Oxfordshire Strategic Rail Freight Interchange
Pins Ref: TR050008

Written Representations on Behalf of Value Retail Management (Bicester Village) Limited

Prepared by

[redacted])

motion

Document Control Sheet

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[redacted])

This document has been issued and amended as follows:

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1.0 Introduction

Author's Qualifications and Experience

1.1 These representations have been prepared by [redacted]. I am a member of the Chartered Institute of Highways and Transportation with ten years of experience in the fields of transport planning and traffic engineering.

1.2 I am an Associate Director working for Motion Consultants Ltd. I have responsibility for development planning projects, advising on transportation, accessibility, highways, traffic and parking issues at all stages of the planning process. I have extensive experience of a variety of strategic-scale projects across a range of sectors, including commercial, residential and retail. Recent projects of note include:

- Bicester Village – ongoing advice and support over a period of over five years, including extensive traffic assessment in the Bicester area.
- Cody Technology Park – redevelopment of an existing technology park specialising in aerospace and defence to provide 143,000 sqm of new flexible employment floorspace.
- Great Wolf Resorts – advice in relation to three proposed water park resorts, including one in the Bicester area.
- Warish Hall Farm, Takeley – a strategic housing allocation located close to Stansted Airport, currently progressing towards a planning application.

1.3 The representations which I have prepared for this examination have been prepared in accordance with the guidance of my professional institute, and I confirm that the opinions expressed are my true and professional opinions.

1.4 No Artificial Intelligence (AI) has been used in the preparation of this submission, other than to assist in the review of spelling and grammar.

Background of Appointment and Engagement to Date

1.5 Motion has been retained for a number of years by Value Retail Management (Bicester Village) Limited, the owners and operators of Bicester Village, to provide highways and transportation advice. Our brief includes monitoring of proposals across the local area, particularly where they have the potential to jeopardise or otherwise prejudice operations at Bicester Village. It is in this capacity that these representations are provided.

1.6 I previously provided a Relevant Representation (RR-144) registering interest in the scheme and reserving the right to provide further comments on a number of transport-related matters. The Applicant has since provided a response to this initial RR in their submission '*Applicant's Comments on Relevant Representations*' (PDA-007). This response is acknowledged.

1.7 I subsequently spoke at the preliminary hearing, setting out our intention to provide a further written submission. At this stage, our concerns relate primarily to the adequacy of the cumulative traffic impact assessment, in particular with respect to impacts at M40 Junction 9 and the A41 corridor, which serves as the principal access route to Bicester Village. Performance of this corridor is closely linked to the operation of M40 Junction 10, with delays in this location likely to result in traffic rat-running via the A41 through Bicester to reach the Baynard's Green Roundabout and access other routes/destinations.

1.8 With respect to this point, the Applicant provides the following commentary in PDA-007:

'The TA is explicitly based on a comprehensive assessment of 'cumulative' transport and traffic issues, considering all committed and consented development (local plan sites and planning permissions)– the approach is a direct response to constructive working via the Transport Working Group (TWG) of National

Highways, OCC Highways and Cherwell District Council. Furthermore, the approach takes due account of emerging live planning applications (which are not committed or approved) as agreed with the TWG. The Applicant has also engaged where required to share highways data with Puy du Fou and Dorchester Living (the developer of Heyford Park) to enable them to also engage in appropriate cumulative assessments.'

1.9 Following this introduction, these representations cover the following points, as set out at the preliminary hearing:

- Whether all relevant committed, allocated and reasonably foreseeable developments have been included within the cumulative assessment.
- The basis on which developments have been included or excluded from the modelling.
- Whether the assessment adequately reflects the timing and phasing of growth expected across the area.
- The sensitivity testing undertaken to understand network performance under alternative growth scenarios.
- The implications of cumulative demand for key locations including M40 Junction 9, the A41 corridor and other strategic links serving Bicester.
- Whether the mitigation package relied upon by the Applicant remains effective when considered against cumulative rather than scheme-only impacts.
- The extent to which residual cumulative effects may affect existing businesses, visitors, employees and wider network users.

2.0 Comments

Policy Background

2.1 Policy TR6 of the National Planning Policy Framework (NPPF) indicates that when assessing transport impacts:

2.2 *'…reasonable future scenarios should be considered, taking into account impacts at relevant times of the day, potential cumulative impacts, multimodal trip generation and the promotion of sustainable modes of travel, and realising the transport vision for the development itself. Development proposals should be considered having regard to these potential impacts and the other policies in this Framework which are relevant (including TR3, TR4 and DP3(2)(d)).*

2.3 *Development proposals should be refused if they would have a severe adverse impact on the transport network (in terms of capacity and congestion, including cumulative impacts), or an unacceptable impact on highway safety; taking into account any mitigation measures proposed as well as any wider network improvements, including measures to support sustainable patterns of movement. This applies both during the construction phase and following completion.'*

2.4 In order that potential transport impacts can be properly understood, it is essential that all sources of significant growth in travel demand that are likely to occur are properly accounted for. Failure to do so would mean it is not reasonably possible to conclude that severe adverse impacts on the transport network would not occur.

Summary of Current Assessment

2.5 Part One of the submitted Transport Assessment (TR050008-000396-Document 6.3A) sets out the Applicant's approach to assessing cumulative schemes and committed development across the local area. It tests an opening year of 2031 and a completion year of 2034, and goes on to provide a sensitivity test for the end of the Local Plan period (2042).

2.6 Table 3.4 of the Transport Assessment indicates that the following committed schemes are included in the future-year modelling:

- Heyford Park (10/01642/OUT, 18/00825/HYBRID) - Redevelopment to deliver a new residential settlement, including employment uses, primary school, and a range of other community facilities.
- David Wilson Homes (was Pye Homes) (22/03063/F) - Residential development for 123 homes.
- Richborough Estates/Lone Star (21/04289/OUT) - Residential development for up to 230 homes.
- North-West Bicester expansion - 6,000 homes in total, local centre hubs, four primary schools, one secondary school, other community facilities and at least 10 ha of employment land. Key consents include:
  - 14/02121/OUT
  - 14/01675/OUT as varied by 19/00347/OUT
- Great Wolf leisure resort (19/02550/F varied through 21/04158/F) - New leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping.
- M40 J9, Tritax development for Siemens (22/01144/F) - Up to 56,162 sqm of B2 floorspace and ancillary uses.

2.7 The following speculative schemes are then identified in Table 3.5:

- Albion Land in the vicinity of the A43, north of M40 Junction 10 (21/03266/F: infrastructure only; 21/03267/OUT: east of the A43; 21/03268/OUT: west of the A43) - 280,000 sqm of logistics floorspace across the two sites;
- Symmetry Park by Tritax Big Box (22/01340/OUT) - 300,000 sqm of B8 warehousing and distribution use.

2.8 These schemes were refused by Cherwell District Council (CDC) and are the subject of a conjoined appeal at the time of writing. They proposed mitigation works at the A43 Baynard's Green Roundabout, which are understood to be included in all future-year modelling scenarios. It is further understood that the Albion Land scheme forms part of the reference case, while the Tritax scheme forms part of the DS5A sensitivity test scenario.

Commentary

2.9 Following a review of the committed developments included in the assessment, two primary concerns arise. These are set out below.

Inclusion of Baynard's Green Mitigation Scheme

2.10 The mitigation works at Baynard's Green associated with the Tritax and Albion Land schemes are included in all future-year modelling scenarios. This is despite the fact that these schemes were refused by CDC and are currently under appeal. There remains a significant risk that these schemes and their associated mitigation works do not come forward.

2.11 No assessment of this scenario is provided within the Transport Assessment and as such the likely impacts have not been quantified and cannot be understood. In the absence of a revised assessment which tests this scenario, the Examining Authority cannot be confident that severe adverse impacts on the transport network would not occur.

2.12 It is further noted that the Baynard's Green Roundabout works illustrated on the Highways General Arrangement Plans (TR050008-000259-Document 2.7A) differ significantly from those proposed as part of the Albion Land and Tritax schemes. It is therefore unclear whether the DCO scheme is compatible with the appeal schemes, what works would be delivered in practice and by whom.

2.13 While it is stated that the DCO will include provisions for OxSRFI to implement an alternative highway improvement for Baynard's Green should OxSRFI come forward ahead of the Albion Land scheme, no assessment is provided to justify this approach.

2.14 The Applicant should:

- Clarify what works are actually planned at Baynard's Green, and how they would be delivered;
- Assess traffic impacts in a scenario where the Albion Land scheme does not proceed.

Other Proposed Developments

2.15 In addition to the speculative developments identified above, a number of other significant proposals exist across the local area. Some of these are acknowledged in the Transport Assessment; however, they do not appear to be included in any of the modelling scenarios presented. Two such schemes have been identified which are considered to have the potential to materially affect the conclusions of the Transport Assessment, namely:

- Puy du Fou (25/02232/OUT) – Proposed historical theme park located off the B4100, south of Baynard's Green.
- Heyford Park New Town (25/02190/HYBRID) – Proposed new town including up to 9,000 dwellings on land around Heyford Park.

2.16 Both of these schemes are significant in scale and would impact the same transport network as OxSRFI. In particular, Puy du Fou has the potential to attract in excess of two million visitors annually, with the promoters indicating that M40 Junction 10 and the Baynard's Green Roundabout will be the principal access route.

2.17 The Applicant implicitly acknowledges that it is important to account for speculative schemes where they would have a significant impact on the assessment. Indeed, Albion Land is included in the reference case, despite being a speculative scheme which was refused by CDC. Both planning applications were submitted in 2025, meaning they were public knowledge in advance of the draft DCO submission.

2.18 It is recognised that, in transport modelling, it is often necessary to exclude cumulative schemes for reasons of complexity, relevance or timing. In this case, the cumulative schemes identified:

- Are significant in scale, both in absolute terms and in terms of transport impacts;
- Are located in close proximity to OxSRFI and rely on the same transport infrastructure; and
- Were public knowledge prior to the modelling presented in the Transport Assessment being finalised, meaning they could reasonably have been included.

2.19 The rationale for excluding these proposals is therefore unclear.

2.20 The Applicant should explain the rationale for excluding these proposals from the assessment or provide a comprehensive cumulative assessment that includes these schemes.

3.0 Summary and Conclusions

3.1 The Applicant's Transport Assessment identifies a number of committed and speculative developments within the study area and seeks to account for cumulative traffic impacts through a series of future-year modelling scenarios. However, there remain significant concerns regarding both the scope of the cumulative assessment and the assumptions upon which it is based.

3.2 In particular, the assessment relies upon highway mitigation at Baynard's Green associated with third-party developments that have been refused planning permission and remain subject to appeal, yet no assessment is presented of a scenario in which those schemes, or their mitigation measures, do not come forward. Equally, other major proposals with the potential to generate substantial additional demand on the same strategic highway network appear to have been excluded from the modelling, despite their scale and potential influence on network performance.

3.3 The consequence of these omissions is that the assessment does not provide a comprehensive understanding of the cumulative effects likely to arise on the surrounding highway network, including key locations such as M40 Junction 9, M40 Junction 10, Baynard's Green Roundabout and the A41 corridor serving Bicester Village.

3.4 In the absence of a comprehensive cumulative assessment which appropriately considers all relevant committed, allocated and reasonably foreseeable development proposals, it is not reasonably possible to reach robust conclusions regarding the extent of cumulative traffic impacts or the effectiveness of the proposed mitigation package. Accordingly, the Examining Authority cannot be satisfied that severe adverse residual impacts would not arise, nor that the transport effects of the Proposed Development have been fully assessed in accordance with national policy requirements.

3.5 The Applicant should therefore be requested to provide further evidence and sensitivity testing to demonstrate the performance of the transport network under a more comprehensive range of cumulative growth scenarios before any definitive conclusions are drawn regarding the acceptability of the Proposed Development.