Economics Response on Proposed Seacourt Park & Ride Extension.

R. Macey-Dare. 3 October 2017

Dear Planning Officer and Planning Committee,

Here is a response to Turley's August 2017 Planning Addendum submissions on economics. This response has been produced to assist you in your evaluation of the Seacourt P&R Extension proposal.

Yours sincerely, R. Macey-Dare

**1. No good economic analysis basis for the planning application**

In their Planning Statement Addendum, (the Addendum) Turley effectively admit that there is no established economic basis for the proposed Seacourt P&R development. This is a fundamental flaw in the application.

In Addendum para 9.2 Turley states that: "*An economic analysis has not been prepared to support the planning application submission*."

In Addendum para 9.4 Turley states that: "*The proposed extension to Seacourt P&R has been justified…..not solely on the economic viability of the project*" so it may not even be economically viable.

**2. No good survey basis for the planning application**

In Addendum para 9.9 Turley refer to a survey of vehicle users at Seacourt P&R and finding that "*10% of people surveyed….experienced difficulty in finding available car parking spaces*." Firstly the Seacourt survey may well have been biased leading to over-reporting of any car parking difficulties the user could remember. However

notwithstanding this point, the Turley survey still confirmed that 90% of people surveyed reported no difficulty in finding car parking spaces.

## 3. Inconsistent and non-robust financial projections behind the planning application

In Addendum para 9.12 Turley admit that the financial projections in the Seacourt P&R application are inconsistently higher than those reported in the statutory Oxford City Council Executive Board minutes of 15 December 2016.

## 4. Negligible predicted annual traffic growth at Seacourt from Turley's TEMPro model

In Addendum para 9.21 Turley refer to the Department of Transport TEMPro model. In their **Green Belt Response**, Turley use ad hoc data from this Department of Transport model to predict a change in Average Weekday traffic trips for the whole of Oxford of 19.4%[1] and from this, to extrapolate increased demand for Seacourt P&R. However this 19.4% growth estimate is actually for total growth over the 14 year period between 2017 and 2031 and so only equates to a negligible predicted annual growth rate of just 1.3% per year on an annual basis (which is probably statistically insignificantly different from zero growth, given the natural variability of the model.) [2]

[1] See Turley's Response to Objections based on Protection of the Green Belt dated 10 August 2017 at p.8 and Table 2.

[2] Moreover, the TEMPro point estimate for total traffic growth in Oxford between 2017 and 2031 does not have the granularity to distinguish between say feeder roads, ring roads and city centre, let alone between sections of the ring road and specific junctions. Also, with key unknown factors ahead such as Brexit, which may have a disproportionate impact on university cities such as Oxford, and changes in diesel and electric transport, it is equally possible for vehicle traffic demand at Seacourt to fall off significantly over this period.

Turley have also not used the TEMPro model to produce parallel i) with-scheme and ii) without-scheme forecasts, which The Department of Transport say is a critically important step in using their model. The Department of Transport notes at para 1.12 of its guidance that: "*In transport scheme appraisal, models are used to establish the difference between two forecasts (without-scheme and with scheme). In order to do this, the modeller must establish whether the comparison between the forecasts is significant by understanding the errors and associated uncertainty and what impact this may have on the analysis. Uncertainty around assumptions creates a risk that the scheme will not be*

**5. Oxford County Council's alternative scheme can more than accommodate expected traffic growth into Seacourt**

Meanwhile in Addendum 9.10 Turley admit that over the same 14 year period "*OCoC* [Oxford County Council] *has identified capacity for 1,200 new car park spaces to the west of the city as part of its timetable for the introduction of new P&R schemes*." So Oxford City Council can actually provide much more and much more sustainable additional P&R car parking over the medium term time horizon that Turley is using.

**6. Most traffic into Seacourt P&R is actually diverted traffic which should go to other P&Rs, specifically Pear Tree, Water Eaton and Redbridge**

In Addendum Appendix 3, at page 71, Turley present an important WYG map showing the source of road travellers to Seacourt P&R. The map shows that 5.2% + 1.7% live around the ring road nearest to Seacourt. Additionally the map shows that 11.1% + 4.9% + 3.4% +1.5% + 1.2% + 0.7% + 11.8%/2 live nearest to the A420 feeder road into Oxford. So the WYG map shows that only: c.35.6% of the traffic into Seacourt comes from the Western approaches, and implies that the other 64.4% comes by circling round the ring road past the nearer P&R sites at Pear Tree, Water Eaton and Redbridge. So already much of the use of Seacourt P&R is needlessly diverted traffic.

In Addendum para 9.13, Turley admit that Redbridge, which should be used instead of Seacourt for traffic coming from the South, has large free capacity and is half empty: "*Estimates of existing occupancy [of Redbridge] were taken from the Westgate Centre Transport Assessment. This uses data from 2012. The estimated occupancy at that time was shown as 762/1412 i.e. 54%."*

*as successful as forecast, or that the forecasts will hide some side effects (including some environmental and social impacts) which could occur."*

Turley also admit that traffic growth at Redbridge since 2012 has only been c.1.62% per year i.e. in line with the very low speculative number used in the TEMPro model: *"Since 2012 the trendline shows an increase…. of approximately 6.7% over 4 years*."

Clearly the obvious solution to the current problem of traffic being diverted from Pear Tree, Water Eaton and Redbridge is for the Council to sort out proper efficient access and proper signage from the ring road to Pear Tree, Water Eaton and Redbridge and to prevent the ring road from being clogged up with needless extra traffic circuits and pollution.

## 7. Understanding the CIHT 85% occupancy figure

In Addendum para 9.19 Turley states that: "*The Chartered Institute of Highways and Transportation (CIHT) recommends that a target occupancy should be no more than 85% to ensure that a car park can continue to operate satisfactorily and that users do not have to spend a long time searching for spaces and blocking aisles*." In fact what highway construction lobby group the CIHT means is something slightly different, i.e. that when occupancy reaches 85% then there is typically scope to profitably increase parking space and create more parking demand. In practice 85% occupancy, which is frequently not reached at the existing Seacourt P&R site, equates to one free space every 6 cars i.e. an average drive of c.12 metres to find a free space, which is hardly excessive and is arguably optimally efficient.

## 8. Likely statistical bias in Sequential Test results provided.

In Addendum Appendix 1, Turley undertakes a purported sequential test of 147 alternative sites. Notwithstanding the alternative sites strongly recommended as suitable by Oxfordshire County Council and the established underused capacity at Redbridge and diverted ring road traffic, and the potential for decking at the existing Seacourt P&R site (now admitted by Turley in its Response to Objections based on Protection of Green Belt), Turley nevertheless find that not one of the 147 alternatives sites they consider is suitable.

Statistically the probability that the Applicant would start with the most suitable site and that all 147 alternatives subsequently considered would all be unsuitable, is highly unlikely and implausible. This suggests that the Sequential Test process applied by the Applicant has somehow become biased[3] and so the results should be disregarded as unsound. [4]

[3] This could include unconscious bias and accidental bias for example.

[4] N.B. The use of statistical Improbability to indicate and invalidate biased claimed results was applied for example in the recent High Court case of: Deutsche Bank v Sebastian Holdings [2013] EWHC 3463 (08 November 2013).