

**Joy White**

Principal Transport Planner  
Transport Development Control: Cherwell, West Oxfordshire & Oxford City  
Oxfordshire County Council

07 October 2022

**By Email and Without Prejudice**

Dear Joy,

LAND AT NORTH WEST BICESTER HOME FARM, LOWER FARM AND SGR2 CAVERSFIELD  
APPLICATION NO: 21/01630/OUT

Further to Oxfordshire County Council's (OCC) recent consultation response to the above-mentioned planning application dated the 06<sup>th</sup> of September 2022, I have prepared this letter to comment on the objection. For completeness, the objection is as follows:

*"The traffic congestion impact of the development prior to the construction of the A4095 realignment would be severe. The assessment of the impact of the proposed interim (mini roundabout) traffic mitigation scheme is not reliable, and the scheme is unlikely to provide any significant benefit."*

Whilst I note that the objection considers that the impact of the traffic associated with the proposed Firethorn development would be considered to be severe, and further details of how the measure of severity has been established are set out within the supporting text of the consultation response, I would maintain that we do not consider that the traffic impact from the proposed development at the A4095 Howes Lane/Bucknell Road priority junction would be severe, nor would the proposed development traffic result in an unacceptable impact on highway safety at the junction.

Further to OCC's earlier consultation response dated the 23<sup>rd</sup> of June 2022, in which OCC objected to the application on the basis that *"the assessment of the traffic impact is not reliable"*, the supporting text set out within this earlier consultation response noted that the traffic data that was used for the technical assessment of the junction was considered to be flawed and that the calibration methodology set out within the supporting technical evidence was not considered to be acceptable to OCC.

VTP subsequently commissioned further traffic counts, which took place over a 3-day period in July 2022, which were agreed with OCC. Based on these observed traffic flows, we were able to provide further details of the calibration methodology, which was reviewed by an independent consultant, Stantec, on behalf of OCC and was agreed to be an acceptable methodology for calibrating the operation of the existing junction arrangement, albeit only the north approach from the A4095 Lords Lane had been calibrated.

**SEVERITY**

Further to the June 2022 OCC consultation response to the application and following further meetings and discussions with OCC and their independent consultants, we have considered OCC's concerns in terms of the potential impact of the proposed development on the operation of the A4095 Howes Lane/Bucknell Road priority junction.



Paragraph 111 of the NPPF states, “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Whilst we have commissioned a Stage 1 Road Safety Audit of the existing and proposed junction improvements, it is understood that OCC’s concerns relate not to an unacceptable impact on highway safety but rather to the severity of the residual cumulative impacts on the local road network. The NPPF does not define severity, and as such, the technical work submitted to OCC to date, and this written response, aim to define the measure of severity in relation to the specific impacts of the proposed development at this critical junction.

## Queue Lengths

The initial concerns raised by OCC related to the potential impact of extended vehicle queues on the local network that might extend to a point where the impact would be considered to be severe.

For traffic from the north, the A4095 Lords Lane approach is acknowledged to develop a queue in the peak hours. It was discussed and considered to be agreed with OCC at the meeting with Stantec on the 22<sup>nd</sup> of August 2022 that should the vehicle queue extend to the roundabout junction of the A4095 Lords Lane/B4100/Banbury Road/A4095 to the extent that the queue would encroach on this junction, the impact would be considered to be severe.

Whilst OCC did not request further assessment of the A4095 Howes Lane approach in terms of vehicle queues; it is acknowledged that the original assessment of the operation of the A4095 Howes Lane/Bucknell Road junction undertaken by Hyder Consulting in December 2014, and then again by David Tucker Associated in September 2015, identified that the resultant vehicle queues on the A4095 Howes Lane approach would not extend to a point whereby the signal junction of Shakespeare Drive would be blocked. As such, it is considered that the threshold for severity in terms of vehicle queues on the A4095 Howes Lane would be triggered if the queue encroached on this junction.

## Driver Delay

The recent consultation response from OCC acknowledged that the proposed calibration of the Bucknell Road approach from the north is acceptable. However, it is noted that the calibration of the model only considered the Bucknell Road (or A4095 Lords Lane) approach from the north and did not calibrate the A4095 Howes Lane approach.

It is worth noting that our concerns over the validity of the BTM still stand. It is acknowledged that the operation of the junction has been observed to be at or near capacity, albeit the results of the PICADY model are not considered to reflect the actual operation of the junction, hence the need to calibrate the model. However, if the BTM is predicting a substantial increase in traffic through this junction in 2026 without the Firethorn development (12.7% in the AM and 38.3% in the PM), it stands to reason that the BTM data could be flawed as it is assigning more traffic through the junction than can reasonably be accommodated. This in turn would mean that any further assessment of the impacts associated with the Firethorn development would always result in disproportionate impacts.

Notwithstanding our concerns over the validity of the BTM data, OCC note that it is considered that the impact of delay on the A4095 Howes Lane approach, which increases by almost double to 13 minutes in the AM peak hour and from 10 minutes to the 17 minutes in the PM peak hour, is considered to be severe.

It must be acknowledged that the 2026 BTM traffic data should not result in the existing junction operating over capacity, as this would result in a residual cumulative impact that could be considered to be unacceptable. As such, the 2026 BTM



data should have factored a level of delay into the modelling that would be acceptable to OCC, and the operation of the junction has to be calibrated so that it reflects the junction operating at or near capacity without the addition of the traffic associated with the proposed development.

As the measure of severity in terms of delay is not defined in the NPPF, nor has it been defined by OCC at this specific junction, it is suggested that the measure of delay at the junction is assessed in terms of thresholds set out within the Guidelines for the Environmental Assessment of Roads Traffic. Driver delay is identified as a specific environmental impact within the Guidelines, but there is no specific mention of thresholds that are to be met in this regard. However, Rule 1 (paragraph 3.17) states that 30%, 60% and 90% changes in traffic levels should be considered as “slight”, “moderate” and “substantial” impacts respectively. These figures are presented in the table below:

Magnitude	Criteria
High	Changes in total traffic or HGV flows over 90%
Medium	Changes in total traffic or HGV flows of 60% - 90%
Low	Changes in total traffic or HGV flows of 30% - 60%
Negligible	Changes in total traffic or HGV flows less than 30%

Whilst it is acknowledged that the identified delay on the A4095 Howes Lane approach effectively doubles in the both the AM and PM peak hours, it must also be acknowledged that the A4095 Howes Lane approach was not calibrated on the revised modelling that was presented in TN008 Rev B dated July 2022. In addition, if the 2026 BTM data is excessively high, the comparison in terms of queue lengths and delay must be flawed as the BTM data is what is causing these excessive queues and delay, which is not considered to be an acceptable baseline for the assessment of the Firethorn development impacts.

Based on the above it is considered that a potential threshold for measuring severity in terms of delay, could be an increase in traffic levels that would exceed 90%. It is not considered that the increase in traffic associated with the Firethorn development would have even a negligible impact on the A4095 Howes Lane/Bucknell Road junction as the increase would be less than 30%.

## REVIEW OF RELATIVE OCC/CDC CONSULTATION RESPONSE

VTP have considered the objections raised by OCC and Cherwell District Council (CDC) in their respective consultation responses in relation to the operation of the A4095 Howes Lane/Bucknell Road junction that have been provided to date. For clarity, these objections are summarised below:

- OCC Consultation Response (06<sup>th</sup> July 2021)
  - Some inaccuracies and omissions in the Transport Assessment and Environmental Statement mean that it is not possible to fully assess the impact of the development in accordance with paragraphs 109 and 111 of the NPPF.
- CDC Consultation Response (21<sup>st</sup> September 2021)
  - There may be a need for a Grampian Condition to restrict the level of development permissible until such time as the realigned A4095 is in place and open to traffic.
- OCC Consultation Response (05<sup>th</sup> January 2022)
  - The assessment of the impact of the development in the absence of the A4095 diversion/Strategic Link Road is not sound and therefore it is not possible to predict the traffic impact of this proposal.



- OCC Consultation Response (11<sup>th</sup> of May 2022)
  - The application seeks to bring forward the full development ahead of the A4095 diversion. The traffic assessment provided shows that this would have a severe congestion impact on the local network, and the proposed mitigation would make queueing worse on Lords Lane.
- OCC Consultation Response (23<sup>rd</sup> June 2022)
  - The assessment of the traffic impact is not reliable
- OCC Consultation Response (06<sup>th</sup> September 2022)
  - The traffic congestion impact of the development prior to the construction of the A4095 realignment would be severe. The assessment of the impact of the proposed interim (mini roundabout) traffic mitigation scheme is not reliable, and the scheme is unlikely to provide any significant benefit.

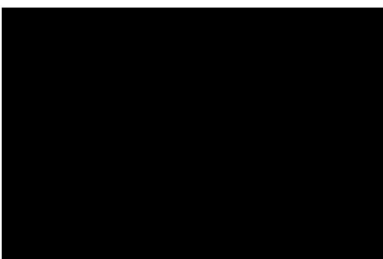
VTP prepared a series of Technical Notes to address each of the objections raised. It is considered that these Technical Notes addressed the specific concerns raised by OCC at each stage. In relation to aspects of the operation of the A4095 Howes Lane/Bucknell Road junction raised by OCC in their latest further objection, a comprehensive assessment of the junction in the future year of 2026 both with and without the proposed development traffic would be required once the 2026 BTM data has been considered further, and OCC have confirmed the level of delay that would have been factored into the 2026 BTM scenario in order to establish an appropriate baseline to undertake the further assessment from.

In order to undertake this comprehensive assessment, the following would be required:

- Details of the development content included within the 2026 Bicester Transport Model (BTM);
- Details of the delay at this junction in 2026 that has been factored in to the BTM;
- Redistribution of the proposed development traffic due to the fact that the SLR has not been implemented by 2026;
- It is assumed that the SLR would be implemented by 2031 and as such, the agreed distribution of the development traffic would be as per the original agreed assumptions set out within the TA, which include the provision of the SLR;
- Recalibration of the model based on the agreed methodology for all approaches (not just the A4095 Lords Lane approach);
- Re-assessment of the recalibrated model to reflect consistent conditions that were observed in the July 2022 traffic surveys; and
- Defining the thresholds of severity both in terms of vehicle queues and driver delay.

It is considered that OCC's latest objection does not reflect the results of a comprehensively calibrated junction model and therefore, it is not possible for OCC to come to the conclusion that the residual cumulative impacts of the proposed development traffic at the A4095 Howes Lane/Bucknell Road junction could be considered to be severe.

Yours sincerely,



**Mark Kirby** for  
Velocity Transport Planning Ltd

