bicester 10 allocation. The science park has a much lower staff to floorspace ratio than compared to the expectations of the Bicester 10 allocation, which results in traffic impact being underestimated.

The revised TA seeks to justify the inclusion of the Science Park on the basis that its employment density is in line with expected levels of this type of use, however, this completely disregards the number of staff anticipated at the time when the Bicester 10 site was allocated in the Local Plan. The Local Plan envisages an employment density far greater than that at the Science Park, and therefore the concern raised in Motion's Technical Note (October 2019) is still valid.

A second Science Park is considered in the revised TA (Begbroke Science Park), although it is subsequently acknowledged in paragraph that 4.2.9 that a free minibus operates between the University and the site, which will reduce overall car based trips. The TA does not rely on this site in estimating trip attraction as it is not a representative comparison site.

Trip Attraction

As set out within Motion's Technical Note (October 2019), 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. The revised TA accepts in paragraph 4.2.8 that the level of car use in Bicester may be higher than that suggested in their traffic flow data (indeed this is noted to have been a concern expressed by Oxfordshire County Council). The revised TA applies a 10% sensitivity test to the Science Park traffic flows to account for this, although it is still some way short of likely traffic flow. The revised TA still refers to Cherwell 015 output area which is not reflective of the site location.

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Table 12 within the revised TA sets out the anticipated level of traffic flow associated with the larger employment floorspace scenario (27,000sqm), excluding the health and racquet club. This is directly comparable with Table 13 in the original TA. Whilst Table 12 includes the additional sensitivity test assuming a 10% increase in employment trips, this only adds negligible additional traffic flow and therefore the assessment is still considered to greatly underestimate likely traffic flow for this use.

As set out in Motion's Technical Note (October 2019), 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. Levels of traffic flow would be even higher when utilising more accurate car driver percentage splits, as described above.

Health and Racquet Club

The revised TA assesses the potential to remove existing health and racquet club TRICS sites alongside introducing additional sites, although concludes that the assessment contained in the original TA is more robust. As noted in Motion's Technical Note (October 2019), the provision of 246 parking spaces for the Leisure and Racquet Club suggests 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 still considered relatively low.

Trip Distribution

As set out in our October review of the original TA, errors within the census data 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. No attempt has been made to correct these errors.

Table 22 in the revised TA sets out the anticipated percentage impact of development traffic on the surrounding road network. The percentage impact does not alter from that set out in the previous version of the TA, as the assessment is based on the trip rates for 'knowledge industry' and not the science park trip rates referred to in this letter. The sensitivity test shown within the TA is not therefore carried through to the impact assessment.

Whilst the level of development traffic generated by the knowledge industry trip rates is higher over a daily profile than the science park trip rates, they are shown to be lower during the peak periods. The percentage impacts shown within Table 22 (and indeed Tables 23 and 24) in the revised TA are therefore considered to underestimate the overall impact of the development.

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Traffic Impact

The junction modelling assessment of the A41 corridor does not appear to have been updated further to the previous version of the TA. This is evident from reviewing Tables 33-36, which show no change from the original TA. It therefore fails to assess the 10% sensitivity test proposed.

As described within Motion's Technical Note (October 2019), 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.

The assessment still 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 significant traffic flow during the weekend.

Overall, the revised TA produced to support the scheme still 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.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Phil Bell', with a large, stylized initial 'P'.

Phil Bell

Managing Director

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