



## Strategic Sites Committee agenda

Date: Thursday 18 November 2021

Time: 2.00 pm

Venue: The Oculus, The Gateway, Gatehouse Road, Aylesbury, HP19 8FF

### Membership:

P Bass, A Bond, N Brown, P Cooper, M Fayyaz, P Fealey, R Newcombe, J Ng, A Turner (Chairman), P Turner, J Waters (Vice-Chairman) and A Wheelhouse

Agenda Item	Page No
<b>1 Apologies for absence</b>	
<b>2 Minutes</b> To agree the minutes of the strategic sites committee meeting held on 23 June 2021.	<b>3 - 6</b>
<b>3 Declarations of interest</b>	
<b>4 15/00314/AOP - Land South of The A421 West of Far Bletchley, North of the East West Rail Link and East of Whaddon Road, Newton Longville</b>	<b>7 - 288</b>
<b>5 20/03539/APP - Installation of a gas tanker off-loading facility for injection of renewable gas into the national gas distribution network, SGN Gas Depot, Bletchley Road, Newton Longville, Buckinghamshire</b>	<b>289 - 320</b>
<b>6 Availability of members attending site visits (if required)</b> To confirm members' availability to undertake site visits if required.	

If you would like to attend a meeting, but need extra help to do so, for example because of a disability, please contact us as early as possible, so that we can try to put the right support in place.

For further information please contact: Sally Taylor on 01296 531024, email [democracy@buckinghamshire.gov.uk](mailto:democracy@buckinghamshire.gov.uk).

This page is intentionally left blank



## Strategic Sites Committee minutes

Minutes of the meeting of the Strategic Sites Committee held on Wednesday 23 June 2021 in The Oculus, The Gatehouse, Gatehouse Way, Aylesbury, HP19 8FF, commencing at 9.30 am and concluding at 1.02 pm.

### Members present

P Bass, A Bond, N Brown, P Cooper, P Fealey, J Ng, A Turner (Chairman), P Turner, J Waters and A Wheelhouse

### Apologies

S Morgan and R Newcombe

### Agenda Item

#### **1 Appointment of Vice Chairman**

It was proposed by Councillor A Turner that Councillor J Waters be appointed as Vice-Chairman of the Strategic Sites Committee for the ensuing year. This proposal was seconded by Councillor P Fealey and agreed unanimously at a vote.

#### **Resolved:**

that Councillor J Waters be appointed as Vice-Chairman of the Strategic Sites Committee for the ensuing year 2021-22.

#### **2 Apologies for absence**

Apologies for absence were received from Councillor R Newcombe and Councillor S Morgan.

#### **3 Declarations of interest**

##### **Application PL/19/2260/OA**

Councillor P Cooper declared that he had received a telephone call from a representative of one of the other motorway service area sites. The Chairman added that he had also received a similar call and stated he had declined to comment on the application.

Councillor A Wheelhouse declared that she was a member of the Beaconsfield Town Council Planning Committee and Chairman of the Beaconsfield Society; however, neither organisation had commented on the application.

#### 4 Minutes

Cllr Nic Brown advised that he was not a member of the Strategic Sites Committee on 8 April 2021 as stated in the minutes; however, it was clarified that the reference to N Brown was Cllr Noel Brown.

Cllr P Cooper also advised that he was not a member of the Strategic Sites Committee but was listed in previous minutes. However, upon checking, it was noted that Cllr Cooper was only listed on the minutes of the meeting of 26 May 2021 when he was appointed to the Committee.

**Resolved:** The minutes of the Strategic Sites Committee meetings held on 8 April and 26 May 2021 were agreed as an accurate record.

#### 5 PL/19/2260/OA - Land Between Junctions 16 and 17 of the M25, Near Chalfont St Peter, Buckinghamshire

Proposal: Outline Application, accompanied by an Environmental Statement, for the erection of a Motorway Service Area with all matters reserved with the exception of access from the M25, comprising a facilities building, fuel filling station, electric vehicle charging, up to 100 bedroom hotel, service yard, parking facilities, vehicle circulation, landscaping, woodland and amenity spaces, Sustainable Drainage Systems (SuDS)/attenuation, pedestrian and cycle links, retaining structures and associated mitigation, infrastructure and earthworks/enabling works.

Speaking as local members, Councillors Linda Smith, Jonathan Rush and Isobel Darby.

Speaking as representative of Chalfont St Peter Parish Council, Councillor Tony Shinner.

A written statement was read out by the Democratic Services Officer on behalf of Ms Ann Bartaby, who acted for Bickerton's Aerodromes Limited that owned and operated Denham Airport.

Speaking as an objector, Mr Colin Brown.

Speaking on behalf of the agent, Mr Barry Cansfield.

Following a thorough debate, it was proposed by Cllr P Cooper and seconded by Cllr J Waters and agreed at a vote.

**Resolved: that the Members were 'minded to refuse' the application for the following reasons:**

1. The proposal constitutes inappropriate development in the Green Belt which is, by definition, harmful to the Green Belt. Very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly

outweighed by other considerations. The proposal would also have substantial harm to the openness of the Green Belt, in both spatial and visual terms resulting in substantial erosion of openness, unrestricted sprawl, closing the gap between neighbouring towns and substantial encroachment into the open countryside. Such harm is afforded very substantial negative weight. The proposed development is of a scale and nature on an open green field site which would represent an obstruction in to open countryside and result in significant adverse landscape character and visual impact on the area of the development site, its immediate setting and the wider area, loss of best and most versatile agricultural land, and would result in less than substantial harm to the setting of the listed buildings at Mopes Farm and the public benefits do not outweigh the harm to the heritage assets. Having regard to the benefits arising from the proposal and the harm to the Green Belt and other harm resulting from the proposal, this harm is not clearly outweighed by other considerations. There are therefore no very special circumstances to clearly outweigh this harm. The proposal is contrary to the National Planning Policy Framework and Policies CS1, CS3 and CS4 of the Core Strategy for Chiltern District Adopted 15 November 2011, Policies GB1, GB2, GB30, GC1, LB1 and LB2 of The Chiltern District Local Plan Adopted 1 September 1997 (including alterations adopted 29 May 2001) Consolidated September 2007 and November 2011.

2. Had the above reason for refusal not applied, it would have been necessary for the applicant and the Local Planning Authority to enter into a satisfactory Section 106 Agreement to secure the provision of planning obligations, including monitoring and financial contributions that are necessary to facilitate delivery of the proposed development and mitigate its impacts. In the absence of such provision the proposal is contrary to requirements of policies GC1, GC4, GC9 and TR3, in The Chiltern District Local Plan Adopted 1 September 1997 (including alterations adopted 29 May 2001) Consolidated September 2007 and November 2011, and policies CS4, CS24, CS25, CS26, CS29, CS30, CS31 and CS32 of the Core Strategy for Chiltern District Adopted 15 November 2011, policy PWI1 of the Chalfont St Peter Neighbourhood Plan (2013 – 2028) and the National Planning Policy Framework.

This page is intentionally left blank



**Report to Strategic Planning Committee**

---

<b>Application Number:</b>	15/00314/AOP
<b>Proposal:</b>	Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.
<b>Site Location:</b>	Land South of The A421 West of Far Bletchley North of the East West Rail Link and East of Whaddon Road, Newton Longville.
<b>Applicant:</b>	SWMK Consortium
<b>Case Officer:</b>	Helen Fadipe
<b>Ward(s) affected:</b>	Gt Brickhill
<b>Parish-Town Council:</b>	Newton Longville
<b>Date valid application received:</b>	30.01.2015
<b>Statutory determination date:</b>	22.05.2015
<b>Recommendation</b>	

The recommendation is that permission be deferred and delegated to the Director of Planning and Environment for **APPROVAL** subject to the satisfactory completion of a legal agreement to secure: 1) financial contributions towards provision of education (primary and secondary); 2) on or off site sport and leisure provision; 3) off site farmland bird mitigation; 4) on-site provision of affordable housing, 5) financial contribution for hospital facilities; 6) provision of community facility; 7) onsite provision of primary school facilities and land for a secondary school; 8) provision of a health centre (GP surgery) (and/or financial contributions thereto); 9) provision and maintenance of public open space and recreation and play areas; 10) on-and off-site highways contributions/ works/road infrastructure works, travel plans, sustainable transport measures (and/or financial contributions thereto); 11) SUDS maintenance; and 12) phasing plan and subject to conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused

**1.0 Summary & Recommendation/ Reason for Planning Committee Consideration**

- 1.1 This application was previously heard at the Strategic Development Management Committee of the former Aylesbury Vale District Council on 7 June 2017 when it was resolved that permission be deferred and delegated for APPROVAL subject to the completion of a legal agreement to secure financial contributions towards and/or

onsite provision of education facilities, off-site sport and leisure provision, on-site provision of affordable housing, public open space and play areas, on- and off-site highways works, travel plan and sustainable transport measures (and/or financial contributions thereto) and subject to conditions as considered appropriate by Officers, or if these are not achieved for the application to be refused.

- 1.2 Following the resolution, an update report was presented to Members of the Strategic Development Management Committee of the former Aylesbury Vale District Council on 24<sup>th</sup> April 2019. The report set out the latest position on the S106 relating to the health contributions requested from Milton Keynes Council (MKC) and to provide updates in respect of the NPPF and policy position.
- 1.3 The updated Committee report set out that the Council were satisfied that sufficient justification had now been provided to secure the contribution towards secondary health care at MKUH. The report also set out that the changes in circumstances since the application was considered by Committee could not justifiably alter the conclusion that the proposals constitute a sustainable and acceptable development. In this instance it was considered that the planning balance exercise was not affected by the change in circumstances to arrive at a different conclusion and recommendation to that which the committee previously considered and resolved to agree. That resolution was agreed by Members at the meeting. This updated the resolution (previously taken on 7<sup>th</sup> September 2017) to include the additional S106 matter and subject to appropriate conditions.
- 1.4 Work has been progressed on the S106 legal agreement and since the resolutions taken on application 15/00314/AOP as set out above, the applicants have submitted a package of updated documents and associated plans proposing amendments to the scheme. These updates have sought to address changes in regulation, policy and guidance since the original application was submitted in 2015. The revisions do not alter the application site area itself but amount to amendments to the proposed development parameters within the site and to the proposed mitigation package.
- 1.5 The supporting documentation submitted with the amendments advises that the changes have arisen for the following reasons:
  - The alignment of the oil pipeline crossing the application site was not identified correctly in the original planning application drawings, and as a result needs to be amended to show the correct alignment. The oil pipeline was and continues to be, located within an area identified as a green infrastructure corridor in the Proposed Development;
  - The standards required for climate change mitigation have been enhanced since the Planning Application was submitted. As a result, larger surface water attenuation ponds need to be included which has required changes in the size and disposition of the proposed development parcels;
  - The housing needs of older people is identified as a specific issue in the adopted Vale of Aylesbury Local Plan and this type of housing is supported

by policy H6b on those sites identified as suitable in the Housing and Economic Land Availability Assessment. The application site is identified as a suitable housing site and is a draft housing allocation. As a result, the applicant has decided that an element of elderly persons' accommodation (within use class C3) should be included in the proposed development within the total quantum of housing.

- 1.6 The updates include a revised Environmental Statement reflecting requirements of the 2017 Regulations and it addresses the up-to-date policy and regulatory framework. Further Transport Response Notes (TRN) were submitted in response to the Council's queries and comments on the May 2020 Transport Assessment.
- 1.7 The additional documents submitted have been the subject of further public consultation. Further representations have been received and in this context, it is considered appropriate for the application to be returned to committee for determination and to provide an up to date position, including the evolving policy framework.
- 1.8 A parallel application was submitted to Milton Keynes Council for "Outline planning application for physical improvements to the Bottledump roundabouts and a new access onto the A421 (priority left in only) to accommodate the development of land in Aylesbury Vale District reference 15/00314/AOP (for Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure - EIA development).
- 1.9 The application was considered at a number of committee meetings and finally referred back to the DCC meeting on 7th November 2019, with a recommendation that permission is granted subject to conditions. However, DCC resolved to refuse permission specifically on highway matters (and not to the principle of the proposed development). The refusal reason is:  
*"That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and Grid Road network, with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK."*
- 1.10 An appeal was lodged against the refusal of application 15/00619/FUL by Milton Keynes Council (MKC). Buckinghamshire Council (BC) presented their case as a Rule 6 party at the Public Inquiry (PI). The inquiry was originally to open on the 13th October 2020 and programmed to sit for 6 days. In light of the additional highway information submitted the Inquiry was postponed to mid-February and was eventually held mid-

May 2021. BC presented as expert witnesses in respect of highway and development management. The appeal was dismissed on the 26<sup>th</sup> July 2021.

- 1.11 This application seeks outline permission (with all matters reserved) except for access for a mixed-use sustainable urban extension including up to 1855 mixed tenure dwellings, employment and other uses as set out in detail in the description below.
- 1.12 The proposal site is located to the south west of Milton Keynes, immediately to the west of Far Bletchley. It is contained by the boundary of Buckinghamshire Council, but physically relates to the urban area of Milton Keynes, completing its western flank. The site is an allocated site within the adopted VALP, namely D-NLV001 Land south of the A421 and east of Whaddon Road.
- 1.13 The application is considered to comply with the requirements of its site allocation policy D-NLV001. The development is required to incorporate upgrade improvement to vehicular and pedestrian facilities to the land especially to Buckingham Road Access, Whaddon Road Access and A421. The site makes a significant contribution to the delivery of housing ; the supply of affordable housing. There would also be economic benefits in terms of the creation of jobs associated with the B1 commercial units proposed as well as the other commercial elements and further jobs created from the construction of the development.
- 1.14 It is considered that the resultant development would meet open space requirement, drainage, parking, net enhancement in biodiversity and be designed to ensure an acceptable impact on the residential amenities of both existing and future residents .
- 1.15 Negotiations have enabled the scheme to be amended such that BC are satisfied that the development will achieve safe and suitable access and will not result in a severe individual or cumulative network impact and is acceptable, in this regard, subject to relevant conditions and completion of a S106 Agreement to secure the highway works, construction management and financial contributions.
- 1.16 The site has been the subject of detailed examination in public during the VALP process. The Landscape Character Assessment carried out as part of the evidence for the preparation of VALP shows that the site has moderate impact on the Landscape. It is acknowledged that the site is currently a large greenfield site and that localised harm would result from the residential development of it in landscape terms and from the users of the public footpath network. The Environmental Impact assessment and revisions to the proposed development, including specific on-site mitigations will minimise the harm thereby ensuring that the development is sensitive to the site context.
- 1.17 It is considered that the proposals complies with VALP and the NPPF. The resultant development will be designed to meet VALP requirement for trees and hedgerows, open spaces, parking and access, promoting sustainable transport relating to cycling, walking and public transport, public rights of way, drainage, meeting the challenge of

climate change, and conserving and enhancing the natural environment, archaeology, well-designed places and design, healthy and safe communities, contamination, air quality, and residential amenities.

- 1.18 This assessment identifies that various s106 planning obligations would need to be secured to make the schemes acceptable and mitigate its impact in accordance with adopted VALP policies and the NPPF if the council was minded to approve the application. These obligations are set out in section 5 below.
- 1.19 Under Part D section 4.4 of the constitution, the Strategic Sites Committee have responsibility for wider strategic development; sites which have a significant impact beyond the specific local area; and sites fundamental to the implementation of an adopted Local Plan. This will include amongst other criteria large scale major development comprising housing (approx. 400 dwellings or more). The application is for up to 1,855 dwellings, the site forms part of the strategic delivery of sites as set out in the adopted VALP policy D2. It is therefore considered that this application would fall within the terms of reference to be considered by the Strategic Sites Committee as a strategic site which forms part of the overall strategy fundamental to the implementation of the adopted VALP. Under section 2.5 of the constitution officers consider the exercise of delegated powers is not appropriate in this instance given the change in policy framework and other material considerations since it was previously considered and that it would be appropriate for the application to be returned to committee for determination.

## **2.0 Description of Proposed Development**

- 2.1 The application site is located to the south west of Milton Keynes, immediately to the west of Far Bletchley. It is contained by the boundary of Buckinghamshire Council, but physically relates to the urban area of Milton Keynes, completing its western flank.
- 2.2 The site is bordered to the north by the industrial area of Snelshall West and to the east by the established residential area of Far Bletchley. The western boundary and southern boundaries predominantly comprise agricultural farmland, with Newton Longville located to the south of the site.
- 2.3 The application site covers an area of approximately 145 hectares. The site is defined by the A421 (Standing Way) to the north, Whaddon Road which links the Bottledump roundabout in the north west corner of the site to Newton Longville, to the west and the disused railway line to the south which now forms part of the East West Rail proposals. The eastern boundary is defined by the existing residential neighbourhood of Far Bletchley.
- 2.4 Two existing recreational routes fall within the physical limits of the site. Weasel Lane runs along an elevated physical ridge running north-east. Milton Keynes Boundary Walk also runs through the eastern part of the south in a north-south direction. Three sections of public footpaths are also within the site. One footpath traverses the South

West section of the site, linking Newton Longville to Weasel Lane, itself a public right of way and part of the long distance National Cycle Route (Sustrans no. 51). The other two sections of footpath converge in the north-east corner of the site, connecting to the wider rural area and Thrift and Broadway Woods.

- 2.5 The topography of the site is undulating and characterised by a ridge running across the central length of the site from east to west aligning with Weasel Lane. The predominant topographic features are therefore shallow ridges and valleys sloping away from this focal ridge line, which run broadly on a south west alignment.
- 2.6 The site naturally divides into two areas along Weasel Lane Ridge: the north/northwest with its undulating land falling northwards towards the A421; and the south/southeast which gradually falls toward the south eastern corner of the site. Mature trees are mostly confined to boundary hedgerows, mostly in the north of the site including Weasel Lane. The dominant species on site are Ash and English Oak.
- 2.7 The application (as amended) seeks outline permission (with all matters reserved) except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide;
- up to 1,795 mixed tenure dwellings;
  - 60 extra care housing units (class C3);
  - employment area;
  - neighbourhood centre including retail and community uses;
  - primary school;
  - secondary school,
  - grid road reserve;
  - multi-functional green space;
  - sustainable drainage system; and
  - associated access, drainage and public transport infrastructure.
- 2.8 The application is accompanied by an illustrative masterplan and parameter plans which shows how the development could be achieved on the site.
- 2.9 The application is accompanied by the following:
- Documents**
- a) Planning Statement & Appendices
  - b) Design & Access Statement
  - c) Sustainability Strategy
  - d) Flood Risk Assessment
  - e) Retail Assessment
  - f) Employment Assessment
  - g) Statement of Community Involvement
  - h) Transport Assessment & Appendices & Framework Travel Plan
  - i) Arboricultural Impact Assessment

- j) Energy Strategy
- k) S106 draft Heads of Terms
- l) Construction Environmental Management Plan
- m) Environmental Statement & Appendices
- n) Environmental Statement Non-Technical Summary

### **Drawings**

- o) Development Framework Plan
- p) Parameter Plan
- q) Open Space Plan
- r) Illustrative MP in Context
- s) Application Site Boundary
- t) Residential Density
- u) Public Transport
- v) Constraints Plan
- w) Phasing
- x) Ground Remodelling
- y) Building Heights
- z) Illustrative Landscape Plan

2.10 Additional documentation was submitted in August 2016 which made the following revisions;

- Revisions to the proposed site access arrangements:
  - Improvements to the Bottledump Roundabout, including an equestrian crossing and links to Redway routes to the north of the A421 and within the site;
  - Revision of the proposed junction with the A421 from a 'left in and left out' arrangement to a 'left in' only arrangement and consequent amendments to the disposition of land uses immediately adjacent to the junction;
  - Revision of the proposed traffic light controlled junction with Buckingham Road to a roundabout junction;
- The incorporation of 1.69 Ha of green space (ecological corridor and land effected by archaeological constraints) situated between the proposed satellite secondary school and housing at Far Bletchley within the boundary of the school site;
- Changes to the Whaddon Road corridor to provide for a widening of the landscape corridor along the western boundary of the scheme, removal of the proposed bunding, a general increase in the extent of planting and accommodation of the Milton Keynes Boundary Walk to the internal edge of the landscape corridor;

- Changes to the corridor adjacent to the southern boundary with the relocation of the woodland planting to the northern edge of the proposed SUDs features and changes to the overall design concept for the development parcels in the south east quadrant of the site which incorporates new east-west 'ribbons' of green infrastructure;
- An increase in the number of LEAP (now 9No), the sizes of LEAP and NEAP increased to meet RoSPA guidance and their disposition across the site to maximise coverage in reflection of Fields in Trust guidance;
- Identification of a parcel of land (0.2 Ha) to the rear of the proposed neighbourhood centre to be used either for employment purposes (B1) or to accommodate a 6GP practice (D1) developed over two floors with associated car parking.
- reduced the development parameters directly south of the SAM in order to retain a larger area of Ridge and Furrow and which was accompanied by an update from CgMS archaeology.

2.11 The ES was reviewed following the changes made with implications to the ES chapters considered and a formal addendum to the Environmental Statement and non technical summary received in August 2016. The submission explained the reasoning for preparing revised chapters or for not doing so, the addendum ES includes updated ecological assessment and chapters on the following topic areas

- Chapter 9 – Landscape and Visual
- Chapter 10- Traffic and Transport
- Chapter 11 – Air Quality
- Chapter 12 – Noise and Vibration

2.12 In response to the amendments the supporting drawings were amended to reflect the changes sought and a formal round of publicity was undertaken on the amendments submitted. A supplementary Addendum Design and Access Statement document 2016 was provided.

2.13 Following submission of the updated Travel Assessment (TA) prepared by Mouchel, the Consortium engaged with the Council and MKC as local highway authorities (LHA) and their appointed technical advisers to consider the updated TA and highways objections by third parties, including an independent review of the TA commissioned jointly by West Bletchley Town Council and Newton Longville Parish Council. In light of this engagement, further technical work has been undertaken and submitted to the respective LPA; in particular to address criticism of the modelling of the Whaddon Road and Buckingham Road junction arrangements. In consequence, to mitigate identified capacity issues at the proposed junctions, revised junction arrangement for Whaddon Road Junction and Buckingham Road Junction were submitted.

2.14 In June 2020, the following documents were submitted

- Amended Development Framework Parameter Plan (Drawing No. CSN4857/100 Rev K) showing proposed distribution of uses across the site. The proposed distribution of uses includes:
  - New highway access points at two locations on the A421 comprising an 'at grade' roundabout located on Buckingham Road that would cater for all traffic movements and a left turn 'access only' slip further west along Standing Way;
  - A new 'Ghosted Right Turn' access that would cater for all traffic movements off Whaddon Road to the south east of Bottledump roundabout.
  
- Revised transport assessment (TA) to update the transport evidence base associated with the planning applications prepared in January 2015 (subsequently updated in August 2016). The revision is as a result of the scoping and methodology which was agreed by all parties following meetings held with BC and MKC in December 2019 through to April 2020 .
  
- An updated ES to address the proposed amendments that have been made to application 15/00314/AOP and to reflect changes in regulation, policy and guidance. The updates address changes to relevant, adopted and emerging development plan documents and policies since the application was submitted. These include Milton Keynes Plan which was adopted in 2019, and Vale of Aylesbury Local Plan (VALP) adopted September 2021.

2.15 The updated ES supersedes the ES prepared in January 2015 and its Addendum in August 2016. There are three environmental topics that were not assessed in the original ES but are included in the updated ES to meet the requirements of the EIA Regulations 2017, which are as follows: human health, climate change and disaster management. Furthermore, the updated ES has reconsidered alternative sites and alternative site layouts as required by the EIA Regulations 2017.

2.16 Full publicity and re-consultation have been undertaken following the receipt of the amended plans and supporting documentation. Site and press publicity was undertaken for a 30 day period in July 2020. Full technical reconsultation was also undertaken together with formal consultations with MKC and the Parish Councils of Newton Longville, Whaddon and Mursley.

2.17 In October 2020, the suite of drawings submitted in June 2020 were updated, to correct a drafting error which incorrectly illustrated the alignment of the 'left in' access from the A421 Standing Way. The consequential minor amendment was to the disposition of the attenuation feature, housing development parcel and the alignment of the primary route corrido immediately adjacent to the access. In addition, Addendum to Chapter 7 of the Ecology of the Environmental Statement was updated. The addendum confirmed the ecological survey work conducted between April and August 2020. The addendum supports the assessments made of the likely significant

effects of the proposed development in terms of Ecology and Nature Conservation within Chapter 7 of the updated ES. A Technical note was submitted in response to a request for information relating to SuDs; and in addition, a response note was submitted to address comments from the Council's ecologist (19<sup>th</sup> August 2020) and the BBOWT (27<sup>th</sup> July 2020).

- 2.18 Further to ongoing discussions in respect of highway matters, the application package was subsequently updated. These updates were submitted both for the appeal scheme, and as further supporting documentation for planning application 15/00314/AOP.
- 2.19 These technical updates are pertinent to BC's formal consideration of the application revision package that was submitted in summer 2020. The submitted updates include:
- TRN2 submitted on 18th December 2020. This was prepared to respond to comments from Buckinghamshire Council as LHA on TRN1 and relates primarily to the Buckinghamshire road network.
  - A Stage 1 Road Safety Audit & Designer's response was submitted on 15th January 2021 and considers the proposed mitigation work at junctions on the Buckinghamshire road network.
  - On 29th January 2021 TRN3 was submitted, along with a Stage 1 Road Safety Audit and Designer's Response (Junctions in Milton Keynes) and an Addendum to the Environmental Statement dealing with Traffic & Transport, Noise and Air Quality. TRN3 applies the methodology of TRN2 to the Milton Keynes highway network. The Addendum ES has been prepared to assess the application scheme in light of the additional work that has been undertaken.
  - An ES Addendum updating Chapters 10-12 inclusive (Traffic & Transport, Noise and Air Quality) of the Environmental Statement (June 2020).
- 2.20 Site and press publicity were undertaken for a further 30 day period in October 2020 and March 2021 together with a full technical consultation.

### **3.0 Relevant Planning History**

- 3.1 10/00891/AOP - Site for mixed-use development of up to 5,311 dwellings, 7.4 hectares of employment (Classes B1a-c & B2, utilities & renewable energy infrastructure (sui generis), a relocated recycling centre & a new household recycling centre (sui generis); a neighbourhood centre comprising: a reserve site for a railway station (sui generis); a supermarket (Class A1), mix of A1, A2, A3, A4, A5, B1a & B1b uses, up to 274 dwellings, utilities & renewable energy infrastructure (sui generis), a Thames Valley Police one stop facility (sui generis) & Community Facilities (Classes D1 & D2); two local centres & a small mixed use centre comprising: A1, A2, A3, A4, A5, B1a, B1b, D1 & D2 uses, an emergency/ambulance call point (sui generis), utilities & renewable energy infrastructure (sui generis), up to 90 dwellings & a veterinary practice (sui generis); sites for four primary schools & one secondary school; ground remodelling; multi-functional green infrastructure including new landscaping with formal & informal

sporting areas, allotments, woodland & a wildlife area, foul & surface water drainage networks; associated highway infrastructure & public transport infrastructure (including a reserve site for Park & Ride) & associated car parking. – Application withdrawn.

- 3.2 13/60019/SO - Environment Impact Assessment Scoping Request for a proposed development – Scoping Request is Acceptable

#### **4.0 Representations**

4.1 Newton Longville Parish Council, Whaddon Parish Council, Mursely Parish Council, West Bletchley Council and Drayton Parslow Parish Council have objected (see Appendix C), and a total of 587 letters of representation have been received. Of these responses 582 raised objections, 4 letters raise comments that neither support nor object and 1 letter raised comments in support of the proposal. Whilst these objections have been more clearly set out in Appendix D (General Representation), the key concerns are:

- Highways capacity and road condition
- Parking
- Density
- Inadequate and dangerous access
- Lack of pedestrian access
- Impact on social infrastructure – for example police resources, shopping centre, schools, hospitals
- Settlement identity of Newton Longville
- Loss of access to historic footpaths
- Noise, light and air pollution
- Visual impact on neighbouring village of Newton Longville
- Out of character within the rural setting
- Flood risk
- Disruption of and loss of habitat for wildlife including endangered species
- Impact on the conservation area
- Impact on light and privacy
- Loss of valuable agricultural land
- Prematurity
- Not in keeping with rural context of Newton Longville and the wider area
- Cost impact on Milton Keynes Council taxpayers
- District council boundary should be moved to include site area within MKC.
- No need for the volume of housing
- Requirement for duty to co-operate not met
- Lack of regard to future potential of Oxford v. Cambridge Expressway proposals.
- Insufficient traffic surveys and assessment.
- Proposed local centre should be accessible
- Greater emphasis should be given to the employment provision on site.

- It is a logical development area and will increase access to secondary school and provide better local amenities

## **5.0 Policy Considerations and Evaluation**

Vale Aylesbury Local Plan (VALP) adopted 15 September 2021

The National Planning Policy Framework (2021)

National Planning Policy Guidance

Aylesbury Transport Strategy (January 2017)

Buckingham Transport Strategy (January 2017)

Local Industrial Strategy (2019)

Open Space – good practise guide for the provision of public open space.

Aylesbury Vale Strategic Landscape Visual Capacity (2017)

### **Policy Background**

- 5.1 The South East Plan (SEP), published in 2009 identified Aylesbury Vale as a major growth area, Aylesbury as a ‘regional hub’ and required the Vale to expand by 26,890 dwellings from 2006-2026. The majority of those dwellings were indicated to be at Aylesbury, with lower numbers being accommodated in Rest of District and in the north east of Aylesbury Vale.
- 5.2 The Milton Keynes and South Midlands Sub-Regional Strategy identified land to the south west, between the A421 and the railway line as a growth location. The South East Plan (SEP) was adopted in 2009 which identified a Strategic Development Area at South West Milton Keynes (SWMK), known as the SWMK SDA Area. Policy MKAV1 included a requirement 5,390 dwellings as an urban extension to the south west of Milton Keynes. This proposal covered a larger site area than that currently proposed by this planning application. The levels and distribution of housing provision in Policy MKAV1 of the SEP were proposed to deliver the spatial vision for Milton Keynes and Aylesbury Vale set out in Policies MKAV2 and MKAV3. These policies clarified the housing provision split between the local authority areas in advance of Policy MKV2 which related to the spatial framework for Milton Keynes growth area. Policy MKV3 proposed the spatial framework for Aylesbury Growth Area.
- 5.3 The draft Aylesbury Vale Core Strategy (2009) sought to carry forward all relevant information and policies from the SEP and in the proposed submission core Strategy. The strategic objectives proposed a distribution of growth across the district and policy CS1 identified the provision of 5,390 dwellings in the north east of Aylesbury Vale close to Milton Keynes as part of the Core Strategy.
- 5.4 The Government revoked the South East Plan in July 2010 at which time AVDC withdrew the Core Strategy. Whilst these plans are no longer in place the background policy position is considered material to the planning application.

## Milton Keynes policy position

- 5.5 There are a number of policies of note in the Milton Keynes Council Plan:MK 2016 - 2031 (adopted March 2019) Policies DS1 Settlement Hierarchy, DS2 Housing Strategy, SD1 Place- Making Principles for Development, SD9 General Principles for Strategic Urban Extensions, SD11 South East Milton Keynes Strategic Urban Extension , HN1 Housing Mix and Density, HN2 Affordable Housing, CT1 Sustainable Transport Network, CT2 Movement and Access, CT3 Walking and Cycling, CT5 Public Transport, CT8 Grid Road Network, CT10 Parking Provision, L4 Public Open Space Provision in New Estates, ER10 Assessing Edge Of Centre And Out Of Centre Proposals, FR1 Managing Flood Risk, FR2 Sustainable Drainage systems (SuDs) and Integrated Floor Risk Management, FR3 Protecting and Enhancing Watercourses, EH5 Health Facilities, EH6 Delivery of Health Facilities in New Development, EH7 Promoting Healthy Communities, HE1 Heritage and Development, DS6 Linear Park , NE1 Protection of Sites, NE2 Protected Species and Priority Species and Habitats, NE3 Biodiversity and Geological Enhancement, NE4 Green Infrastructure, NE6 Environmental Pollution, NE5 Conserving and Enhancing Landscape Character and INF1 Delivering Infrastructure.
- 5.6 Policy SD15 of the MK Plan sets out that when and if development comes forward for an area on the edge of Milton Keynes which is wholly or partly within the administrative boundary of a neighbouring authority this Council will put forward the following principles of development during the joint working on planning, design and implementation:
1. The local authorities will work jointly, and with infrastructure and services providers, to achieve a coordinated and well designed development.
  2. A sustainable, safe and high quality urban extension should be created which is well integrated with, and accessible from, the existing city. Its structure and layout should be based on the principles that have shaped the existing city, especially the grid road system, redways and the linear parks and strategic, integrated flood management.
  3. A strategic, integrated and sustainable approach to water resource management (including SUDS and flood risk mitigation) should be taken.
  4. The design of development should respect its context as well as the character of the adjoining areas of the city.
  5. Linear parks should be extended into the development where possible to provide recreational, walking and cycling links within the development area and to the city's extensive green infrastructure and redway network.
  6. Technical work to be undertaken to fully assess the traffic impacts of the development on the road network within the city and nearby town and district centres and adjoining rural areas, and to identify necessary improvements to public transport and to the road network, including parking.
  7. A route for the future construction of a strategic link road(s) and/or rail link should be protected where necessary.
  8. New social and commercial facilities and services should be provided, and existing facilities improved where possible, to meet the day to day needs of new and existing residents.

9. The opportunity for new 'Park and Ride' sites for the city should be fully explored and where possible provided and efficiently and effectively linked to the city road system.
  10. The local authorities and their partner organisations should produce an agreement on appropriate mechanisms to secure developer contributions towards improvement and provision of infrastructure to support the development, including facilities in the city that will be used by residents of the development area
- 5.7 Paragraph 24 of the National Planning Policy Framework (NPPF) states that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly where strategic issues are involved. It is expected by the Government that joint working on areas of common interest should be undertaken. The application site is wholly located within the administrative boundary of Buckinghamshire Council, but the principal access points to the A421 fall within the administrative boundary of Milton Keynes Council (MKC). The planning application has been submitted to both the legacy AVDC and MKC to enable both authorities determine the elements of the proposed development that fall within their respective administrative areas.
- 5.8 In order to co-ordinate and plan for the cross -boundary implications of the proposed development a Memorandum of Understanding has been drawn up with Milton Keynes Council. Since the applications were submitted in July 2015 (when the application was submitted), there has been ongoing dialogue and work with Milton Keynes Council on the proposal. A number of topic based meetings have taken place at regular intervals looking at key issues such as highways, education, design and layout and S.106 matters engaging with key consultees, stakeholders and the applicants. It is considered that the requirement to work cooperatively with adjoining authorities as specified in the NPPF has been met in this instance

### **Principle and Location of Development**

S1 Sustainable development for Aylesbury Vale S2 Spatial strategy for growth, S3 Settlement hierarchy and cohesive development, D2 Delivering site allocations in the rest of the Aylesbury Area), D-NLV001 Land South of the A421 and east of Whaddon Road, BE2 Design of new development.

- 5.9 The site falls within the Parish of Newton Longville. The Council's Settlement Hierarchy Assessment (September 2017) identifies Newton Longville as one of Aylesbury Vale area medium villages.
- 5.10 The site is allocated for development in VALP, policy D2, it is one of two strategic sites considered at the issues and options stages of the local plan. The Housing and Economic Land Availability Assessment (HELAA) v4 (January 2017) confirmed that the two strategic allocations known as Salden Chase (NLV001) and Shenley Park (WHA001) were both suitable or part suitable for housing and/or economic development. The application site, VALP Policy D-NLV001 Salden Chase, Whaddon Road comprises agricultural land and the VALP anticipates delivery of the following:

- At least 1,855 dwellings
- employment area (2.07 ha)
- A neighbourhood centre on 0.67ha including retail (A1/A2/A3/A4/A5)
- Community (D1/D2)
- A primary and secondary school
- Grid road reserve
- Sustainable and strategic flood mitigation and urban drainage scheme linked to multi-functional Green Infrastructure
- Access and public transport infrastructure
- A high-quality walking, cycling and public transport links to and from Newton Longville, Bletchley.
- Enhancement of the existing bus service or provision of a new service to operate between the proposed development and Central Milton Keynes (CMK) via the existing rail station will be required.
- A number of improvements to the surfacing of the local footpaths
- Adequate green links to Tattenhoe Park

5.11 In respect of the location of the site and transport sustainability, the site is located on the edge of Milton Keynes, and whilst it is within Newton Longville Parish, the site is actually approximately 0.5km distant from the built up area of the settlement of Newton Longville (to the south-east) and is more directly associated with the built form of Milton Keynes.

5.12 The nearest bus stops to the application site that are served by a regular bus service are on Chepstow Drive in Far Bletchley to the east of the site. These existing bus stops on Chepstow Drive are currently on Route 28 which provides on Monday to Saturday an hourly service operates between Central Milton Keynes and Bletchley Bus Station.

5.13 The nearest bus stops to the application site that provide a more frequent level of service are around 800 metres walking distance from the site boundary on Whaddon Way. These stops are currently on Route 4 which provides a 10 minute service during peak weekday hours and a 20 minute service throughout the rest of the day.

5.14 Bletchley Railway Station is approximately 4km driving distance from the application site to the east and therefore is accessible both by cycle and car. The station has parking spaces and there is also sheltered parking for cycles. The station, is located on the West Coast Main Line, providing connections to Milton Keynes Central and Birmingham New Street to the north, and Watford and Euston to the south. The station also provides links to local stations, including Leighton Buzzard. Southern Trains operates an hourly service which terminates at South Croydon.

5.15 Milton Keynes Central is approximately 7km driving distance from the site and is therefore accessible by both cycle and car. Cyclists can also use the network of Redways to access the station. The train operators serving Milton Keynes Central are London Midland, Southern trains and Virgin Trains.

- 5.16 These services and facilities are within 5km of the site, a distance where cycling can be considered a meaningful alternative to the private car. The application site is well connected on a local, sub-regional and regional scale. The A421/H8 Standing Way runs in a north easterly direction towards the A5 providing connections to the Bletchley, Emerson Valley and Furzton areas. A roundabout at the junction of H8 Standing Way and V6 Grafton Street allows access to Redmoor Roundabout which interchanges with the A5. To the east of the A5, A421 Standing Way provides access through to Junction 13 on the M1 Motorway and also north into Bedford.
- 5.17 To the west, the A421 provides links to Buckingham and the A43. The A421 runs west from Bottle Dump Roundabout in the north-west corner of the application site and providing links to the surrounding villages. The A421 continues west and meets the A413 to the east of Buckingham, some 12.5km west of the site.
- 5.18 National Cycle Route 51 (Sustrans) runs south-west through the site, along Weasel Lane from Buckingham Road, crossing Whaddon Road before re-joining the road network, east of Lower Salden Farm. Weasel Lane is a restricted byway, and the site can link with a number of public right of ways in the vicinity. The Milton Keynes cycle network, the Redway system, connects to the site, and a route can be followed towards the City Centre and Central Milton Keynes Railway Station.
- 5.19 Furthermore, there is good access to employment and leisure opportunities in Milton Keynes and the proposal also includes employment provision creating further opportunities.
- 5.20 Drawing this all together, the site is in a sustainable location for economic and housing growth which is capable of accommodating a level and form of development, which would result in a comprehensively and holistically planned urban extension. The proposals would provide major opportunities and enhancements to support sustainable growth at a strategic level, given the quantum of employment and housing proposed. It is therefore considered that the site would constitute sustainable development in locational terms, in accordance with adopted VALP policies S1, S2, S3, D2, D-NLV001, BE2 and the NPPF.

### **Employment issues**

S1 Sustainable Development for Aylesbury Vale, D2 Delivering site allocations in the rest of the Aylesbury Area, D-NLV001 Land South of the A421 and east of Whaddon Road, D6 Provision of employment land, E5 Development Outside Town Centres.

- 5.21 The NPPF paragraph 81 states that planning policies and decisions should help to create the conditions in which businesses can invest, expand and adapt significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Policy D6 of the adopted VALP recognises that continuing provision of

land and premises suitable for employment uses is needed, of a type and scale appropriate to the characteristics of the local area.

- 5.22 In recognition of the importance of sustainable development, the application proposes a sustainable mix of uses on site and job creation. The proposed employment element comprises of 2.07 hectares and this will be developed for B1 purposes, most probably offices. The offices will be developed at the gateway to the scheme, fronting the A421, and next door to the neighbourhood centre and would be closely related to the employment uses located opposite the application site within MKC. This would provide high quality employment space in a phased development as well as a local centre and up to 1855 new homes.
- 5.23 The application is accompanied by a Planning statement, retail and employment reports which considers that the site proposes a balanced and diverse employment offer creating a land use blend which is compliant with the requirements of the NPPF.
- 5.24 The neighbourhood centre will provide a range of community infrastructure and facilities to ensure the delivery of a sustainable mixed-use development of sufficient critical mass and diversity to meet the requirements and expectations of the new community and generate new employment opportunities.
- 5.25 The Updated Employment Assessment (May 2020) advises that based on a plot ratio of 0.45 the provision of 2.07ha of employment land would generate 9,315 sq. m of floor space (gross external area (GEA)). 80% of this would represent usable floor space of 7,452 sq. m.
- 5.26 The submission is clear to explain that this site is deliverable and will provide a range of local employment opportunities for people with differing skills and work experience.
- 5.27 The proposed development would also include small scale retail/ community uses within the neighbourhood centre to provide a further element of local employment. 0.67Ha of land is allocated for a neighbourhood centre which will comprise a mixed-use space for local retail and other services to include retail (A1), financial and professional services (A2), a family public house (A4), takeaways (A5) and community and recreation uses (DI and D2). Retail provision on the site would be modest and limited to only providing convenience needs for the residents of the new development, ensuring no impact upon existing services and facilities in the area in line with NPPF advice.
- 5.28 The ES also sets out that in economic terms the development will create in excess of 150 construction jobs on site, the majority for the duration of the development of the project. It is also estimated that once fully constructed, the new development will create approximately 1,880 new permanent jobs, 621 fte arising from the proposed employment land and 1,261 fte from the neighbourhood centre, schools and supporting on site community facilities / services, depending on the exact types of businesses that occupy the new units. It is also predicted that the completed

development will generate a figure of £48,230,000 arising as support for the local economy, this being a reflection of gross median household incomes derived from the Council's monitoring data. The ES provides an estimate of New Homes Bonus arising from the scheme of £8,000,000. The Retail Assessment (updated May 2020) concludes that the turnover of the proposed Neighbourhood centre will be £5,174,943 whilst the development will generate a total expenditure of £29,481,550 comprising £8,946,920 of convenience goods and £20,531,630 of comparison goods expenditure to the local economy by 2031.

- 5.29 The NPPF seeks to promote competitive town centre environments and seeks to support their viability and vitality. The NPPF states at paragraph 90 that local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (default of 2,500sqm). Policy E5 of the adopted VALP (main modification) sets out the sequential test to be followed for proposals that do not comprise small scale rural development and are not within defined town centres.
- 5.30 A Retail Assessment (updated May 2020) accompanies the application and concludes that the scheme is capable of being supported by the expenditure of the new residential population and that the impact the convenience element of the proposal would have on other local shops would be imperceptible and their turnover will increase. The turnover of the larger stores will increase also. As such, the retail provision is considered appropriate to serve as a neighbourhood centre for the development. The retail element of the proposal meets local need without adversely impacting on the existing centres. Limits to the retail floor area can be secured by condition to ensure that this element would not undermine the vitality of the town centre.
- 5.31 Therefore, not only will the development provide additional employment land and the direct creation of jobs which weighs in its favour, it is acknowledged that the construction of the development in itself would contribute to the economy of the area and so too would the resultant population growth in supporting local businesses, facilities and services with increases in expenditure estimated in the ES as well as the new services the development includes. It is therefore considered that the proposal would give rise to a number of economic benefits in accordance with policies S1, D2, D-NLV001, D6, E5 of the adopted VALP and the NPPF.

### **Housing: Quantum, Affordable Housing and Housing Mix**

D2 Delivering site allocations in the rest of the Aylesbury Area, D-NLV001 Land South of the A421 and east of Whaddon Road, H1 Affordable Housing , H6a Housing Mix , and H6c Accessibility.

Affordable Housing Interim Position Statement (November 2019)

- 5.32 The 2021 Five Year Housing Land Supply Position Statement for the Aylesbury Vale area shows that the Council can demonstrate 5.47 years' worth of deliverable housing supply against its local housing need in this area. This calculation is derived from the new standard methodology against the local housing need and definition of deliverable sites set out in the NPPF and NPPG.
- 5.33 Quantum: This site is included in the trajectory for deliverable housing sites and calculation for the 5 years' worth of deliverable housing supply against its local housing need. The adopted VALP shows that the proposal would contribute to housing land supply within the next 5 years (delivering 300 homes in 2020-25 and 1,705 homes in 2025-2033).
- 5.34 There is no reason that the site could not be delivered within the next five-year period which would be a significant benefit. The planning statement advises that the site could deliver approximately 600 dwellings in the five year period. The SWMK Consortium comprises both developers and housebuilders, all of whom are experienced at delivering large scale mixed use developments of the type proposed in this planning application. The application site is either owned by members of the Consortium or is controlled under option. The report concludes that the initial phases of the proposed development are deliverable and could contribute to the five year housing land supply.
- 5.35 Affordable: In relation to affordable housing, VALP policy H1 requires a minimum of 25% provision. A tenure mix of 75% rented and 25% shared ownership would also be required. All of the dwellings will be required to meet the appropriate Building Regulations and this will ensure that suitably accessible housing is achieved.
- 5.36 The NPPF states that local planning authorities should set policies for meeting affordable housing needs on site and those policies should be sufficiently flexible to take account of changing market conditions over time. The applicant has confirmed through S106 discussions that 30% (557) of the dwellings are to be affordable units and any phasing will ensure that the aggregate percentage as the scheme progressed does not fall below 30%. The provision meets VALP policy requirement of at least 25% affordable housing to be provided on site. Regard is paid to MKC policy HN2 requirement for developments to secure 30% of new housing in the Borough as affordable housing. It is considered that 30% provision for affordable housing is in line with policy requirements of VALP and the NPPF. S106 discussions are ongoing between the Consortium and housing officers on securing this provision and the clustering standards, housing mix and tenure split.
- 5.37 Mix: The scheme is in outline and does not seek permission for a specific housing mix and officers will ensure at the detailed matters stage that the market housing and affordable housing on the scheme accords with the housing need prevailing in the area at that time and is reflective of the overall mix of dwellings within the development. The approach of setting out an indicative mix (at the outline stage) will ensure flexibility over the duration of the development programme and is considered to be in line with

the NPPF which seeks to create sustainable, inclusive and mixed communities and requires a mix of housing based on current and future demographic trends.

- 5.38 Policy H6c of VALP requires that all development meet and maintain high standards of accessibility so all users can use them safely and easily, 15% of the affordable units will be required to be wheelchair accessible. The accessible units will be secured in the S106 and it is being progressed on this basis.
- 5.39 As part of the housing proposed, 60 units will be extra care residential units (C3). The 60 Extra Class residential units (C3) introduced as part of the amended scheme will allow the occupation of the units by older people with some levels of care needs – consistent with retirement accommodation and or conventional sheltered housing, use class C3 (as described in VALP see Table 14 - Types of Older people accommodation). The provision of the extra care units would add to the range of accommodation provided across the development ensuring that there is a sustainable mix and balanced community. The Extra Care housing will be secured in the legal agreement, and the detailed design, scale, layout, access and landscaping will be subject to reserved matters approval.
- 5.40 Having regard to the above matters, the provision of 1, 855 houses at Salden Chase would make a significant contribution towards the supply of deliverable housing land and contribution of affordable housing on site as well as the mix of properties to be proposed and is consistent with the approach advocated by the Government in planning positively to deliver sustainable development. The proposal would also contribute to the delivery of affordable housing, older persons housing, sustainable homes that would have economic, social and environmental benefits in accordance with the adopted VALP policies D2, D-NLV001, H1, H6a, H6c and the NPPF.

#### **Transport matters and parking**

T1 Delivering the Sustainable transport vision, T3 Supporting local transport schemes, T5 Delivering transport in new development and T6 Vehicle parking, Appendix B (Parking Standards), T7 Footpaths and cycle routes, T8 Electric vehicle parking and T4 Capacity of the transport network to deliver development.

- 5.41 The NPPF at paragraph 110 seeks to encourage sustainable transport modes and to ensure safe and suitable access to new development. It will also be necessary to consider whether the proposal provides opportunities to undertake day-to-day activities and that the development would ensure that safe and suitable access to the site can be achieved for all people, and that improvements can be undertaken that effectively limit the impacts albeit that development should only be refused on transport grounds where the residual cumulative impacts are severe.
- 5.42 The promotion of sustainable transport is a core principle of the NPPF and patterns of growth should be actively managed to make the fullest possible use of public transport,

walking and cycling and to focus significant development in locations which are or can be made sustainable.

- 5.43 Local Transport Plan 4 (2016-2036): Buckinghamshire's 4th Local Transport Plan was adopted in April 2016 and sets out the Council's policies and strategies to address transport related issues and challenges over the plan period. Policy 2 relates to improvement in connectivity: and Policy 7 discusses the importance of reliable road travel.
- 5.44 Since the resolution was taken at the Committee meeting in April 2019, the applicants have submitted a package of updated documents and associated plans proposing amendments to the scheme. This included a revised Transport Assessment and Framework Travel Plan (May 2020), the scope of the revised TA was discussed and agreed between the Applicants and representatives of both Buckinghamshire Council (BC) and Milton Keynes Council (MC) with Buckinghamshire Council providing final agreement on 20th February 2020. Two Technical Notes were further submitted ahead of submission of the revised TA for Trip Generation and Trip Distribution. The Trip Generation Note was accepted by BC on 26th March 2020 and MKC confirmed acceptance on 7th April 2020 in email sent by their representative Nigel Weeks Stirling Transport. The Trip Distribution Note was submitted for review on 26th March 2020 and MKC emailed acceptance of the methodology on 7th April 2020 by Nigel Weeks. BC raised several comments in a series of emails on review of the revised TA it was noted that some of these comments had not been addressed and were subject to further discussion. Initial Highway comments were provided on 29th July 2020 which in turn led to a further Technical Note (TRN1) submitted in September 2020. Further comments were provided on the TRN1 on 2nd October 2020 with a further Technical Note TRN2 submitted in December 2020 and TRN3 in January 2021 with further clarification letters provided by the Applicant.
- 5.45 BC Highways full comments were provided on 13<sup>th</sup> April 2021, contained in Appendix E. A further BC Highways response was provided on 27<sup>th</sup> May 2021 (Appendix F) providing comment and response to an objection received from Milton Keynes (Appendix G) .
- 5.46 A separate Application was submitted to Milton Keynes Council in March 2015 (15/00619/FUL) in relation to physical improvements to the Tattenhoe and Bottledump roundabouts and a new access onto the A421 (priority left in / left out) to accommodate the development for Aylesbury Vale District 15/00314/AOP. The application was taken to a number of MKC Development Control Committee (DCC) from 2016 to 2019, where Officers recommended that planning permission be granted and decision was deferred until November 2019 when MKC DCC resolved to refuse planning permission, against Officer recommendation, on the basis:

*'That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and Grid Road network, with specific reference to Standing Way and*

*Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.'*

The Applicant appealed against the decision of MKC DCC to the Planning Inspectorate, with a Planning Appeal held in May 2021 in which Buckinghamshire Council attended as a Rule 6 party. The Revised TA (May 2020) and subsequent Technical Notes (1 to 3) were used for the purpose of considering the Traffic Impact of the development on the Milton Keynes network. The Planning Inspectorate provided their findings on the 26th July 2021, the overall conclusion was as follows,

*Paragraph 88. For the above reasons, I have found that the appellant has demonstrated that mitigation would be able to be provided to adequately address the highway impacts, and the proposal would not have an unacceptable impact on highway safety or on the flow of traffic and congestion on the Grid Road network. The residual cumulative impacts on the road network would not be severe and there are no highways related grounds for refusing planning permission. The proposal would accord with the statutory development plan, and policies in the Framework taken as a whole, and would facilitate the delivery of substantial benefits in the public interest through the SWMK development.'*

*Paragraph 94. I have found that the proposal would accord with the development plan as a whole and the other material considerations that I have given above weigh in its favour. Therefore, for the reasons given, and having regard to all relevant matters raised, I conclude that the appeal should succeed.'*

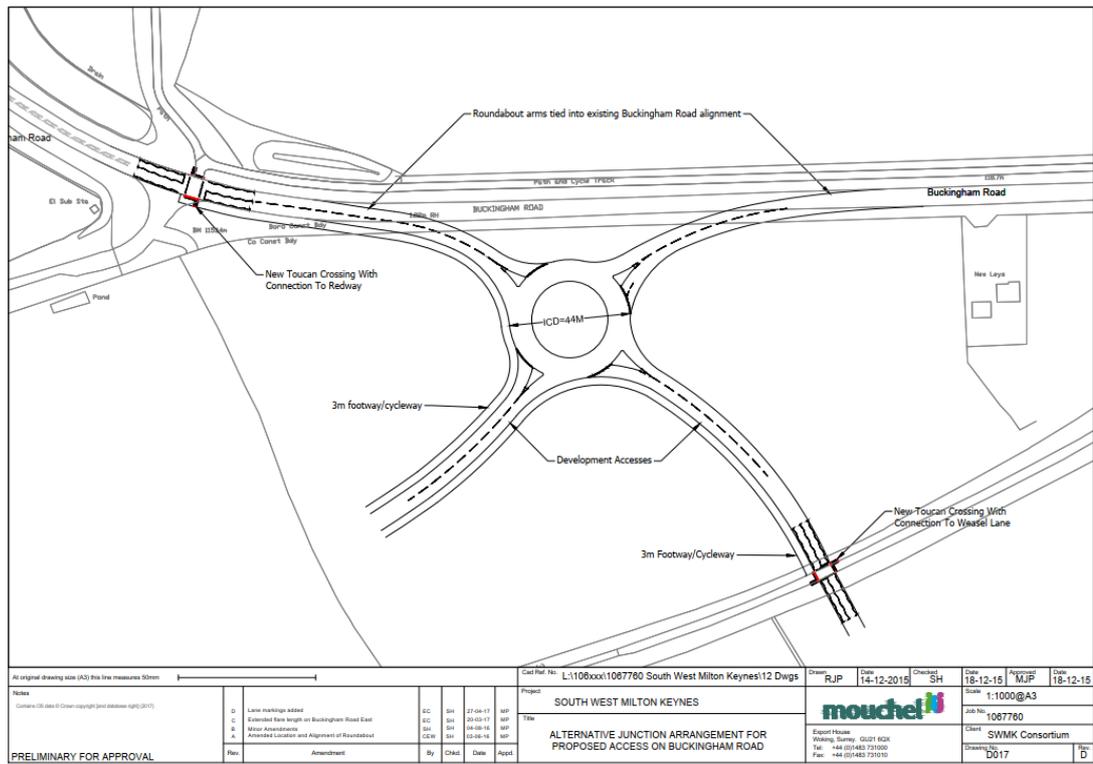
- 5.47 The Inspector's decision is a material consideration in determining this application. The full Planning Inspector Planning Decision Report is contained in Appendix H.

#### **Vehicular Access**

- 5.48 Access into the site is a matter for consideration in this application and as submitted, there are three points of access proposed from the development onto the local highway network at the following locations: Whaddon Road, Buckingham Road and A421 Standing Way.
- 5.49 The access onto Whaddon Road falls within the jurisdiction of Buckinghamshire highway authority whilst the A421 Standing way access point joins the highway network controlled by Milton Keynes Council. The Buckingham Road access joins the existing public highway controlled by Milton Keynes Council but the majority of the new layout is located within Buckinghamshire.
- 5.50 Three access points were selected to distribute traffic onto the local highway network and provide route choice options for new residents of the proposed development. The internal road layout, to be considered at the reserved matters stage, would however need to be designed to discourage through trips (rat running through the development). This will need to be addressed, using principles from Manual for Streets, as part of any future reserved matters application.

#### Buckingham Road Access

- 5.51 The original Transport Assessment proposed a signalised gyratory arrangement. Both Milton Keynes Council and at the time Buckinghamshire County Council raised concerns regarding introducing traffic signals in this area as well as the complex arrangement, which could be confusing for drivers.
- 5.52 In response to these concerns a new four arm roundabout junction has been proposed, encompassing two new site roads. The existing Redway on the northern side of Buckingham Road is to remain and a 3m shared footway is proposed on the southern arms of the junction into the site. Toucan crossings are proposed on the western arm between the new roundabout and Tattenhoe Roundabout and where the new road crosses Weasel Lane, providing safe crossing facilities to the wider pedestrian and cycle network.
- 5.53 During the planning application determination period, and subsequent to agreement of the layout with Buckinghamshire Council and Milton Keynes Council, revisions were undertaken at the request of Buckinghamshire Council to provide minor lane marking improvements. These revisions were shown on Drawing 0017D and it is this revision that Buckinghamshire Council recommend being taken forward.
- 5.54 The Buckingham Road access junction has been modelled using industry standard software Junctions 9 (ARCADY), as set out in TRN2.
- 5.55 The assessment of this proposed junction shows that the junction operates within capacity in both the AM and PM peaks in the 2033 Do something 1 and 2033 Do Something 3 scenerios, in particular the current free flowing sections of Buckingham Road are predicted to have at maximum 11 seconds of delay. Furthermore, the design of the junction does not impede the ability of either Council to deliver the Grid Road if required in the future. Whilst the modelling demonstrates that there is junction capacity available in its current form to accommodate changes to the network, additional land will be secured by S106 Agreement, as part of the Grid Road reserve, to ensure that amendments to this junction can be carried out in the future.



5.56 An independent Stage 1 Road Safety Audit has been undertaken and Buckinghamshire Council is satisfied that the problems identified can be resolved during detailed design consideration at the reserved matters stage. The current design as shown in the May 2020 TA shows wide single lane entry on Buckingham Road East. Further revisions were undertaken at the request of Buckinghamshire Council to provide minor lane marking improvements, as shown on Drawing 0017D. This version would be required to be taken forward to detailed design.

5.57 At the May Planning Inquiry this junction was discussed in detail. In his Appeal Decision report, the Planning Inspector stated:

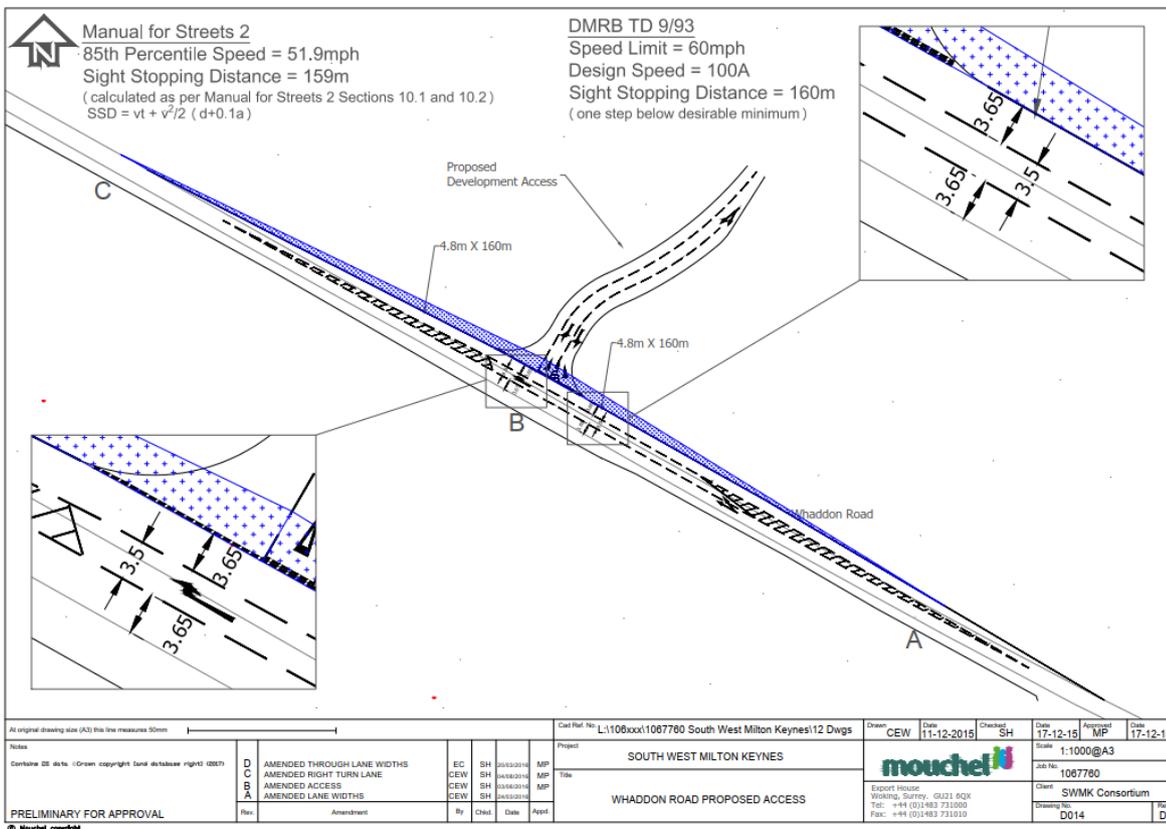
*'41. I conclude on this junction that it has been designed in sufficient detail to demonstrate that it would be safe, or would be able to be made safe with minor amendments that might be recommended by a Stage 2 RSA, particularly with regard to the provision of adequate visibility, its entry widths and pedestrian and cycle crossings.'*

#### Whaddon Road Access

5.58 The proposed access at Whaddon Road is a ghosted right turn priority junction. Speed surveys were completed on Whaddon Road in June 2015 and the design of the junction ensures that appropriate visibility in both the horizontal and vertical planes can be achieved based on requirements set out in Manual for Streets 2 and DMRB.

5.59 An independent Stage 1 Road Safety Audit was carried out on the Whaddon Road access and the design has been amended to address the problems raised, including the extension and provision of a longer flare length (within the site) to accommodate peak hour demand for vehicles leaving the site.

5.60 The Stage 1 Road Safety Audit did raise concerns regarding the conspicuity of the junction to approaching road users. Whilst the Applicant has demonstrated that the required visibility splays can be achieved, both in the horizontal and vertical planes, the Highway Authority is of the view that further design features are necessary including but not limited to, signs, lines and coloured surfacing. A review of the collision record along Whaddon Road has shown that the majority occur within the hours of darkness, as such the provision of lighting on approach and at the junction should be considered. Furthermore, a speed limit reduction on Whaddon Road should be investigated, given the recorded 85th percentile speeds and the change in character that would result from the development. A potential implementation plan would need to be developed for a reduced speed limit if deemed necessary. The Highway Authority is content that these can be secured by way of a condition.



- 5.61 The Whaddon Road access junction has been modelled using industry standard software Junctions 9 (PICADY), as set out in TRN2. The results of the assessment show that the junction operates within capacity in both the AM and PM peaks for all the modelled scenarios with minimal queuing and delay expected, significant spare capacity is present to cater for possible increases in flow.
- 5.62 The results of the modelling work and sensitivity testing undertaken by the Applicants have adequately demonstrated that with an element of traffic reassignment the two site access junctions in combination have sufficient capacity to accommodate the vehicle trips generated by the proposed development. As such, the Highway Authority is of the view that subject to detailed design, 'safe and suitable access' can be achieved in accordance with the requirements of the NPPF.

#### A421 Standing Way

- 5.63 The design of the access from A421 Standing Way is in the form of a left in only junction. This junction falls within Milton Keynes Council's jurisdiction and was considered separately by their planning committee, whose refusal of permission was successfully appealed against by the Applicant including items raised in reference to this junction. It should however be noted that Buckinghamshire Council does not have any objections in principle to the proposed access arrangement, noting that the junction has been designed in accordance with relevant design standards. Buckinghamshire Council did raise concern over how the access will interact with the Old Buckingham Road alignment, which is used by pedestrian and cyclists, and potentially the same user groups from the development will also make use of the route. It was considered that measures would be needed to ensure safe crossing movements for non-motorised users with potential high vehicle speeds (relative) on exiting the bend of the new access and restricted intervisibility.
- 5.64 In TRN1 the applicant provided an arrangement to manage the potential interaction with Old Buckingham Road, replicated below. The arrangement would enable pedestrians and cyclists to divert further into the Site and to cross the proposed road access safely. Whilst this design provides a less direct route, it does in principle provide a safer crossing location with lower vehicle speeds. The set-back crossing also reduces the potential environmental impact of tree removal to ensure adequate intervisibility for an in-line crossing, the design of which would be finalised as part of reserved matters.



## Off Site Impact Assessment:

### Assessment methodology

- 5.67 It was agreed at the scoping stage with both Buckinghamshire Council and Milton Keynes Council that the development proposals would be tested within a static spreadsheet-based transport model. The alternative approach would to have been the use of one of the strategic transport models for the area. Buckinghamshire Council raised some concern over the use of updated Milton Keynes Multi-modal Model (MKMMM). On review of the model documentation at the time there were several potential issues that could impact the use of the model to provide a single, unified, assessment methodology
- 5.68 In addition to the MKMMM the Buckinghamshire Countrywide Strategic Model was also considered, but like MKMMM this would not cover all the network within MKC that would need to be modelled. As such a manual spreadsheet-based approach assessment was requested to ensure a consistent process was applied across the study area. It is acknowledged that the use of a manual spreadsheet-based approach is unable to account for the benefits of any dynamic reassignment that would arise in a congested urban network such as found in Milton Keynes. However, the methodology assumes that traffic volumes at a junction would continue to increase even when queues and delay predicted by the model would likely result in drivers seeking alternative routes as they would unlikely to be willing to accept a certain level of queueing and delay. Nor does the methodology consider potential modal choice which may occur on a congested network. As such BC highways consider the manual-spreadsheet based methodology provides a robust 'worst case' assessment of the development impacts on the junctions assessed with impact determined when comparing the future year scenarios of with or without development traffic
- 5.69 A series of traffic surveys were commissioned in February 2020, including Automatic Traffic Counts (ATCs), junction turning counts, and queue length surveys. The ATC data covered a two-week period, and the turning counts and queue length surveys were carried out over three consecutive mid-week for the 18 junctions included in the assessment. The scope and location of the surveys were agreed with then Buckinghamshire County Council and Milton Keynes Council prior to being commissioned and the Highway Authority is satisfied that surveys have been carried out in accordance with best practice and the 2020 base data is robust.
- 5.70 Some concern was raised over the validity of the surveys in February 2020 as is not a usual neutral month for data collection purposes. The average two-way flow from the permanent counter on A421 Standing Way was reviewed for the period from 0800 - 0900 by month for 2017 to 2019 period and this was compared to an average neutral month across the period. The result of which when comparing the peak hours was the AM peak varied by 32 vehicles less than the average for the neutral month whilst the PM peak showed there to be 89 vehicles less than the average for the neutral month.

This indicates that traffic through the month of February is comparable to neutral months.

- 5.71 Milton Keynes Council have raised an objection to the Proposed Development on Highway matters. One element of which relates to the use of the assessment methodology employed (having been previously agreed) in that if redistribution is relied upon then a wider area network needs to be modelled. Buckingham highways confirm that the assessment of the impact on assessed network has not relied on any re-routing with all flows sustained on the A421, Buckingham Road and other roads that form the assessed network.
- 5.72 It is BC highways opinion that the methodology used provides a robust interrogation of the junctions under review and is likely to represent a worst-case scenario. It is accepted that this may result in some movements to adjacent roads and that the mitigation proposals along the A421 have the potential to attract greater use, drawing traffic away from currently congested roads, in addition to taking some movements away from the A421 to others following improvements to the local network. The most likely outcome is that this would balance across the surrounding network and that overall changes in route flow would be very limited. As such, a wider network model is not considered a requirement and the development of a suitable micro-simulation model, or localised update of the MKMMM, to be unnecessary and at this stage in the application to be disproportionate.
- 5.73 The view of BC Highways was accepted by the Planning Inspector and is detailed in the Planning Appeal Decision report:

*Paragraph 23. The appellant has taken the results of the Updated TA and sought to mitigate the impacts through junction improvements. I accept the position of the appellant and BC that some redistribution of traffic is likely, but the appellant does not appear to me to have relied upon this in determining the mitigation and reaching its conclusions as to the acceptability of the traffic impacts of the SWMK development. As such, I am satisfied that it is not necessary to attempt to model any redistribution effects over the wider area, especially as the amount of extra work that would be required to provide anything that would be accurate enough to assess would be disproportionate in time and expense.'*

*Milton Keynes Junctions:*

- 5.74 It is acknowledged that the majority of traffic generated by the development will occur on roads within Milton Keynes. For assessing the impact within Milton Keynes, a static spreadsheet-based transport model was adopted as discussed above. Buckinghamshire Highway Authority has performed a full review of the junctions and network which fall under the remit of Milton Keynes Council as Highway Authority. This was undertaken to determine the wider impact of the development and that where necessary suitable mitigation is proposed to ensure the development will not have significant impact on the wider highway network. It is acknowledged that this is

somewhat unusual, in that performing a full review outside of the Buckinghamshire boundary but was considered necessary to process the Application.

- 5.75 The first substantive response to the Buckinghamshire Application from Milton Keynes Council highways was received on 13<sup>th</sup> April 2021 (with a holding letter dated 12<sup>th</sup> February 2021 detailing initial objection). The latter letter provided greater details on the reasons for objecting. Previous to this no communication was received in terms of the application in reference to highways, as such it was determined that a full review be performed of the Milton Keynes network in late 2020 so a decision could be made on the impact of the wider network, taking into consideration that a provisional Committee date had been set for early 2021.
- 5.76 Milton Keynes Council commissioned Stirling Maynard, an independent transport consultant, to assess the highway and transport impacts of the proposed development on the Milton Keynes network. Their comments received on 13<sup>th</sup> April 2021 indicated their objection to the development on highways grounds. The Buckinghamshire Highway Authority's response to the Milton Keynes objection can be seen in Appendix F which identifies numerous items / issues which Buckinghamshire highways consider to have been satisfactory resolved, or details where Buckinghamshire highways are in disagreement with Milton Keynes and state our reasoning and justification for the non-severe impact determination on the network.
- 5.77 The junction assessments and proposed mitigation schemes have been reviewed by Buckinghamshire Highway Authority and a full detailed position for each junction is set out in the full highway comments attached as Appendix E. The junctions in Milton Keynes have undergone further review and analysis based on the consultation response from Milton Keynes highways and this is attached at Appendix G. The outcome of which is that the mitigation modelling with development traffic has shown that overall, most junctions will operate at the same level or better than the current layout, whilst noting that some arms may perform worse. However, when considering each junction as a whole across both peak period's improvements can be observed and the impact in terms of highway safety and congestion impact is not considered to be severe in the context of paragraph 111 of the NPPF.
- 5.78 All the junctions in Milton Keynes were discussed in detail at the May Planning Appeal and within the associated Appeal documentation. In the Planning Appeal Decision Report the Planning Inspector came to the following conclusion in terms of the overall effects of the Mitigation within Milton Keynes:

*Paragraph 76. The modelling has shown that there would be increased congestion on some arms of some of the junctions by 2033, with the forecast traffic growth. However, this would be expected in an urban area and, when all parts of the junctions are considered across the AM and PM peaks, the modelling shows that with the mitigation there would be an improvement in 2033 compared to the 'Do-Nothing' scenario. With regard to an assessment of the overall effect on the network, I accept that the MKMMM Reference case is based on out of date data, but it does not indicate that*

*there would be any significant problems due to congestion on the Grid Road network as a result of the identified additional development in Plan:MK, including the SWMK development.’ xx*

*Paragraph 77. For the reasons given above, I have found that the proposed mitigation is deliverable and would not result in any unacceptable impact on highway safety. I conclude that the appellant has demonstrated that the residual cumulative impact during peak travel periods with the SWMK development fully occupied in 2033 on a worst-case basis would not be severe. The mitigation would address the impact of the SWMK development and assist with accommodating the predicted wider growth in traffic. This view is also supported by the BC highways expert that provided evidence to the Inquiry.’*

Buckinghamshire Junctions:

- 5.79 The junction assessments and proposed mitigation schemes have been reviewed by Buckingham highways and a full detailed position for each junction is set out in the full highway comments attached as Appendix F. The outcome of which is that the mitigation modelling with development traffic has shown that overall, most junctions will operate at the same level or better than the current layout, whilst noting that some arms may perform worse. However, when considering each junction as a whole across both peak period’s improvements can be observed and the impact in terms of highway safety and congestion impact is not considered to be severe in the context of paragraph 111 of the NPPF.
- 5.80 The exception to the previous statement is the junction of Bletchley Road/Stoke Road/Drayton Road/Whaddon Road in Newton Longville. The Applicant has provided a potential mitigation scheme which would alter the form of the junction from a priority crossroads to a mini roundabout. Buckingham highways expressed some concern about the design and the positive impact of providing significant capacity benefits to the junction. This would serve to encourage non-local traffic using Stoke Road and Whaddon Road as a ‘Rat-run’ between the A4146 to the south-east and the A421 to the north-west. On this basis, the Highway Authority recommends that the junction is retained as a priority crossroads, A new raised junction table should be provided, as part of a comprehensive traffic calming scheme for Newton Longville, which is discussed further below.

Mitigation Package A421 Corridor:

- 5.81 The A421 provides a key east-west link within the Aylesbury Vale Area, connecting the M40 with the M1 via Buckingham and Milton Keynes. The majority of the A421 is single carriageway; however, the route becomes a dual carriageway after crossing the boundary with Milton Keynes. There are concerns regarding congestion on the A421 at peak times, and its function as a key east-west link. The further impact of potential developments on the A421 in Buckinghamshire is therefore of particular concern. As

part of the application the A421 has been subject to extensive modelling and testing to ensure the highway network can accommodate the proposed development.

- 5.82 Several junctions along the A421 corridor are shown to be operating over capacity in 2033 without development traffic. This is a direct result of background traffic growth. The Applicant has however demonstrated that the impact of the development on the surrounding highway network can be mitigated and therefore the cumulative residual impact of the development cannot be considered 'severe' in the context of paragraph 111 of the NPPF. Furthermore, several of the improvements proposed are likely to provide a 'nil-detriment' situation, whereby the highway network is 'no worse off' with the proposed development in a future forecast year of 2033.
- 5.83 At present the A421 is free flowing along most of its length in Buckinghamshire, with junctions managed through priority junctions or roundabouts. The Applicant has proposed signalisation of the priority junctions of the A421/ Warren Road and A421/Shucklow Hill/Little Horwood Road. Whilst the signal schemes proposed adequately resolves queuing on the minor road, it would also stop the free flow and introduce delays to the primary route.
- 5.84 In order to retain the free flowing nature of the A421 in Buckinghamshire and ensure limited delay is encountered on the route, it is prudent to commute the costs of construction of the signal schemes into the Section 106 agreement. A contribution towards corridor improvements will be agreed with the Applicant to aid in management of the A421 and the safe access and exit from its joining roads that are predicted to suffer capacity issues in future years.

*Traffic through the Villages:*

- 5.85 The Transport Assessment considers in detail the impact of the proposed development on the villages of Whaddon, Newton Longville, Little Horwood, Mursley and Great Horwood, in terms of capacity and road traffic safety. The Transport Assessment considers the impact on these villages, in terms of capacity, and has been assessed with reference to the 'Guidelines for the Environmental Assessment of Road Traffic' (GEART) produced by the Institute of Environmental Assessment (1993).
- 5.86 The predicted increase in traffic flow is greatest through Newton Longville, due to the location of the development. The impact of development traffic reduces further to the north and west as traffic disperses across the wider highway network. The results of this revised assessment indicate that the increase in traffic flow through Nash, Great Horwood, and Mursley are not considered to be significant (do not exceed the 10% traffic growth for sensitive areas) and would not result in a significant impact on the local highway network
- 5.87 Newton Longville has a conservation area and should be considered against the lower GEART threshold (10%) for impact. The assessment has shown that there would be

10% or more growth through the village in peak periods for the scenarios which is considered to constitute a significant impact. The Applicant has therefore proposed a traffic calming scheme to mitigate the impact of the development, which is addressed further below and is to be secured in a S106 Agreement.

- 5.88 Little Horwood does have a conservation area and should therefore be considered 'sensitive' in nature and against the lower GEART threshold (10%) for impact, which is predicted to be 20% increase for both DS1 and D3 scenarios in the PM. However, the actual change in traffic flow in the PM peak is only six vehicles northbound and seven vehicles southbound (a total of 13 vehicles) and this is not considered to be a significant change in traffic flow and would not result in a severe impact through the village.
- 5.89 Whilst no impact is predicted for Whaddon a consultee has queried the accuracy of the traffic flows, and subsequent traffic impact modelling, which may have affected the journey time analysis on the basis that road closures were in place within north Milton Keynes impacting the potential movements through the village. A previous financial contribution of £22,000 to improve road safety and enhance the existing traffic calming was previously agreed, to mitigate against potential redistribution via Whaddon Village and improve road safety through the village. This contribution has been maintained and will be secured in a S106 Agreement.
- 5.90 Some consultees have queried the validity of the impact on local villages, including citing that the assessment does not include neighbouring developments. Buckinghamshire Council are satisfied that the impact on villages performed by the Applicant is robust and founded on 'worst' case whole development trip generation and appropriate trip distribution and includes committed developments in the area and the sensitivity test for Shenley Park and therefore is fit for purpose. Where necessary mitigation measures have been proposed to alleviate potential impacts.

*Newton Longville Traffic Calming Proposals:*

- 5.91 An indicative traffic calming scheme for Newton Longville has been submitted as part of the revised TA, which includes enhanced gateway features on all roads leading into the village, pinch points along Whaddon Road, raised junction tables and signing/lining. The Council is satisfied that the scheme would provide the desired effect of deterring traffic that could otherwise use the strategic road network, by slowing journey times through the village. Despite this, the Council is aware that Newton Longville Parish Council has their own aspirations for traffic calming within the village and is of the view that it would be more appropriate for a financial contribution towards the design, consultation and implementation of traffic calming be paid by the Applicant. This will allow the Council to work with the Parish Council to provide a comprehensive traffic calming scheme that meets the aspirations of the local community. As such a financial contribution is required to be secured in a S106 Agreement.

***Impact on Highway Safety:***

- 5.92 The agreed development trip distribution has identified additional trips on the network and the Applicant has utilised the computer programme COBALT (Cost and Benefit to Accidents – Light Touch) developed by the Department of Transport (DfT) to undertake analysis of the impact on highway safety. The assessment is based on a comparison of collisions by severity and associated costs across an identified network in ‘Without-Scheme/Development’ and ‘With-Scheme/Development’ forecasts, using details of link and junction characteristics, relevant collision rates and costs and forecast traffic volumes by link and junction.
- 5.93 As the Proposed Development will result in an increase in traffic, the impact will always show negative values. However, the extent to which a negative value is derived will be dependent upon the volume of additional traffic that the Proposed Development would generate. Traffic flows developed and agreed as part of the development trip generation and distribution process and provided in TRN2 were used to perform the analysis.
- 5.94 The analysis indicates that most links across the study area will see very small changes in ‘negative benefits’ (as they are described in COBALT), with B4304 Buckingham Road and A421 Standing Way to the east of the site showing the greatest impact of the development traffic. The COBALT analysis also predicts a change in collisions and casualties (over a 60-year period). The results predict that there will be an increase of 140 collisions with 202 casualties because of development traffic. This equates to on average to 2.4 collisions and 3.4 casualties per year. It should be noted that the analysis does not consider mitigation measures proposed as part of the development application.
- 5.95 Based on the results of the COBALT analysis Buckinghamshire Highways are satisfied that the development will not have a significant impact on highway safety and that overall, this does not represent an unacceptable impact.

***Walking, Cycling and Public Transport  
Existing Conditions – Sustainable Modes of Transport***

***Public Transport Provision***

- 5.96 In respect of bus services, currently the nearest bus stops that are served by a regular bus service are on Chepstow Drive in Far Bletchley to the east of the Site. The existing bus stops on Chepstow Drive are currently served by Route 28 operated by Red Rose Travel. Between Monday and Saturday, an hourly service operates between Central Milton Keynes and Bletchley Bus Station. The nearest bus stops to the Site that provide a more frequent level of service are around 950 metres walking distance from the Site boundary on Whaddon Way, and 2km from the centre of the Site. These stops are currently on Route 4, operated by Arriva which provides a 20-minute frequency service from 6:47 am to 10:27pm between Milton Keynes City Centre and Bletchley from Monday to Friday. To ensure that all new dwellings are within 400m walking distance

to a bus stop, it is essential for a bus service to be provided that enters into the application site.

- 5.97 The Applicant has proposed to either enhance an existing bus service or provide a new start up service to operate between the proposed development and Central Milton Keynes (CMK) via the existing rail station. The objective is to provide a high quality, fast, frequent and reliable bus service that serves the social and accessibility needs of those without access to a car. It is also expected that with the effective marketing initiatives included within the Framework Travel Plan, people who would otherwise use a private car will be encouraged to use the proposed bus service for many of their work and leisure based journeys.
- 5.98 The Applicants preferred option would be to start a completely new high frequency service between the Site, CMK, the rail station and key social infrastructure. The target would be to provide a journey time between the Site and CMK of circa 20 minutes. There is also an option to extend an existing service to the site. As part of the previous submission. Initial discussions with MKC and the operator Arriva indicate that either service 8 or 2 could be extended. This is considered to be adequate to provide a realistic option to new residents, in order to influence modal choice.
- 5.99 The bus service would have a phased operation based on the anticipated 'build-out' of the Proposed Development with the intention to ensure that there is a critical mass of occupied dwellings prior to the commencement of the service, to ensure sufficient potential patronage so that the service would be operationally viable. The proposed bus service between the Site and Central Milton Keynes would commence no later than the occupation of the 100th dwelling. Buckinghamshire Council have requested that a second trigger be applied to the start of the bus service so the service would start no later than the occupation of the 100th dwelling or 12 months from first occupation, this trigger is to be secured through the s106 agreement. BC requires the submission of a bus service phasing plan, which can be secured by condition. Indicative locations of the bus stops are shown on the illustrative masterplan and the majority of residential properties are within 400m walking distance of a bus stop, which is considered appropriate.
- 5.100 The contract for operating the new service would normally be tendered by Milton Keynes Council in conjunction with the public transport team at Buckinghamshire Council. On this occasion however, the Applicants wish to have a service level agreement directly with the preferred operator and agree the appropriate costs to operate a viable high quality service in perpetuity. This will be provided by way of a S106 obligation, in consultation with both Milton Keynes Council and Buckinghamshire Council.

#### *Rail Provision*

- 5.101 The nearest railway station to the development sites is Bletchley Railway Station, approximately 4km distance to the east via the A421 / B4034. The station has provision for 628 parking spaces. It provides an hourly service to Milton Keynes, London Euston,

Bedford, Croydon and Clapham Junction and links to the north including Milton Keynes Central and Birmingham New Street.

- 5.102 Bus access to Bletchley Railway Station would be via Bus Route 4 that operates with a frequency of every 20 minutes. The nearest bus stop for Route 4 is on Whaddon Way in Bletchley, a 950m walk from the Buckingham Road site access. Bus users would alight at Sherwood Road, from where it is a 300m walk to the Railway Station. The total journey time for this route would be 20 minutes (11 minute walk, 5 minutes bus, 4 minute walk).
- 5.103 Cycle access to Bletchley Railway Station would be via Buckingham Road. There is an existing Redway along Buckingham Road to Caernarvon Crescent, from where the route would be on-road to the station. The route is 3.2km long, equivalent to a 13 minute cycle (based on an average cycling speed of 15kph). An alternative route would be via the Redway on Buckingham Road initially, then using the quieter on-road routes of Whaddon Way, Shenley Road, Church Green Road, Wilton Avenue and a short cycle path to the station. The route on quieter roads is 4km; equivalent to a 16 minute cycle. The Applicant has proposed a contribution for the provision of additional sheltered and secure cycle parking at Bletchley Station, to promote the use of sustainable travel to and from the station. This is to be secured as an obligation by way of a S106 Agreement.
- 5.104 Milton Keynes Central Railway Station is approximately 7km from the site (via Snelshall Street, Childs Way and Elder Gate). It provides an hourly service to Milton Keynes, Watford Junction, London Euston, Croydon and Clapham Junction. Access to Milton Keynes Central Railway Station by public transport would be via the extended Route 8, with an approximate travel time of 20 minutes from the Site. The station provides sheltered storage for 900 bicycles and can be accessed from the site via the Redway network, a journey of approximately 30 minutes.
- 5.105 Buckinghamshire Council consider that new residents of the proposed development would have ability to access rail services by means other than that of the private car.

### **Cycle and Pedestrian Provision**

- 5.106 The Site is currently served by a network of existing pedestrian footways and public rights of way predominantly to the north and east of the Site and provide suitable access from the site to local footway/footpaths and the local cycle network, providing connections to services and facilities within the area. The existing opportunities for walking to the south and of the Site are limited given the more rural nature of those locations.
- 5.107 National Cycle Route 51 is the nearest cycle route to the A421 corridor; it runs between Bletchley and Winslow, passing to the south of Salden Chase, before continuing on to Bicester. Furthermore, the majority of the A421 corridor consists of unclassified rural roads, where on-road cycling is a viable option.

- 5.108 The Milton Keynes Cycle Network, known as the Redway System, commences west of the Bottle Dump roundabout and continues eastbound, north of the A421 Standing Way. The existing infrastructure provides highway quality routes from the site to both Milton Keynes City Centre and Central Milton Keynes Railway Station.
- 5.109 Updated walking and cycling isochrones were provided in TRN1 to highlight the range of facilities and amenities accessible within walking and cycling distance of the Site. These indicate that most of the existing amenities and facilities will be within an acceptable cycling distance but fall outside typical pedestrian distances. This is offset by the proposed development providing on site facilities and amenities which will likely minimise the need for longer walking journeys, with a convenience store, primary and secondary schools, retail space for Café, Pub or Takeaway and community facilities. Furthermore, as part of the S106 agreement the securing of a contribution toward the delivery of healthcare facilities either on or off site has been agreed.
- 5.110 An updated illustrated masterplan has been submitted in support of the planning application. The masterplan aims to encourage walking and cycling as realistic alternatives to that of the private car, through high quality infrastructure. Pedestrian access to the proposed development will be achieved as follows (with all but the recreational footpaths being available for use by cyclists):
- The old Buckingham Road south of the current A421 dual carriageway
  - Whaddon Road - across the A421 close to Bottle Dump Roundabout via the existing subway
  - The existing Subway across A421 to Snelshall West
  - Buckingham Road – south east of the Tattenhoe Roundabout
- 5.111 Consideration will need to be paid to pedestrian crossing facilities as part of any future reserved matters application. At this stage the following crossings have been identified:
- A toucan crossing across the Primary Road at Weasel Lane
  - A surface crossing to provide safe and convenient access to the secondary school. This should be in the form of a controlled facility
  - A Pegasus crossing across Whaddon Road
  - Toucan crossings on Buckingham Road East and Buckingham Road West
- 5.112 The application proposes a new connection for walkers and cyclists between Weasel Lane and the Bottle Dump roundabout, along a green corridor. This will provide an important strategic connection between NCN 51; the proposed new cycling route along the old Buckingham Road (A421); and the Redways alongside the new A421.
- 5.113 As this is an outline application with all matters reserved except access, details of the cycle and pedestrian infrastructure within the site will need to form and be considered as part of any future reserved matters application.

5.114 Buckinghamshire Council consider that new residents of the proposed development would have ability to access on-site amenities and facilities on foot or on bike, with external trips being achievable by bike but limited local trips on foot due to distance. However, the new high frequency bus service will provide the opportunity for multi-modal journeys to be performed and consider that overall, the development will have a positive impact on pedestrian and cyclist movements.

#### **Public rights of way**

5.115 Policy C4 of the adopted VALP seeks to protect public rights of ways and requires that the protection and conservation of public rights of way needs to be reconciled with the benefits of new development, to maximise the opportunity to form links from the development to the wider public rights of way network. Several improvements to the surfacing of the local footpaths are proposed as outlined below. Those within the site will be completed as part of the development and a financial contribution is to be secured as part of the Section 106 Agreement for those routes outside of the site. The improvements within the site include:

- Footway/cycleway/bridleway along Grid Road reserve to be provided and constructed to 'Redway' standard
- Existing PROW
- Upgrade of footpath 19 Newton Longville Parish, resurfaced to a sealed carriageway standard to a width of 3m between Weasel Lane and the railway underpass; route to be dedicated as a public bridleway;
- Restricted byways 20 and 25 Newton Longville Parish and Restricted Byway 15 Mursley Parish, locally known as Weasel Lane, to be resurfaced to a width of 3m, between Dagnell House Buckingham Road to the adopted highway adjacent to Lower Salden farm entrance; and
- Dedicate as a PROW with public bridleway status alongside Whaddon Road from Weasel Lane to Bottle Dump roundabout and provide a sealed surface 3m wide. This would form part of the Milton Keynes boundary walk and would be contained within the Site behind a landscaped buffer.

#### **Weasel Lane**

5.116 Passing south-west to north-east through the centre of the site, Weasel Lane is likely to be a busy walking and cycling route used by new residents. Weasel Lane is restricted by a byway, for use by pedestrians, cyclists and horseback. Notwithstanding its status, Weasel Lane is accessible to motor vehicles from both Whaddon Lane and Buckingham Road and provides access to the existing residential property.

5.117 It is proposed as part of this application to improve the surface of Weasel Lane, which will encourage walking and cycling within the site but also longer trips to Milton Keynes and Winslow that National Cycle Route (NCN 51) aims to achieve. A 3m wide walking cycling route should be secured by way of condition and supported by a S106 to resurface Weasel Lane outside the red line, from Whaddon Road south-east to the property 'Weasels' Lodge. A 2.5m x 1,200m loose surface, such as road planning was originally suggested, this will be secured by means of the S106 agreement.

## **Connection to Newton Longville**

5.118 Footpath 19 Newton Longville Parish connects the parish of Newton Longville with the new development site. As part of the package to mitigate the impact of the development and improve connectivity with Newton Longville, an improvement is required along Footpath NLO/19/2 and NLO/19/3. The footway within the site is to be resurfaced to a sealed carriageway standard to a width of 3m between Weasel Lane and the railway underpass, to be dedicated as a public bridleway. South of the railway bridge, a contribution would be required for the improvement of the footpath between the site and Nos. 36 and 38 Whaddon Road, Newton Longville to provide a 2m wide granite to dust path.

5.119 The application site is traversed by public rights of way and as indicated the development will alter/improve those routes. It is clear that the character of these public right of ways would be altered by the proposed development from that of footpaths which presently crosses

## **Internal Road Layout**

5.120 As part of the illustrative masterplan submitted in support of the planning application, a new network of Primary Streets will form the principal circulation route for all vehicular traffic. The route will connect with the existing highway network at the three access points. The indicative plans show that the primary street is to be 7.3m wide, with a footway/cycleway of 3m wide, which is considered to be appropriate for the nature of the road.

5.121 The primary streets are to form part of the proposed bus route. The primary streets therefore need to be designed to avoid on-street car parking, which could result in obstructions to the bus route. This could be achieved by ensuring appropriate off-street parking is provided, the use of on-street car parking laybys, and frontage car parking with dropped kerbs. This will need to be considered as part of any future reserved matter applications.

5.122 The illustrative masterplan shows the tertiary roads to be between 4.8m and 5.5m, which are considered appropriate for the nature of the road. It should be noted that if a shared surface is to be proposed then a minimum width of 4.8m (not including service margins) would be required. All roads will need to be designed to accommodate an 11.2m refuse vehicle in line with Buckinghamshire Council and tracking should be provided as part of any future reserved matters application.

5.123 There are two schools (a primary and secondary) proposed as part of the development. The internal road layout will need to be carefully designed as part any future reserve matters application to accommodate these facilities. The design will need to consider drop off provision, widened footways, crossing points, road signage and lining to provide for a serviced school site. In addition, the bus stops serving the school will need to be designed to accommodate the predicted number of buses/coaches, to ensure

that they do not obstruct the free flow of traffic. This will require early engagement with Buckinghamshire Education and Highways Development Management team.

### **Grid Road**

5.124 A grid reserve corridor of 80 m width, to cater for a dual carriageway and associated verge and footway provision, is required to allow for the potential implementation of the Bletchley Southern Bypass at a point in the future if it is determined that such a road is deemed to be beneficial.

5.125 Whilst the proposed development only requires a single carriageway road for access, in accordance with the adopted VALP policy D-NLV001, the masterplan has been developed to ensure that a dual carriageway could be provided in the future. The land for the grid road will need to be adequately secured in the S106 Agreement, so that the Council can develop and implement a scheme in the future. Furthermore, the detailed design should look to limit the future cost of dualling, and this will need to be demonstrated as part of a future reserved matters application.

### **Framework Travel Plan**

5.126 A Framework Travel Plan (FTP) has been developed for the Site with the aim in reducing traffic generated by the Proposed Development and increasing the use of sustainable travel modes. The FTP submitted as part of the planning application includes details of the initial targets that will be set regarding modal shift and details of the measures that will be put into place to achieve this modal shift.

5.127A costed action plan was provided in TRN1 for the residential element of the Framework Travel Plan (FTP) including the role of Travel Plan Manager. This cost has been provided for the life of the TP (i.e based on the agreed FTP) which is assumed to be 14 years from first occupation of the development through to full occupation (anticipated in 2031) plus five years (i.e. 2036).

5.128 Overall, the submitted Framework Travel Plan generally meets the standards set out in the Buckinghamshire Council (BC) Travel Plan Guidance for residential employment and education uses. There are some areas that would require improvement and would be addressed as part of the formal Travel Plan adoption process. Overall Buckingham Council are satisfied that the FTP is well thought out with some good measures to reduce single occupancy car use and the implementation of the FTP will be secured through planning conditions and/or S106 agreement.

5.129 Buckinghamshire Highways Authority consider that new residents of the proposed development would have ability to access rail services by means other than that of the private car, and the benefits of an improved bus service are acknowledged, such that the site is considered to be sustainably located. The inclusion of facilities on site will enable residents to make local shopping trips, which reduce the need for car travel and offers some employment opportunities at a local level. This in turn enables appropriate

social infrastructure to support the residents of the site and enable residents to engage positively with the community and contribute socially with the community, in line with NPPF guidance.

5.130 As part of their objection Milton Keynes Council detailed that the development proposals do not meet MKC policies. It is BC Highways position that the proposal would comply with the principles of the MK Core Strategy including Policy CS6 and to those principles of policies of the adopted Milton Keynes Local Plan including S3 City Expansion Areas, T3, T4 Pedestrians and Cyclists, T5 Public Transport, T10 Traffic, T15 Parking Provision and T17 Traffic Calming amongst others. This was also the finding of the Planning Inspector who detailed in his Planning Appeal Decision Notice (paragraphs 80 to 82):

*Paragraph 80. I have found that the appeal proposal, which would facilitate the SWMK development, with the identified mitigation in place would result in an overall improvement to the highway network. It would accord with Plan:MK Policy CT1, as the appellant has demonstrated that it would manage congestion and provide for consistent journey times; and Policy CT2, as it has been shown that it would mitigate impacts through the provision of, or contribution towards, necessary and relevant transport improvements and would not have an inappropriate impact on the operation of the highway network. These are the only policies in Plan:MK given in the reason for refusal.'*

*Paragraph 81. In so far as Policy SD15 applies, I am satisfied that the technical work carried out by the appellant fully assesses the traffic impacts of the scheme and identifies the transportation improvements necessary to mitigate impacts. I find that the proposal would also comply with Plan:MK Policy CT3, with regard to walking and cycling; and Policy CT5, with regard to the needs of public transport operators and users. The public transport issues would be addressed by the Section 106 contribution of £2 million and the delivery of bus priority measures within LTP4's 3-year initial action plan.'*

*Paragraph 82. I therefore conclude on the development plan that the appeal proposal accords fully with the relevant policies in Plan:MK. Therefore, the presumption in favour of sustainable development in paragraph 11c) of the 2021 Framework applies in that planning permission should be granted without delay.'*

5.131 Overall, the Highways officer considers that the development proposal would not have an unreasonable impact on the highway network. Milton Keynes Council have registered an objection to the development in terms of non-compliance with policy and impact on the network which is contrary to the Council's Highways review. The Highways response to the Milton Keynes objection can be seen in the Appendices which identifies numerous items where the issues have been satisfactorily resolved, or details where the Council's Highways assessment are in disagreement with Milton Keynes.

5.132 Having regard to the Highways officer's comment, the amended ES, appeal Inspector's decision and all other material consideration, it is considered that the development would not have an unreasonably adverse impact on highway safety or convenience and would be in accordance with VALP policies T1, T3, T5, T6, T7, T8, T4 and the NPPF.

### **Landscape and Visual Impact**

BE2 Design of new development, NE4 Landscape character and locally important landscape, NE8 Trees, hedgerows and woodlands and D2 Delivering site allocations in the rest of Aylesbury Vale, D-NLV001 Land south of the A421 and east of Whaddon Road.

5.133 The NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. Policies BE2 is consistent with the objectives of the NPPF and states that the design of new development proposals should respect and complement the physical characteristics of the site and surroundings, the scale, context and setting of the site and its setting; local distinctiveness, the building tradition, ordering, form and materials of the locality; the natural qualities and features of the area and the effect on important public views and skylines.

5.134 D-NLV001 seeks to retain existing landscape features, and rights of way and seeks a landscape led approach and responds positively to the best characteristics of the surrounding area. Policy NE4 of the VALP seeks to ensure that the scheme respect the local context and landscape character of the area.

5.135 The Environmental Statement includes a chapter containing a Landscape and Visual Impact Assessment and this has been updated through the submission of an addendum ES statement for the Landscape and Visual Impact Assessment chapter, which takes on board comments from the Councils Landscape Officer on the scope of the LVIA and which assesses the potential landscape and visual effects of the proposed development before and after mitigation measures.

5.136 The site is greenfield land and is located in the open countryside adjacent to the settlement of Milton Keynes and has physical boundaries to the north in the form of the A421, the south by the disused railway line and well treed embankment and also to the west with Whaddon Road and Bletchley to the east. Whilst the proposals represent an extension of built development into the open countryside, these site specifics offer some visual and physical containment of the development.

5.137 The Aylesbury Vale, Strategic Landscape and Visual capacity study (August 2017), states, in respect of the application site (NLV001), that the site is fairly exposed to distant views from the existing settlement on elevated topography to the south and the east (with some limited views from listed buildings and buildings in the conservation area), this is exaggerated by the open nature of the large fields in the intervening landscape. To the north the field boundaries are taller, with little intervisibility or opportunities for views out, screening views of large existing industrial

units. Some views from scattered farmsteads. Site remote and detached from settlement

- 5.138 The ES and the updated addendum assess the visibility and views through a Zone of Theoretical Visibility (ZTV) exercise to establish the representative visual envelope. This exercise has identified a number of viewpoints where the development has been assessed from and evaluates the potential effects through the phases of development. The ES considers that the development would result in a permanent land use change from agricultural land to built development.
- 5.139 The ES has judged that at the outset (on completion of the development) the proposal would result in major-moderate adverse landscape effect on the site, which is concluded as being a locally significant effect. Fifteen years after completion, the Green Infrastructure (GI) would form a mature framework of connected woodland, parks, greenspace and recreational routes that would provide considerable environmental benefits (in line with the enhance and reinforce guidelines) and it is assessed in the ES that these benefits would reduce the degree of adverse effects to moderate adverse and that these effects would not be significant.
- 5.140 Turning to the conclusions of the ES on the visual effects, the report advises that views of the proposed development within the wider landscape would be restricted as a result of the containment created by the built up area of Milton Keynes and Bletchley, and as such marked adverse effects would be limited to receptors that are either within the site or within the immediate landscape. It is assessed that the proposed development would not be an uncharacteristic feature within the landscape given the sites proximity to the edge of Milton Keynes and Bletchley. In the longer terms as the development's GI becomes fully established and mature the framework of woodland, trees and hedgerows around the perimeter of the of the site and within the layout would help to soften and filter views of the built form and as a result it has been concluded that none of the visual effects are judged to be significant in the longer term.
- 5.141 The ES also assesses the night time effects of the development noting the existing baseline situation of Milton Keynes and Bletchley which presently illuminate and impart a level of sky glow on the landscape. Therefore, whilst it is acknowledged that there would clearly be a degree of adverse effect, it has to be recognised that the change to the site will be experienced in the context of the already well-illuminated surrounding built up area especially in long views and therefore, would not be seen to especially intrusive or harmful to the night sky.
- 5.142 The site lies within Character Area Bedfordshire and Cambridgeshire Claylands . It is not situated within a landscape that is afforded any statutory landscape quality protection or designation at an international, national, regional or local scale. The nearest landscape designation being the Whaddon-Nash Valley LLA which lies 1.8km to the north-west of the site. The Aylesbury Vale Landscape Character Assessment (Jacobs 2008) identifies that the site is located within the Newton Longville-Stoke Hammond Claylands Landscape Character Area (LCA). The Strategic Landscape Visual

Capacity (2008 & 2017 respectively) judged the Landscape Character Area (LCA) condition of the site as being moderate with a low sensitivity and an overall guideline to enhance and reinforce the character area. The key characteristics and landscape elements include and which are relevant to the application site; a gently undulating to rolling landform, heavy clay with mixed agricultural use, nucleated settlement pattern and parliamentary enclosures.

- 5.143 The application was originally submitted with a LVIA (dated January 2015) in support of their proposal which concluded that the proposed development of up to 1855 dwellings etc., on this currently green field site, will not result in significant landscape character impacts in the long term on the site itself or in either the short or long term on the wider character area (Newton Longville - Stoke Hammond Claylands LCA 4.9) within which it lies. This was a conclusion that the Council's landscape Officer considered to be unreasonable.
- 5.144 The Landscape officer considers that the proposed development will be perceived, both from within the site and from the wider landscape as a significant change in landscape character terms in both the short and long term when assessed against the existing landscape character 'baseline' of undeveloped agricultural land in open countryside and it is upon this basis that the proposed development should properly be considered.
- 5.145 The landscape officer acknowledged that the original submission addressed a number of concerns which had been raised on the previous planning submission (withdrawn prior to determination) and considered that with regard to the identified need for 'better physical connections across Weasel Lane' this has been addressed in principle by the provision of both a 'primary' and 'secondary' connection north south across the proposed area of GI that occupies the high ground in the centre of the site.
- 5.146 Following lengthy and detailed discussions relating to the landscape and design merits of the application, the applicant proposed a number of changes to the submitted scheme with a view to addressing (amongst other matters) a number of the landscape and visual issues raised in the landscape officers original comments. To reflect these changes, the applicant submitted an 'Addendum Environmental Statement' (dated July 2016) contained within which was a revised Landscape and Visual Impact Assessment (LVIA).
- 5.147 Having considered the revised design, the applicant has concluded in the revised LVIA that the proposed development, with respect to its landscape character impacts, would 'at the outset ... result in a major-moderate adverse landscape effect on the site, which is concluded as being a locally significant effect' but that after 15 years 'the Green Infrastructure would form a mature framework ... that would be providing considerable environmental benefits [and] ...that these benefits would reduce the degree of adverse effects to moderate adverse, and that these effects would not be significant'.

- 5.148 Whilst the Landscape officer accepts the conclusion set out in the LVIA with regard to the impacts at the outset, he disagrees with the conclusions for year 15 and beyond. In line with the officers previous comments he was of the opinion that the proposed development would be perceived, both from within the site and from the wider landscape as a significant change in landscape character terms in both the short and long term when assessed against the existing landscape character 'baseline' of undeveloped agricultural land in open countryside. Whilst it is accepted that the improvements to the layout will, by year 15, have mitigated the impact of the proposed development on the wider landscape to the extent that the effects may reduce to a level that is less than significant, the Landscape Officer does not accept that these improvements would reduce the impact on the landscape within the site to a level that is less than significant .
- 5.149 With respect to the visual impacts of the proposed development, the revised LVIA (updated May 2020) concludes that 'in the longer term, as the development's GI becomes fully established and mature, the framework of woodland, trees and hedgerows around the perimeter of the site, and within the layout, would help to 'soften' and filter views of the built form. As a result, it is concluded in the LVIA that the level of effects on all visual receptors would lessen, and that none of the visual effects are judged to be significant in the longer term'.
- 5.150 The indicative Landscape Masterplan sets out the landscape framework for the proposal and allows for a significant provision of Green Infrastructure (GI), with 53.97ha to be allocated as open space and landscape in a range of forms including an 'eco-corridor', formal and informal open space to create a high quality and distinctive landscape. The proposal sets out mitigation of the potential significant adverse landscape and visual effects and which includes an enlarged perimeter screen and structural planting, the redesign of the proposed layout to facilitate the introduction of tree planting tiered through the site utilising the gradient of the site and an ecological buffer, the inclusion of open spaces, the retention and enhancement of the public rights of way/ bridleway and key features such as hedgerows and trees, sensitively designed lighting scheme and sensitive positioning of development away from the central ridge line.
- 5.151 Turning to the relationship of the proposed development to the adjacent settlement of Milton Keynes, it is considered that the proposed development would provide a generally logical and cohesive extension to the existing settlement pattern and character of the settlement. Whilst the proposed development is designed to be responsive to the specific context and character of the site upon which it is proposed (rather than definitively following the MK 'development style') it is clear that the proposed development does seek to address its relationship with the adjacent settlement in a constructive and positive manner, taking influences from the adjacent settlement character.
- 5.152 The proposed Green Infrastructure delivery seeks to integrate the proposed areas of open space with the extensive city wide network – in particular the MK Boundary Walk

and the neighbouring Chepstow Park, through particularly the extension of the linear park network. With regard to the MK grid road system, whilst the proposed development adopts a more relaxed approach to the delivery of a grid system than that adopted in the wider city, the application seeks to provide and safeguard for the future extension of Snelshall Street (V1) as part of the proposals should this be required in the future.

5.153 Generally, the proposed development adopts an approach to settlement character that seeks to respond to the topographical and landscape issues on the application site rather than proposing a wholly MK based style of development. In that regard it is considered that the principles of those policies set out in Plan MK in particular policy SD15 relating to development on the edge of Milton Keynes has been taken into consideration.

5.154 However, it is clear there will still be significant landscape and visual impacts on the area of the development site itself and its immediate surrounding landscape through the proposed development of a greenfield site and the topography of the land. However, the adverse impact would be limited to the site itself, users of the footpaths and the sites immediate setting due to its position at the urban edge of Milton Keynes. The mitigation package proposed including the structured planting will be secured through S106 agreement to ensure it reduces the impact on the landscape .

5.155 The proposal is landscape led and has taken into consideration the distinctive local landscape character and features and seeks through mitigation measures to minimise the impact on the open countryside. The proposal would retain and enhance natural boundaries, including hedgerows, which contribute to visual amenity. It is considered therefore that the proposal accords with VALP policies BE2, NE4, D-NLV001 and the NPPF

#### Agricultural land

##### NE7 Best and most versatile agricultural land

D-NLV001 D-NLV001 Land south of the A421 and east of Whaddon Road.

5.156 The NPPF in paragraph 174 (b) states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land (i.e. Grades 1, 2 and 3a in the Agricultural Land Classification (ACL)). Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land (i.e. Grades 3b, 4 and 5) in preference to that of higher quality. Policy NE7 of VALP states that subject to the development allocations set out in the VALP, the council will seek to protect the best and most versatile farmland for the longer term.

- 5.157 The land is graded depending on the extent to which physical or chemical characteristics impose long-term limitations on agricultural use.
- 5.158 The ES includes an Agricultural Land Classification Study and it assesses 144 hectares of predominately agricultural land which at the current time is primarily in arable use with a small area of grassland to the northern and western boundaries. The site is occupied by a number of separate farm business, on a variety of different tenures.
- 5.159 The application site is shown on the Provisional Agricultural Land Classification Map as being Grade 3 and 4, and the agricultural land classification survey shows mainly sub-grade 3b land, of moderate quality (88%) with small areas of better quality land, Grade 3a (11%) and other land (1%). The moderate quality land is limited by soil wetness and significant wetness/workability problems. The better quality land is described with lighter textures or having soils with calcareous topsoils.
- 5.160 In summary the site comprises of 16 hectares (of the 144 ha total site area) of best and most versatile agricultural (BMV) land. This falls below the threshold of 20ha set by Natural England. The magnitude of the impact on the agricultural land as a result of the irreversible development of this quantity of BMV land is considered to have an adverse effect. In terms of the 4 occupying farm businesses, three of these businesses will remain operating off-site as viable businesses and the fourth is only a part time business. Having regard to the above it is not considered that the development would conflict with the adopted VALP policy NE7, D-NLV001, or with the aims of the NPPF in this regard.

#### Trees and Hedgerows

NE8 Trees, hedgerows and woodlands, D-NLV001 Land south of the A421 and east of Whaddon Road.

- 5.161 Policy NE8 seek to enhance and expand existing trees and hedgerows within the Aylebury Vale Area. The Plan policy also accords with the NPPF which states that planning permission should be refused for development resulting in the loss of veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.
- 5.162 The application is accompanied by an Arboricultural Assessment (updated June 2020) to identify the quality and value of existing trees on site which was supported by the Tree Officer. The site has no trees subject to tree preservation Orders. A total of sixty four individual trees and twenty five groups of trees were surveyed as part of the arboricultural assessment. Six of these and three groups of trees were graded as category A, 28 trees and 8 groups of trees were graded as B and 19 trees and 11 groups of trees were graded as C and there are 13 individual and 3 groups of trees graded as category U trees on the site which could be removed as good arboricultural practice.
- 5.163 Trees of A and B category are to be retained and incorporated into the development as the proposal seeks for the retention and protection of existing good quality trees

and hedgerows. All trees to be removed, with the exception of two trees (T47 and T60), were considered to be of low arboricultural quality or low amenity value. The trees assigned category C are those which whilst still relatively young should not present a significant constraint to the potential to develop the site. Loss of category C material can suitably be mitigated for through new tree planting forming part of the overall landscaping proposals which would support the development. Any current amenity value can be regained within a relatively short time frame and therefore such losses should not raise objection from an arboricultural perspective

5.164 New structural and screen tree planting, hedge and shrub planting is also indicated as being proposed as part of the future detailed scheme. On the basis of the detail submitted it is considered that a scheme could be designed to pay adequate regard to the landscaping of the site and subject to completion of a Arboricultural Impact Assessment, Statement Tree Protection Plan and Arboricultural Method Statement such that the development would accord with VALP policies NE8, D-NLV001 and the NPPF.

### **Ecology**

NE1 Biodiversity and geodiversity, D-NLV001 Land South of the A421 and east of Whaddon Road.

5.165 Paragraph 174 of the NPPF requires new development to minimise impacts on biodiversity and provide net gains in biodiversity. Paragraph 180 (NPPF) requires development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity improvements in and around developments should be integrated as part of their design especially where this can secure measurable net gains for biodiversity. Paragraph 120a (NPPF) states that policies and decisions should 'encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside'.

5.166 Adopted VALP Policy 'NE1 states that planning conditions/obligations will be used to ensure net gains in biodiversity by helping to deliver the Buckinghamshire and Milton Keynes Biodiversity Action Plan targets in the biodiversity opportunity areas. A monitoring and management plan will be required for biodiversity features on site to ensure their long-term suitable management (secured through planning condition or Section 106 agreement). Policy D-NLV001 requires that the proposal will need to quantify ecological impacts in a meaningful way to enable pre and post development comparison, sufficient to objectively assess net losses or gains and to provide for multifunctional habitats .

5.167 The application is supported by an ecological assessment which has been updated during the course of the submission. The assessment details the species and habitats currently found on the proposed development site as a number of surveys were carried out (badger, bats, reptiles, great crested newts and birds). The Ecology Officer has

reviewed the updated ecological response and consider that the measures to secure the enhancement features set out in the Ecology Report will need to be implemented to ensure compliance with current legislation and policy. The ecological enhancement measures in respect of habitat impacts will need to be secured with a condition requiring an Ecological Mitigation & Enhancement Management Plan (EMEMP). This will need to detail the measures set out in the Biodiversity Impact Assessment and metric calculation provided.

5.168 In addition, it is considered that the development is not considered to be fully compensating for the impacts of Farmland Birds. The principles of a financial obligation secured by a S106 agreement to enable the applicant to compensate for the residual impact incurred on the farmland birds species identified as being impacted by the proposal have been supported by the Council's ecologist and the BBOWT Planning officer.

5.169 The Ecologist has advised that the impact on bats can be compensated for by an appropriately worded condition on the lighting requirements on the development. Further enhancements within the dwellings proposed will be secured through a condition requiring the applicant to submit details of the species specific integrated bat and bird boxes throughout the development. The scale of enhancements proposed within the units will need to be at the 30% threshold set out in the report. Further species specific enhancements including hedgehog highways will need to be established within the condition to be imposed.

5.170 Natural England has been consulted on the application and considers that the proposed development will not have significant adverse impacts on designated sites and has no objections. The inclusion of green infrastructure is welcomed as it will provide environmental gains locally, and it is advised that biodiversity gain should be embedded into the development. Impacts on protected species was not assessed and instead Natural England has referred the applicant to the standing advice, which has been followed.

5.171 Although officer's consider that the current proposals do not quantify ecological impacts in a meaningful way to enable pre and post development comparison, sufficient to objectively assess net losses or gains of the end-scheme, it is recognised that the application is in outline form where such details would not be known or expected at this stage. The NPPF seeks development to contribute and enhance natural and local environments by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure. It is recommended that a condition could be attached to any approval of this outline application requiring the submission of a scheme, in accordance with the Biodiversity Strategy submitted as part of this application alongside details of the off-site compensation scheme to be secured by way of s106, that provides for net gain of biodiversity on the site and that secures the submission of full details for mitigation in accordance with VALP Policies NE1, D-NLV001, as part of the reserved matters applications.

5.172 Overall, it is considered that the mitigation proposed, to be secured through planning conditions and S106 agreement will result in a development that will be in accordance with VALP policies NE1, D-NLV001 and the NPPF

### **Environmental issues**

NE5 Pollution, air quality and contaminated land and BE3 Protection of the amenity of residents

#### *Air Quality*

5.173 The NPPF includes air quality as an issue to be evaluated when considering the need to conserve and enhance the natural environment and that planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan. Policy NE5 of the adopted VALP states that “development that may have an adverse impact on air quality will be required to prove through a submitted air quality impact assessment that the effect of the proposal would not exceed the Nationally Air Quality Strategy Standards (as replaced) or the surrounding area would not be materially affected by existing and continuous poor air quality. The potentially polluting development will be required to assess their air quality impact with detailed air dispersion modelling and appropriate monitoring. Required mitigation will be secured through a planning condition or section 106 agreement”.

5.174 The ES includes a chapter which assesses the air quality effects associated with the proposed development and looks at both the construction and operational impacts of the proposals. The assessment methodology was agreed with the Council prior to the assessments being undertaken. Information provided in the Transport Assessment and on traffic modelling has been used to predict local air quality. The designated Air Quality Management Areas (AQMA) are approximately 18km to the south of the application site and would not be affected by development traffic.

5.175 The Council’s Air Quality Officer has accepted the content and conclusions of the assessment. The amendments to the scheme do not alter the quantum of development and overall trip generation and therefore, the air quality impacts remain as originally assessed. The construction works have the potential to create dust and during construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emission, and with these measures in place it is expected that any residual effects will not be significant. Mitigation measures can be used and secured by condition. The air quality impacts associated with the construction and operation of the proposed development have been assessed and it has been concluded that the operational impacts of increased traffic emissions arising from additional traffic on local roads will be negligible at all receptors and the impacts on overall operation air quality would be insignificant. On the basis of the assessment, and with the proposed mitigation (to be conditioned in respect of construction works and imbedded design) in place, the proposed development is in accordance with policies BE3 and NE5 of the VALP and with the NPPF.

## *Noise*

- 5.176 Paragraph 185 of the NPPF states that planning decisions should aim to avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of the new development and mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development including through the use of conditions. Policy NE5 of VALP requires significant noise generating development to minimise the impact of noise on occupiers of proposed buildings, neighbouring properties and the surrounding environment.
- 5.177 Plan:MK policies D5(Amenity and Street Scene), CT1 (Sustainable Transport Network), CT2 (Movement and Access) and NE6 (Environmental Pollution) are relevant to the consideration of noise impact.
- 5.178 The ES includes a chapter on noise and vibration which considers the impacts arising from construction activities, road traffic and noise associated with the employment uses.
- 5.179 The revised Environmental Statement and addendum ( January 2021) identifies that noise and vibration impacts in relation to the scheme will occur during both the construction and operation. The report identifies monitoring locations both within Buckinghamshire and MKC for noise monitoring. During construction, the nearby properties will experience adverse effects from noise and vibration but this will be temporary and intermittent in nature and generic mitigation measures to reduce the effects will be employed. There are potential impacts from the increased levels of road traffic and also from new any fixed installations and plant associated with the proposed development.
- 5.180 The Environmental Health Officer has reviewed the revised documentations and is of the opinion that the significant effects remain substantially unchanged. Since the production of the original ES there have been a number of updates to relevant standards and guidance. No objections have been raised subject to the carrying out of the measures detailed in Chapter 12 of the ES and the Construction Environment Management Plan (CEMP) (updated May 2020) to ensure that the effects of construction noise and dust are minimised for people living nearby. The measures highlighted can be secured via a condition and with detailed consideration of the layout at reserved matters stage, to allow maximum enjoyment of gardens and amenity areas for residents as well as satisfactory internal noise levels within dwellings. Officers are satisfied with the content and findings of the noise assessment in the ES and consequently, following the adoption of the recommended mitigation measures as outlined in the ES and conditions, there is not considered to be a detrimental noise impact from the proposed development .
- 5.181 Overall, in respect of noise and vibration it is considered that subject to mitigation measures, including the imposition of conditions regarding noise and which will also

require the approval of a CEMP the proposal is in accordance with VALP policies BE3 , NE5 and the NPPF.

### *Contamination*

5.182 A further consideration in the NPPF in relation to the need to conserve and enhance the natural environment is contamination, and the guidance states in paragraph 123 that planning decisions should ensure that the site is suitable for its new use taking account of ground conditions.

5.183 The Environmental Statement submitted with the application includes a chapter on ground conditions and contamination assessing the potential environmental effects on ground conditions and contamination. A Phase 1 Desk Study has been completed on the site and it was agreed with the contaminated land officer that no site investigation was necessary to inform the EIA. The land has always been used as farm with two minor tracks and a footpath with a railway line to the south of the site. The only potential sources of contamination related to imported made ground associated with minor areas of hardstanding, the railway lines and associated sidings, contamination associated with factories to the north and contaminants associated with farming. The investigation concluded that there is unlikely to be a requirement for large scale remedial works but it is proposed to conduct ground investigations at the application site prior to the detailed design of the proposed development in order to delineate areas of contamination and any other risks prior to construction. In accordance with VALP policy NE5 a condition can be attached in case any contamination is found.

### *Waste Management*

5.184 The most significant effects of the proposed development from a waste management perspective include construction waste arising from site clearance, excavation and construction activities; and earthworks; household waste generated by residents; and commercial waste generated by businesses and people using the local facilities. The effects of this are assessed within the ES (updated May 2020). The updated ES states that a site waste management plan will be prepared for the construction phase of the proposed development to minimise the amount of waste generated during site clearance and construction activities, so that construction waste is reused on-site or reused or recycled off-site. The ES assessed that the effect of construction waste from the proposed development would be negligible and not significant.

5.185 The proposal will include internal and external waste and recycling facilities which will be provided within the curtilages of the dwellings. Home composting and community composting facilities will be provided for residents. The Council's weekly kerbside waste collection will be utilised, and the ES assessed that the effect on household waste from the proposed development would be negligible and not significant.

5.186 The commercial and industrial uses will be provided with waste and recycling storage facilities. The ES assess that the effect on commercial waste from the proposed development would be negligible and not significant.

5.187 The Site waste management Plan and the measures set out in the ES can be conditioned, in respect of construction waste, operational waste, household and commercial waste.

5.188 Overall, the ES anticipates that the development will have a minor impact in terms of the increase in waste production. It is considered, therefore that the proposed development will accord with VALP policy NE5 and the NPPF.

### **Historic environment (or Conservation Area or Listed Building Issues)**

BE1 Heritage Assets, D-NLV001 Land south of the A421 and east of Whaddon Road.

5.189 Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 places a duty on local authorities to pay special regard to the desirability of preserving or enhancing the character or appearance of Conservation Areas. This is generally reflective of policy BE1 which make specific references to conservation of heritage assets in a manner appropriate to their significance, including their setting, and seek enhancement wherever possible.

#### *Impact of the built form of the development on the conservation area and listed buildings*

5.190 Adopted VALP Policy D-NLV001 states that “the significance of any heritage assets affected including any contribution made by their setting will need to be considered. When considering the impact on the significance, great weight should be given to the asset’s conservation. The protection and enhancement of sites of archaeological importance needs to be considered”.

5.191 The impact of the proposal was evaluated in the ES (updated May 2020) and it confirms that there are no listed buildings within the site. The nearest listed building is Lower Salden Farmhouse (Grade II) located 1.5km south-west of the site and the development sites lies beyond the wider setting of the farmhouse. A number of listed buildings are within Newton Longville Conservation Area and they were considered as part of the Conservation area rather than individually. The relative location of development to the Lower Salden Farmhouse means there will also be no material impact on the contribution that the setting makes to the significance of the Salden Farmhouse (Grade II) Listed Building. Furthermore, there will be negligible impacts on the wider setting of those listed buildings located within the designated Newton Longville conservation area and therefore the character and appearance of this area is preserved.

5.192 In terms of the impact on the designated conservation area at Newton Longville, this is located 850m south west of the site and is surrounded by 20<sup>th</sup> century housing development and therefore at its nearest point is considered to be sufficiently distant from the development as to not affect its character or appearance. It is acknowledged that the proposed development would be visible in long distance views from the Whaddon Road within the conservation area, but it is considered that the proposal

would not result in any material harm to the character or appearance of the conservation area.

#### Heritage conclusions

5.193 Special regard has been given to the statutory test of preserving the setting of the listed building under section 66 and 72 of the Planning (Listed Building and Conservation Areas) Act 1990, which it is accepted is a higher duty. It has been concluded that the development could be designed so as to preserve the setting of the listed buildings. Therefore in applying sections 66 and 72 of the Act it is concluded that the setting of the listed building and the character and appearance of the conservation area would be preserved .

5.194 In consideration of the above, it is considered that the development would accord with adopted VALP policies BE1 and D-NLV001

#### **Archaeology**

BE1 Heritage Assets, D-NLV001 Land south of the A421 and east of Whaddon Road

5.195 The NPPF highlights the desirability of sustaining and enhancing the significance of heritage assets including that of archaeological interest. The VALP policy BE1, requires all developments to conserve heritage assets in a manner appropriate to their significance. There will be a presumption in favour of retaining archaeological in situ, wherever practicable, unless it can be demonstrated that the harm will be outweighed by the benefits of the development.

5.196 The Council's Archaeologists welcome the submission of the archaeological evaluation report which included the results of the geophysical survey and trial trenching which have been undertaken within the proposed development area.

The evaluation recorded numerous well-preserved, substantial archaeological features at the site. Relatively large quantities of pottery were recovered. There were four main foci of activity:

- Area 1 contained three enclosures. These spanned the Iron Age/Roman transitional period;
- Area 2 contained at least one late prehistoric enclosure;
- Area 3 contained at least one late prehistoric enclosure and related ditches;
- Area 4 contained a series of enclosures, ditches and other features spanning the Late Iron Age/Roman transitional period into the 4th century AD.

5.197 The evaluation also exposed a number of features which had not been detected by geophysical survey, including some quite substantial ditches in Trench 7. There was some evidence to suggest that some of the features interpreted as furrows in the survey might actually be archaeological features. The proposed development has been designed so as to enable all four settlement areas to be preserved within open space and school playing fields.

5.198 The Archaeology Officer has reviewed the updated ES and has stated that the development or ground works including landscaping, paving /sports fields. MUGA's is likely to have a significant detrimental impact on the buried archaeological remains and is likely to harm significant of a number of heritage assets and has recommended that the proposed development should be subject to appropriate investigation, recording, publication and archiving of results in line with Paragraph 205 of the NPPF.

5.199 In summary there is not considered to be a conflict with the NPPF in respect of heritage assets and the development is in accordance with VALP policy BE1, D-NLV001 and the NPPF

### ***Healthy and Safe Communities***

S1 Sustainable development for Aylesbury Vale, D2 Delivering site allocations in the rest Aylesbury Vale, D-NLV001 Land South of the A421 and east of Whaddon Road, I1 Green infrastructure, I2 Sport and recreation, I3 Community facilities and assets of community value, C4 Protection of public rights of way.

5.200 In facilitating social interaction and creating healthy, inclusive communities the proposals should aim to achieve places which enable communities to integrate and come together, including through mixed use developments and strong neighbourhood centres and active streets; safe and accessible environments and developments.

5.201 This should include the provision of sufficient choice of school places, access to high quality open spaces and opportunities for sport and recreation and the protection and enhancement of public rights of way. This should in particular address the need to provide sufficient green infrastructure which provides value in many ways. It will therefore be necessary to consider how each scheme addresses these issues.

5.202 The NPPF seeks to achieve healthy, inclusive and safe places, promoting social interaction, safe and accessible development and support healthy life-styles. This should include the provision of sufficient choice of school places, access to high quality open spaces and opportunities for sport and recreation and the protection and enhancement of public rights of way, and designation of local spaces.

#### Thames Valley Police

5.203 Contributions have been requested from TVP towards staff, new vehicles, mobile IT equipment, radio capacity, number plate recognition cameras, a programme of works at Bletchley which appears to be planned for release. The majority of these requests are not considered to meet the relevant tests particularly given the police benefit from funding elsewhere.

5.204 The proposed development is in close proximity to a railway which runs adjacent to the development. The railway line is part of the proposed East-West Rail Link. Thames Police have requested that the future use of the railway should be taken into

consideration in assessing the application and has recommended that planning conditions be attached to the proposed development.

#### Community Facilities

- 5.205 VALP policies I1, I2 and I3 seeks to ensure that appropriate community facilities are provided arising from a proposal (e.g. school places, public open space, leisure facilities, etc.) Policy NLV001 sets out the community facilities and green infrastructure the site will need to provide. The illustrative master plan indicates provision of a comprehensive network of multi- functional open spaces and green corridors with both formal and areas of informal public open space. The GI Plan has been amended to show how Weasel Lane and the Milton Keynes boundary walk are safeguarded and utilised as principal recreational routes and incorporated within broad corridors of greenspace. The proposal provides for 53.97ha of green open space and 1.18ha of allotment land highlighting the importance of open space as a means of establishing a high quality setting for development is recognised and the role it plays in realising a distinctive character of the new community as well as its contribution to the wider Green Infrastructure around Milton Keynes and providing an opportunity to link with the linear park to the southern edge of the site and acts as an extension to the existing Chepstow Park and a new linear park to improve the north western section of the MK Boundary Walk.
- 5.206 The parameters plan as amended makes provision for 9 Locally Equipped Area of Play (LEAP's) and also 2 Neighbourhood Equipped Area's of Play, with each including a multi-use games area. The sizes of the LEAPs have increased to provide an activity area of 500sqm to accord with RoSPA guidance and their disposition across the site provides increased coverage and ensures suitable accessibility to meet the standards set out in the Fields in Trust guidance. In addition to the provision of LEAPs and NEAPs on site, youth shelters, a MUGA, sports hall, changing pavilion, skateboard park, sports pitches, cricket wicket, tennis courts and community centre are proposed. Subject to these measures which could be ensured by S106 Agreement, the proposal can be considered acceptable in terms of leisure provision in accordance with VALP policy D-NLV001, I1 and I3 and the NPPF.
- 5.207 Policy C4 requires regard to be had to the amenity, convenience and public enjoyment of public rights of way and the desirability of their retention or improvement. The application site is traversed by public rights of way and as indicated the development will alter/improve those routes. It is clear that the character of these public right of ways would be altered by the proposed development from that of footpaths which presently crosses open countryside to one passing through a residential development and impact on the character of these public rights of ways and the enjoyment of some of its users. However, this would be mitigated to some degree by the introduction of open spaces flanking the route of the footpath and compensated for by the provision of improved footways and links. It is considered that the convenience resulting from the improvements set against the potential loss in enjoyment to users from the more urban environment through which the path would pass is such that it is considered

that the proposal would benefit the local community and would be in accordance with VALP policy D-NLV001 and C4 and the NPPF.

#### Education

5.208 Adopted VALP policy D-NLV001 requires the provision for a three-form entry primary school with early years pre-school facilities on 3ha and a secondary school on 5.2ha of land. The proposal includes educational facilities on site and given the position of the site on the edge of the Aylesbury Vale Area, careful consideration has been given to the education requirements and as with the other matters these have been discussed in conjunction with the neighbouring authority MKC.

5.209 The proposed development makes provision for a 3 form entry primary school, with Early Years Pre-school facilities on 3.0 Ha of land and a secondary school on 5.2 Ha of land. Provision is also made for accessible recreation and community uses to serve the new residents, designed and located with the intention to be complementary to the delivery of the new schools. An education facilities assessment is included in the ES to support the proposal.

5.210 The primary, secondary and special schools including Children's Centre provision within the planning area of the development are all currently or projected to be at capacity. The lack of long term housing plan causes significant difficulties for the Local Authority with regard to its ability to effectively plan for additional secondary and special school provision. The development proposal borders Milton Keynes so may well impact on schools across the border. Both local authorities will need to work together to ensure that the effects of the development are most effectively mitigated.

5.211 An agreement has been reached with the applicant that the proposed development will fund the provision of an appropriate number of additional secondary school places in accordance with the Council's Planning Obligations Policy. The s106 agreement will secure the provision of a secondary school on site with a proviso that if the Council does not require a secondary school on site, then the developer will be required to make financial contributions (based on the indicative mix of homes provided), in accordance with the policies set out in its "Guidance on Planning Obligations for Education Provision". The justification for all the contributions identified above is set out in the evidence and demonstrates that they meet the three tests covered under the CIL regulations.

5.212 Having regard to this advice and subject to the required contributions being secured in the S106 agreement, it is considered that this matter would be in accordance with the requirements of VALP policy I3 and NPPF advice.

#### Healthcare

5.213 The development lies in Newton Longville Parish in the administrative boundaries of Buckinghamshire Council and abuts MKC wards Bletchley Park and Tattenhoe. The Health Impact Assessment (Environmental Statement 2020 - Appendix 13.2) states

that as of October 2018 there were 4,008 patients, resident in the Great Brickhill ward (which includes Newton Longville) registered with a GP. Of that total 3,934 are registered at sixteen different practices. The remaining 74 residents are registered in very low numbers at a further eight practices. In Bletchley and Fenny Stratford ward, as of October 2018, there were 17,1910 patients registered with a GP. Of that total, 16,993 were registered at eleven different surgeries, and the balance is registered in very low numbers at a further twenty-two practises. Newton Longville residents are registered at 22 different GP surgeries: 30% at The Red House (Milton Keynes), 20% at Norden House (Winslow), 16% at Whaddon House (Milton Keynes), and diminishing numbers at the others.

5.214 The HIA (2020) also shows that the local acute hospital is Milton Keynes University Hospital NHS Trust which is 4 miles from the proposed development and the next nearest acute hospital is Luton and Dunstable University Hospital, which is 15 miles from the proposed development. Within a 15 mile radius are Stoke Mandeville Hospital, the Royal Buckinghamshire Hospital for Rehabilitation and Specialist Nursing and Buckingham Hospital, a private hospital.

#### Primary Care

5.215 In terms of primary care, the MK CCG have advised that the development will result in approx. 4,524 additional residents (based on 2.4 occupancy) and would affect several existing GP surgeries in Milton Keynes - Drayton Road, Hilltops, Parkside, Westcroft and Whaddon surgeries. None of these GP practices currently include the South West Milton Keynes development within their practice boundaries and do not have capacity to absorb the population increase.

5.216 To mitigate the impact of the development, the MK CCG seeks the provision of a site to accommodate a 6-GP surgery, the construction of the GP surgery to NHS England specifications and a contribution per dwelling in line with MK's Social Infrastructure SPD. In addition, the MK CCG requested a financial contribution of £1,990,057 to provide additional facility to offset patient demand in the first year of its operation. The calculation takes into account the phasing capacity of development delivery.

5.217 The amended ES (2020) sets out that the resulting population from the development based on 2.56 average household size will result in 4,749 residents. The amended ES baseline assessment shows that there are 10 General Practitioners within 5km radius of the site and to ensure that adequate services are provided for the new residents, and those who wish to use them. The Development Framework Parameters Plan identifies a parcel of land for a potential 6.no GP practice within an Employment Area (up to 0.2 hectares) to provide accessible (D1) health facilities. The ES acknowledges that further discussions will take place with service providers so that the new facility meets the projected requirements for the area.

#### Secondary Care

- 5.218 In terms of secondary care provision, the MKC state that it is likely that the majority of residents would expect to use Milton Keynes University Hospital for their care. The MKC (on behalf of the MKUH Trust) consider that there will be an impact on acute/hospital facilities as a result of this development and existing NHS provision will not have the capacity to absorb the likely impact and therefore additional health provision that will be required.
- 5.219 NHS England in their consultation response fully supports the request of the MKCCG. Given the proximity of the development to Milton Keynes and the services located here, it is anticipated by MKC that the impact of this development will directly affect MK Hospital. This is supported by the HIA. NHS England have commented that the scale of this proposed development, distance, and most importantly due to other significant developments planned in the area, NHS England needs to take a more holistic view. The NHS England also support the MKC in their request for a contribution per dwelling (“the Hospital Contribution”)
- 5.220 Initially, the financial contribution request from the MKC could not be justified as the MK SPD (2005) was a ‘tariff’ style cost based on a strategy of meeting projected costs of healthcare provision for the City to 2016 and did not apply in the Aylesbury Vale area. The basis for the costing was considered to be out of date and the request for a per head contribution in addition to land and buildings would not comply with the CIL Regulations. When this application was initially brought to the legacy AVDC Strategic Planning Committee in June 2017, the delegation from members to officers to defer and delegate subject to a s. 106 agreement did not include a requirement to secure a planning obligation for the Hospital Contribution, as officers concluded the request did not comply with CIL regulations.
- 5.221 The non-compliance of the tariff style cost with CIL regulations was highlighted by changes to the Government’s National Planning Practice Guidance (NPPG) September 2019 on funding formulas. The NPPG (2019) requires that any evidence of need for infrastructure based on ‘formulaic’ approaches to determining planning obligations need to be part of the plan making process, so it could be examined. The NPPG (2019) led to the removal of the financial / tariff type formulas from the MKC’s Social Infrastructure SPD and a revised SPD was adopted in February 2021.
- 5.222 In February 2019, (prior to the changes to MK’s Social Infrastructure SPD) following on-going discussions, Milton Keynes Council submitted a supporting document from the NHS Trust regarding the likely impact of the South West Milton Keynes development (SWMK) on the Milton Keynes University Hospital (MKUH). This demonstrates and quantifies the impact from the development via a detailed impact assessment and derives a projected contribution for the development based on activity rates of the MKUH catchment population. Finally, MKUH has specified patient facilities to which the contribution will be applied to allow for monitoring of the financial contribution. Thus, officers are satisfied that the contribution satisfies CIL Regulation 122.

- 5.223 Following these negotiations in February 2019, an agreement was reached with MKC. Officers presented the MKC's request for health care obligations to Members at the former legacy AVDC Strategic Development Management Committee meeting in April 2019 pursuant to which a resolution to delegate to officers to include the financial contribution for secondary health care facilities at Milton Keynes University Hospital (MKUH) to the S106 agreement was reached.
- 5.224 The Hospital Contribution will be applied towards: i) a new cancer unit or extension to the radiotherapy centre; ii) a new pathway unit incorporating a frailty unit as well as associated diagnostic and intervention facilities and iv) support service infrastructure. The total contribution requested (£1,990,057) would be split equally into three payments with payments to be secured through a S106 agreement and indexed from the date of the Agreement.
- 5.225 As for the request from MKCCG for a GP surgery, the proposal includes provision for D1/D2 uses (up to 575 sq.m) to be located within the local centre, and there is additional flexibility provided within the scheme in that a parcel of land has been identified within the employment area (up to 0.2 hectares) to accommodate the construction of a health care centre building in accordance with NHS England specifications or a financial contribution to meet the costs of equivalent provision off-site. The health centre land and alternative provision will be secured through the S106 agreement.

#### BHT Request For Financial Contributions Towards Acute and Community Healthcare Services

- 5.226 In March 2019, in addition to the request from the MKCCG and MKC, Buckinghamshire Hospital Trust (BHT) requested S106 contributions of £1,748,228.00 to be used to provide additional health care services to meet patient demand. The demand is based on BHT's calculation that the development would equate to 4,656 new residents. Using 2017/18 demographic data and the referral rates to BHT from Norden House Surgery formed the BHT's projection, that the development would generate over the period of 12 months 3,173 acute and 2,772 community interventions.
- 5.227 The BHT seeks financial contribution for revenue funding for operational costs for its acute and community care services. The contribution is based on a formulae that assumes 100% referral from the new population comprising the development would be from Norden House. Currently only 20% of Newton Longville residents are registered with the Norden House GP surgery which is located approx. 6.5 miles (shortest walking distance) from the development site. Moreover, the BHT projections makes assumptions on concealed households and existing residents that is at variance with the data contained in the HIA.
- 5.228 Officers have reviewed BHT's request for section 106 contribution and in this instance, the request cannot be supported as the BHT has not provided sufficient evidence and adequate justification to demonstrate in accordance with the CIL regulations how the

sums are necessary to make the development acceptable in planning terms or how they are directly related to the development or fairly and reasonably related in scale and kind to the development (CIL Regulation 122). The Community Infrastructure Levy or CIL test requires obligations to be necessary, directly related to the development and be proportionate.

5.229 Officers are satisfied that the health care obligations provided in the S106 agreement have the potential for flexibility to meet the wider strategic vision for the delivery of health care in the future. Notably, the health care obligations secured in the S106 are supported by MKCCG and MKC. Furthermore, the provision is in accordance with policy requirement as set out in VALP policy D-NLV001.

5.230 In view of the proposed provision of health care facilities, sports fields, playspaces and other public spaces, the proposal is considered therefore to be in accordance with VALP policies S1, D2, D-NLV001, I1, I2, I3, C4 and the NPPF.

### **Raising the quality of place making and design**

BE2 Design of new development, NE4 Landscape character and locally important landscape, D2 Delivering site allocations in the rest of Aylesbury Vale, D-NLV001 Land South of the A421 and east of Whaddon Road.

5.231 The NPPF sets out that the Government attaches great importance to the design of the built environment and that good design is a key aspect of sustainable development. The focus of policy BE2 (Design of New Development) of the adopted VALP is on local distinctiveness, and development are required to be appropriate to its contexts; and individual identify that either complements or forms an attractive contrasts with its surrounding is encouraged. Furthermore, the site specific requirements (Policy D-NLV001) is conserving and enhancing the natural environment in terms of the impact on the landscape, the site proposal should use land efficiently and create a well defined boundary along the western edge of Milton Keynes. In addition, the proposals will be required to identify the building tradition of the locality, and the scale and context of the setting, the natural qualities and features of the area and the effect of the development on important public views and skylines including the protection of Newton Longville and Whaddon villages.

5.232 The rationale for the design and layout of the proposed development is set out in detail in the Design & Access Statement and the addendum Design and access statement submitted in August 2016 (updated June 2020). In summary, the form and layout of the proposed development is strongly influenced by principles set out in the adopted VALP and MK Core Strategy place-shaping principles for sustainable urban extensions in adjacent Local Authorities. The proposed development includes a primary road grid structure, local routes with pedestrian/cycle route connections, a neighbourhood centre at a prominent east west junction of the main connecting route, which would create lively, well used streets and walkable neighbourhoods which encourage linked trips and foster community cohesion.

- 5.233 All matters are reserved at this stage except for access, and as such the assessment has been considered against those plans submitted and in particular the amended Development Framework Plan and amended Illustrative Masterplan (2020).
- 5.234 The design of the proposed development seeks to respond to the specific spatial context of both Milton Keynes and Aylesbury Vale Area, and in particular the characteristics (density, built form, and open space) which define the built form of the residential areas located around or in close proximity to the Application Site. The three areas which have informed the design and layout are: the traditional grid square of Tattenhoe; the neighbourhoods in the southern part of Newton Longville; and the western neighbourhoods of Far Bletchley. The proposed design approach has been the subject of detailed discussions with both BC and MKC officers and amendments were sought to the scheme which responds to more closely to the site constraints and context.
- 5.235 In summary, the proposed uses would comprise residential development; employment area; neighbourhood centre; land for a three form entry primary school with early years provision and four form entry secondary school; green infrastructure and associated drainage, highway and transport infrastructure and the proposed distribution of uses across the site are set out on the land use parameters plan.
- 5.236 The proposed development includes a variety of residential densities, with the average density being shown as 36 dwellings per hectare (dph), which is typical of other Milton Keynes expansion areas. Lower densities are proposed at the more sensitive boundaries, and higher densities close to the primary routes and at the neighbourhood centre. The building heights are determined by their location within the site and the proposed use. The residential buildings are higher at key entrances or intersections to provide landmark or gateway buildings. The application is supported by an amended density plan which indicates the development in the southern, western and eastern edges in more visually sensitive locations will be restricted to 20-30 dph, with development increasing to 30 to 35 dph within less visible locations at the site. Towards the centre and north of the site (adjacent to primary routes) the density increases to 35-40 dph; and close to the neighbourhood centre 40-45 dph and a density of 66 dph for the extra care housing. This approach is supported by the indicative building heights which prominently proposes development limited to 2-2.5 storeys (up to 10m) with a small areas of 3 storeys (up to 11m) restricted to along primary routes and at key entrances or intersections in order to provide landmark or gateway buildings. Within the employment area building heights are shown with a maximum of 12m, which is similar to other employment sites opposite and adjacent to A421. The proposed neighbourhood centre indicated a maximum of 13m with retail and community uses at ground floor and residential above. The extra care housing will be up to 13m and the changing pavilion up to 5.5m. The proposed primary school would comprise heights up to 10m and 2 storeys for efficient use of site and the secondary school up to 12m.
- 5.237 The proposal includes large areas of open space and recreation facilities within the site, including a local park and district park, formal sports pitches, tennis courts and a Multi-

Use Games Area (MUGA), a skateboard park, children's play areas, and allotments. These facilities are located where they are easily accessible to residents within the site and also from neighbouring areas.

- 5.238 The existing rights of way and cycle routes through the Application Site will be retained and incorporated into the proposed development. The proposed development includes new and enhanced walking, cycling and public transport infrastructure and facilities, which would connect to the existing networks in the surrounding area.
- 5.239 The mixed use scheme is set within approximately 54ha hectares of parkland and a comprehensive green infrastructure strategy providing areas of public open space, structural landscaping including a linear parkland area of open space of some 40-50 metres typical width. The supporting DAS indicates that this approach has sought to create a landscape lead approach and a form of development which responds to the site context. The DAS suggests a building style of 'arts and crafts' influenced style housing with well-articulated building forms and varied roof lines to reflect a traditional 'edge of settlement' character.
- 5.240 The Crime Prevention and Design Advisor from Thames Valley Police have commented on the proposal and confirmed that they do not wish to object to the proposals at this time, however, they do identify a number of concerns which should be addressed and incorporated at the Reserved Matters stage and subject to any other conditions. A condition is recommended which would ensure the proposed development would be substantially in accordance with the Secure by Design guidance.
- 5.241 The NPPF advises that consideration should be given to using design codes to help deliver high quality outcomes. It is considered that design codes can go some way to demonstrate that the proposal would comprise sustainable development, create and sustain an appropriate mix of uses and support local facilities and transport networks and achieve high quality and inclusive design. The detailed design of the proposal is a reserved matter for later consideration and it is therefore not possible to assess this aspect fully at this stage. However, subject to appropriate conditions on any approval, it is considered this issue could be adequately addressed through design codes and the consideration of any subsequent reserved matters applications. The need for a design code (to inform future reserved matters applications) can be secured by way of condition and or s106 agreement.
- 5.242 MKC have confirmed that their Urban Design Officer considers that this application would fit well as an urban extension to Milton Keynes and complements many of the grid squares in MK for example with the inclusion of the grid road reserve and underpasses, Redway (along primary street) as well as the high provision of open space (Appendix C of MK Local Plan). The central primary street proposed also mirrors many other primary streets that "loop" through established MK estates such as Shenley Brook End, Shenley Lodge and Old Farm Park/Browns Wood.

5.243 Subject to the imposition of appropriate conditions on any outline approval to agree the specific details of design codes, materials, boundary treatments, landscaping, slab levels and lighting, it is considered the proposal could comprise an appropriate form of design in the context of the site, in accordance with VALP policies BE2, NE4, D2, D-NLV001 and NPPF advice. The proposal would accord with the principles of policy SD15 of the MK Core Strategy..

### **Flooding and drainage**

I4 Flooding, D-NLV001 Land South of the A421 and east of Whaddon Road.

5.244 Paragraph 166 of the NPPF requires new development to consider the risk of flooding to the site and elsewhere. Developments need to demonstrate resilience to climate change and support the delivery of renewable and low carbon energy which is seen as central to the economic, social and environmental dimensions of sustainable development. This will not only involve considerations in terms of design and construction but also the locational factors which influence such factors. Development should be steered away from vulnerable areas such as those subject to flood risk whilst ensuring that it adequately and appropriately deals with any impacts arising.

5.245 The Environment Agency flood map shows the majority of the site to lie within Flood Zone 1. However, the north western corner of the application site lies within Flood Zone 3. All built development is located in Flood Zone 1 (lowest risk) where the annual probability of flooding in any year is less than 1 in 1000. As there are no vulnerable land uses (classified as less, more or highly vulnerable uses (as set out in table D.2 (Flood Risk Vulnerability Classification) in the EA Guidance Note within Flood Zones 2 or 3, it is not necessary to require the applicant to carry out a Sequential Test, as the built development has been steered away from these higher risk zones, in accordance with para 166 in the NPPF.

5.246 The ES includes a chapter on drainage which incorporates the findings of the Flood Risk Assessment, which sets the drainage strategy for the site. The proposed mixed use development is on a greenfield site covering an area of approximately 144 ha. The Tattenhoe Brook flows along the northern western corner of the site prior to being culverted under Standing Way (A421) and Bottle Dump roundabout. There is a tributary of the River Ouzel, located 100 m to the south of the site, with several field drains (culverted under the railway) discharging into it. Soakage rate tests carried out on the site have established that infiltration unlikely to be viable, and it is proposed that surface water will be discharged via a series of attenuation ponds to the Tattenhoe Brook on the northern boundary (requiring consent from the Bedford Group of Drainage Boards), with run-off to the south being conveyed via attenuation basins into the network of existing field drains.

5.247 The SuDS systems required for drainage purposes will take the form of 'green' SUDS features such as swales and attenuation ponds and will be formed in the areas of open space and will be designed and managed to provide ecological opportunities.

- 5.248 The proposed dwellings would be required to be constructed to modern standards of design and sustainability to accord with current building regulations.
- 5.249 It is not considered that the proposed development would materially increase or exacerbate flood risk on the site nor in the wider locality. Therefore, the proposed development would be resilient to climate change and flooding in accordance with the NPPF.
- 5.250 In summary the LLFA has carefully considered the proposed development and Officers consider that having regard to the amended ES, the FRA and the drainage scheme proposed that the development would be acceptable. This would be subject to conditions to ensure that development does not begin until a surface water drainage scheme for the site based on sustainable drainage principles and an assessment of the hydrological and hydro-geological context of the development as set out in the FRA and also a “whole life” maintenance plan for the site have been submitted to and approved by the Council to be secured by a S106 agreement, and these conditions are considered to be required to make the scheme acceptable.
- 5.251 The ES states that Construction Environmental Management Plan will be prepared for the construction phase to manage flood risk and drainage and to prevent pollution to water. The assessment identified negligible effects on flood risk, surface water drainage, geomorphology, water resources and ground water during the construction phase. The FRA identified a minor adverse effect on water quality during the construction phase, but the effect is not significant and guidance on water pollution would be implemented to protect water quality. The ES concludes that there would not be a significant effect on flooding. The commitment to incorporating flood alleviation measures into the development as well as the detailed flood risk assessment demonstrates that the proposal takes full account of flood risk.
- 5.252 The FRA states that the Environment Agency and MK have been consulted on the proposal and they are keen for the development to encompass a range of sustainable drainage systems as part of the surface water drainage strategy. The development will include sustainable drainage systems comprising rainwater harvesting and permeable paving, and attenuation basin. The ES concludes that there would not be a significant effect drainage and water. Having regard to the flood attenuation proposals set out above it is considered that the development would provide wider benefit in terms of water quality, ecology and contribute towards the Water Framework Directive and therefore complies with policies I4 and I5 of the adopted VALP and with the NPPF.
- 5.253 It is considered that subject to the imposition of appropriate conditions and S106 obligations, the proposal has measures in place to manage drainage and flooding issues. In addition, it is considered that the proposed development would be in accordance with VALP policy I4 and the NPPF.

***Supporting high quality communications***

## 16 Telecommunications

- 5.254 The NPPF states that advanced high quality communications infrastructure is essential for sustainable economic growth. Paragraph 116 of the NPPF requires Local Planning Authorities' to ensure that they have considered the possibility of the construction of new buildings or other structures interfering with broadcast and electronic communication services. Given the nature and location of the proposed development, it is considered unlikely for there to be any adverse interference upon any nearby broadcast and electronic communications services as a result of the development.
- 5.255 It is noted that telecommunication services are located nearby in Whaddon Road and environs and has some support for ultrafast broadband with maximum upload speed of 30MBS and download speed of 151.6Mbps. It is considered that the development should maximise the use of existing capacity in utility services in accordance with planning policy guidance.
- 5.256 In accordance with VALP policy I6, developers are also expected to have explored the option of providing on-site infrastructure, including ducting to industry standards in any new residential development for efficient connection to existing networks. A planning condition will ensure that this is adequately addressed.

### **Amenity of existing and future residents**

BE3 Protection of the amenity of residents, D-NLV001 Land South of the A421 and east of Whaddon Road.

- 5.257 The NPPF in its core planning principles seeks to secure a good standard of amenity for all existing and future occupants. One of the principles set out is that authorities should always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings. Policy BE3 of adopted VALP states that, amongst other things, proposals for development will be supported provided that it does not adversely affect neighbouring properties by way of loss of privacy, daylight, noise, visual intrusion or amenity. In addition, that any new development does not result in the loss of any existing publicly accessible open space.
- 5.258 At this stage, the matters of the detailed appearance, layout and scale of the proposed development are reserved for approval at a later date (and the submitted layout plans provided are illustrative only). It is therefore not possible to make detailed assessments relating to the direct impacts the new houses would have on existing neighbours or one another (or indeed the impact that other matters such as the landscaping proposals or lighting of the site may have).
- 5.259 However, the indicative details submitted show a layout which following discussions has been amended to reflect the character and appearance of the adjacent development within MKC and that provides for spacing between and about properties such that it is considered should ensure that no adverse over or interlocking between properties should occur and that acceptable amounts of amenity space could be

achieved. Therefore, It is considered that the scheme could be designed at a detailed stage so as to ensure that the amenities of future occupants would not be adversely affected.

5.260 Matters of air quality, noise and disturbance are covered above. In summary, the ES addendum concludes that there will be varying degree of noise and vibration impacts on nearby residential receptors arising from construction and operational traffic. Subject to an appropriate layout and scale of development, it is considered that the proposed development would not result in any significant loss of light, outlook, or overshadowing to, neighbouring properties. Although there will be some impact from during the construction phase a condition requiring compliance with the submitted Construction Environmental Management Plan (CEMP) to ensure that amenities are adequately protected. It is therefore considered that at the detailed stage the proposal could be designed in accordance with VALP policies BE3, D-NLV001 and the NPPF.

### **Building sustainability**

#### **C3 Renewable Energy, T8 Electric Vehicle Parking**

5.261 The NPPF states that planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability and providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure. This is central to the economic, social and environmental dimensions of sustainable development.

5.262 The application is accompanied by a sustainability strategy which sets out how the adopted sustainability principles will be translated into practical measures on the ground and how the different sustainable interventions combine and interact to create a place where sustainable living is both desirable and achievable. In addition, an Energy strategy was submitted which reviews the range of options that exists for the generation of energy from renewable sources. The proposal will seek at reserve matters stage to address efficiency including solar gain and shading, fabric heat loss, glazing performance water demand control, through fittings and appliances etc. The solar gain will be utilised to meet both Building Regulations Requirements and the proposed developments energy target for 10% of the site's total energy demand to be served using on-site renewable energy sources and sets the residential development on a path to 'zero carbon' by 2016.

5.263 The applicant has evidenced in the submitted energy strategy how the proposed development can also be designed to achieve high standards of sustainable design and construction, with the residential aspect being compliant with Part L of the Building Regulations and the non-residential buildings will achieve BREEAM 'Very Good' as a minimum, with an aspiration to achieve BREEAM 'Excellent'. The Energy Statement identifies the use of enhanced building fabric thermal performance, reduced thermal bridging, enhanced air permeability, solar control glazing, passive solar design and

natural ventilation as design measures which would enable the housing to deliver a sustainable design. The sustainability statement highlights that an Energy Strategy and Design codes will be submitted for approval at the reserved matters stage. The development would be required to include electric charging points in accordance with policy T8 (electric vehicle parking), in addition details of high water use efficiency will be required. These would be secured by conditions and as such the development would accord with VALP policy C3, T8 and with the NPPF.

### **Infrastructure and Developer Contributions**

H1 Affordable Housing, H6b Housing for older people, BE2 Design of New development, BE3 Protection of the amenity of residents, NE1 Biodiversity and Geodiversity, NE8 Trees, Hedgerows and Woodlands, T3 Supporting local Transport Schemes, I1 Green Infrastructure, I2 Sports and recreation, I3 Community facilities and assets of community value, D-NLV001 Land South of the A421 and east of Whaddon Road.

Assessment of open space, sports and recreation needs for Aylesbury Vale (March 2017).

5.264 As noted in the sections above, there are a number of requirements which would need to be secured in a Planning Obligation Agreement to secure their delivery. Having regard to the statutory tests in the Community Infrastructure Levy regulations and the National Planning Policy Framework it is considered that the following planning obligation(s) are required to be secured within a section 106 agreement: namely, 1) financial contributions towards provision of education (primary and secondary); 2) on or off site sport and leisure provision; 3) off site farmland bird mitigation; 4) on-site provision of affordable housing, 5) financial contribution for hospital facilities; 6) provision of community facility; 7) onsite provision of primary school facilities and land for a secondary school; 8) provision of a health centre (GP surgery) (and/or financial contributions thereto); 9) provision and maintenance of public open space and recreation and play areas; 10) on-and off-site highways contributions/ works/road infrastructure works, travel plans, sustainable transport measures (and/or financial contributions thereto); 11) SUDS maintenance; and 12) phasing plan. Specific projects are also to be identified for the financial contributions to ensure compliance with CIL Regulations in consultation with relevant sections of the Council and the Parish Council.

5.265 It is considered that such requirements would accord with The Community Infrastructure Levy (CIL) Regulations 2010. Regulation 122 places into law the Government's policy tests on the use of planning obligations. It is now unlawful for a planning obligation to be taken into account as a reason for granting planning permission for a development of this nature if the obligation does not meet all of the following tests: necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

5.266 In the context of this application the development is in a category to which the regulations apply. The requirement for all of the above named measures being sought, if the proposals were to be supported, would need to be secured through a Planning

Obligation Agreement. These are necessary and proportionate obligations that are considered to comply with the tests set by Regulation 122 for which there is clear policy basis either in the form of development plan policy or supplementary planning guidance, and which are directly, fairly and reasonably related to the scale and kind of development. Specific projects would be identified within the Section 106 in accordance with the pooling limitations set forth in CIL Regulation 123 to ensure that the five obligations limit for pooled contributions is not exceeded.

5.267 The applicant has confirmed that he is willing to enter into a legal agreement and a draft of the S106 agreement was published on 28 June 2021 and is available on the Council's planning web page.

## **6.0 Weighing and balancing of issues / Overall Assessment**

- 6.1 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:
  - a. Provision of the development plan insofar as they are material,
  - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
  - c. Any other material considerations.
- 6.2 Paragraph 11 of the NPPF sets out the presumption in favour of sustainable development which for decision taking means approving development proposals that accord with an up-to-date development plan without delay; or where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.
- 6.3 VALP is an up-to-date adopted local plan and the proposal accords with VALP policies and the NPPF.
- 6.4 Special regard has been given to the desirability of preserving the setting of nearby listed buildings and the conclusion is that the proposal would preserve the setting of those listed buildings. In addition, in relation to the setting of the nearest conservation area, the impact of the built form of the development is not considered to result in any material harm to the Conservation Area.
- 6.5 The proposals comply with VALP and the NPPF relating to trees and hedgerows, parking and access, promoting sustainable transport relating to cycling, walking and public transport, public rights of way, meeting the challenge of climate change and

flooding, and conserving and enhancing the natural and historic environment, archaeology, well-designed places and design, healthy and safe communities contamination, air quality, and residential amenities.

- 6.6 Although, there would be harm to the character of the landscape and visual impacts, the proposal includes mitigation measures that minimise the impact of the development.
- 6.7 The proposal would deliver a very significant level of new homes and make a valuable and significant contribution to the Council's medium to long term housing land supply. It would also make a significant contribution to affordable housing, create significant economic benefits as a result of population growth and investment in construction and the local economy/businesses. There would be a net gain in biodiversity.
- 6.8 The proposal is acceptable on highway grounds, subject to a number of mitigation works to be secured as part of the S106 and conditions.
- 6.9 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the Equalities Act, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.

#### Prematurity

- 6.10 Objections were raised that the proposal is premature. In light of the recent adoption of the VALP (September 2021), the objections are no longer relevant.

## **7.0 Working with the applicant / agent**

- 7.1 In accordance with paragraph 38 of the NPPF (2021) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 7.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 7.3 In this instance:
  - The agent and applicant were updated of issues and consultee concerns and provided opportunity to submit further information to address these
  - The application was considered by the Planning Committee where the applicant/agent had the opportunity to speak to the committee and promote the application.

## **8.0 Recommendation**

- 8.1 The officer recommendation is that the application be Deferred and Delegated to the Director of Planning and Environment to GRANT permission subject to the satisfactory completion of a S106 agreement to secure the requirements set out in the report and subject to any conditions considered appropriate or refuse if a satisfactory S106 agreement cannot be completed for such reasons as officers considers appropriate.

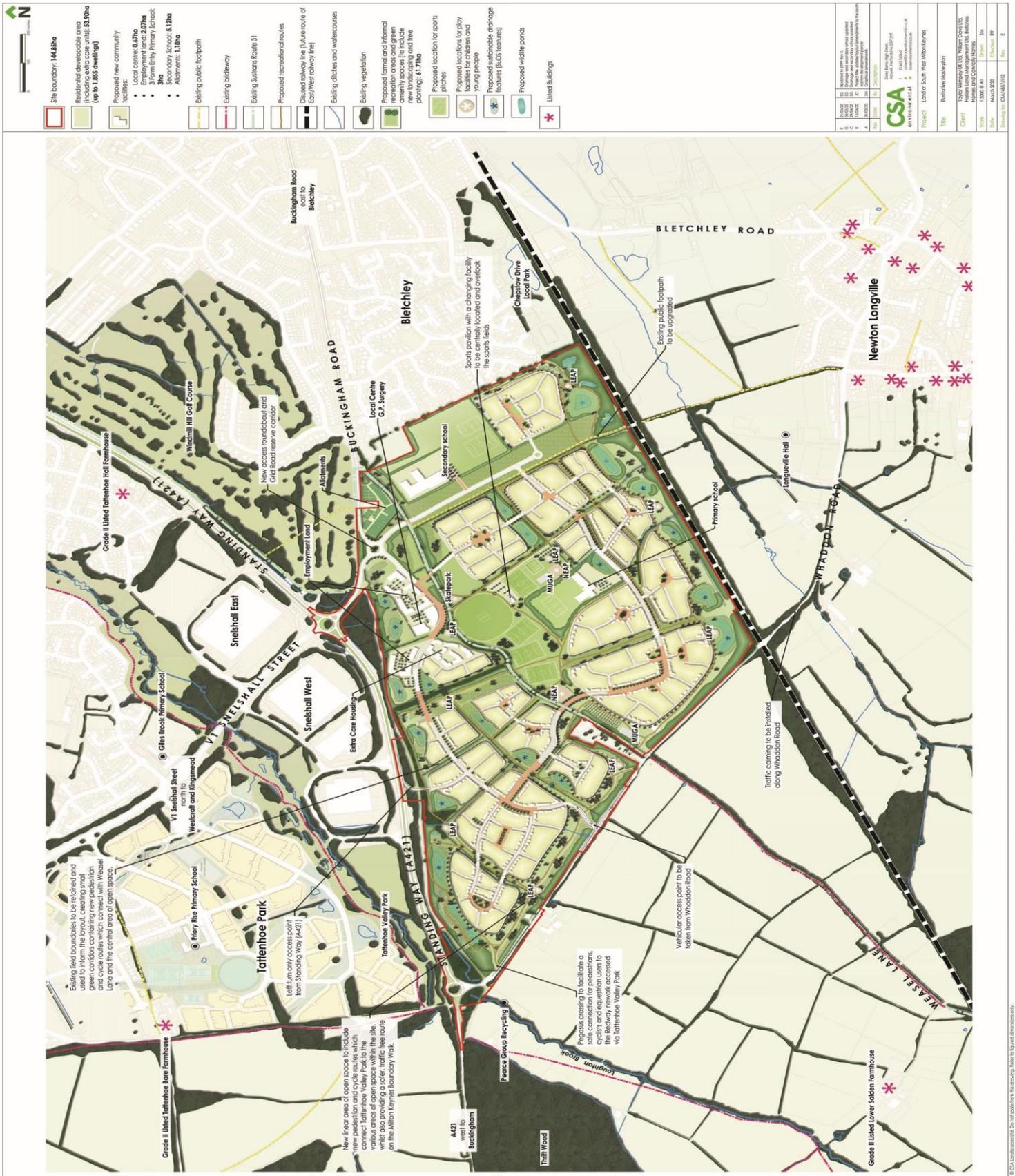
## **List of Appendices**

- Appendix A: Site Location plan
- Appendix B: Proposed Masterplan
- Appendix C: Consultee Responses
- Appendix D: General Representations
- Appendix E: Highways Response
- Appendix F: Highways Response to Milton Keynes
- Appendix G: Milton Keynes Response
- Appendix H: Planning Inspectorate MKC Appeal Decision
- Appendix I: Newton Longville Comment
- Appendix J: Whaddon Parish Council Comments





# Appendix B: Proposed Masterplan





## **APPENDIX C: Consultation Responses (Consultees)**

### Councillor Comments

*Comments inserted verbatim and/or attached as appendices*

#### **MP, Rt. Hon. John Bercow**

A letter of objection of been received from the MP, Rt. Hon. John Bercow, raising concerns regarding the policy position and in particular the consideration of the application ahead of Newton Longville's neighbourhood plan. Concerns are raised relating to the highway and traffic implications and the increased strain on infrastructure and congestion, the limitations of access to public transport and the ultimate reliance on the private car. Furthermore, concern is raised on the grounds of the loss of a distinctive aspect of the village and the implications of further linking development onto Far Bletchley. Finally objections are raised to the additional pressures this development would place on doctors surgeries as well as other vital infrastructure. In conclusion it is not considered that the development would comprise sustainable housing growth

#### **Cllr Scott Raven**

I would like to state a strong opposition to this development. Regardless of the need to meet the demand for new housing, we should not be allowing the obliteration of existing towns and villages in the process. This major development will add no benefit to the surrounding villages and will put an enormous further strain on local hospitals, highways, and welfare and education services. Furthermore, building a major development in this area of North Bucks is against previous consultant recommendations that housing is required in the South of the County. This seems like a continuation of the Oxford-Cambridge Arc project which was tabled last year by national government, and an attempt to sneak through huge scale development in the area bit by bit until the area is unrecognisable.

#### **Cllr Ben Everitt\* 30.10.2020**

Please register my consultation response as strongly opposed. Grounds include but are not limited to traffic, environment, public services, loss of enmity, highways.

*\*Mr Ben Everitt was a Councillor at the time of providing comment.*

#### **Cllr Allan Rankine (Milton Keynes Councillor) 27.07.20**

I am responding to your request for comments dated 8 July 2020

I am a Councillor for Bletchley Park Ward which borders with this application site.

I object to this development for the following reasons:

##### **1. Strategic**

This development must be considered within the wider framework of your local plan, Plan MK and the more strategic work of the National Infrastructure Commission (NIC) on Oxford-Milton Keynes Cambridge corridor. It also pre-empts and therefore cannot be informed by MKC's 2050 strategy paper for the expansion of Milton Keynes.

In their report to Government '[Partnering for Prosperity in November 2017](#)' NIC refers to the delivery of housing across the East- West arc:

*It is unlikely that this level or quality of development can be delivered if growth is focused exclusively on the fringes of existing towns and cities.*

*Such an approach to development can:*

- *be deeply unpopular with existing communities: focusing development on much loved periurban landscapes, and making it difficult for local authorities to provide for ambitious growth in their local plans;*
- *fail to deliver necessary supporting infrastructure: the incremental pattern of growth means that no single development is ever sufficient to trigger the need for investment in city-wide infrastructure and services. This can reinforce perceptions that development is a burden on communities; and*
- *reduce the potential to capture land value uplifts to fund infrastructure: as land on urban fringes is acquired, traded by speculators, or optioned by developers, the 'hope' value of the land increases. This can reduce the scale of further uplifts that result following the granting of planning permission. Local mechanisms typically used to capture land value uplifts from incremental developments (CIL and S106 agreement) are not sufficiently powerful to influence decisions on land trading and speculation, whereas statutory mechanisms to support the delivery of other forms of development (e.g. new settlements and major urban extensions) can be more effective.*

NIC also says:

#### **BUILDING INVITING, EFFECTIVE AND LIVEABLE COMMUNITIES**

*The delivery of new developments should not be of detriment to the interests of existing communities, nor need they have adverse impacts on the quality of the natural and built environment. Developing wholly new settlements provides the opportunity to recognise, celebrate and reflect the environmental and cultural assets that have made the Cambridge Milton Keynes-Oxford arc such an attractive place to live. This is an opportunity that incremental urban fringe developments, city-centre regeneration and infill developments can rarely exploit. This presents a major challenge to development around the fringes of these major regional centres, and their satellite towns. Further population growth in new suburbs, and in satellite towns and villages, together with increases in city-centre employment will place even greater demand on these towns and cities' infrastructure. It is vital therefore, that any deal under which local authorities agree to accelerated housing delivery also supports the delivery of supporting and enabling infrastructure that make it easier for businesses to locate in key towns and cities, and which enable people access the jobs they can create.*

Instead, NIC believes that major house build growth will be delivered by building brand new large towns along the Arc. This development should not go ahead until the Government makes a decision on new garden cities. On cross border developments, HMG requires planning developments to be consistent across local authorities and for plans not to be considered in isolation of each other. We risk making unnecessary errors for the futures of our communities if new housing and infrastructure developments are made in the absence of an overall strategic plan for the corridor. There needs to be fully thought-through and joined-up thinking between all of the affected local authorities.

Current infrastructure projects such as East-West Rail and the Oxford-Cambridge Expressway offer huge opportunities for our area but need to be fully integrated into local plans in Aylesbury Vale,

Milton Keynes and beyond. Innovation in intelligent transport and “smart city” technologies also provides opportunities for new ways of providing new housing, rather than relying on traditional urban expansion. The impact of Covid-19 has changed work behaviours that are likely to persist long term and this will have a direct consequence on housing need.

Milton Keynes Council is committed to plan-led rather than developer-led development and that commitment and expectation extends beyond its borders. Milton Keynes Council has an agreed policy for urban extensions on the border of Milton Keynes, defined in Policy SD15 of Plan:MK, including provisions for integration with Milton Keynes (including the grid system, Redways and linear parks).

This development could place unacceptable strain on the infrastructure and services in Milton Keynes including on highways and transport infrastructure, quality public open space, GP services and school provision;

The development proposals lack any conformity or integration with the surrounding and adjoining infrastructure of Milton Keynes BUT would likely be regarded informally and geographically as part of Milton Keynes. However, it falls outside the administrative boundaries of Milton Keynes Council so any planning decisions and future income would not fall to Milton Keynes Council. It could become a ghetto, ignored by both local authorities.

The new Buckinghamshire Council should engage with Milton Keynes Council about the long-term sustainability of extension settlements. Any urban extension to Milton Keynes within Buckinghamshire Council should adopt the Milton Keynes approach of adopting a Design Brief focussed on good ‘placemaking’, agreed by the local authority, which developers will be expected to conform to, rather than allow a developer-led design.

National guidance is clear that housing needs should be calculated and accommodated across Housing Market Areas as a whole. Where these cross Local Authority boundaries, the Duty to Cooperate should be engaged to ensure needs are met.

Through this Duty to Cooperate the new Buckinghamshire Council and MKC have established a point of disagreement over what the Housing Market Area proposed allocations should be attributed to.

I cannot support this development in the absence of a strategic long-term vision in which infrastructure precedes housing development and not the other way around.

## 2. Transport Infrastructure

SWMK have not properly considered the highways impact on Buckingham road. The highways impact focusses on Standing Way and the connection with Milton Keynes

The closest services and retail provisions are in Central Bletchley accessed via Buckingham Road. The level of congestion on Buckingham road at peak times is very bad with tail backs that stretch from the railway bridge in Central Bletchley to the roundabout at the Three Trees pub. That is about one mile and approximately half the Bletchley stretch of Buckingham road.

There are many documented flaws in the highways modelling and I have no confidence in it. The congestion on Buckingham road is real. For years, every political campaign that has been run in

Bletchley Park Ward has seen calls for a Bletchley Southern By-pass to alleviate pressure on Buckingham road

The development at Salden Chase accesses Buckingham road directly. SWMK say that any harm to the local area from road access from this development can be “adequately mitigated or would only be short to medium term in impact.”

They are talking about Standing Way not Buckingham road. There are no possible mitigations for congestion on Buckingham road. That is why residents are calling for a by-pass

Additional traffic from the Salden Chase housing development cannot make our traffic problems better but because the flawed modelling does not recognise the existing issues it therefore cannot calculate the added problems that will result from any new developments.

The application should be rejected on the basis that there are no mitigating solutions to the severe congestion issues on Buckingham Road and that new access onto Buckingham Road would add to this congestion and make life unbearable for residents.

MKC Development Control Committee have rightly recognised the flawed highways modelling and agreed with submissions on this matter. That is why the DCC rejected the highways modifications to service the SWMK development at Salden Chase. That planning application remains rejected but subject to appeal.

Buckinghamshire Council should not approve a development that has no proper access to MKC highways infrastructure and in recognition that if it did have access then it would add to the existing traffic chaos that already exists on Buckingham road.

### **Parish/Town Council Comments**

#### **Newton Longville Parish Council (23.11.20)**

#### **Objection by Newton Longville Parish Council**

Application: 15/00314/AOP “Salden Chase”

For: Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

At: Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville

(Note: The description above is as quoted by Buckinghamshire Council in their consultation letter to NLPC and site notices. It is not accurate, see 19 below.)

1. For the reasons detailed below, we respectfully request Buckinghamshire Council:

**Reject the application now** in accordance with the decision of the AVDC Strategic Development Management Committee on 7th June 2017 that:

*“That application 15/00314/AOP be Supported and Deferred and Delegated to officers subject to the completion of a legal agreement (with Bucks County Council, Aylesbury Vale District Council and if appropriate Milton Keynes Council) as outlined in the officer’s report and subject to conditions as considered appropriate by officers. **If this cannot be achieved, then the application will be refused for reasons as considered appropriate by officers.**”*

Amongst other things it is clear there is no executed, or even agreed, section 106 agreement. Surely three years is more than enough time for a Section 106 agreement to be completed.

2. Failing that, then Buckinghamshire Council should undertake a far more comprehensive and legally compliant meaningful and effective public consultation exercise which should be ongoing for as long as the applicants keep submitting changes in what they propose. Newton Longville Parish Council is more than happy to work with Buckinghamshire Council to ensure the appropriate consultation is carried out on this (as it has on planning application 20/03539/APP <https://bit.ly/GasTankerBletchleyRoad> which has attracted over 1,100 objections in less than a month due to efforts of NLPC and others).

3. The fundamental objections to this application and how it has been incorrectly handled by Aylesbury Vale District Council, is well documented and reproduced as an Appendix to this objection.

4. The application is a cross-boundary application. How a cross boundary application should be dealt with is detailed in our letter of 6th June 2016. It is not two different applications, but identical applications submitted to each planning authority each of which must be made considered holistically, not for each planning authority to act as if in a silo without any regard for the application site as a whole.

5. The consultation letter sent to Newton Longville Parish Council by Buckinghamshire Council required comments by 20th November, however it is clear, that far from adequate consultation has been undertaken by Buckinghamshire so far, as is demonstrated by the very low number of public comments as a result of the re-consultation on the amended proposals.

6. It is clear, from what has said by the QC representing Buckinghamshire Council as a Rule 6 party in the Appeal against the refusal of the application by Milton Keynes Council, that the applicants have been asked by Buckinghamshire Council to provide further information which is to be submitted by the applicants in December. This will inevitably mean further consultation is needed.

7. Under the temporary publicity requirements due to Coronavirus (as explained at <https://bit.ly/335K3Q9>) it is clear that Buckinghamshire Council should have done much more than the minimal efforts made so far to consult on the very significant, and ongoing, material changes made to this application since it was submitted over five years ago, but still not determined.

8. Given the size of this proposed development and particularly that it is subject to an Environmental Impact Assessment, Buckinghamshire Council is under an obligation to take reasonable steps to inform any persons who are likely to have an interest in a planning application.

9. The temporary changes allow local planning authorities to take a flexible and pragmatic approach according to their local circumstances. This means that Buckinghamshire Council are required to publicise an application **“in a manner which is proportionate to the scale and impact of the development”** but so far have not done so. Flimsy notices on generally inaccessible lamp columns

are of little use when they are nowhere near people affected, particularly when people are subject to lockdown, nor is an advert in a newspaper which is not generally in circulation in the area.

10. Site notices were erected dated 14th August 2020 at various locations requiring comments by 13th September (Annex 1). Further site notices were erected dated 30th October requiring comments by 29th November (Annex 2). The Town and Country Planning (Development Management Procedure) (England) Order 2015 gives interpretation of “by site display” as “the posting of the notice by firm fixture to some object, **sited and displayed in such a way as to be easily visible and legible by members of the public**”.

11. Given the current closures of most rights of way around the site, due to works being carried out by East West Rail, there is even less chance of site notices being seen. Similarly, displaying notices on such as on Whaddon Road and Standing Way in isolated locations subject to National Speed Limits are not “sited and displayed in such a way as to be easily visible and legible by members of the public”.

12. The detail within the site notices and press advert(s) do not comply with the requirements the Town and Country Planning (Development Management Procedure) (England) Order 2015.

13. Schedule 3 to the order contains the appropriate form for the notices to be published in the local press and posted on site, which subject to the temporary Coronavirus regulations, must (inter alia):

- state that a copy of the Environmental Statement is included in the documents which will be open to inspection by the public and give the address where the documents can be inspected free of charge
- state the latest date by which any written representations about the application should be made to the local planning authority (being a date not less than 30 days later than the date on which the notice is published).

14. The most recent press advert in the Milton Keynes Citizen, for which a copy is on the planning register, was on 16th July 2020 (Annex 3). Yet it was not until 29th September, over two months later that a copy of the advert was uploaded to the planning register. It appears a further advert was placed on 29th October but not copy is on the planning register. Advertising in Milton Keynes Citizen is not an appropriate way to make residents of Newton Longville and nearby villages in Buckinghamshire aware of a planning application.

15. The Environmental Statement must be placed on Part I of the planning register ... **as soon as possible** after publication, but this was not done.

16. An Environmental Statement should be in an easily accessible form, but it has been uploaded to the Buckinghamshire Council website in a haphazard way, making navigating through it a “paper chase” contrary to the principles laid down by Lord Hoffman in *Berkeley v SSETR* [2000].

*“It may consist of one or more documents, but it must constitute a “single and accessible compilation of the relevant environmental information and the summary in non-technical language”*

17. As the government guidance on the temporary regulations makes clear **“Greater and more frequent publicity** would be appropriate where the potential impact of the planning application is **expected to generate a large volume of representations**. This may be the case, for example, for

**large scale applications ... or where there has been a previous application which has attracted interest.”**

18. As has already been made clear in earlier correspondence (See Appendix) the Environmental Statement for this application was already an inappropriate “paper chase” by 2016. Then as part of their appeal an “updated” Environmental Statement was produced in May 2020 and submitted to Buckinghamshire Council by email on 19th June. This included yet another new TA with much changed or remodelled, but fundamental errors still there. 19. There had been an ongoing issue of AVDC, and now Buckinghamshire Council, failing to put documents on the public planning file in good time, if at all. For example, the letter from the agent (Annex 4) sent by email on 19th June was not uploaded until 19th August, two months later. The letter sent by email on 8th October 2020 (Annex 5) was not uploaded until 19th and 23rd October 2020. Despite several requires for an explanation for these and other delays no explanation has been provided by Buckinghamshire Council. 20. Since then there have been even more changes submitted applicants/appellants in September and October purporting to amend the Environmental Statement submitted in May 2020. Overall, this amounts to an even bigger paper chase than before. 21. The description used for the application has not been amended to include the addition a 60 bed care home as detailed in the letter from the applicant’s agent on 8th June 2020, nor does it include any mention of provision for a 6 GP surgery. The letter gives the description as:

*“Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings, including 60 extra care units (C3); an employment area (B1) including provision for a 6GP surgery (D1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school; a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.”*

22. The applicants and their highways consultants have had over five years to get this right, but it seems they are either unable or unable to defend the “data” submitted which led to the refusal by MKC. So, what should have been a new application for a fundamentally scheme was submitted, but which is still not correct. As a result, every week or so it seems another change is submitted.

23. As soon as a change is submitted, it does not take long for those very competent highways experts supporting and advising NLPC/WBC and MKC as well as Buckinghamshire Council Highways to find and point out the latest errors and/or omissions. So, there is yet another change and so the circle goes on. This is an abuse of process that should be stopped now.

24. How many attempts does it take to sort this out?

25. Within the Appeal Case Management Conference Call on 20th November it became clear that there has been multiple correspondence between Buckinghamshire Council and the applicants/appellants or their consultants which has not as yet all been made available on the public register. That these may have been Highways matters is no justification for not placing them on the planning register as required by law. The planning system is meant to be open and transparent.

*The full text including the appendices attached to Newton Longville Comment is attached as Appendix I*

**Buckingham Town Council** notes with concern that in 2020 this 2015 application has still not been determined by either AVDC or its successor the Buckinghamshire Council and wishes to reiterate their previously expressed fears over the increase of traffic generated by this proposal on the single-carriageway A421 both in the vicinity of the site (which affects commuter traffic between Buckingham and Bletchley station and school transport for the MK pupils attending the grammar school) and in the wider area, which does not appear to have the necessary capacity; and on the effect on local schools, in particular the Royal Latin School which will be the most convenient grammar school for residents' children who pass the 11+. They also support the more detailed opposition of the surrounding parishes, and the effects on the local infrastructure.

**Drayton Parslow Parish Council (01.04.2015)**

Stance: Customer objects to the Planning Application

Comment Reasons: - Residential Amenity - Traffic or Highways

Comment: At its meeting on 30th March 2015 Drayton Parslow Parish Council resolved to object to this development as it will add a considerable volume of vehicles to an already overburdened traffic system for those wishing to access Milton Keynes or Buckingham via the A421, resulting in their usage of the roads in and around Drayton Parslow as a 'rat run'.

**Little Horwood Parish Council (5.03.2015)**

Little Horwood Parish Council OPPOSES this application due to the impact it would have on traffic and particularly the flow of traffic along the A421 from the West of the development into Milton Keynes. In addition the Parish Council does not believe adequate consideration had been given to the additional infrastructure and supporting services that will be required.

Many of the surrounding villages have difficulty accessing the A421 from the South when heading towards Milton Keynes. This is particularly difficult for traffic from Little Horwood and the surrounding area where access to the A421 is via a very dangerous exit at the end of Warren Road.

This development provides the District and County with an opportunity to improve safety and the amenity to local residents by making changes to this junction.

Little Horwood Parish Council (LHPC) proposes that as part of this development either:

a. The Junction from Warren Road is closed to exiting traffic and traffic is redirected down Shucklow Hill and onto the A421 via a new roundabout situated when the road meets the A421. This also provides an opportunity to remove a dangerous staggered junction with the road towards Nash.

Or

b. A roundabout is installed at the Warren Road exit. It is noted that as this is on a blind brow this may not be the best option.

In addition, the additional traffic from this development will further compound the traffic bottleneck at the Bottledump roundabout when heading East. LHPC asks AVDC to ensure appropriate changes are made to this roundabout to ensure a clear route for traffic from the A421 and avoid unnecessary queuing at peak times.

For a development of this size the Parish Council believes there should be greater provision made for additional infrastructure, support services and amenities to meet the increased demand created by a significant increase in the number of residents in the area.

The Parish Council would like to speak at Committee should this be appropriate.

**Mursley Parish Council** – Oppose the application

**Whaddon PC**

The Parish have provided lengthy comments which have been appended in full to this report at Appendix J In summary their comments fall into various categories mainly relating to Traffic and Transport; Sustainability; Need and Location; Landscape and Coalescence.

## **Consultation Responses (Summaries)**

### **External consultee responses**

Milton Keynes Council

11.02.2021 – The changes to the proposal are not substantial. It is relevant to note that Milton Keynes Council objected to the previous application, but their views were overlooked by AVDC. It is also relevant to note that a parallel application for the previous proposal to Milton Keynes Council (reference 15/00619/FUL) for physical improvement to Bottledump Corner and a new access on to the A421 to accommodate the development of land in Aylesbury Vale District was refused by Milton Keynes Council and is currently the subject of a planning appeal. The reason for refusal was: *“That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and grid road network with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.”*

Summary A new Transport Assessment (TA) was prepared as part of the appeal mentioned above and an identical TA accompanied this application, titled as “Updated Transport Assessment” (albeit it represents a completely new analysis and can be considered a new TA). That new TA is now understood to have been superseded by the submission of TRN3 on 29th January 2021, as is the information submitted by the applicant / appellant in the intervening period. BC has very recently consulted MKC on TRN3 (and also on TRN2 which relates to its own highway network). MKC has commenced its own assessment of TRN3 and will respond under separate cover once it is able to do so; in the meantime, we trust that the following response is helpful. In terms of traffic impact, which was the main concern of the Council last time around, the new TA took an entirely new approach, which is also reflected in TRN3. The previous TA relied on data from the Milton Keynes Traffic Model to test the impact within Milton Keynes but the new TA relies on a ‘count and factor’ approach. This means that new traffic surveys were done at a number of junctions early in 2020 (before the traffic conditions were affected by Covid) to give up-to-date base data. These were then growthed to 2033 using standard factoring (TEMPRO), with traffic from the development added in and junctions analysed using junction capacity models. The two key differences over the previous TA are the fact that there is no redistribution of traffic as congestion builds up (unlike when the traffic model was used) so traffic on a particular route just continues to grow. In addition, the forecast year is now 2033 not 2026, to reflect the time that has passed since the original application and the latest estimates for build out of the development. As a result of this forecast, the 2033 base network (no development) is more congested than the 2026 base in the previous TA. Concerns have been raised with the applicant over evidence relating both to the ongoing appeal and this planning application. These discussions are ongoing and relate to matters including the Council’s serious concerns with the subsequent capacity analysis and proposed mitigation. On the basis of the new TA, the final situation with all in place is worse than if the development doesn’t happen. This is defended in the TA on the basis: i) In practice there will be some redistribution of traffic on the grid road network. ii) The mitigation means that the situation is better than if the development came forward with no mitigation. iii) The residual impact is not severe as required in NPPF.

In response to these points it is considered they are not valid because: i) There is no analysis to show whether the spare capacity exists on alternative routes so, although this may be a possibility, it cannot be accepted at this stage. ii) The correct comparison is with the base situation not with the development with no mitigation. iii) The residual impact is considered severe as there is a significant

reduction in performance even with the mitigation measures in place. It is relevant to note that the mitigation package overall is more substantial than for the previous application, where improvements were proposed to the three main A421 roundabouts only.

## Conclusion

Based on the new TA, the development has an adverse impact on the road network in Milton Keynes which is still judged to be severe with the proposed mitigation in place. On that basis, Milton Keynes Highways would recommend that Buckinghamshire Council objects to the proposed development on traffic impact grounds. However, it is now understood that TRN3 updates the new TA in relation to junctions within Milton Keynes. The Council therefore reserves its position on the application until such time as it has had time to fully consider it.

MKC Local Planning Authority resolved on the 17 November 2016 to object to the planning application consultation from Aylesbury Vale District Council, as an adjoining Local Authority to the planning application for the following reason:

The application fails to take account of the level of services and facilities required to meet the day-to-day needs of its future residents and fail to make a proportionate contribution towards an increase in the capacity of existing facilities within Milton Keynes to satisfy these increased demands and to mitigate the impact of the proposed development on existing services and infrastructure in Milton Keynes. It is therefore considered that the proposal fails to meet the statutory test for the use of planning obligations in accordance with Regulation 122(2) of the Community Infrastructure Levy Regulations 2010. Policy SD15 of the Core Strategy and Paras. 209-210 of the National Planning Policy Framework.

MKC objects to the proposal on the basis that the proposed development will also result in an adverse impact on the highways network of Milton Keynes.

MKC LPA fully support the comments put forward by NHS England and the Milton Keynes Clinical Commissioning Group in respect of the need for onsite primary healthcare provision and a per dwelling contribution in support of secondary health care facilities at Milton Keynes Hospital. Milton Keynes objects to the proposal on the basis that the development would not provide adequate primary and secondary healthcare facilities to offset the impact of the development. Furthermore should Aylesbury Vale District Council be minded to grant planning permission Milton Keynes Council Local Planning Authority would support the request from NHS England and Milton Keynes CCG that health care requirements are secured within a collaborative section 106 agreement.

Milton Keynes Council object to the proposals on the basis of the adverse impact the development would have on existing education facilities within Milton Keynes. It is considered that the proposed on site education provisions are insufficient to offset the education needs generated by the development and that given the sites proximity to Milton Keynes the burden would fall on existing facilities within Milton Keynes. It is confirmed that Milton Keynes Council does not have capacity to accommodate education need generated by this development and given the sites location within the Aylesbury Vale District Council administrative area any education need arising would need to be accommodated within Aylesbury Vale.

Whilst it is acknowledged that Aylesbury Vale District Council maybe unable to demonstrate a five year housing land supply at the time of the determination of this application and therefore

paragraphs 49 and 14 of the NPPF would be engaged Milton Keynes Council request that full consideration is given to the test of if this site would constitute a sustainable development. On the basis that the current development proposals do not incorporate the necessary critical physical and social infrastructure to constitute a sustainable development in the terms set out within paragraph 14 and therefore consider that this proposal should be refused on this basis despite the 5 year housing land supply position.

A list of S106 requirements has been provided and is addressed in more detail in the report under the heading promoting healthy communities.

**West Bletchley Council** formally OBJECTS to this planning application. The objection relates to both the principle and detail of the proposed development; the particular reasons include the following:

1. The principle of a development at the site is not supported by any adopted development plan or supplementary planning document;
2. The proposed development would place an unaccepted burden on the transport infrastructure;
3. The proposed grid road that would follow the route of a known gas main is not shown to be technically viable nor that such a proposal does not represent a health and safety risk to existing I future residents or users of the road;
4. The proposal would result in the loss of a significant amount of best and most versatile agricultural land;
5. Unreasonable draft Heads of Terms that do not reflect the way a real world timetable operates nor does it allow sufficient flexibility to account for an uncertain commercial market;
6. The impact on local services;
7. The location of the proposed allotments;

**Buckingham And River Ouzel Drainage Board** - this site is outside the Boards district, in this instance the Board has no comment to make

**Crime Prevention Design Advisor (CPDA)** - Do not wish to object to the proposals at this time, however, identify a number of concerns which should be addressed either prior to planning approval being considered or via specific conditions attached to any subsequent approval.

22.05.21 - Additional concerns/ previous comments remain relevant

**Environment Agency** - Following the submission of the FRA addendum we are satisfied that the proposed development can incorporate a sustainable method of surface water drainage without increasing the risk of flooding on or off site.

19.02.21 – No comments on the amended plans as submitted

**Natural England** - The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

**Sports England** - The additional/amended information received does not appear to relate to sport and recreation facilities therefore Sports England's comments submitted on 28th July 2020 are still applicable

**Anglian Water** - No objections and recommend the imposition of conditions

**Highways England** - Following the receipt of amended plans and additional information Highways England raise no objections and recommend that conditions should be attached to any planning permission that may be granted.

Berkshire Buckinghamshire Oxfordshire Wildlife Trusts (BBOWT) – No further comments subject to condition to secure Landscape Ecology Management Plan which incorporates a revision of the Biodiversity Impact Assessment once the details of the site landscaping are known so as to demonstrate the final plans will achieve Biodiversity Net Gain as being indicated at outline stage.

### **Internal consultee responses**

**Archaeology** – No objection in principle and recommend the imposition of a condition is applied to require the developer to secure appropriate protection, investigation, recording, publication and archiving of the results in conformity with NPPF paragraph 141 (NPPF 2019)

**PROW Officer** – Raises no objection to the application and recommends the imposition of conditions

**Drainage Engineer** - Following the receipt of further details the drainage engineer withdraws their previous comments and therefore has no objections to the application on surface water drainage grounds and recommends the imposition of the standard drainage condition be placed upon the application.

Flood Management - Based on the information provided BCC Strategic Flood Management Team has no objection to the proposed development subject to the imposition of conditions.

**Biodiversity** - These proposals involve the development of a greenfield site and are therefore highly likely to have a negative impact upon biodiversity if unmitigated. A series of ecological assessments has been produced and submitted in support of this application by the consultant FPCR. These reports detail the species and habitats currently found on the proposed development site. It is considered that this element of the ecological assessment acts as an accurate account of the features found at the time of the assessment. The recommendations of this report are not considered to be detailed enough to address the enhancement aspects of a major development of the scale proposed and the applicant will need to demonstrate how the development minimises impacts on biodiversity, provides net gains in biodiversity, and conserves and enhances biodiversity, in accordance with NPPF. The mention of ecology links in the Design and Access Addendum is welcomed but detail is required on how these measures will be achieved

**Contaminated Land Officer** - A Phase 1 Geo-Environmental Desk Study report written by Pell Frischmann has been submitted as part of the ES for the above application. After reviewing the Desk Study report and section 16 of the ES, which relates to the Ground Conditions and Contamination, it is concluded that based on the historic land uses and its current operational use, the overall risk from land contamination at the site is considered to be low for the current developments, and low for the re-developed site. However, this would need to be confirmed by appropriate intrusive investigation, testing and assessment of the results of the investigation. The officer confirms that she agrees with this conclusion and recommends the imposition of conditions on any planning approval.

**Education** - Primary, secondary and special schools including Children's Centre provision within the planning area of the development are all currently or projected to be at capacity. The development proposal borders Milton Keynes so may well impact on schools across the border. Both local authorities will need to work together to ensure that the effects of the development are most

effectively mitigated. Notwithstanding these issues, should the application be approved the County Council would require the developer to make contributions in accordance with the policies set out in its Guidance on Planning Obligations for Education Provision :

**Environmental Health** - The Environmental Statement dated January 2015, identifies that noise and vibration impacts in relation to the scheme will occur during both the construction and operation. The noise mitigation measures detailed in chapter 12 must be implemented as part of the Construction Environmental Management plan. Should this application be approved then further information will be required regarding the siting of noise sources, the use of low-noise road surfacing and any other noise mitigation measures to demonstrate that residential properties will comply with the standards specified in 8S8233:2014.

‘There are no further environmental health comments over and above those made by colleagues in their memos dated 19.02.2015, 05.09.2016 and 29.07.2020 in respect of this application. This memo does not include comments relating to air quality or contaminated land, where relevant, these comments will be provided separately’

**Housing** - Should the scheme achieve 1855 dwellings housing officers would expect at least 556 units of affordable housing to be offered in order for it to be policy compliant at 30%. These units should be of a type and size reflective of the overall housing mix whilst also taking into account the district-wide need with a suitable tenure mix to be agreed and secured as part of S106 discussions. It should be noted, however, that the affordable element of a scheme should be broadly in line with the site’s overall housing mix.

**Highways** – Following extensive discussions and the submission of amended plans detailed comments the outline application is acceptable to the Highway Authority subject to a Section 106 Agreement to secure works and contributions and to a number of suggested conditions and informatives. A full copy of the detailed comments has been appended to this report at Appendix E of this report. In summary the required contributions relate to the following matters;

- A421 Corridor Improvements - A financial contribution towards corridor improvements between Buckingham and Milton Keynes
- Newton Longville Traffic Calming A contribution towards the design, consultation and implementation of a traffic calming scheme in the village of Newton Longville to mitigate the impact of the development traffic
- Bus Service Provision - An obligation to enter into a Service Agreement with a bus operator to encourage sustainable modes of travel between the site and Milton Keynes and to support the aspirations and targets set out in the Travel Plan.
- Travel Plan – To submit for approval a Travel Plan in general accordance with the approved Travel Plan Framework and County Council’s Travel Plan Guidance for Developers.
- Travel Plan Monitoring – A financial contribution towards the auditing of the travel plan.

- Upgrade to Footpath 19 Parish of Newton Longville - A contribution is required for the improvement of the footpath between the site and the path to the footway between Nos. 36 and 38 Whaddon Road, Newton Longville to provide greater connectivity between Newton Longville and the site.
- Whaddon - A contribution towards road safety improvements on Coddimoor Lane and Stock Lane.
- Cycle Parking Provision – A financial contribution to provide additional cycle parking at Bletchley Station to encourage sustainable modes of travel between the site and the railway station and to support the aspirations and targets set out in the Travel Plan.
- Highway Works – An obligation to enter into a Highway Works Delivery Plan to secure the delivery of the following works:
  - 1) Improvements to Bottle Dump Roundabout and a Pegasus crossing on Whaddon Road in general accordance with drawings D018 Rev.A and D015 Rev.B to include CCTV camera provision and variable message signs.
  - 2) Improvement to Whaddon Road/A412 Roundabout in general accordance with drawing D019 Rev. B.
  - 3) Site Access to Whaddon Road.
  - 4) Site Access to Buckingham Road to include toucan crossings on Buckingham Road (East) and the development access road.
- Grid Road Reserve – An obligation to dedicate the land for the grid road reserve to Buckinghamshire County Council as Highway Authority, in order to not prejudice the ability of the Council's to deliver this scheme in the future.
- NLO/19/1 – An obligation to dedicate a public bridleway along the alignment of Footpath NLO/19/1 between Weasel Lane and the railway line, under Section 25 of the Highways Act.
- Weasel Lane – A contribution to resurface Weasel Lane outside the red line, from Whaddon Road south-east to the property Weasels' to provide improved connectivity to the wider rights of way network for leisure purposes.

Milton Keynes Council has set out the following obligations, which are considered necessary to mitigate the impact of the development within Milton Keynes, to be secured under Section 278 Agreement:

1. Capacity Improvements at the following junctions within Milton Keynes:
  - Bleak Hall Roundabout on A421
  - Elfield Park Roundabout on A421
  - Emerson Roundabout on A421
2. Redway provision and connections (to the A421 Redway, the old A421 itself and the new link to Buckingham Road). These connections will require improvements to surfacing, lighting and signage.

### 3. Phasing and timing of infrastructure provision

**Landscape Officer** – Following discussions and the submission of amended plans and updated ES documents the Landscape Officer accepts that the improvements to the layout will improve the visual mitigation on the receptors beyond the site boundary (in particular the views from Newton Longville to the south-east), however does not accept that views of the proposed development from the footpaths that traverse the application site would reduce to a level that any reasonable observer would regard as not being a significant change from the existing baseline views over open countryside. For these reasons the Landscape officer disagrees with the overall conclusions in the submitted revised LVIA and would advise that the scheme should be considered to have a significant adverse landscape and visual impacts to the application site itself.

In respect of the proposed impact on settlement character and identity it is concluded that generally the proposed development adopts an approach to settlement character that seeks to positively respond to the topographical and landscape issues on the application site rather than proposing a wholly MK based style of development.

**Tree Officer** - No objection - Further information required at reserved matters stage. Due to the outline nature of the application, and the resultant lack of detailed layout and technical design information etc, it is not possible to accurately assess the likely significance of impacts to trees.

However, it is clear that consideration has been given to existing trees and the constraints they may pose, and to opportunities for new planting. Therefore it is possible to state with confidence that the proposal is feasible without significant detriment to the tree stock – subject to appropriate mitigation and continued consideration of trees throughout the design process.

Accordingly, should the balance be in favour, it would be appropriate to attach conditions to any permission to secure:

- A full AIA of the final layout or individual development phases, taking into account the comments raised above, and including indicative tree protection details and Arboricultural Method Statement, in accordance with BS5837:2012.
- Full details of new planting, including a design statement, specifications for planting and aftercare, and detail showing there is sufficient space for the trees to achieve full growth potential, taking into account guidance within BS8545:2014 and clause 5.6 of BS5837:2012

The British Transport Police (BTP) Designing Out Crime Unit (DOCU)

This planning application was brought to BTP's attention by the Thames Valley Police Designing Out Crime Officer due to the close proximity of the proposed development to the railway running to the adjacent to the development. The railway is part of the proposed East-West Rail Link and BTP has recommended that the future use of the railway should be considered as part of their response.

Whilst not objecting to the application. The Officer is of the opinion that there will be an impact on the railway land and a condition should the development go ahead be imposed. The condition requires that a fence on the boundary of the railway must be in line with the Network Rail Standards should be put on the developers. Further guidance is available to help clarify risks within the proposal and provide designing out crime advice for those parts of the development which may impact on the railway.

## **APPENDIX D: General Representations**

### **Amenity Societies/Residents Associations**

#### **Bletchley Park Area Residents Association (BPARA) and the Consortium of Bletchley Residents Associations (COBRA).**

- Considers that the Committee failed to have regard to any of the important information provided by various parties who opposed the application.
- Disappointed that AVDC is continuing to consider this application rather than defer any consideration until 2 important matters are concluded:
  - Approval of the Aylesbury Vale District Local Plan (AVDLP), and
  - Confirmation of the precise route of the Cambridge/Milton Keynes/Oxford Expressway:
- The draft AVDLP refers to only 35% of development in rural areas, of which application 15/00314/AOP must form part.
- It is disappointing to note that Milton Keynes Council are no longer seeking contributions via Section 106 monies for a number of services other than a contribution towards Milton Keynes University Hospital. As previously stated, Council Tax Payers in the Milton Keynes area will have to fund these services and any infrastructure requirements as residents of the proposed development will use Milton Keynes and not Aylesbury Vale services.
- AVDC have a duty to seek to ensure contribution to Blue light services are properly investigated rather than requests dismissed as relevant tests not met

#### **Newton Leys Residents Association**

Newton Leys is a development that straddles the boundary of Milton Keynes and Aylesbury Vale. We believe that development of this size which cross local authority boundaries, simply do not work. We have first hand experience of much needed community facilities not being developed, and political squabbling between authorities

Milton Keynes and Aylesbury Vale have very different policies for local residents, and Newton Leys is an example where people living either side of the same road can have refuse collected either weekly or fortnightly and be subject to completely different planning policies. People who are situated at Newton Leys will generally use the facilities within Milton Keynes, without funding support from Aylesbury Vale. It simply does not work. We suggest that is building go ahead, the area should be subject to a boundary review and ceded to Milton Keynes.

No development should take place without local transport infrastructure in place such as the Southern Bletchley relief Road, and the development of an interchange on the East West rail link, this would allow quick access via train to Aylesbury, Bletchley and Milton Keynes.

#### **The Parks Trust Milton Keynes**

- insufficient about how the Old Buckingham Road along the northern edge of the development. There is some reference to this being enhanced as a pedestrian/cycle green link however there is still no indication of how the informal car parking area that currently

exists at the west end of the old road is to be treated. This area has a history of anti social behaviour and fly-tipping.

- The application should be supported by a clear strategy setting out on how the open spaces and green infrastructure in the development will be managed and maintained in the long term. This should identify which body/bodies will take on this function and how the future maintenance of the open spaces will be funded.
- A general Landscape Strategy should be developed setting out the design principles for new areas of open space, play areas as well as retained landscape and ecological features such as hedgerow and trees
- A set of clear landscape design principles for the SUDS/attenuation ponds and basins should be developed. In particular these principles should include guidance on the safety risks of water bodies in public open spaces and how good design can reduce these risks (e.g. shallow bank gradients) and how the features will be maintained via good access routes for machinery to cut
- vegetation, dredge accumulations of silt, etc. The guidance should also include for the landscaping of these ponds to optimise their amenity and ecological potential in line with their drainage function.

### **Other Representations**

A total of 482 letters of representation had been received to the original submission, 478 of which raise objections, and 4 letters raise comments that neither support nor object. The salient objections raised are as follows:

- Existing road which runs East-West through Newton Longville is already deteriorated from use by all classes of vehicle, and many people exceed the speed limit.
- Potentially an extra 1000+ cars to the roads during peak hour will increase noise disturbance, air pollution and further damage the road surface, as well as increasing the risk of a road accident for those who live in the village.
- There was previous significant opposition to the development in 2010/2011.
- Roads around Newton Longville, Far Bletchley, Stoke Hammond, Mursely, Drayton Parslow, Stewkley and Whaddon, as well as the Bottle Dump roundabout and the A421 will have to work beyond their capacity and congestion is experienced in the vicinity and there are already bottlenecks experienced as a result of infrastructure constraints present.
- Current road infrastructure around Bletchley is unable to cope with the volumes of traffic. Any increase is unacceptable.
- Inadequate public transport means the majority of residents will use their cars to travel everywhere.
- Development will be too high density, and there will not be enough off-street parking spaces.
- There is inadequate parking provision in Bletchley to accommodate the shoppers that would arise from the proposal, there are currently capacity issues.
- Provision of the layout and location of access points to the site is inadequate. All 3

are very dangerous with 2 being on 60mph roads, with bends and hazards, and 1 on a 70mph dual carriageway on a downhill slope that is regularly used by large goods vehicles. During rush hour it would take a long time for the road to be clear for just 1 car to safely exit the site, let alone a potential 2,000 cars. Accident waiting to happen.

- There is no practical pedestrian access from the new development to the nearest shopping destination – Bletchley centre.
- The development would put strain on the already hard-pressed police resources in Milton Keynes.
- There will be an adverse impact on the current village school, either it will not be able to cope with the influx of students, or it will close due to students going to the new school that is proposed.
- The educational infrastructure is inadequate to provide for an influx of this size, they are stretched thin as is.
- Despite being residents of Aylesbury Vale, residents of this development would likely use the facilities in MK, due to their closer proximity. E.g. being expected to use Stoke Mandeville hospital is preposterous when it is a 45 minute drive away, while MK hospital is just a 15 minute drive away. The development would therefore put significant strain on services in MK, namely Milton Keynes General hospital.
- The development threatens the settlement identity of Newton Longville.
- Amenity and recreation from the footpaths that cross the historic field system will be denied for current and future generations of the village.
- The development will generate further noise, light and air pollution.
- Proposed 3 storey buildings will create unacceptable visual exposure and be out of character with the village of Newton Longville as well as be detrimental to the appearance of the countryside.
- There is a risk of flooding that will impact this development and the surrounding areas.
- Disruption of and loss of precious habitat for wildlife, including an endangered protected species of bird
- Wildlife highly valued by local residents, provides a spectacle for recreation when walking in the countryside.
- The traffic and identity implications experienced by Newton Longville as a result of the development will severely detract from the conservation area.
- The proposed housing would be very close to existing housing, blocking both light and taking considerable privacy.
- Valuable agricultural land will be lost, reuse of existing buildings and brownfield sites should be sought first.
- The application is premature, submitting before the completion of the VALP and emerging Neighbourhood Plan.
- The development of an urban extension, with a population of a small town in a largely rural setting is not in keeping with the rural context of Newton Longville and the wider area.
- AVDC will get the vast majority of council tax and S106 taxes, while MKC will have to put up with the costs and additional strain.

- “As a taxpaying Milton Keynes residents, object strongly to having to fund facilities for residents in Aylesbury Vale”.
- To consent this proposal without a whole-hearted approval from MKC will store up problems for the future. The district council boundary should be moved to include the area within MKC, only then can a rational decision be made.
- There is no need for this volume of housing in AVDC or MKC, hence it is superfluous to requirements.

Following receipt of amended plans/additional information in August 2016, 102 further letters of representation were received. The letters reiterated those points set out above and whilst a number of letters acknowledge the changes to the scheme, they continue to raise objections to the proposals and make the following additional material considerations;

- There is a need for the provision of further infrastructure associated with the scheme including a youth centre, bowling green and public house
- The proposed local centre should be more accessible
- There is a need for greater emphasis to be given to the employment provision on the site
- The requirement for duty to co-operate has failed to be met by AVDC
- No regard has been given to the future potential of the Oxford – Cambridge expressway proposals
- Granting permission on this site sets clear future precedents for similar schemes which would have a significant impact on the adjacent settlement identifies and landscape impact
- The grid road should make provision for a dual road. The current position of the reserve grid road is considered inappropriate
- The proposals would put increased pressures on already stretched infrastructure, further emphasised by the failure of the proposal to improve hospital provision
- Insufficient traffic surveys/assessments have been undertaken and the possible potential of increased use of Newton Longville as a rat run is underestimated
- The provision of an additional roundabout on the A421 would negatively impact upon traffic flow
- The impact of construction traffic will have significant adverse impacts particularly given the extensive period for construction
- Proposal has a contrived and insufficient parking provision and fails to address the issue of the displacement of existing on street parking that would be lost through the development of this site.

Following receipt of amended plans/additional information in July, October 2020 and February 2021 respectively, 3 further letters of representation comprising one letter of support and 2 letters of objections were received. The following additional material considerations matters were raised.

#### Objections

- The issues raised relates to overstretched amenity especially health and educational facilities

- Impacts on Highway network – clogged roads, rats runs, massive roadside and pavement parking.
- The development should be considered within the wider framework of the Local Plan and overall strategic plan for the corridor
- The development should not go ahead until the Government makes a decision on new garden cities
- The impact of Covid-19 has changed work behaviours that are likely to persist long term and this will have a direct consequence on housing need.
- Cannot support this development in the absence of a strategic long-term vision in which infrastructure precedes housing development and not the other way around
- SWMK have not properly considered the highways impact on Buckingham Road. The highways impact focusses on Standing Way and the connection with MK. The closest services and retail provisions are in Central Bletchley accessed via Buckingham Road. It is my personal experience that the level of congestion on Buckingham Road at peak times is very bad with tail backs stretching one mile.
- There are no possible mitigations for congestion on Buckingham road
- there are no mitigating solutions to the severe congestion issues on Buckingham Road and that new access onto Buckingham Road would add to this congestion and make life unbearable for those of us resident in this area

#### Support

- It is a logical development area. It provides schools and will prevent secondary school children having to travel from Newton Longville to Wing, Aylesbury or Buckingham. It may well provide better local amenities.

This page is intentionally left blank



Directorate for Planning Growth & Sustainability  
Buckinghamshire Council,  
Walton Street Offices,  
Walton Street,  
Aylesbury  
HP20 1UA

highwaysdm@buckinghamshire.gov.uk  
01296 382416  
www.buckinghamshire.gov.uk

Directorate For Planning, Growth And Sustainability  
The Gateway  
Gatehouse Road  
Aylesbury  
HP19 8FF

Date: 13<sup>th</sup> April 2021

Your ref: 15/00314/AOP

Sent to: devcontrol.av@buckinghamshire.gov.uk

Dear Sirs,

**Re: South West Milton Keynes, Updated Transport Assessment**

**Location: Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville**

**Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.**

Thank you for your letter dated the 8<sup>th</sup> July 2020 in which you requested comment for the above application.

The planning application was originally submitted in 2015 and was supported by a Transport Assessment undertaken by Pell Frischmann on behalf of the South West Milton Keynes Consortium, dated January 2015. Buckinghamshire County Council raised several concerns with the Consortium regarding the methodology of the assessment, including the appropriateness of Milton Keynes Traffic Model (MKTM) to assess the traffic impact within Buckinghamshire and the scope of the study area within Buckinghamshire.

Mouchel transport consultancy were appointed by the Consortium to agree a methodology for progressing transport and highway matters resulting in a revised Transport Assessment, submitted in September 2016. The revised Transport Assessment supersedes the original Transport Assessment and had been compiled following extensive discussions with Highways England, Milton Keynes Council and Buckinghamshire County Council.

Highway Authority comments were provided on the 28th April 2017 and the application initially considered at the Strategic Development Management Committee (SDMC) on 7th June 2017. Members, at their meeting resolved that the application be deferred and delegated to officers for approval subject to the completion of a legal agreement and appropriate conditions. Following the resolution to grant permission taken at the Committee meeting, Officers engaged in ongoing negotiations in relation to the S106. The application was subsequently reported back to SDMC on 24th April 2019 to update members on the latest position on the S106. The update Committee report set out that the Council were satisfied that sufficient justification had now been provided to secure the contribution towards secondary health care at MK University Hospital. The report also set out that the changes in circumstances since the application was considered by Committee could not justifiably alter the conclusion that the proposals constitute a sustainable and acceptable development.

Since the resolution was taken at the Committee meeting in April, the applicants have submitted a package of updated documents and associated plans proposing amendments to the scheme. This is

included a revised Transport Assessment and Framework Travel Plan (May 2020), the scope of the revised TA was discussed and agreed between the Applicants and representatives of both Buckinghamshire Council (BC) and Milton Keynes Council (MC) with Buckinghamshire Council providing final agreement on 20th February 2020. Two Technical Notes were further submitted ahead of submission of the revised TA for Trip Generation and Trip Distribution. The Trip Generation Note was accepted by BC on 26th March 2020 and MKC confirmed acceptance on 7th April 2020 in email sent by their representative Nigel Weeks Stirling Transport. The Trip Distribution Note was submitted for review on 26th March 2020 and MKC emailed acceptance of the methodology on 7th April 2020 by Nigel Weeks. BC raised several comments in a series of emails on review of the revised TA it was noted that some of these comments had not been addressed and were subject to further discussion. Initial Highway comments were provided on 29<sup>th</sup> July which in turn led to a further Technical Note (TRN1) submitted in September 2020. Further comments were provided on the TRN1 on 2<sup>nd</sup> October 2020 with a further Technical Note TRN2 submitted in December 2020 and TRN3 in January 2021 with further clarification letters provided by the Applicant. The following comments are based on the revised May 2020 submission along with TRNs 1 to 3:

## 1. Trip Generation

The trip generation methodology used has been to identify person trip rates for each land use and apply appropriate mode shares. The agreed Trip Generation is detailed in TRN2 and incorporated comments received from Buckinghamshire Council in relation to trip diagram discrepancies and the use of higher employment trip rates to ensure a robust assessment.

### (i) Residential Trips

The residential land use will consist of up to 1,855 dwellings including up to 60 extra care units. The TRICS trip generation database was interrogated to identify trip rates with the category 'Private Houses' selected to reflect the likely mix of dwellings proposed on the Site. Buckinghamshire Council requested further details of the trip rates for the care units to ensure that the 'Private Houses' trip rates were suitable for this alternative dwelling type. TRN1 provided additional data and confirmed that care unit homes have a lower trip rate, and therefore the use of the 'Private Houses' rate for all dwellings provides a robust assessment. Comparison of the TRICS categories are provided below.

Trip Type	AM Peak (08:00- 09:00)	PM Peak (17:00-18:00)
Care Home Person Trip Rate	0.287	0.312
Residential Trip Rate (from updated TA)	0.994	0.878
Difference	0.707	0.566

The AM and PM peak trip rates (per dwelling) were extracted from TRICS and applied to the dwellings to derive the resultant trips shown in the table below.

Residential Trip Rates (per dwelling)	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Residential Person Trip Rate	0.197	0.797	0.994	0.611	0.267	0.878
Residential Person Trip Generation	365	1478	1844	1133	495	1629

The person trip rates, and the subsequent trip generation were then disaggregated by journey purpose and mode. This approach enabled detailed consideration of internalisation as well as providing an opportunity for different mode shares to be applied to each journey purpose. This methodology utilised National Travel Survey (NTS 0502) data which identified journey purpose by time of day.

Education trips are separated within NTS 0502 into those that are escorted and those that are not. For the purposes of the trip generation it was assumed that unescorted education trips represent those undertaken by secondary, further and higher education pupils, whilst education escort trips were assumed to be undertaken by primary school pupils.

The following mode share and internalisation assumptions were applied after the trips were split by journey purpose:

- Commuting and Business - Census Travel to Work data was used to provide a mode share. A 10% reduction in employment and business trips was assumed to reflect the presence of employment land uses on Site.
- Education – 90% of trips were internalised reflecting the presence of a secondary school on Site. The remaining 10% were considered external and the commuting and business mode share used.
- Education Escort – 90% of trips were internalised reflecting the presence of a secondary school on Site. The remaining 10% were considered external and the commuting and business mode share used.
- Shopping – 20% of trips were internalised reflecting the presence of a local centre on Site. The remaining trips were externalised using the commuting and business mode share.
- Other trips – all trips were considered external and utilised the commuting and business mode share.

A review of Census data was undertaken to identify the mode share for residential external trip making by all journey purposes. Owing to the location of the Site, adjacent to Milton Keynes, the output areas in the south west of Milton Keynes along with the output area in which the Site is located were used as a proxy for the Proposed Development.

The trip generation for each mode share were calculated and then combined to provide the overall external to development residential land use trip generation.

The residential trip generation uses the industry standard TRCIS rates for the proposed land uses. The disaggregation of trips to journey purpose and reduction for internal trips is an acceptable method and provides a robust and representative methodology for determining trips for a development of this size and its location.

#### *(ii) Employment Trips*

For employment trips the TRICS trip generation database was interrogated to identify appropriate employment person trip rates that reflect the land uses proposed on Site. The TRICS category 'Business Park' was used to reflect the multiple tenant employment area proposed, which is the most representative land use. The trip rates were extracted, and the resultant generation determined by the predicted number of jobs.

Buckinghamshire Council raised an issue with the projected number of jobs within the development (895 in the May 2020 TA), as this was a change in the number of jobs from those previously agreed as part of the scoping process which resulted in significant reduction of employment trips. Buckinghamshire Council requested that the number of jobs assumed in the highway network assessment increased to 1021 on the basis of 929 jobs plus a 10% buffer, which accounts for the smallest floorspace area per employee ratio rather than a median point within the floorspace range within the Employment Assessment, and would provide a robust assessment. The new employment trips were included in the revised assessment as detailed in TRN1.

The employment trip generation was adjusted to remove the internal employment trips generated by the residential land use. Rather than apply a percentage reduction the actual number of internalised residential trips were subtracted from the gross external employment trip generation. The Census Travel to Work data was then further utilised for the same MSOAs as that of the residential land use to generate an employment mode share.

The employment trip generation uses the industry standard TRCIS rates for the proposed land uses. The disaggregation of trips to journey purpose and reduction for internal trips is an acceptable method and provides a robust and representative methodology for a development of this size and its location.

*(iii) Education Trips*

The assumptions around education trips are the same as those agreed for the 2016 TA, which were derived following discussions with then Buckinghamshire County Council’s education department. The results of which were that the primary education trips are likely to be predominantly internal trips within the site and would therefore not impact on the external road network.

The secondary school trip generation was derived using the previously agreed external vehicular trip generation from the August 2016 TA, as shown below in the table below.

Secondary School Trip Generation	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Staff	24	0	24	0	15	15
Pupils	73	73	146	0	0	0
Buses	3	3	6	0	0	0
<b>Total</b>	<b>101</b>	<b>76</b>	<b>177</b>	<b>0</b>	<b>15</b>	<b>15</b>

The Secondary School vehicular trip generation was then factored up to represent an all mode trip generation. The staff all mode trip generation was then based of the following assumptions, which were derived from the 2016 TA and associated TNs:

- 58 staff members of which 69% would be teaching staff and 31% non-teaching staff.
- 50% of teaching staff would arrive and depart in the peak hours. 90% of non-teaching staff would arrive in the AM peak and 10% depart in the PM peak.
- The Census Travel to Work mode share previously adopted in the 2016 TA has been used for the staff trips.

For student trips it was assumed that the four-form of entry school proposed would have a capacity of 600 students and that all would be present on Site each day for robustness. In addition, all pupil vehicular arrival trips would have a corresponding vehicular departure in the AM peak. For staff trips, 20% were then assumed to be internalised and 50% of the student trips were internalised. The resultant combined external staff and pupil external all mode trip generation for the secondary school is presented below.

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Rail	8	0	8	0	1	1
Bus	129	0	129	0	1	1
Taxi	0	0	0	0	0	0
Motorcycle	0	0	0	0	0	0
Car Driver	98	73	171	0	13	13
Car Passenger	89	0	89	0	1	1
Cycle	7	0	7	0	0	0
Pedestrian	94	0	94	0	2	2
Total	413	73	498	0	18	18
Vehicular Total – (Total from 2016 TA – includes allowance for school buses)	101	76	177	0	15	15

The resultant external school trips are based on previous agreements and detailed discussions and are still considered an appropriate methodology to provide a robust trip generation value.

*(iv) Neighbourhood Centre Trips*

The neighbourhood centre is proposed to serve the needs of the Proposed Development and as such will not have an external trip generation, other than servicing trips.

*(v) Servicing Trips*

Servicing trips have been calculated based upon the LGV (Light Goods Vehicle) and OGV (Other Goods Vehicle) trip rates obtained for the various land uses from TRICS, which was agreed as part of the scoping study. This was considered an appropriate methodology to determine Service trip rates.

*(vi) Total Development Trips*

The Proposed Development total trip generation is a combination of all the proposed land uses which includes external residential, employment and secondary education trips. This provided the total development trips as outlined in the table below, which includes the increase in employment trips as requested by Buckinghamshire Council. On review of TRN1 discrepancies were noted in the traffic flow diagrams between the number of trips as detailed in the table below and within the flow diagrams, these were updated and the discrepancies resolved in TRN2 and TRN3.

Mode	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Rail	0	0	0	0	0	0
Bus	161	53	215	66	41	106
Taxi	6	9	15	10	8	18
Motorcycle	6	9	15	10	8	18
Car Driver reduced to account for servicing trips	530	729	1257	806	576	1382
Car Passenger	134	63	198	77	55	132
Cycle	19	18	37	22	16	38
Pedestrian	135	45	180	53	47	100
Servicing	19	15	34	9	9	18
<b>Total – Person Trips</b>	<b>1010</b>	<b>940</b>	<b>1950</b>	<b>1053</b>	<b>759</b>	<b>1812</b>
<b>Vehicular Total – (sum of Taxi, Motorcycle and Car Driver and servicing)</b>	<b>563</b>	<b>763</b>	<b>1325</b>	<b>838</b>	<b>602</b>	<b>1440</b>

All the trip generation has been derived using industry standard TRICS database or on previously agreed assumptions that are still considered valid. The overall trip generation methodology is considered to be appropriate and thereby provides a robust assessment for the development.

*(vii) Construction Traffic:*

The impact of the trips generated by construction traffic during the build out of the development have been calculated within the Environment Statement. The Applicant has provided a number of assumptions in relation to construction activity that have been used to develop a profile of the likely construction traffic trip generation with a summary detailed in the table below.

Phase	Land Use	Staff (per day)	Staff Vehicles (75% car driver)	HGVs (vehicles per day)
Infrastructure	Site Setup	30	23	20
1	Residential	195	146	15
	Local centre	30	23	5
	Education	30	23	5
2	Residential	195	146	15
	Employment	30	23	5
3	Residential	195	146	15

It is considered that the flows provided for construction traffic are acceptable and developed in line with best practice and would provide the basis for a robust assessment.

## 2. Trip Distribution

To distribute and assign the vehicular trips on the highway network two distributions were derived:

- residential trip distribution
- employment trip distribution

The residential trip generation (for all journey purposes) was distributed using the residential trip distribution and all other land uses, including servicing trips were distributed using the employment trip distribution. The process for deriving the two trip distributions is provided below.

### (i) Residential Distribution

A two-stage trip distribution was adopted for the residential trips. Firstly, 2011 Census, 'Location of usual residence and place of work by method of travel to work' data at the MSOA level (WU02EW) was extracted from Nomis to provide the proportion of trips to each MSOA across the Country from the five MSOAs used to derive the mode share for the Site. Data for the mode car driver was used to ensure that trip patterns replicated the mode to be used within the highway network assessment. The destination MSOAs were then ranked by the total number of people making the journey per MSOA and the most popular destinations were analysed.

An online journey planner was then used to find the quickest route to the destination MSOA from the Site in order to assign the trips to the network. The journey planner was set to a weekday 8am start time to ensure that peak period congestion was accounted for. Where more than one route was identified the trips were split proportionally between those routes. For example, if two routes were identified by the online journey planner with a similar journey time the trips would be split 50% to each route.

### (ii) Employment Distribution

The same methodology that was developed for the residential trip distribution was applied to the employment trip distribution. However, instead of using outgoing trips (workplace trips from the five selected MSOAs to all other MSOAs) incoming trips were selected (trips to the five selected MSOAs from all other MSOAs).

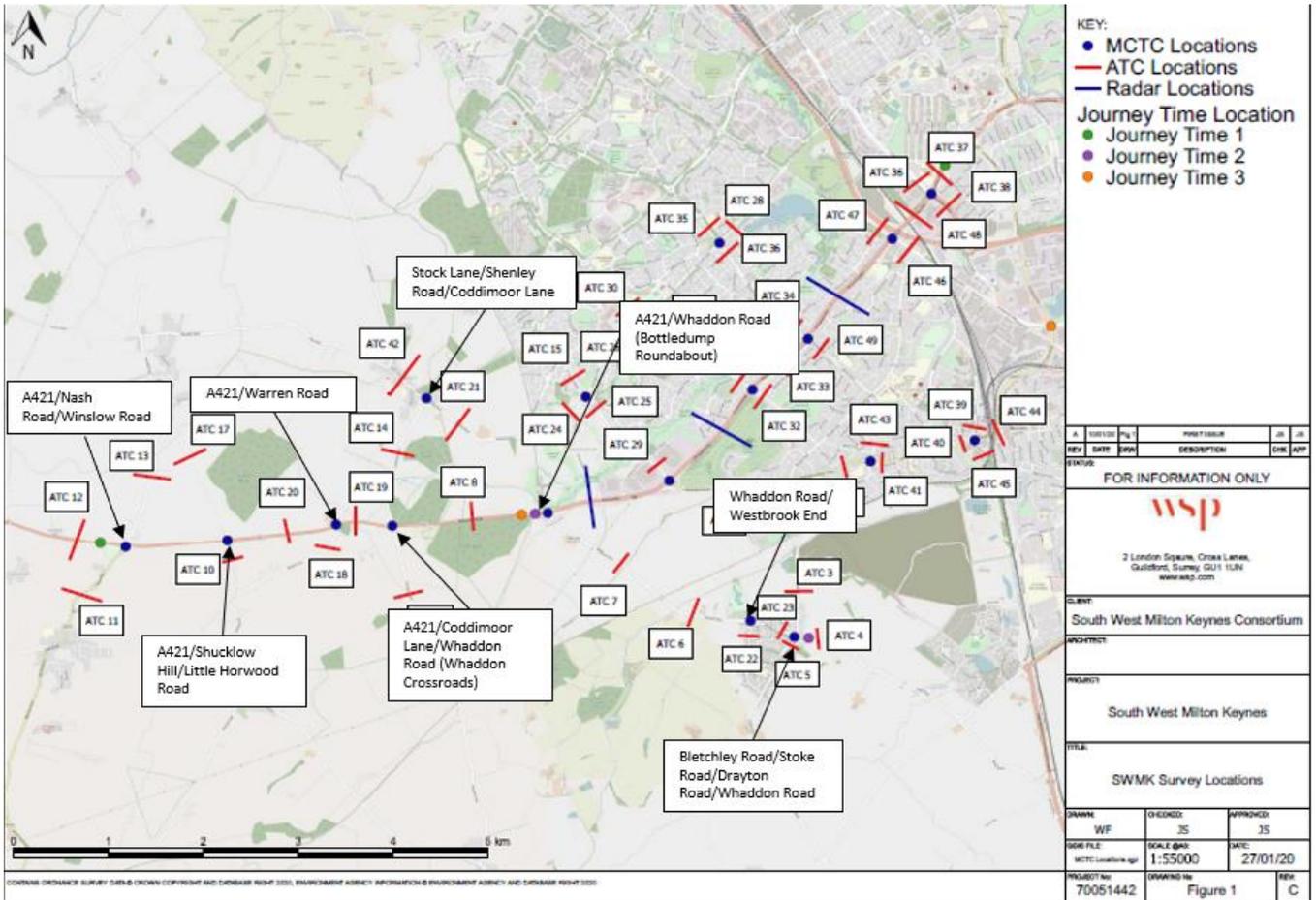
### (iii) Study Area

Traffic flow diagrams were created that represented the study area for the TA. This study area included 18 off-Site junction locations, eight of which are fully or partially within Buckinghamshire border, where it had been agreed as part of the scoping process that capacity assessments would be required. The distribution was then applied to the trip generation using a two-stage approach. Firstly, routes across the traffic flow diagram were coded by the junctions that traffic would travel through to get to and from the Site. Once at the Site boundary, trips were then assigned to one of the three access points based upon their land use and location within the Site. To do this a review of the masterplan was undertaken and a judgement made about the proportion of development that would use each access point based upon the layout of the Site.

Buckinghamshire Council requested a change in both employment and residential trip generation to that shown in the May 2020 TA, to better reflect potential trips within Buckinghamshire. This was addressed in TRN1 with a revised distribution assigned to the network. The use of census data to determine travel patterns from the adjacent areas to determine likely movements to and from the development, along with the use of an online journey planner to determine likely routes is considered and appropriate methodology for determining distribution and provides a robust assessment.

## 3. Traffic Surveys

A series of traffic surveys were commissioned in February 2020, including Automatic Traffic Counts (ATCs), junction turning counts, and queue length surveys. The ATC data covered a two-week period, and the turning counts and queue length surveys were carried out over three consecutive mid-week days at the sites shown in the image below:



Analysis of the ATC data demonstrated that traffic conditions on the days the turning counts and queue length surveys were carried out were 'typical', i.e. no major incidents on the network were identified.

The scope and location of the surveys were agreed with Buckinghamshire Council and MKC prior to being commissioned. Whilst concerns have been raised by objectors regarding the validity of the surveys, including that the surveys were not conducted within neutral months, the Highway Authority is satisfied that surveys have been carried out in accordance with best practice and the 2020 base data is robust. To this end further analysis was conducted of the survey performed in February 2020 and the permanent traffic counter on the A421 to the west of the Bottledump roundabout and one of the new survey ATC sites.

The average two-way flow on A421 Standing Way was reviewed for the period from 0800 - 0900 by month for 2017 to 2019 period and this was compared to an average neutral month across the period. The average two-way traffic flow on the A421 between 08:00 and 09:00 across the neutral months (March to November, excluding August) is 2,404 vehicles. In February, the average flow is 2,372, 32 vehicles less than the average for the neutral month. The same exercise has been undertaken for the 17:00-18:00 hour period, this showed that the average two-way traffic flow on the A421 between 17:00 and 18:00 across the neutral months is 2,501 vehicles. In February, the average flow is 2,394, 89 vehicles less than the average for the neutral month. This indicates that traffic through the month of February is comparable to neutral months.

#### 4. Forecast Year

A future forecast year of 2033 was agreed between Buckinghamshire Council, Milton Keynes Council, and the Applicant as this should coincide with the full occupation and the end of the current VALP assessment period. To assess the impact within Buckinghamshire and Milton Keynes and establish a forecast year, use has been made of the Trip End Model Presentation Programme (TEMPro). This is an industry standard tool used to estimate traffic growth. The NTM dataset AF09 was used to establish an NTM adjusted local traffic growth factor, between the base year 2020 and the forecast year of 2033.

For the purposes of this assessment, the geographic area of Milton Keynes was selected and growth factors for car driver trips selected and agreed with Buckinghamshire Council. The use of Milton Keynes growth factor was considered appropriate to provide a consistent value across the combined authority network, furthermore the growth values are higher than the geographical area of 'rural (Aylesbury Vale)' and provides a robust assessment. Adjustments have been made to take account of local planning assumptions, which were agreed with the Highway Authority.

Scenario	AM Peak	PM Peak	Daily	Weekday
2020-2033	1.147	1.154	1.168	1.166

The high growth rate, adjusted for local planning factors, is assumed to accommodate the future developments in the local area over the assessed period. The planning factors have been reviewed and the Highway Authority is satisfied that this adequately captures minor developments in the area.

## 5. Scenario Testing

To determine the impact of the Proposed Development on the highway network, the roads and junctions in the vicinity of the site were tested against three development scenarios. The purpose of scenario testing is to determine the level of impact considering external factors including background growth on the highway network and other committed developments in the surrounding area.

Buckinghamshire Council requested the effects of the FTP were not considered within the main assessment scenario. Instead the effects of the development including consideration of the targets established in the Framework Travel Plan are established through a separate sensitivity test. In addition, at the request of Buckinghamshire Council, the neighbouring draft allocation site at Shenley Park was also considered within a separate sensitivity test. This resulted in the following scenarios being used for assessment purposes:

- Do Nothing - base traffic with committed developments but without the Proposed Development
- Do Something – base traffic with committed developments with the Proposed Development
  - 2020 Base Year
  - 2033 Do Nothing
  - 2033 Do Something 1
  - 2033 Do Something 2 (Do Something 1 + reduction to account for travel planning at the Proposed Development)
  - 2033 Do Something 3 (Do Something 1 + Shenley Park draft allocation)

These scenarios were agreed with Buckinghamshire Council and Milton Keynes Council. The exclusion of travel planning measures in the Do Something 1 results in a robust worst-case scenario and Buckinghamshire Council are satisfied that this scenarios tested provide a robust assessment of the impact on the surrounding network.

## 6. Committed Developments

It was agreed with the Applicant that the only committed developments requiring consideration within the core scenarios of this TA are Tattenhoe Park and Kingsmead South. These developments are both currently under construction and are considered certain to take place and are included in the future year scenarios

To derive the trip generation for Tattenhoe Park and Kingsmead South the following process was undertaken:

- Vehicular trip rates were extracted from the residential land use person trip rates extracted from TRICS for this development assessment.

- Both Tattenhoe Park and Kingsmead South are currently under construction with a proportion of each development already completed and occupied. The data collection exercise completed in February 2020 is therefore likely to include some existing development traffic and therefore it was agreed that it would not be appropriate to add the full development quantum associated with the developments as this would result in double-counting of trips. To derive an appropriate quantum of development for each, a review of the MKC Housing Trajectory 2019-2024 was undertaken. The number of completions anticipated from April 2020 within the housing trajectory document indicates that there are 178 dwellings at Kingsmead South and 883 dwellings at Tattenhoe Park still to be completed and occupied.
- Relevant trip rates were applied to the outstanding dwellings and distributed across the highway network study area using the same distribution as that derived for the residential land

Buckinghamshire Council are satisfied that this approach adequately captures the major committed developments in the area.

## 7. Access Strategy

There are three points of access from the development onto the local highway network at the following locations:

- Whaddon Road
- Buckingham Road
- A421 Standing Way

The access onto Whaddon Road falls within the jurisdiction of Buckinghamshire highway authority, whilst the A421 Standing way access point joins the highway network controlled by Milton Keynes Council. The Buckingham Road access joins the existing public highway controlled by Milton Keynes Council, but the majority of the new layout is located within Buckinghamshire.

Three access points were selected to distribute traffic onto the local highway network and provide route choice options for new residents of the proposed development. The internal road layout will however need to be designed to discourage through trips (rat running through the development). This will need to be addressed, using principles from Manual for Streets, as part of any future reserved matters application.

### (i) *Buckingham Road Access:*

The original Transport Assessment proposed a signalised gyratory arrangement. Both Milton Keynes Council and at the time Buckinghamshire County Council raised concerns regarding introducing traffic signals in this area as well as the complex arrangement, which could be confusing for drivers.

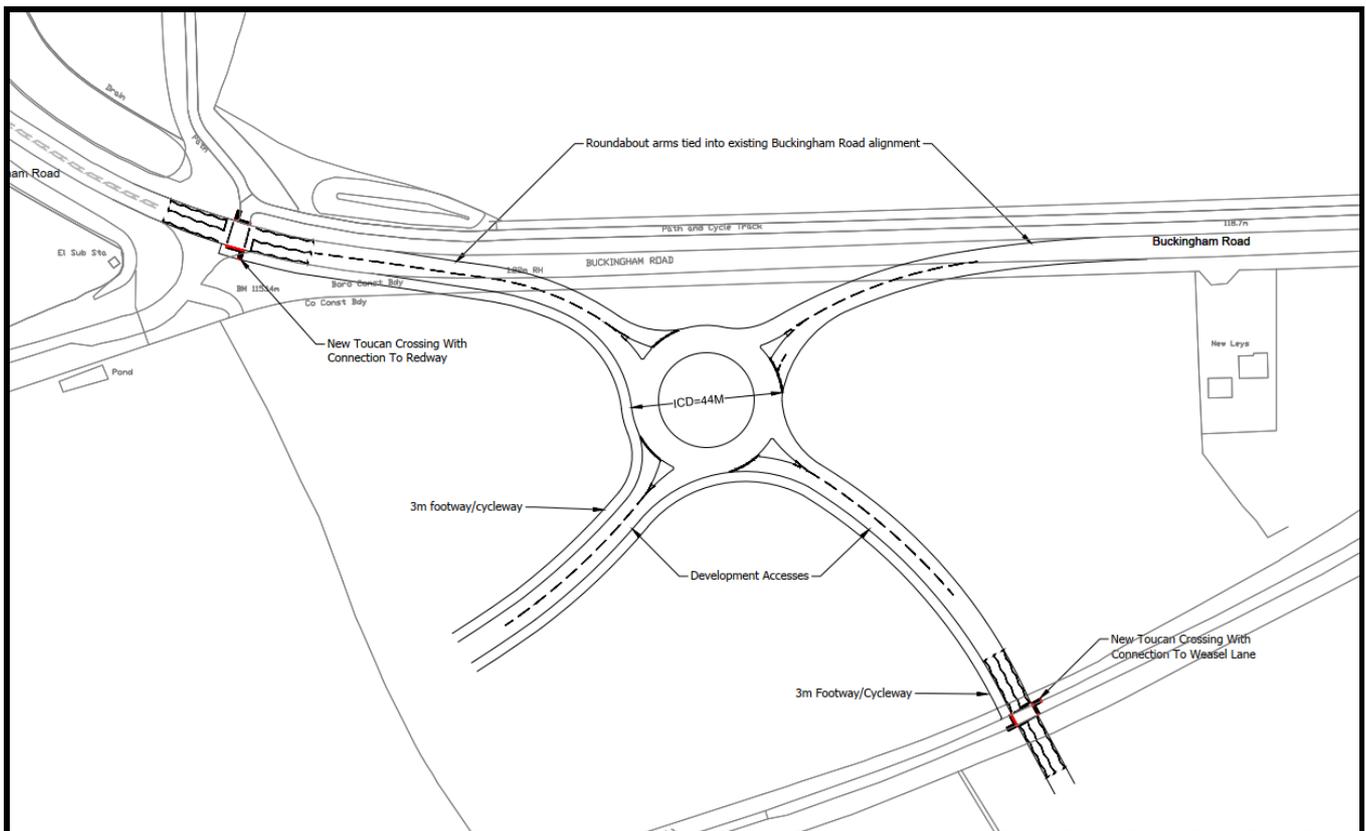
A new four arm roundabout junction has been proposed, encompassing two new site roads. The existing Redway on the northern side of Buckingham Road is to remain and a 3m shared footway is proposed on the southern arms of the junction into the site. Toucan crossings are proposed on the western arm between the new roundabout and Tattenhoe Roundabout and where the new road crosses Weasel Lane, providing safe crossing facilities to the wider pedestrian and cycle network.

During the planning application determination period, and subsequent to agreement of the layout with BC (Buckinghamshire Council) and MKC, revisions were undertaken at the request of BC to provide minor lane marking improvements. These revisions were shown on Drawing 0017D and it is this revision that BC recommend being taken forward.

The Buckingham Road access junction has been modelled using industry standard software Junctions 9 (ARCADY), as set out in TRN2. The results of the assessment show that the junction operates within capacity in both the AM and PM peaks in the 2033 Do Something 1 and 2033 Do Something 3 scenarios, in particular the current free flowing sections of Buckingham Road are predicted to have at maximum 11 seconds of delay.

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2033 Do Something 1</b>						
Buckingham Road S	0.7	4.2	0.41	1.3	6.06	0.56
Access SW	0.2	4.46	0.14	0.2	5.49	0.15
Access NW	1	7.66	0.5	0.7	6.45	0.4
Buckingham Road N	1.3	6.54	0.56	2.4	9.91	0.72
<b>2033 Do Something 2</b>						
Buckingham Road S	0.7	4.1	0.4	1.1	5.51	0.53
Access SW	0.2	4.37	0.14	0.2	5.13	0.14
Access NW	0.7	6.41	0.4	0.4	5.62	0.31
Buckingham Road N	1.2	6.18	0.54	2	8.43	0.67
<b>2033 Do Something 3</b>						
Buckingham Road S	0.7	4.28	0.43	1.5	6.64	0.6
Access SW	0.2	4.54	0.15	0.2	5.75	0.15
Access NW	1	7.9	0.51	0.7	6.85	0.41
Buckingham Road N	1.6	7.35	0.61	2.8	10.68	0.74

Furthermore, the design of the junction does not impede the ability of either Council to deliver the Grid Road if required in the future. Whilst the modelling demonstrates that there is junction capacity available in its current form to accommodate changes to the network, additional land which can be secured by S106 Agreement, as part of the Grid Road reserve, to ensure that amendments to this junction can be carried out in the future.



An independent Stage 1 Road Safety Audit has been undertaken and Buckinghamshire Council is satisfied that the problems identified can be resolved during detailed design. The current design as shown in the May 2020 TA shows wide single lane entry approaches on Buckingham Road East, Buckingham Road West and the eastern Site Access. For these arms of the roundabout to work effectively, as modelled, they should be widened to two lane approaches capable of accommodating 2-3 cars. Furthermore, to improve circulation of the roundabout the diameter of the central island should be reduced. This is achievable within the limits of the highway and land within the applicant's control and can be secured by way of a condition revisions were undertaken at the request of BC to provide

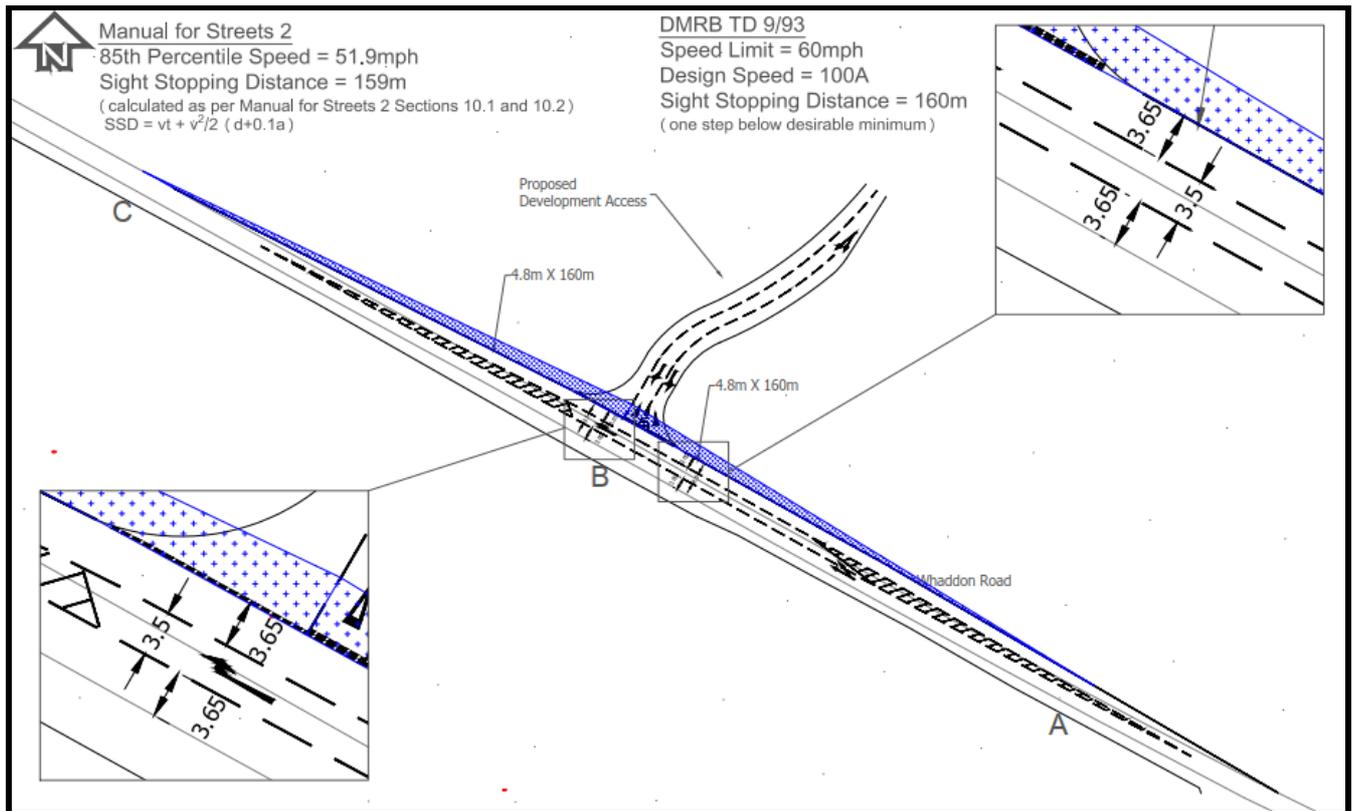
minor lane marking improvements, as shown on Drawing 0017D. This version would be required to be taken forward to detailed design.

(ii) *Whaddon Road Access:*

The proposed access at Whaddon Road is a ghosted right turn priority junction. Speed surveys were completed on Whaddon Road in June 2015 and the design of the junction ensures that appropriate visibility in both the horizontal and vertical planes can be achieved based on requirements set out in Manual for Streets 2 and DMRB.

An independent Stage 1 Road Safety Audit was carried out on the Whaddon Road access and the design has been amended to address the problems raised, including the extension and provision of a longer flare length (within the site) to accommodate peak hour demand for vehicles leaving the site.

The Stage 1 Road Safety Audit did raise concerns regarding the conspicuity of the junction to approaching road users. Whilst the Applicant has demonstrated that the required visibility splays can be achieved both in the horizontal and vertical planes, the Highway Authority is of the view that further design features are necessary including but not limited to, signs, lines and coloured surfacing. A review of the collision record along Whaddon Road has shown that the majority occur within the hours of darkness, as such the provision of lighting on approach and at the junction should be considered. Furthermore, a speed limit reduction on Whaddon Road should be investigated, given the recorded 85<sup>th</sup> percentile speeds and the change in character that would result from the development. The Highway Authority is content that these can be secured by way of a condition.



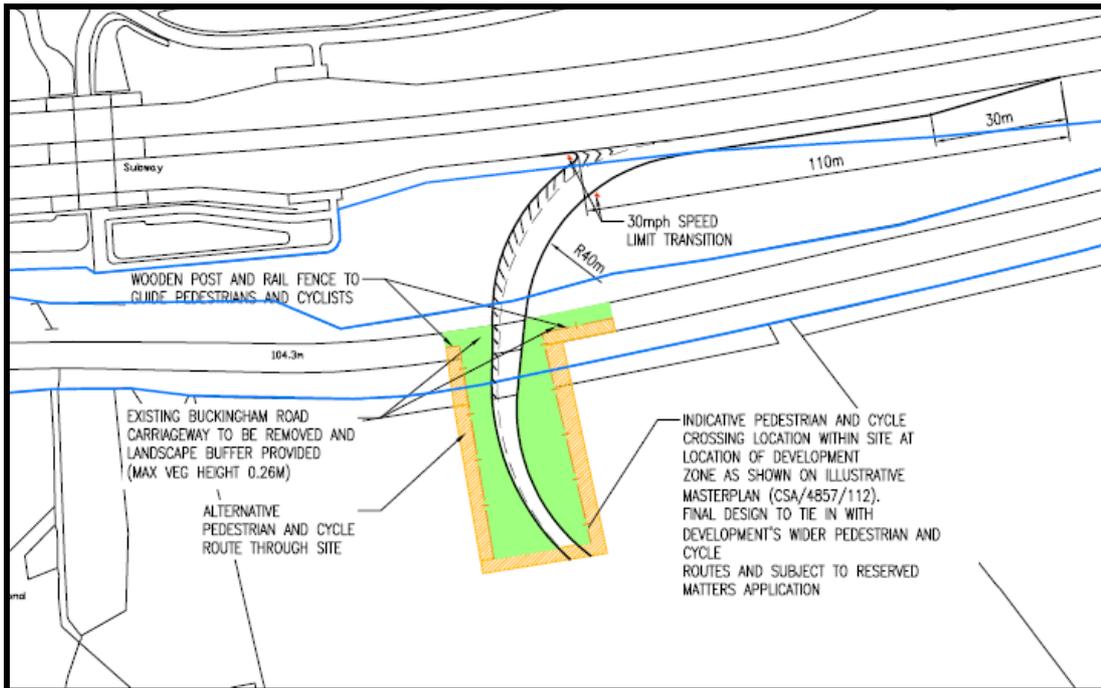
The Whaddon Road access junction has been modelled using industry standard software Junctions 9 (PICADY), as set out in TRN2. The results of the assessment show that the junction operates within capacity in both the AM and PM peaks for all the modelled scenarios with minimal queuing and delay expected, significant spare capacity is present to cater for possible increases in flow.

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2033 Do Something 1						
Site Access to Whaddon Road (S)	0.1	5.89	0.1	0.1	5.82	0.08
Site Access to Whaddon Road (N)	0.5	10.71	0.33	0.2	9.05	0.19
Whaddon Road (S) to Site Access	0.1	6.34	0.09	0.1	6.95	0.12
2033 Do Something 2						
Site Access to Whaddon Road (S)	0.1	5.74	0.08	0.1	5.61	0.07
Site Access to Whaddon Road (N)	0.4	9.88	0.28	0.2	8.42	0.15
Whaddon Road (S) to Site Access	0.1	6.28	0.08	0.1	6.48	0.1
2033 Do Something 3						
Site Access to Whaddon Road (S)	0.1	5.97	0.1	0.1	5.76	0.08
Site Access to Whaddon Road (N)	0.5	11.05	0.34	0.2	8.97	0.19
Whaddon Road (S) to Site Access	0.1	6.41	0.09	0.1	6.64	0.11

(iii) *A421 Standing Way*

The design of the access from A421 Standing Way is in the form of a left in only junction and falls within Milton Keynes Council's jurisdiction. It should however be noted that Buckinghamshire Council does not have any objections in principle to the proposed access arrangement, noting that the junction has been designed in accordance with relevant design standards. Buckinghamshire Council did raise concern over how the access will interact with the Old Buckingham Road alignment, which is used by pedestrian and cyclists, and potentially the same user groups from the development will also make use of the route. It was considered that measures would be needed to ensure safe crossing movements for non-motorised user with potential high vehicle speeds (relative) on exiting the bend of the new access and restricted intervisibility.

In TRN1 the applicant provided an arrangement to manage the potential interaction with Old Buckingham Road, replicated below. The arrangement would enable pedestrians and cyclists to divert further into the Site and to cross the proposed road access safely. Whilst this design provides a less direct route, it does in principle provide a safer crossing location with lower vehicle speeds. The set-back crossing also reduces the potential environmental impact of tree removal to ensure adequate intervisibility for an in-line crossing, the design of which would be finalised as part of reversed matters.



Based on the new information provided, Buckinghamshire Council does not have any objections in principle to the proposed access arrangement, subject to detailed design and entering into relevant Highways Agreements. This can be secured via means of a S106 obligation.

## 8. Network Impact:

The following junctions were identified, in conjunction with the applicant, for assessment within Buckinghamshire:

1. Junction 3: Bletchley Road/Stoke Road/Drayton Road/Whaddon Road (Newton Longville)
2. Junction 4: Whaddon Road/Westbrook End (Newton Longville)
3. Junction 7: A421/Coddimoor Lane/Whaddon Road (Whaddon Crossroads)
4. Junction 8: A421/Warren Road
5. Junction 9: A421/Shucklow Hill/Little Horwood Road
6. Junction 10: A421/Nash Road/Winslow Road
7. Junction 11: Stock Lane/Shenley Road/Coddimoor Lane (Whaddon)

The following junctions were identified, in conjunction with the applicant, for assessment within Milton Keynes:

1. Junction 1: Sherwood Drive/Water Eaton Road/B4034 Buckingham Road
2. Junction 2: Shenley Road/Newton Road/B4034 Buckingham Road
3. Junction 5: Tattenhoe Roundabout
4. Junction 6: Bottle Dump Roundabout
5. Junction 12: Kingsmead Roundabout
6. Junction 13: Westcroft Roundabout
7. Junction 14: Furzton Roundabout
8. Junction 15: Bleak Hall Roundabout
9. Junction 16: Elfield Park Roundabout
10. Junction 17: Emerson Roundabout
11. Junction 18: Windmill Hill Roundabout

For the purposes of Buckinghamshire Council review the Do Something 1 scenario (which does not include the reduction for travel planning) is considered the main scenario for future year modelling results. The Shenley Park sensitivity test (which includes the projected traffic for the draft allocation site and new link) was also requested as part of the assessment process.

It was agreed at the scoping stage with both Buckinghamshire Council and Milton Keynes Council that the development proposals would be tested within a static spreadsheet-based transport model. The alternative approach, to use one of the strategic transport models for the area. Buckinghamshire Council raised some concern over the use of updated Milton Keynes Multi-modal Model (MKMMM). On review of the model documentation at the time there were several potential issues that could impact the use of the model to provide a single, unified, assessment methodology, these issues being:

- The key use of the model is identified as to assess the impacts of Plan:MK on the strategic road network and to inform the Local Transport Plan 4 and as a tool to support future transport infrastructure bids. Aecom, on behalf of MKC, indicate that depending on the scheme specific circumstances, including the scale, size and location of the scheme, the model may need to be updated further (particularly on the demand side and in the vicinity of the scheme) to support the economic case for such schemes. This would highlight further enhancement may be needed for the assessment of more local schemes and developments. The MKMMM report states that “It is important to note that the model was not designed for use in a scheme specific economic assessment for which it is recommended the model would be recalibrated with additional and more recent data and targeted to reflect a more specific geographical focus of resources and modelling effort”.
- The origin / destination flow data is 7 years old (collected in 2009) for the base model calibration (2016). There was concern that the Origin and Destination data would not be representative of current 2020 travel patterns.
- The Model simulation area has been extended in all directions, but no new data seems to have been collected to further calibrate flows/journey times with the Buckinghamshire area adjacent to Milton Keynes.

In addition to the MKMMM the Buckinghamshire Countrywide Strategic Model was also considered, but like MKMMM this would not cover all the network within MKC that would need to be modelled to ascertain the impact on the development. Is such a manual spreadsheet-based approach to assessment was requested to ensure a consistent assessment process was applied across the study area. This was discussed at the scoping meeting and agreed by all parties.

It is acknowledged that the use of a manual spreadsheet-based approach is unable to account for the benefits of any dynamic reassignment that would arise in a congested urban network. However, the methodology assumes that traffic volumes at a junction would continue to increase even when queues and delay predicted by the model would likely result in drivers seeking alternative routes as they would unlikely to be willing to accept a certain level of queueing and delay. Nor does the methodology consider potential modal choice which may occur on a congested network. As such BC highways consider the manual-spreadsheet based methodology provides a robust ‘worst case’ assessment of the development impacts on the junction assessed with impact determined when comparing the future year scenarios of with or without development traffic. The extent of the impacts it identifies are unlikely to occur to the same extent and would provide a more robust assessment process.

The Transport Research Laboratory (TRL) Junctions 9 modelling software (ARCADY and PICADY modules) has been used for determining junction capacity. The geometric parameters and flows used in the static junction models were reviewed with final agreement with the applicant outlined in TRN2 and TRN3 which took on board previous formal comments and ongoing discussions with the applicant with regard to the model development. It is considered that the geometries and traffic flows used in the modelling is representative of current geometric layouts and current and future year traffic flows for the various scenarios and provides a robust assessment.

When assessing the impact of the development and its predicted traffic flows the main modelling output within Junctions 9 is RFC (Ratio of flow to capacity). This provides a basis for judging the acceptability

of junction operation and designs, typically an RFC of less than 0.85 is considered to indicate satisfactory performance and is referred to as 'practical capacity. An RFC of 1.0 or more indicates saturated conditions and is referred to as 'theoretical capacity, with arrivals on an arm greater than the capacity to discharge vehicles past the give way line. When an arm exceeds and RFC of 1.0 then queues will build exponentially and in these instances the queue and delay values should not be interpreted as absolute values, but an indication of poor performance.

For mitigation proposals that included the use of full or part-time signal operation the industry standard LinSig3 modelling software has been utilised. This provides a basis for judging the acceptability of junction operation and designs, typically an Degree of Saturation (DoS) of less than 90% is considered to be acceptable.

In the subsequent tables those arms who exceed the above RFC and DoS thresholds have been highlighted red for ease of reading. Red highlighted has been used where delay exceeds 1 minute and queues 20 vehicles, these are arbitrary values to aid in the assessment process.

To ensure the base models are representative of existing conditions the models were calibrated against known and established techniques. This included, shown in priority order below. The final calibration details were provided in TRN2 and TR3 after comments and discussion with the applicant:

- Where underlying conditions allowed, junctions were calibrated making use of the TRL recommended methodology as detailed in the software user guide.
- Employment of the Barbara Chard methodology at roundabouts where uneven lane usage was identified and validation against observed queue survey data.
- Calibration against queue length surveys. The queue results provided in the Junctions 9 software are typical maximum queues likely to be observed at set times within the modelled period. I.e. if you were to monitor a site over several days the results would represent the average longest queue observed at those set times. To establish observed typical queue lengths for validation purposes the applicant was tasked to obtain three days' worth of data. For site calibration purposes three days of data is considered appropriate to allow model calibration to replicate baseline site conditions.

The junction assessments and proposed mitigation schemes have been reviewed by the Council, as detailed below:

## Buckinghamshire Junctions

### 1. Junction 3: Bletchley Road/Stoke Road/Drayton Road/Whaddon Road

The junction of Bletchley Road/Stoke Road/Drayton Road/Whaddon Road is a priority crossroads in Newton Longville and has been modelled as such. There has been some discussion as to whether the junction should be modelled as a staggered crossroads as the two minor roads do not directly align. Whilst this is the case, the actual straight-ahead movements from the minor roads of Stoke Road and Whaddon Road are not performed as two separate turn movements, as would be expected from a true staggered crossroads, rather site visits have shown these movements occur as a diagonal single movement. The junction layout does not conform to typical crossroad or staggered crossroad design and falls somewhere between the two, and as such the modelling results would likewise follow a similar pattern. To ensure that the crossroads model reflects 2020 observations the geometry of Whaddon Road was reduced to reflect current queues, with this geometry reduction carried through to the future year scenarios results, as shown below.

#### Junction 3: Bletchley Road/Stoke Road/Drayton Road/Whaddon Road – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2020 Base						
A- Bletchley Road	0.1	5.74	0.06	0.2	6.01	0.12
B-Stoke Road	12.9	113.5	0.99	6.1	60.99	0.89
C-Drayton Road	0.1	5.79	0.05	0	5.92	0.03

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
D-Whaddon Road	4.1	47.64	0.83	3.5	39.86	0.79
<b>2033 Do Nothing</b>						
A- Bletchley Road	0.1	5.69	0.08	0.2	6.05	0.14
B-Stoke Road	47	373.57	1.19	27.1	208.37	1.09
C-Drayton Road	0.1	5.79	0.06	0	5.93	0.03
D-Whaddon Road	16.1	147.23	1.02	9.9	98.01	0.96
<b>2033 Do Something 1</b>						
A- Bletchley Road	0.1	5.71	0.08	0.2	6.09	0.14
B-Stoke Road	72.5	614.15	1.3	52.9	437.38	1.22
C-Drayton Road	0.1	5.74	0.06	0	5.83	0.03
D-Whaddon Road	46	416.88	1.2	27.5	221.76	1.1
<b>2033 Do Something 2</b>						
A- Bletchley Road	0.1	5.71	0.08	0.2	6.08	0.14
B-Stoke Road	67.9	577.17	1.28	49	396.85	1.2
C-Drayton Road	0.1	5.75	0.06	0	5.84	0.03
D-Whaddon Road	41.4	366.06	1.18	24.1	199.11	1.08
<b>2033 Do Something 3</b>						
A- Bletchley Road	0.1	5.71	0.08	0.2	6.09	0.14
B-Stoke Road	79.7	672.66	1.32	60.1	507.85	1.25
C-Drayton Road	0.1	5.73	0.06	0	5.82	0.03
D-Whaddon Road	57.7	538.56	1.26	31.1	246.8	1.12

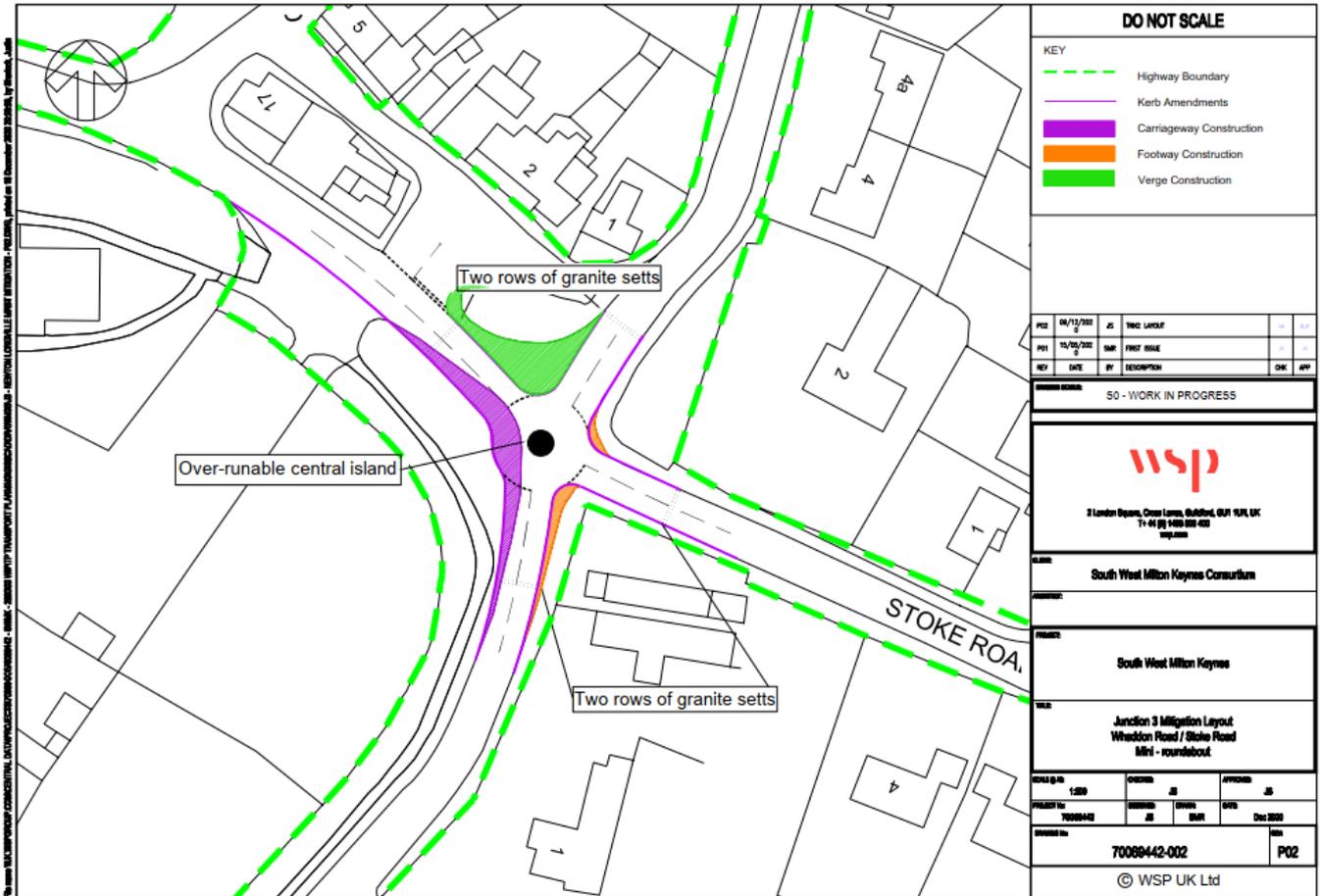
The results show that in the 2020 Base, the Stoke Road arm is approaching theoretical capacity (RFC of 1) in the AM peak and is above practical capacity (RFC of 0.85) in the PM. In the future year of 2033 (Do Nothing) Stoke Road operates at/above capacity (RFC of 1.0) in both peak hours with a maximum queue of 47 vehicles and a delay of 6 minutes in the AM peak. Whaddon Road also exceeds theoretical capacity in 2033 (Do nothing) in the AM with a predicted queue of 16 vehicles and delay of 2.5 minutes.

With the addition of the Proposed Development (Do Something 1 (DS1)), performance of the junction decreases with both Stoke Road and Whaddon now both operating above RFC of 1.0 in both peak periods. There is a maximum queue on Stoke Road of 73 vehicles and a delay of 10 minutes; an increase of 26 vehicles and 4 minutes in the AM peak. In the PM peak the delay increases from 3.5 minutes in the 2033 Do Nothing scenario to 7 minutes in Do Something 1; an increase of approximately 3.5 minutes. Whaddon Road would see an increase in queues from 16 in the 2033 Do Nothing scenario to 46 in the DS1 scenario, an increase of 25 which would extend beyond Manor Road, with an additional 4.5 minutes of delay in the AM.

The results for Do Something 2 (DS2) indicate a slight betterment compared to DS1, but still show a material impact on queues and delay compared to 2033 DN. Do something 3 (DS3) which includes potential Shenley Park traffic shows further worsening of results when compared to DS1 with the longest queue on Stoke Road of 80 vehicles in the AM and delay of 11 minutes.

The modelling exercise has shown that the addition of development traffic would have a material impact on the operation of the junction. The Applicant has however proposed changing the form of the junction from a priority crossroads to a mini roundabout, shown below.

**Junction 3: Bletchley Road/Stoke Road/Drayton Road/Whaddon Road – Mitigation proposal**



**Junction 3: Bletchley Road/Stoke Road/Drayton Road/Whaddon Road – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2033 Do Something 1 (Post-Mitigation)						
A- Bletchley Road	0.7	8.82	0.4	0.6	8.3	0.38
B-Stoke Road	2.6	18.61	0.73	2.5	18.28	0.72
C-Drayton Road	0.4	7.92	0.31	0.3	7.05	0.22
D-Whaddon Road	1.5	11.94	0.6	1.2	9.85	0.54
2033 Do Something 2 (Post-Mitigation)						
A- Bletchley Road	0.6	8.72	0.39	0.6	8.22	0.38
B-Stoke Road	2.6	18.14	0.73	2.4	17.61	0.71
C-Drayton Road	0.4	7.83	0.31	0.3	6.97	0.22
D-Whaddon Road	1.4	11.65	0.59	1.1	9.68	0.53
2033 Do Something 3 (Post-Mitigation)						
A- Bletchley Road	0.7	9.07	0.4	0.6	8.39	0.38
B-Stoke Road	2.8	19.44	0.74	2.7	19.57	0.74
C-Drayton Road	0.5	8.02	0.32	0.3	7.19	0.23
D-Whaddon Road	1.6	12.7	0.63	1.2	10.06	0.55

The mitigation scheme results indicate the mini-roundabout would operate within practical capacity (RFC of 0.85) for all DS scenarios with a maximum queue of 3 vehicles and delay 20 seconds on Stoke Road. Whilst the change in junction form would improve the capacity, operational road safety concerns were raised within the Road Safety Audit in relation to operation, lack of deflection (due to land constraints) and achievable visibility due to adjacent property lines. Initial indications on review of the mini-roundabout design against 'CD116 Geometric design of roundabouts' showed less than desirable visibility to the right on Drayton Road and stopping sight distance on three of the arms. Paragraph 2.12.1 of CD116 also states that a 4-arm mini-roundabout should not be used where the sum of the

maximum peak hour entry flows for all arms exceeds 500 vehicles per hour, which would be the case in all future year scenarios.

Furthermore, it was considered that by providing a junction with increased capacity would serve to encourage non-local traffic using Stoke Road and Whaddon Road as a 'Rat-run' between the A4146 to the south-east and the A421 to the north-west.

On this basis, the Highway Authority recommends that the junction is retained as a priority crossroads. A new raised junction table should be provided, as part of a comprehensive traffic calming scheme for Newton Longville. This would act to slow vehicle approach speeds to the junction and make the junction more visible to drivers. The cost of providing a raised table in this location has been included in the proposed traffic calming contribution, set out later in this response.

### 2. Junction 4: Whaddon Road/Westbrook End (Newton Longville)

The junction of Whaddon Road/Westbrooke End is a priority junction. The results of the assessment show that the junction operates within capacity in both the AM and the PM peak in all scenarios tested. No mitigation is therefore required at this junction.

### 3. Junction 7: A421/Coddimoor Lane/Whaddon Road (Whaddon Crossroads)

The junction of the A421/Coddimoor Lane/Whaddon Road is a large four arm roundabout. All approaches are single carriageway, with flared entries onto the roundabout. The junction has been modelled using Junctions 9 (ARCADY), the results are shown below for the current layout. Capacity corrections were applied to A421 (East) and Whaddon Road to match existing observed queues.

#### Junction 7: A421/Coddimoor Lane/Whaddon Road – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A - Coddimoor Ln	0.5	10.8	0.31	0.4	8.98	0.29
B - A421 (East)	4.9	14.67	0.84	6	16.69	0.87
C - Whaddon Rd	9.5	95.28	0.95	12.5	151.34	1.02
D - A421 (West)	11.7	36.14	0.94	5.5	17.49	0.86
<b>2033 Do Nothing</b>						
A - Coddimoor Ln	0.6	13.04	0.39	0.6	11.74	0.38
B - A421 (East)	21.8	55.28	0.99	33.6	74.74	1.01
C - Whaddon Rd	64.6	541.1	1.41	72.1	931.73	1.66
D - A421 (West)	56.7	131.2	1.06	18.6	50.69	0.98
<b>2033 Do Something 1</b>						
A - Coddimoor Ln	0.6	13.14	0.39	0.6	12.47	0.39
B - A421 (East)	42.9	94.53	1.03	55.6	112.02	1.05
C - Whaddon Rd	81.8	731.77	1.48	111.8	1325.61	1.84
D - A421 (West)	77.4	175.41	1.1	31.9	78.3	1.01
<b>2033 Do Something 2</b>						
A - Coddimoor Ln	0.6	13.12	0.39	0.6	12.38	0.39
B - A421 (East)	39.3	88.19	1.03	51.7	105.48	1.05
C - Whaddon Rd	78.4	705.45	1.47	108.2	1280.43	1.83
D - A421 (West)	74.8	168.69	1.09	29.3	73.26	1.01
<b>2033 Do Something 3</b>						
A - Coddimoor Ln	0.6	13.18	0.39	0.7	12.69	0.4
B - A421 (East)	56.9	119.14	1.06	60.6	120.43	1.06
C - Whaddon Rd	93.7	986.05	1.5	121.3	1420.79	1.88
D - A421 (West)	84.4	191.78	1.11	40.2	94.76	1.03

The results show that in the 2020 AM Base, the western arm of A421 along with the Whaddon Road arm are approaching capacity (RFC of 1.0) in the AM. In the 2020 PM Base, the Whaddon Road arm operates above theoretical capacity (RFC of 1.0). In the future year of 2033 DN scenario the approaches of A421 and the Whaddon Road arm are operating at/above capacity (RFC of 1.0) in both the AM and PM peaks. The worst queuing is on Whaddon Road with a maximum queueing of 72

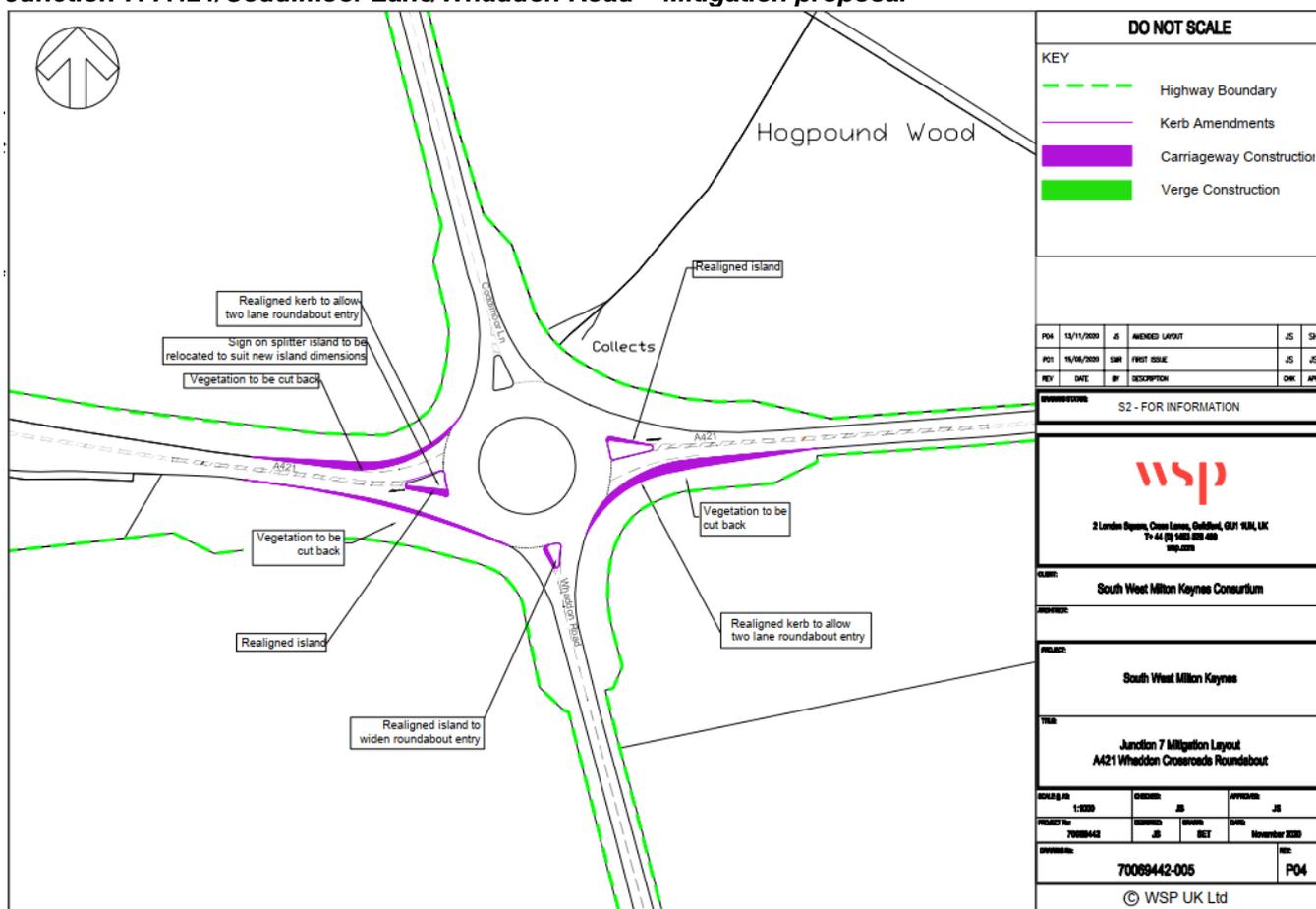
vehicles with a corresponding delay of 15.5 minutes on Whaddon Road in the PM peak. The A421 (W) arm would see queues of 57 in the AM but much lower delay of approximately 2 minutes.

With the addition of the Proposed Development (Do Something 1), performance of the junction decreases with both arms of A421 and Whaddon Road operating above capacity (RFC of 1.0) in the AM and PM peaks. Maximum queueing is 112 vehicles on A421 (E) with a corresponding delay of 22 minutes on Whaddon Road in the PM peak representing an increase in queuing of 40 vehicles and delay of 6.5 minutes. The AM also sees significant increases for Whaddon Road along with both A421 arms. Both arms of A421 and Whaddon Road would continue to operate above RFC of 1.0 for both DS2 and DS3 scenarios, which would be considered significant in the context of NPFF.

DS2 would see an improvement in comparison to DS1 but both A421 arms and Whaddon Road would exceed an RFC of 1.0 in both peaks, whilst DS3 would see additional increases in queues with delays with maximum delay now of approximately 23.5 minutes on Whaddon Road in the PM.

The Applicant has proposed alterations to the current layout to improve capacity, this involves realignment of the kerbs on the approaches from the A421 (east) and A421 (west) with associated amendments to the kerb/islands allowing for two lane roundabout entry and short two lane exit. Whaddon Road entry would also be widened with a reduction in the traffic island size. Due to the minor kerb line amended the previously determined capacity corrections were maintained.

**Junction 7: A421/Coddimoor Lane/Whaddon Road – Mitigation proposal**



**Junction 7: A421/Coddimoor Lane/Whaddon Road – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2033 Do Something 1 (Post-Mitigation)</b>						
A - Coddimoor Ln	0.8	17.31	0.46	0.7	14.09	0.42
B - A421 (East)	3.7	8.91	0.79	4.2	9.39	0.81
C - Whaddon Rd	<b>48.6</b>	<b>368.99</b>	<b>1.25</b>	<b>67.1</b>	<b>634.65</b>	<b>1.53</b>

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
D - A421 (West)	33.1	78.16	1.02	11.8	31.36	0.94
2033 Do Something 2 (Post-Mitigation)						
A - Coddimoor Ln	0.8	17.26	0.46	0.7	13.93	0.42
B - A421 (East)	3.6	8.7	0.79	4	9.16	0.81
C - Whaddon Rd	46.3	351.86	1.24	64.6	607.98	1.5
D - A421 (West)	31.8	75.77	1.01	11.2	29.97	0.93
2033 Do Something 3 (Post-Mitigation)						
A - Coddimoor Ln	0.8	17.36	0.46	0.7	14.5	0.43
B - A421 (East)	4.2	9.75	0.81	4.3	9.69	0.82
C - Whaddon Rd	57.2	436.84	1.32	73.9	694.36	1.59
D - A421 (West)	36.1	83.55	1.02	13.2	34.85	0.95

The modelling results show that the proposed mitigation package will reduce queueing and delay on the A421 and Whaddon Road arms of the junction below the levels identified in the 2033 Do Nothing Scenario. There will be small increases in queueing and delay on the Coddimoor Lane arm, but these are negligible with predicted queues still less than one and maximum delay of less than 20 seconds.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. The current design encourages two lanes of through traffic that could increase the risk side swipe collisions at the A421 exit arms with additional road markings and signing offered as a potential solution, whilst this may aid in mitigating the potential conflict it may also be necessary to consider lengthening of two lane exit tapers to allow for controlled and safe merging which could be achieved within the highway boundary and will need to be considered as part of detailed design process.

The proposed improvement to this junction should provide a 'nil-detriment' situation, whereby the highway network is 'no worse off' with the proposed development in a future forecast year of 2033. This goes beyond the requirements of the NPPF and therefore is considered acceptable by the Highway Authority. This improvement can be delivered by S278 highways agreement, which is to be secured by way of a S106 obligation.

#### 4. Junction 8: A421/Warren Road

The A421/Warren Road is a priority junction with a ghosted right-hand turn lane, providing access to Little Horwood. Warren Road has a wide entry width to allow vehicles to turn in both directions, without blocking the free flow of traffic. The junction is predicted to operate over capacity (RFC of 1.0) on the minor road arm (Warren Road) in both the AM and PM peak because of the traffic growth forecast to 2033, without development. This is because of higher traffic flow on the A421 preventing sufficient gaps for turning traffic. (It should be noted that the RFC value of 9999 indicates that the through one or more 15 minute time segments that capacity is predicted to be zero, with no movements possible, it is unlikely that this would be the case in practice, with some forced movements performed. The prediction of zero capacity is due to the linear nature of the capacity model).

The results detailed in the Table in TRN2, repeated below, are not a true reflection of delay on Warren Road. Due to the flared nature of the entry results are provided for both the left and right-turning movements. For the 2020 Base the delay in the AM for both movements would be 1,539 seconds and 85 seconds in the PM, not the values of 231 and 74 provided. The combined value has not been recorded for the other scenarios, which explains why the DS scenarios delay are lower than the DN in the AM, if the combined value were used the delay would be greater.

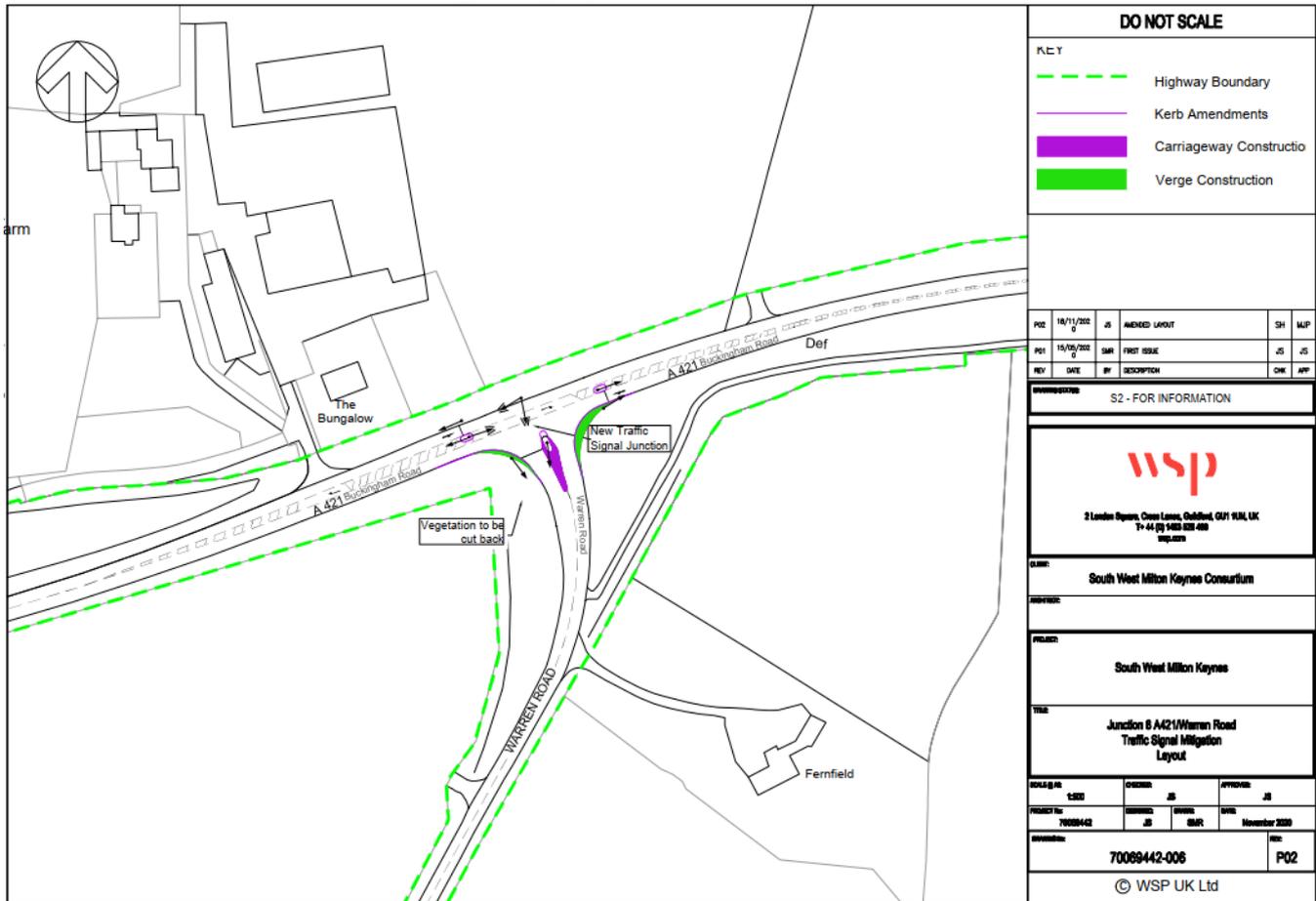
#### Junction 8: A421/Warren Road – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2020 Base						
B-Warren Road	6.1	231.06	0.98	0.5	74.43	0.36
C-A421 (West)	0	8.63	0.01	0	9.19	0

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2033 Do Nothing						
B-Warren Road	56.6	1796.2	9999	15.5	1519.6	9999
C-A421 (West)	0	10.01	0.01	0	10.87	0
2033 Do Something 1						
B-Warren Road	62.1	1469.68	9999	18.8	1598.89	9999
C-A421 (West)	0	10.49	0.01	0	11.37	0
2033 Do Something 2						
B-Warren Road	61.4	1434.12	9999	18.2	1582.52	9999
C-A421 (West)	0	10.43	0.01	0	11.27	0
2033 Do Something 3						
B-Warren Road	62.9	1566.32	9999	18.8	1617.35	9999
C-A421 (West)	0	10.72	0.01	0	11.46	0

The development is only likely to result in a marginal increase in queuing and delay on Warren Road. In reality drivers would look for alternative routes to the A421. The static junction model does not consider re-assignment of traffic, which would be likely to take place. Whilst the development only results in a marginal increase in queuing at this junction, the applicant has proposed a mitigation scheme to increase capacity through signalisation of the junction.

**Junction 8: A421/Warren Road – Mitigation proposal**



The proposed improvement to the A421/ Warren Road junction has been modelled using LinSig3 and the results indicate significant benefits in terms of queuing and delay on Warren Road in all the modelled scenarios, with the DS3 (including both SWMK and projected Shenley Park development traffic) have predicted queues and delay less than current 2020 results. However, the signalisation of the junction would impose queues and delay on the A421 corridor.

**Junction 8: A421/Warren Road – Mitigation Capacity Results**

Arm Description	AM			PM		
	Mean Max Queue (PCU)	Delay (s/PCU)	Deg Sat (%)	Mean Max Queue (PCU)	Delay (s/PCU)	Deg Sat (%)
2033 Do Something 1 (Post-Mitigation)						
A421 (West)	16.7	11.4	86.20%	17	12.1	87.30%
A421 (East)	24.4	13.9	85.50%	29.6	17.9	90.10%
Warren Road	3.6	68.8	65.10%	0.9	51.2	20.30%
2033 Do Something 2 (Post-Mitigation)						
A421 (West)	16.1	11.2	85.90%	16.3	11.8	86.80%
A421 (East)	23.9	13.7	85.10%	29.6	17.4	89.60%
Warren Road	3.5	68.3	64.60%	0.9	51.1	19.80%
2033 Do Something 3 (Post-Mitigation)						
A421 (West)	16.9	12	87.10%	17.9	12.9	88.30%
A421 (East)	25.9	15	87.00%	30.4	18.6	90.60%
Warren Road	3.6	68.8	65.10%	0.9	51.2	20.30%

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design but may require review of current speed limits to ensure stopping sight distance visibility could be achieved. This would need to be determined if taken forward to detailed design

The cumulative residual impact of the development at this junction cannot be considered ‘severe’ in the context of paragraph 109 of the NPPF based on the mitigation scheme results. At present the A421 is free flowing along most of its length in Buckinghamshire, with junctions managed through priority junctions or roundabouts. Whilst the introduction of signals would significantly reduce queuing on Warren Road, it would also stop the free flow and introduce delays to the primary route and potentially provide a stop / start scenario. In this regard the principle of commuting an equivalent construction cost of the proposed junction improvement into a Section 106 contribution for A421 corridor improvements between the site and Buckingham is preferable, as set out later in this response.

**5. Junction 9: A421/Shucklow Hill/Little Horwood Road**

The A421/Shucklow Hill/Little Horwood Road junctions form a left-right staggered priority junction. Both Shucklow Hill and Little Horwood Road are minor rural routes with single lane flared entries. The junction currently operates well with all arms less than 0.75 RFC (Appropriate RFC of 0.75 as this is priority junction on a high-speed road (50mph +) in accordance with the Junctions 9 User Guide). The junction is predicted to operate over capacity on the minor road arms (Shucklow Hill/ Little Horwood Road) in both the AM and PM peak due to traffic growth forecast to 2033, without development. This is because of higher traffic flow on the A421 preventing sufficient gaps for turning traffic out of the minor roads.

The results detailed in the Table in TRN2, repeated below, are not a true reflection of delay on the minor arms. Due to the flared nature of the entry results are provided for both the left and right-turning movements. The combined value has not been recorded but this does not change the overall indication of poor performance.

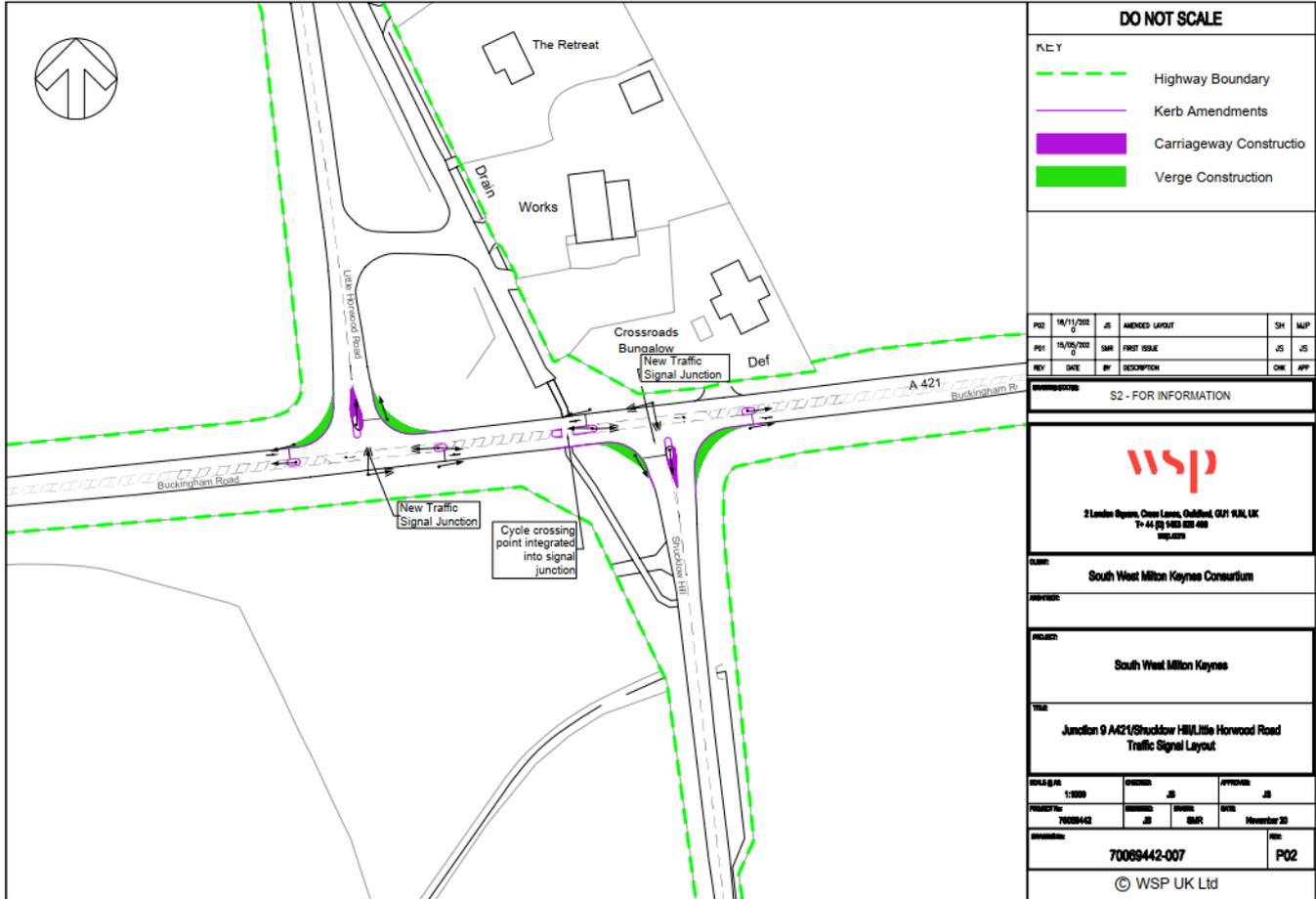
**Junction 9: A421/Shucklow Hill/Little Horwood Road – Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2020 Base						
A - A421 (East)	0.1	10.87	0.11	0.1	9.79	0.08
B – Shucklow Hill	0.3	79.04	0.23	0.3	88.39	0.21
C - A421 (West)	0.1	10.41	0.11	0.1	10	0.08
D - Little Horwood Road	0.1	10.48	0.11	0.1	9.77	0.1
2033 Do Nothing						
A - A421 (East)	0.3	12.13	0.25	0.2	11.48	0.16
B – Shucklow Hill	7.7	1546.81	9999	6.5	1479.7	9999

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
C - A421 (West)	0.3	11.69	0.22	0.1	11.87	0.1
D - Little Horwood Road	24.1	1414.26	9999	0.2	16.76	0.18
2033 Do Something 1						
A - A421 (East)	0.3	12.62	0.23	0.2	12.03	0.17
B – Shucklow Hill	7.8	1625.52	9999	6.5	1513.04	9999
C - A421 (West)	0.3	12.2	0.23	0.1	12.33	0.11
D - Little Horwood Road	24.1	1417.14	9999	0.2	17.69	0.19
2033 Do Something 2						
A - A421 (East)	0.3	12.57	0.24	0.2	11.94	0.17
B – Shucklow Hill	7.8	1614.79	9999	6.5	1506.71	9999
C - A421 (West)	0.3	12.13	0.23	0.1	12.25	0.11
D - Little Horwood Road	24.1	1416.72	9999	0.2	17.54	0.19
2033 Do Something 3						
A - A421 (East)	0.3	12.8	0.21	0.2	12.23	0.17
B – Shucklow Hill	7.8	1675.6	9999	6.6	1524.92	9999
C - A421 (West)	0.3	12.49	0.23	0.1	12.43	0.11
D - Little Horwood Road	24.1	1419.15	9999	0.2	18.03	0.1

The development is only likely to result in a marginal increase in queuing and delay on Shucklow Hill/Little Horwood Road. Due to the likely capacity restriction on the minor road's drivers would in reality look for alternative routes to the A421. The static junction model does not consider re-assignment of traffic, which would be likely to take place. Despite this, the Applicant has proposed a mitigation scheme to increase capacity through signalisation of the junction.

**Junction 9: A421/Shucklow Hill/Little Horwood Road – Mitigation proposal**



The proposed improvement to the A421/ Warren Road junction has been modelled using LinSig3 and the results indicate significant benefits in terms of queueing and delay on Shucklow Hill and Little Horwood Road in all the modelled scenarios. However, the signalisation of the junction would impose queues and delay on the A421 corridor with a queue of 24 predicted for the western arm of the Little Horwood side of the staggered crossroads.

**Junction 9: A421/Shucklow Hill/Little Horwood Road – Mitigation Capacity Results**

Arm Description	AM			PM		
	Mean Max Queue (PCU)	Delay (s/PCU)	Deg Sat (%)	Mean Max Queue (PCU)	Delay (s/PCU)	Deg Sat (%)
2033 Do Something 1 (Post-Mitigation)						
A421 (West)	24.1	13.8	85.30%	24.2	13.9	85.40%
Little Horwood Road	1.4	53.7	29.80%	1.2	52.9	26.90%
A421 (East)	7.8	11.4	85.10%	6.9	10.5	85.10%
A421 (West)	7.9	12.5	87.40%	7.4	11.7	87.40%
Shucklow Hill	2.4	59.1	48.00%	1.4	53.3	29.30%
A421 (East)	13	8.6	81.40%	14.5	9.6	83.80%
2033 Do Something 2 (Post-Mitigation)						
A421 (West)	23.6	13.6	84.90%	23.6	13.6	85.00%
Little Horwood Road	1.4	53.7	29.80%	1.2	52.9	26.90%
A421 (East)	7.6	11.1	84.70%	6.5	10.2	84.80%
A421 (West)	7.8	12.4	87.10%	7.7	11.6	86.90%
Shucklow Hill	2.4	59.1	48.00%	1.4	53.3	29.30%
A421 (East)	12.9	8.5	81.00%	14.4	9.5	83.50%
2033 Do Something 3 (Post-Mitigation)						
A421 (West)	24.9	14.4	86.10%	25.1	14.6	86.40%
Little Horwood Road	1.4	53.7	29.80%	1.2	52.9	26.90%
A421 (East)	8.6	12	86.00%	6.4	10.5	85.60%
A421 (West)	8.6	13.3	88.30%	8.5	12.8	88.40%
Shucklow Hill	2.4	59.1	48.00%	1.4	53.3	29.30%
A421 (East)	13.7	9.2	82.90%	14.5	9.9	84.30%

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. One problem raised the issue of the close proximity of the two signalised junctions that could cause confusion leading to rear end shunts or side-swipe collisions. Proposed mitigation involved signing and road markings, but if the scheme moved forward to detailed design the use of louvred traffic signal heads would also need to be considered.

The cumulative residual impact of the development at this junction can therefore not be considered 'severe' in the context of paragraph 109 of the NPPF. At present the A421 is free flowing along most of its length in Buckinghamshire, with junctions managed through priority junctions or roundabouts. Whilst the introduction of signals would significantly reduce queueing on both Shucklow Hill and Little Horwood Road, it would also stop the free flow and introduce delays to the primary route. In this regard the principle of commencing an equivalent construction cost of the proposed junction improvement into a Section 106 contribution for A421 corridor improvements between the site and Buckingham is preferable, as set out later in this response.

**6. Junction 10: A421/Nash Road/Winslow Road**

The junction of the A421/Nash Road/Winslow Road is a four arm roundabout with single lane entry and flared entries on all approaches. Nash Road and Winslow Road are minor rural roads providing access to local villages. The junction has been modelled using Junctions 9 (ARCADY), the results are shown below for the current layout. Capacity corrections were applied to A421 (West) and Nash Road to match existing observed queues.

**Junction 10: A421/Nash Road/Winslow Road – Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A - A421 (East)	3.8	12.94	0.80	4.6	14.57	0.83
B - B4033 Nash Road	7	71.79	0.91	1.8	24.57	0.65
C - A421 (West)	15.2	62.74	0.97	16.3	60.94	0.97
D - Winslow Rd	0.2	5.78	0.14	0.2	5.62	0.14
<b>2033 Do Nothing</b>						
A - A421 (East)	10.8	33.14	0.93	16	45.13	0.96
B - B4033 Nash Road	55.8	444.84	1.32	7.8	96.26	0.94
C - A421 (West)	58.1	212.53	1.10	88.1	286.65	1.15
D - Winslow Rd	0.2	6.09	0.16	0.2	6.00	0.17
<b>2033 Do Something 1</b>						
A - A421 (East)	16.2	47.31	0.97	23.5	61.89	0.99
B - B4033 Nash Road	69.5	569.75	1.43	11.50	132.75	1.01
C - A421 (West)	70.8	266.31	1.12	111.3	388.07	1.20
D - Winslow Rd	0.20	6.10	0.16	0.20	6.02	0.17
<b>2033 Do Something 2</b>						
A - A421 (East)	15.3	45	0.96	22.3	59.23	0.99
B - B4033 Nash Road	67.5	551.12	1.42	10.9	126.51	1.00
C - A421 (West)	68.7	257.56	1.12	107.5	371.45	1.19
D - Winslow Rd	0.20	6.10	0.16	0.200	6.01	0.17
<b>2033 Do Something 3</b>						
A - A421 (East)	20.6	57.77	0.98	25.6	66.18	1.00
B - B4033 Nash Road	75.2	636.97	1.48	12.5	141.86	1.02
C - A421 (West)	75.0	281.01	1.13	119.5	423.04	1.21
D - Winslow Rd	0.20	6.10	0.16	0.20	6.02	0.17

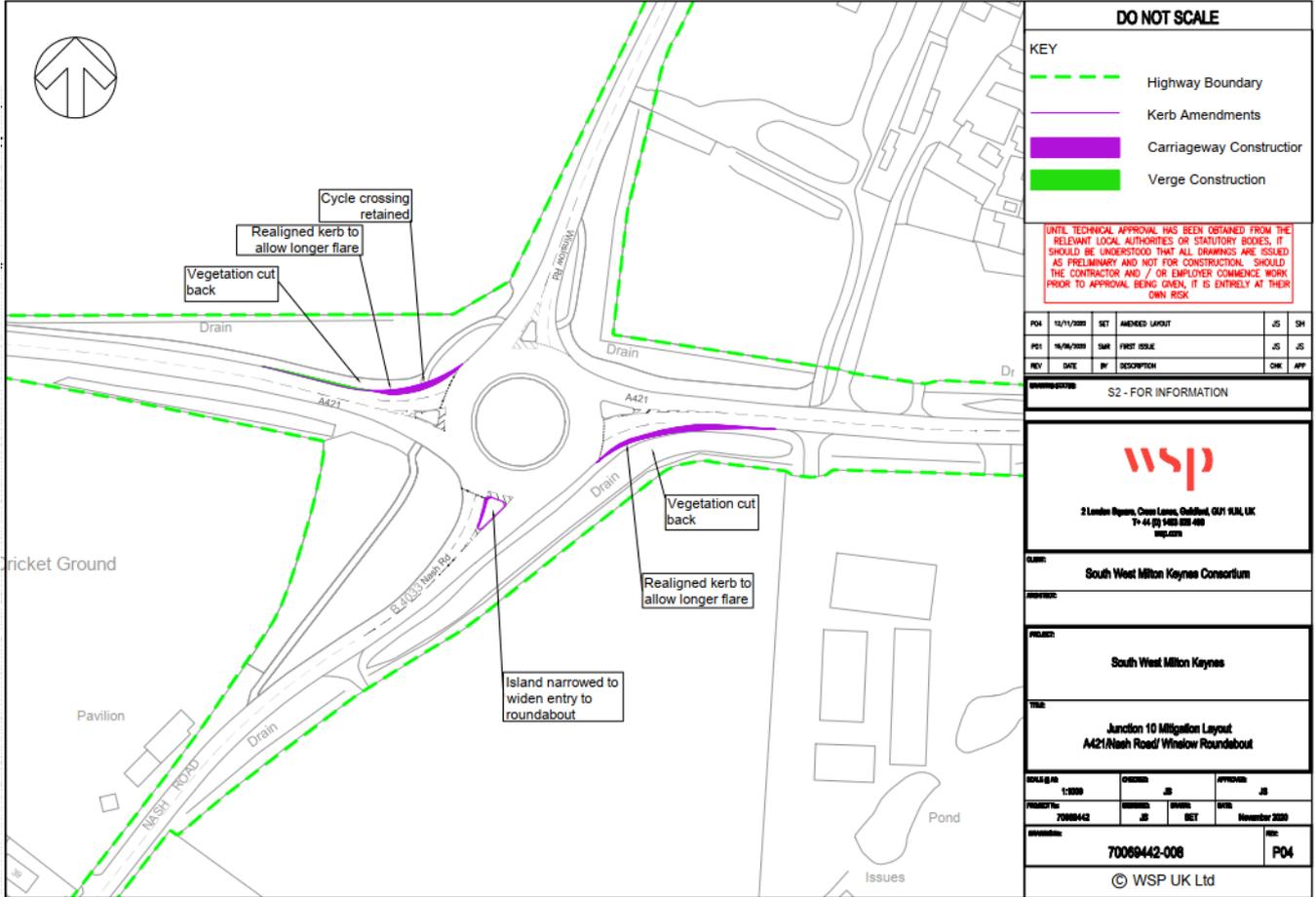
The results of the assessment show that in the 2020 Base scenario A421 (West) is operating close to theoretical capacity (RFC of 1.0) but with relatively small queues and delay of approximately 1 minute in both peaks. Nash Road exceeds an RFC of 0.85 in the AM, but with small queues and delay of just over a minute, but has no issues in the PM. The remaining arms operate within capacity for both peak periods in the 2020 Base scenario.

In the 2033 DN scenario, without development, the A421 arm (East) now operates with an RFC in the AM and PM peaks above 0.85 and is close to theoretical capacity (RFC of 1.0). A421 (West) would exceed theoretical capacity in both peaks with queues of 58 and 88 respectively with longest delay of approximately 5 minutes. Nash Road would exceed theoretical capacity in the AM and be close in the PM with predicted queues of 56 and 8 respectively, with delay of approximately 7.5 minutes in the AM.

With the addition of development traffic (DS1) A421 (East) still operates between practical and theoretical capacity with similar levels of queues and delay. A421 (West) would see an increase in queue of 23 vehicles in the PM with an additional delay of nearly 2 minutes. Nash Road would now exceed RFC of 1.0 in both peak periods with an increase of 15 vehicles in the AM queue and additional two minutes delay.

The predicted decrease in capacity due to development, along with the Shenley Park development on the A421 arms may not be considered severe in context of the NPPF. However, the Applicant has submitted a mitigation scheme, in recognition that the junction is operating close to theoretical capacity on the A421 eastern arm and now exceeds this on Nash Road in the PM. This includes realignment to the kerb on the A421 (East) and (West) arms to allow for a longer entry flare to the roundabout, with some minor amendments to the traffic island on Nash Road.

**Junction 10: A421/Nash Road/Winslow Road – Mitigation proposal**



The proposed improvement to the A421/Nash Road/Winslow Road junction has been modelled using Junctions 9 (ARCADY) with the results detailed below.

**Junction 10: A421/Nash Road/Winslow Road – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2020 Base						
2033 Do Something 1						
A - A421 (East)	2.1	6	0.68	2.3	6.14	0.7
B - B4033 Nash Road	70.1	561.95	1.42	12.9	147.2	1.01
C - A421 (West)	8.6	30.52	0.91	17.1	52.81	0.97
D - Winslow Rd	0.2	6.83	0.18	0.2	7.21	0.19
2033 Do Something 2						
A - A421 (East)	2.1	5.94	0.68	2.3	6.08	0.7
B - B4033 Nash Road	67.8	541.72	1.40	11.8	137.61	1.00
C - A421 (West)	8.4	29.79	0.91	16	50.05	0.97
D - Winslow Rd	0.2	6.8	0.18	0.2	7.17	0.19
2033 Do Something 3						
A - A421 (East)	2.3	6.26	0.70	2.4	6.23	0.71
B - B4033 Nash Road	77.7	632.19	1.48	14.5	162.18	1.03
C - A421 (West)	9	31.68	0.91	19.7	59.27	0.98
D - Winslow Rd	0.2	6.84	0.18	0.2	7.29	0.20

This improvement is shown that in the Do Something 1 scenario RFC, queuing and delay is reduced to below the 2033 Do Nothing scenario on the two A421 arms. Nash Road will experience a slight worsening of results but these would not be considered significant. This improvement can be delivered by S278 highways agreement, which is to be secured by way of a S106 obligation.

### 7. Junction 11: Stock Lane/Shenley Road/Coddimoor Lane

The Stock Lane/Shenley Road/Coddimoor Lane junction is a three arm priority junction. The results of the assessment show that the junction operates within capacity in both the AM and the PM peak in all scenarios tested. No mitigation is therefore required at this junction.

The accuracy of the traffic flows, and subsequent traffic modelling was queried by a consultee, on the basis that road closures were in place within Milton Keynes impacting the potential movements through the junction. A sensitivity test was performed where the 2015 data collection was growthed by 40%, in line with consultees comment, along with re-routing development traffic heading north off Milton Keynes included in the assessment as detailed in the development trip distribution. The results of the sensitivity test are detailed below which indicates that even in the worst case (where all northbound movement from both the Whaddon Road and Buckingham Road access) the junction would continue to work well within capacity.

#### Junction 11: Stock Lane/Shenley Road/Coddimoor Lane – Sensitivity Testing

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2033 Do Something 1						
Shenley Road left-turn	0.2	7.22	0.16	0.2	6.78	0.15
Shenley Road right-turn	0.2	11.00	0.14	0.3	10.27	0.23
Coddimoor Lane right-turn	0.7	7.79	0.34	0.3	6.43	0.17

### 8. Mitigation Package A421 Corridor:

The A421 provides a key east-west link within the Aylesbury Vale District, connecting the M40 with the M1 via Buckingham and Milton Keynes. The majority of the A421 is single carriageway; however the route becomes a dual carriageway after crossing the boundary with Milton Keynes. There are concerns regarding congestion on the A421 at peak times, and its function as a strategic east-west link. The further impact of potential developments on the A421 in Buckinghamshire is therefore of particular concern. As part of the application the A421 has been subject to extensive modelling and testing to ensure the highway network can accommodate the proposed development.

Several the junctions along the A421 corridor are shown to be operating over capacity in 2033 without development traffic. This is a direct result of background traffic growth. The Applicant has however demonstrated that the impact of the development on the surrounding highway network can be mitigated and therefore the cumulative residual impact of the development cannot be considered 'severe' in the context of paragraph 109 of the NPPF. Furthermore, several the improvements proposed are likely to provide a 'nil-detriment' situation, whereby the highway network is 'no worse off' with the proposed development in a future forecast year of 2033.

At present the A421 is free flowing along most of its length in Buckinghamshire, with junctions managed through priority junctions or roundabouts. The Applicant has proposed signalisation of the priority junctions of the A421/ Warren Road and A421/Shucklow Hill/Little Horwood Road. Whilst the signal schemes proposed adequately resolves queuing on the minor road, it would also stop the free flow and introduce delays to the primary route.

It is therefore considered more prudent to commute the costs of construction of the signal schemes into a S106 agreement. A contribution (amount to be determined) towards corridor improvements will be agreed with the Applicant to aid in management of the A421 and the safe access and exit from its joining roads that are predicted to be suffer capacity issues in future years.

#### Milton Keynes:

The majority of traffic generated by the development is on roads within Milton Keynes. As such a detailed assessment of the junctions within this area has been performed to ensure that the development proposals do not have a significant impact on the overall wider network. The Milton Keynes junction assessments were detailed in the May 2020 TA and updated in TRN3 considering the

revised and raised trip generation, traffic flow diagrams, model calibration and geometric parameter review as detailed previously.

### 1. Junction 1: Sherwood Drive/Water Eaton Road/B4034 Buckingham Road

The Sherwood Drive/Water Eaton Road/B4034 Buckingham Road junction is a four arm roundabout situated in close proximity to Bletchley Rail and Bus Stations. junction. B4034 Buckingham Road (West) Sherwood Drive and Water Eaton Road are all single lane entries widening to two lanes at entry, B4034 Buckingham Road (East) is two lane approach and entry. The junction has been assessed using Junctions 9 (ARCADY) in 'lane simulation' mode to accurately reflect the existing lane markings and uneven usage of the lanes. Capacity corrections were applied to all arms for both peaks periods to match observed queue lengths.

Where a junction has been modelled using the lane simulation mode within ARCADY an RFC is not provided by the software and instead a Level of Service (LoS) is reported. The LoS is a measured result based on average vehicle delay and is defined within the Highway Capacity Manual (HCM 2016)19 with the scale of results as follows:

- A – free flowing
- B – reasonably free flowing
- C – stable flow
- D – approaching unstable flow
- E – unstable flow, operating at capacity
- F – forced or breakdown flow.

#### Junction 1: Sherwood Drive/Water Eaton Road/B4034 Buckingham Road – Capacity Results

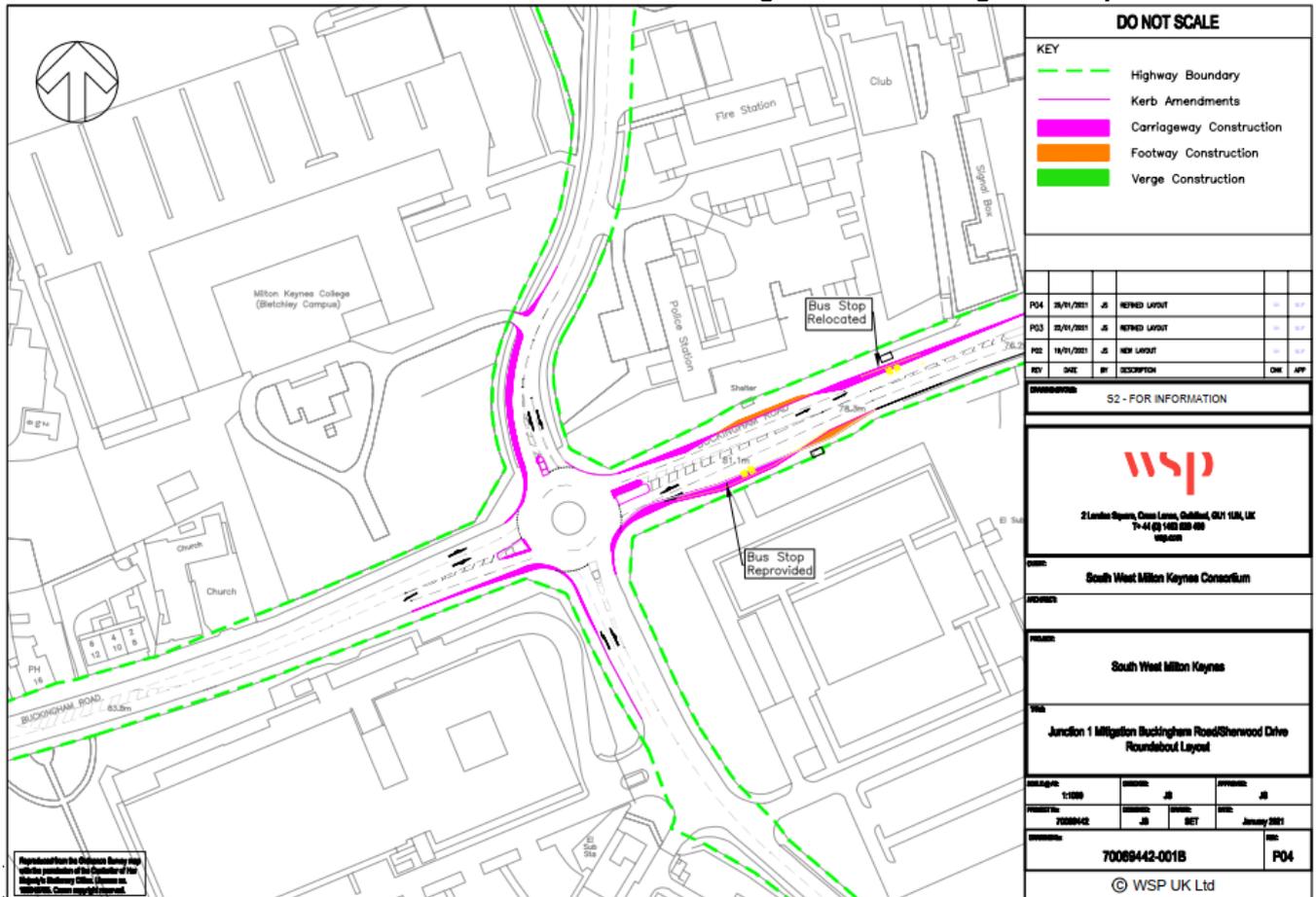
Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	LoS	Queue (Veh)	Delay (s)	LoS
<b>2020 Base</b>						
A - Sherwood Drive	8.7	44.29	E	7.4	37.34	E
B - B4034	9.2	36.3	D	35.5	85.06	F
C - Water Eaton Road	5.8	50.17	F	9.2	72.57	F
D - B4034 Buckingham Road	27	77.8	F	15.8	67.11	F
<b>2033 Do Nothing</b>						
A - Sherwood Drive	28.5	117.55	F	27.7	115.38	F
B - B4034	29.9	95.93	F	136	373.16	F
C - Water Eaton Road	28.1	201.16	F	42.6	289.06	F
D - B4034 Buckingham Road	144.4	459.53	F	79.9	344.51	F
<b>2033 Do Something 1</b>						
A - Sherwood Drive	25	101.43	F	31.6	120.26	F
B - B4034	51.9	168.06	F	224.2	595.04	F
C - Water Eaton Road	40.4	315.81	F	55.2	397.92	F
D - B4034 Buckingham Road	255.6	773.83	F	146	647.15	F
<b>2033 Do Something 2</b>						
A - Sherwood Drive	26.1	110.35	F	30.1	120.83	F
B - B4034	45.7	152.08	F	206.9	554.01	F
C - Water Eaton Road	42.7	333.33	F	49.9	367.03	F
D - B4034 Buckingham Road	243.6	742	F	136.8	613.61	F
<b>2033 Do Something 3</b>						
A - Sherwood Drive	25	103.57	F	34.3	130.53	F
B - B4034	60.9	212.98	F	257.8	673.03	F
C - Water Eaton Road	47.4	376.45	F	58.6	466.43	F
D - B4034 Buckingham Road	323.9	948.63	F	172.7	747.73	F

In the 2020 Base scenario Sherwood Drive, Buckingham Road (W) and Water Eaton Road operate at/above capacity with a LoS of E/F in the AM with queues on Buckingham Road beyond the long flare, due to unbalanced flows the outside right-turn lane suffers from starvation. In the PM peak all the arms operate at/above capacity with a LoS of E/F with the longest queue on Buckingham Road (E) of 35 vehicles and delay of 85 seconds, with the queue mainly contained in the nearside lane, but no lane blocking occurs.

In the 2033 DN scenario all arms operate above capacity with LoS of F in both peaks. Queues on Sherwood Drive would extend to Selwyn Close with an approximate 70 seconds of additional delay in each peak. On Buckingham Road (E) the nearside lane and holds majority of queue with the AM queue now extending to the Rail Bridge with an additional minute of delay whilst in the PM queues would block back to and beyond next roundabout with 5 minutes additional delay. On Buckingham Road (W) within each peak the nearside lane queue extends beyond the flared section with approximate 2 minutes more delay in the AM and 3.5 minutes in the PM. On Water Eaton Road within both peaks the nearside lane extends beyond the flare and blocks the outside lane which suffers from starvation, resulting in approximately respectively 6- and 4.5-minute additional delay in the AM and PM peaks. The addition of development traffic (DS1) would see further worsening of results with queues on Sherwood Drive extending to the fire station in the AM and in and PM beyond Selwyn Close with near identical delay. Both Buckingham Road approaches would see queues extending significantly further with delay increasing from 6 to 10 minutes in the PM on both arms and from 7.5 to 13 mins on the AM for Buckingham Road (W).

The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes providing two straight ahead lanes on the Buckingham Road (B4034) arms of the junction and minor kerb amendments to the Water Eaton Road and Sherwood Drive arms. To allow for two lane exit on the Buckingham Road (East) the bus stop layby on the north side of road has been replaced with an on-carriageway stop.

**Junction 1: Sherwood Drive/Water Eaton Road/B4034 Buckingham Road – Mitigation Proposal**



The proposed improvement to the A421/Nash Road/Winslow Road junction has been modelled using Junctions 9 (ARCADY) using the Lane Simulation mode with the results detailed below.

**Junction 1: Sherwood Drive/Water Eaton Road/B4034 Buckingham Road – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	LoS	Queue (Veh)	Delay (s)	LoS
<b>2033 Do Something 1</b>						
A - Sherwood Drive	45.5	183.96	F	30.5	114.95	F
B - B4034	33.9	101.65	F	86.6	159.7	F
C - Water Eaton Road	15.9	109.84	F	58.6	489.88	F
D - B4034 Buckingham Road	5.4	12.27	B	5.3	19.39	C
<b>2033 Do Something 2</b>						
A - Sherwood Drive	42.1	171.14	F	27	105.09	F
B - B4034	30	89.36	F	74.2	137.83	F
C - Water Eaton Road	15.5	108.75	F	54.4	457.11	F
D - B4034 Buckingham Road	5	12.81	B	5.5	19.5	C
<b>2033 Do Something 3</b>						
A - Sherwood Drive	57.1	228.42	F	35.8	131.83	F
B - B4034	41	119.15	F	107.3	210.46	F
C - Water Eaton Road	18.1	123.88	F	68.7	587.73	F
D - B4034 Buckingham Road	7.2	15.58	C	6	22.11	C

The results show that with the provision of the proposed mitigation queueing and delay on B4034 Buckingham Road (W) is significantly reduced when compared to the existing layout 2033 Do Nothing scenario in the AM and PM peaks with delay now less than 20 seconds (compared to 6 to 7.5 minutes). Buckingham Road (E) would see a slight increase in queues in the AM, but now distributed more evenly across the lanes with no blocking back to the previous roundabout, whilst in the PM the new layout would see a reduction on queue and delay that would still block to the next roundabout but not beyond and is an improvement compared to the DN scenario. There would be slight worsening of results for Sherwood Drive in both peaks, and Water Eaton Road in the PM but overall the junction results would see an improvement considering both peaks compared to 2033 DN with the demand weighted Junction Delay reducing from 250.19 to 84.96 seconds in the AM and from 242.62 to 89.36 seconds in the PM.

Buckinghamshire Council raised concern over the apparent new footway width on Buckingham Road (E) on the southern side is narrowed to accommodate the revised bus stop location. A site visit was performed to measure existing footway widths on the southern side of the road either side of the junction, some discrepancy was noted between the OS plan used as basis for design and the current layout, with variations between 0.4 and 1.8 metres. This may result in the footway behind the bus stop being in the region of 1.5 metres. This concern was provided as part of ongoing application discussions and the Applicant responded by formal letter dated 7th April 2021, this resolved that a width of 1.5 metres would be compliant with the Department for Transport's Inclusive Mobility<sup>1</sup> as the minimum acceptable footway width to enable a wheelchair user and a walker to pass one another. The Applicant also stated that further assessment would be completed at the detailed design stage and subject to finalising the s278 agreement. Whilst the actual resultant footway width will not be known until detailed design is performed the potential conflict point is noted for future consideration.

Buckinghamshire Council also sought clarification on the proposed design in terms of swept path analysis. The Appellant provided swept path analysis on the 7th April 2021, along with junctions within Milton Keynes. On review of this information is noted that the two lane movement from Buckingham Road (W) to Buckingham Road (E) are close to touching and the corner kerb line. While the analysis shows the movement is possible it is considered that further minor alteration may be required as part of the detailed design process, however this does not result in the improvement being undeliverable as it is possible that small amount of additional road space could be taken from the central island to accommodate the movements. Small amendments to design such as this are common as part of the detailed design process.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation

<sup>1</sup> Department for Transport, Inclusive Mobility (2005) – Section 3.1

scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF.

## 2. Junction 2: Shenley Road/Newton Road/B4034 Buckingham Road

The Shenley Road/Newton Road/B4034 Buckingham Road junction is a double mini-roundabout situated in close proximity to Bletchley Rail and Bus Stations. junction. Both the B4034 Buckingham Road arms are single lane approaches widening to two lanes at entry, while both Newton Road and Shenley Road are single lane approaches and entries. The two internal arms on Buckingham Road are also two lanes.

The nearside lane on Buckingham Road (W) junction takes 86 to 92% of movements during the peak periods, which will likely create some unbalanced usage with overestimation of entry capacity and starvation. A negative capacity correction was applied against observed queue lengths to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled. The junction has been assessed using Junctions 9 (ARCADY) with the existing layout results shown below.

### Junction 2: Shenley Road/Newton Road/B4034 Buckingham Road – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
E – A - Shenley Road	2.1	21.64	0.69	1.2	13.34	0.56
E – B - Buckingham Road (E)	0.7	5.2	0.42	3	11.9	0.76
E – C - Buckingham Road (W)	5.7	23.02	0.86	1.3	7.73	0.56
W – A - Buckingham Road (E)	0.9	5.79	0.49	3.4	13.07	0.78
W – B - Newton Road	2.1	15.51	0.69	1.3	13.6	0.57
W – C - Buckingham Road (W)	1.7	12.11	0.63	0.6	6.03	0.36
<b>2033 Do Nothing</b>						
E – A - Shenley Road	3.8	33.94	0.81	4.5	39.91	0.86
E – B - Buckingham Road (E)	1	6.3	0.51	47	129.22	1.1
E – C - Buckingham Road (W)	5.9	24.05	0.87	2.1	10.55	0.68
W – A - Buckingham Road (E)	1.3	6.96	0.58	5.9	20.35	0.87
W – B - Newton Road	55.9	412.45	1.23	2.3	21.02	0.71
W – C - Buckingham Road (W)	59.8	411.56	1.23	0.9	7.54	0.47
<b>2033 Do Something 1</b>						
E – A - Shenley Road	4.7	42.89	0.84	10	76.89	1.01
E – B - Buckingham Road (E)	1.4	7.46	0.59	131.2	448.39	1.29
E – C - Buckingham Road (W)	5.9	23.19	0.87	3	13.86	0.76
W – A - Buckingham Road (E)	1.8	8.35	0.65	5.9	21.03	0.87
W – B - Newton Road	87.5	670.83	1.35	2.7	24.85	0.74
W – C - Buckingham Road (W)	141.9	933.69	1.41	1.3	9.42	0.57
<b>2033 Do Something 2</b>						
E – A - Shenley Road	4.5	41.35	0.84	9	70.45	0.99
E – B - Buckingham Road (E)	1.4	7.29	0.58	117.9	389.22	1.26
E – C - Buckingham Road (W)	5.9	23.19	0.88	2.9	13.19	0.75
W – A - Buckingham Road (E)	1.7	8.15	0.64	5.9	20.88	0.87
W – B - Newton Road	82.7	633.7	1.34	2.6	24.21	0.74
W – C - Buckingham Road (W)	129.5	843.48	1.38	1.2	9.06	0.56
<b>2033 Do Something 3</b>						
E – A - Shenley Road	5.3	48.7	0.86	9.8	76.09	1
E – B - Buckingham Road (E)	1.6	8.01	0.62	176.3	591.93	1.35
E – C - Buckingham Road (W)	5.9	23.24	0.87	3.4	15.15	0.78
W – A - Buckingham Road (E)	2	9.01	0.67	5.9	21.02	0.87
W – B - Newton Road	102.6	794.36	1.39	2.8	26.36	0.75
W – C - Buckingham Road (W)	199.6	1296.73	1.5	1.5	10.14	0.6

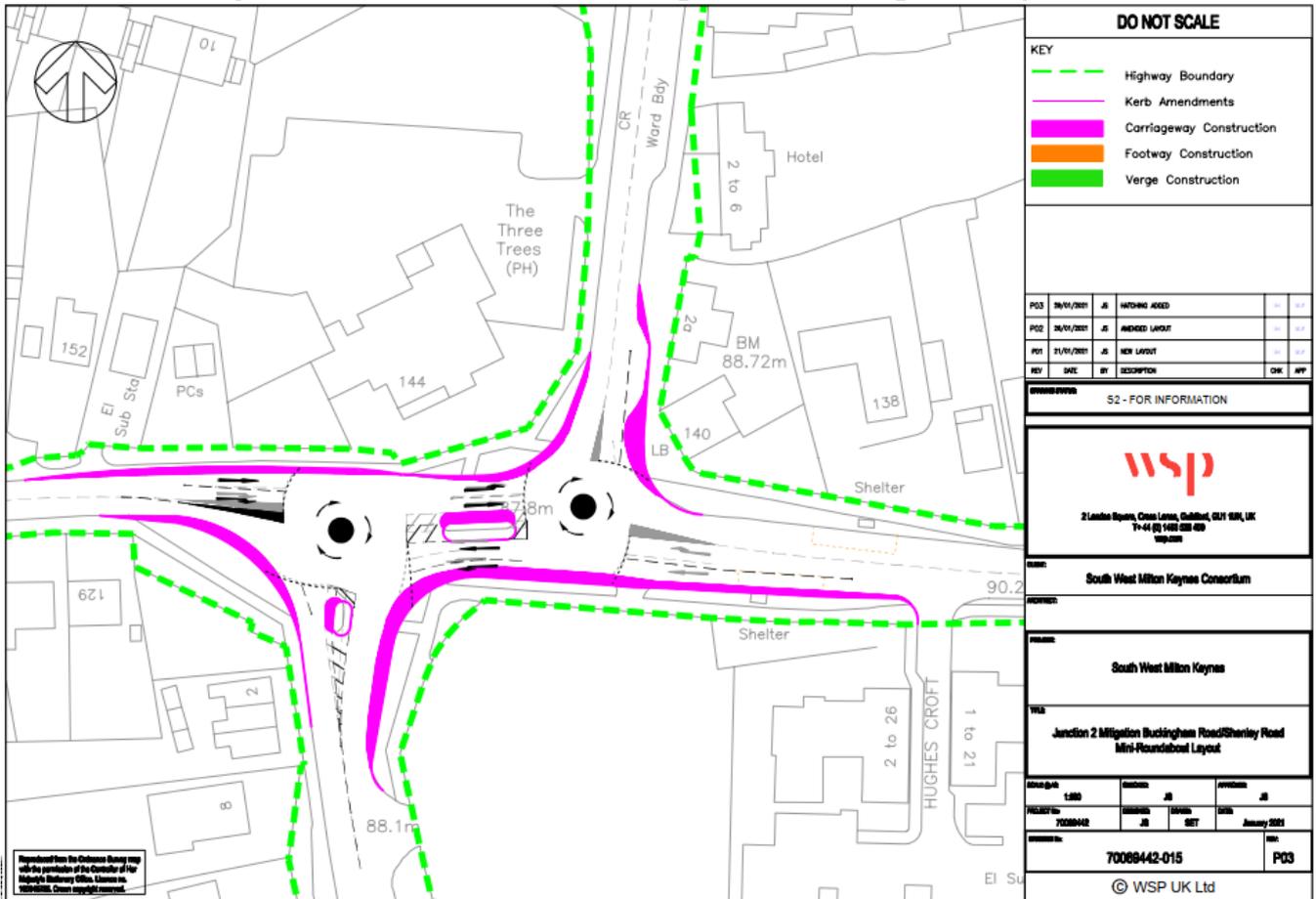
The results show that in the 2020 Base, the junction operates with satisfactory performance with all arms operating within capacity (RFC of 1.0) with only internal Buckingham Road (W) on the eastern roundabout operating above RFC of 0.85. All queues and delays are short ranging between from 0 to 6 vehicle queue and maximum delay of 23 s. Taking into account local traffic growth the 2033 Base DN

scenario shows that at the eastern junction Buckingham Road (E) will operate above RFC 1.0 in the PM with the queue now extending 270 m to Milton Grove (47 vehicles). This is due to the storage on the internal arm on entry to the western roundabout creating an exit restriction. On the western roundabout in the AM Newton Road and Buckingham Road (W) are above theoretical capacity (RFC of 1.0) with the queue on Buckingham Road extending to Tattenhoe Lane with delay of 7 minutes (from 15 seconds in 2020) and the queue on Newton Road extending to St. Mary's Avenue (56 vehicles) with delay of 7 minutes (from 15 seconds in 2020).

The inclusion of development traffic in DS1 would result in Shenley Road in the PM operating above capacity (RFC of 1.0) along with Buckingham Road (E) at the eastern roundabout with Newton Road and Buckingham Road (W) operating further above capacity at the western roundabout. At the eastern roundabout Buckingham Road (E) in the PM the queue now extends to Wilkinson Close (approximately 750m) with delay increasing from 2 to 7.5 minutes. At the western junction in the AM queues are further increased with Newton Road now extending for 500m to St. Aidans Close with delay of 11 minutes. On Buckingham Road (W) the queue extends to Whaddon Road with delay up to 15.5 minutes. The junction would be further detrimentally impacted when considering the Shenley Park development (DS3) but see some improvement when considering the travel planning scenario (DS2), albeit some arms would still perform poorly.

The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes kerb widening on all arms of the mini roundabout to improve capacity. To allow for two lane entry on Shenley Road the existing short layby (covered by no waiting at any time restrictions and hence not used for parking) would need to be removed.

**Junction 2: Shenley Road/Newton Road/B4034 Buckingham Road – Mitigation Proposal**



The proposed improvement to the A421/Nash Road/Winslow Road junction has been modelled using Junctions 9 (ARCADY) with the previous capacity correction maintained as only kerb changes are proposed.

### **Junction 2: Shenley Road/Newton Road/B4034 Buckingham Road – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2033 Do Something 1</b>						
E – A - Shenley Road	1.2	10.32	0.55	2.4	21.74	0.72
E – B - Buckingham Road (E)	1	5.46	0.51	133.5	448.74	1.28
E – C - Buckingham Road (W)	5.9	18.7	0.87	1.6	6.98	0.61
W – A - Buckingham Road (E)	1.8	8.53	0.65	5.9	21.13	0.87
W – B - Newton Road	28.7	163.44	1.1	1.9	17.26	0.66
W – C - Buckingham Road (W)	32.5	137.8	1.08	0.9	6.05	0.46
<b>2033 Do Something 2</b>						
E – A - Shenley Road	1.2	10.17	0.54	6.9	54.9	0.94
E – B - Buckingham Road (E)	1	5.37	0.51	120	392.42	1.27
E – C - Buckingham Road (W)	5.9	18.69	0.87	1.5	6.79	0.6
W – A - Buckingham Road (E)	1.8	8.32	0.64	5.9	20.98	0.87
W – B - Newton Road	24.7	140.86	1.08	1.9	16.93	0.66
W – C - Buckingham Road (W)	26.9	117.25	1.06	0.8	5.89	0.45
<b>2033 Do Something 3</b>						
E – A - Shenley Road	1.2	10.84	0.56	0.9	8.04	0.47
E – B - Buckingham Road (E)	1.1	5.75	0.54	179.6	603.73	1.34
E – C - Buckingham Road (W)	5.9	18.93	0.87	1.7	7.3	0.63
W – A - Buckingham Road (E)	2.1	9.22	0.68	5.9	20.4	0.87
W – B - Newton Road	41.5	255.3	1.16	2	17.99	0.67
W – C - Buckingham Road (W)	57.1	262.31	1.16	0.9	6.33	0.49

The results show that with the provision of the proposed mitigation that overall the junction results would see an improvement considering both peaks compared to existing layout 2033 DN with the demand weighted Junction Delay reducing. At the eastern junction Buckingham Road (E) in the PM queue will still extend to Wilkinson Close (approximately 750m), this is impacted by the downstream internal link storage being filled, creating an exit restriction. The remaining arms on the eastern roundabout would have improved or similar results compared to 2033 DN. At the western junction in the AM queues and delay are reduced compared to 2033 DN existing layout with Buckingham Road (W) seeing queue reductions from 60 to 33 and delay reducing from 7 to 2.5 mins. Newton Road is also expected to see an improvement, with queues and delay reducing by over half compared to DN 2033, however, a new lane has been formed but with the turning proportions unbalanced in both peak periods the outside lane is likely to suffer from some starvation so the benefits on this arm are likely to be overestimated, although overall it is considered that the junctions will see improvement.

Buckinghamshire Council also sought clarification on the proposed design in terms of swept path analysis. The Appellant provided swept path analysis on the 7th April 2021, along with other junctions within Milton Keynes. On review of this information no concerns were raised with the major movement considered to be able to be completed satisfactorily.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF. Although it should be noted that widening for the western roundabout on the Buckingham Road (W) arm indicates converting existing footway allocation to carriageway, this is not considered appropriate and as part of detailed design it will need to be shown that at minimum similar level of footway provision is present, with possible conversion of the existing verge (within the highway).

Some consultees have queried the modelling on the Buckingham Road and that current congestion is not accounted for, with no suitable mitigation available. The modelling for J1 and J2 has been reviewed and is considered to be appropriate in terms of model development. This included use of current traffic demand and existing queues with the base model calibrated to reflect existing conditions with significant queues on the A421. The DN 2033 scenario models have identified that significant queuing and delay along the A421 at these junctions without development traffic. The mitigation proposed for

each junction would see overall junction improvements in terms of collective reduced delay with the A421 at J1 predicted to see similar or much reduced predicted queues and delay. Whilst at J2 it is noted that A421 westbound movement is predicted to worsen compared to the DN scenario in the PM but the eastbound movement in the AM would see marked improvement. Buckinghamshire Council are satisfied that the modelling performed at these junctions are robust and fit for purpose with the proposed mitigation providing overall improvements and reducing the worst queues and delay.

### 3. Junction 5: Tattenhoe Roundabout

The junction is a large four arm roundabout with both A421 Standing Way arms being two lane dual carriageway approach with flared entries to three lanes. Snelshall Street and Buckingham Road are both single carriageway but with flared two-lane entries onto the roundabout. A negative capacity correction was applied against observed queue lengths to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled on A421 Standing Way (E), Buckingham Road and A421 Standing Way (W) in the AM and all arms in the PM. The junction has been assessed using Junctions 9 (ARCADY) with the existing layout results shown below.

#### Junction 5: Tattenhoe Roundabout – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	LoS	Queue (Veh)	Delay (s)	LoS
2020 Base						
A – V1 Snelshall Street	24.2	115.62	1.03	18.5	97.05	1.00
B - A421 Standing Way (E)	6.2	23.59	0.87	9.8	34.71	0.93
C – B4034 Buckingham Road	6.2	53.35	0.89	6.3	50.4	0.89
D - A421 Standing Way (W)	5.9	13.78	0.86	5.7	15.26	0.86
2033 Do Nothing						
A – V1 Snelshall Street	186.9	843.6	1.52	120.1	611.91	1.35
B - A421 Standing Way (E)	20.7	66.81	0.99	47.2	127.2	1.06
C – B4034 Buckingham Road	48.6	311.65	1.20	59	405.99	1.22
D - A421 Standing Way (W)	31.5	60.9	1.00	43.9	89.29	1.03
2033 Do Something 1						
A – V1 Snelshall Street	424.6	2352.72	1.92	325.2	1879.59	1.73
B - A421 Standing Way (E)	162	506.2	1.23	398	1216.96	1.44
C – B4034 Buckingham Road	559.1	4200.35	2.23	450.6	2828.96	1.86
D - A421 Standing Way (W)	110	181.68	1.11	99.5	193.47	1.11
2033 Do Something 2						
A – V1 Snelshall Street	389.6	2054.65	1.87	293.6	1710.2	1.67
B - A421 Standing Way (E)	136.4	423.67	1.2	323.1	969.81	1.38
C – B4034 Buckingham Road	477.2	3609.37	2.10	318.5	1953.72	1.65
D - A421 Standing Way (W)	97.5	157.19	1.09	101.5	201.82	1.11
2033 Do Something 3						
A – V1 Snelshall Street	348.7	2114.49	1.86	228.4	1309.65	1.65
B - A421 Standing Way (E)	177.7	551.58	1.25	409.7	1278.84	1.44
C – B4034 Buckingham Road	540.7	3745.24	2.11	468.7	2773.23	1.85
D - A421 Standing Way (W)	111.4	186.84	1.11	52.7	106.34	1.05

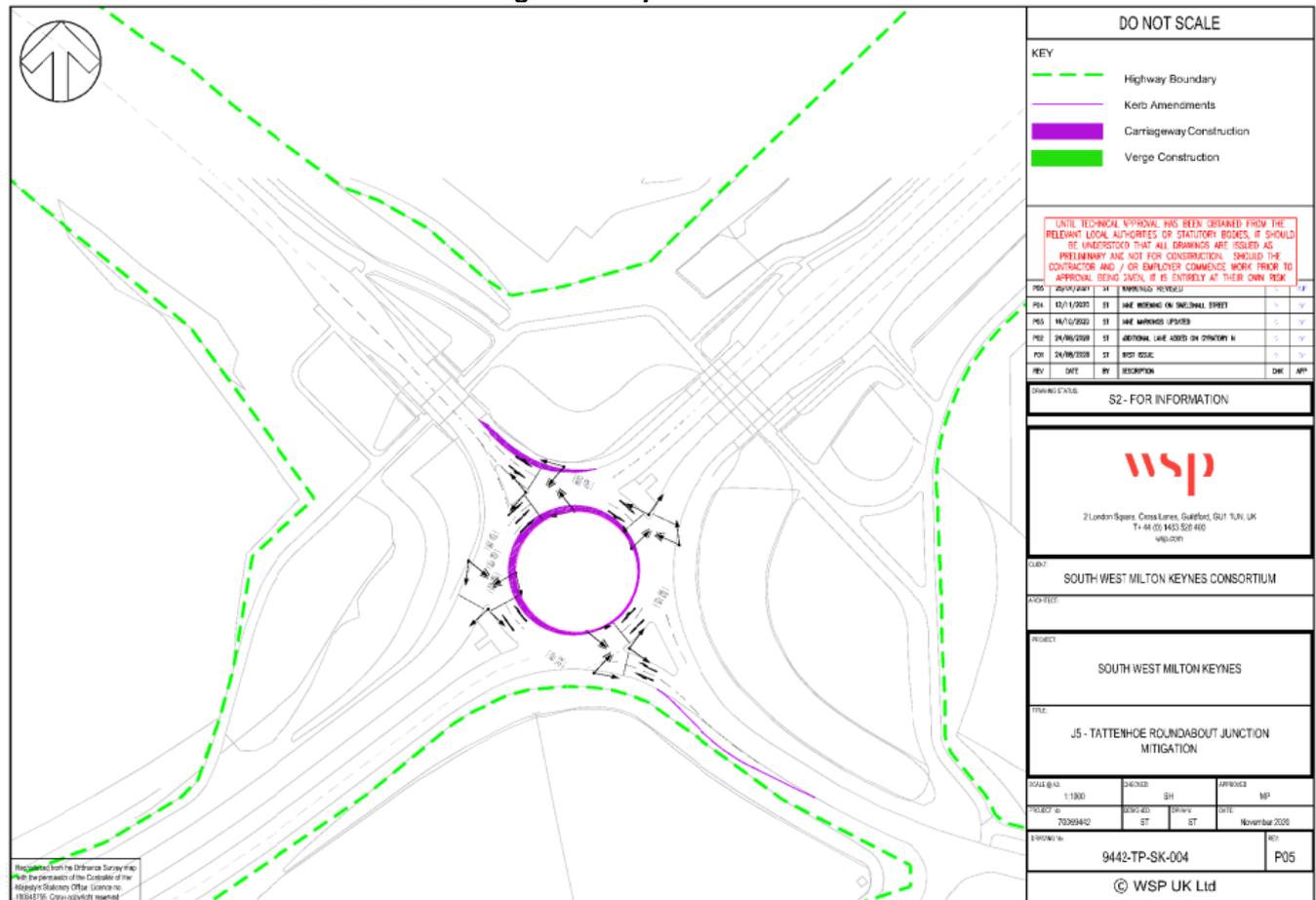
The results show that in the 2020 Base Snelshall Street operates at/above capacity (RFC of 1.0) in both peak periods, with the longest queue of 24 vehicles and delay of nearly 2 minutes in the AM. The remaining arms operate above practical capacity (RFC of 0.85) in both peak periods, with the longest queue of 10 on A421 Standing Way (E) and the greatest delay of nearly 1 minute on Buckingham Road. Considering local traffic growth, the 2033 Base DN scenario shows all arms are above theoretical capacity (RFC of 1.0) except for A421 (E) in the AM which is 0.99. This would have the greatest impact on Snelshall Street with the queue now over 180 vehicles in the AM extending for over 1 km with delay of 14 minutes. The Buckingham Road queue would now extend to, and beyond in the PM, the proposed new access roundabout.

The inclusion of development traffic in DS1 would result in further degradation of performance, with all arms above theoretical capacity (RFC of 1.0), with Buckingham Road in the AM showing an RFC of 2.23. The model predicts queues on Snelshall Street over 425 vehicles in the AM blocking for over

2.5km with delay at 40 minutes. This is slightly better in the PM but there is still a queue over 2km with delay at 30 minutes, in both peaks this would extend beyond Junction 12. On Buckingham Road the queue would now extend to and beyond Junction 2 in the AM and PM. In the AM a queue of over 3km is possible that would nearly extend to Junction 1. Delays were modelled at 70 and 47 minutes respectively.

The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes altering the junction to 'part-time' traffic signals that would operate at peak periods with flare extended on Buckingham Road to provide greater stacking space. The central island would also be slightly narrowed to better accommodate two-lane straight-ahead and turning movements.

**Junction 5: Tattenhoe Roundabout – Mitigation Proposal**



The proposed improvement to the Bottledump roundabout has been modelled using the industry standard LinSig software.

**Junction 5: Tattenhoe Roundabout – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (PCU)	Delay (s)	DoS	Queue (PCU)	Delay (s)	DoS
<b>2033 Do Something 1</b>						
A421 Standing Way (W) Left Ahead	12.5	22.2	89.00%	8.6	16.7	75.80%
A421 Standing Way (W) Ahead	12.5	24.6	87.10%	8.8	18	68.80%
V1 Snelshall Street Left Ahead	178.6	626.8	147.40%	108.8	423.7	125.90%
A421 Standing Way (E) Ahead Left	8	16.9	74.90%	9.2	16.6	76.50%
A421 Standing Way (E) Ahead	7.5	17.7	70.70%	9.2	17.5	69.80%
B4034 Buckingham Road Ahead Left	8.3	23.5	83.60%	20.3	58.3	97.70%
<b>2033 Do Something 2</b>						
A421 Standing Way (W) Left Ahead	10.2	15.6	81.00%	8	15.4	73.50%
A421 Standing Way (W) Ahead	11.3	17.8	79.30%	8.2	16.4	65.30%

Arm Description	AM			PM		
	Queue (PCU)	Delay (s)	DoS	Queue (PCU)	Delay (s)	DoS
V1 Snelshall Street Left Ahead	174.8	623.1	145.90%	96.8	385.3	122.70%
A421 Standing Way (E) Ahead Left	7.3	13.8	66.80%	8.4	14.8	72.40%
A421 Standing Way (E) Ahead	6.9	14.3	61.60%	8.1	15.4	64.10%
B4034 Buckingham Road Ahead Left	8.9	26.2	84.00%	12.7	36	91.20%
<b>2033 Do Something 3</b>						
A421 Standing Way (W) Left Ahead	15.2	25.9	90.60%	8.9	17.1	74.80%
A421 Standing Way (W) Ahead	15.2	28.5	89.90%	9.2	18.4	70.00%
V1 Snelshall Street Left Ahead	155.4	619.1	145.40%	20	73.8	98.70%
A421 Standing Way (E) Ahead Left	7.6	14.2	68.80%	35.6	14.6	92.50%
A421 Standing Way (E) Ahead	7.3	14.8	63.80%	44.8	15.4	92.80%
B4034 Buckingham Road Ahead Left	9.5	24.6	85.00%	21.3	55.2	97.60%

The results show that with change to part-time signal control shows, that all arms would see an improvement considering both peaks compared to 2033 DN existing layout, especially on Buckingham Road where queues would reduce from 50 to 8 in the AM and 59 to 20 in the PM, which would be contained in the link between the junction and the new access on Buckingham Road. Snelshall Street would still experience queues and delay but these would be less than those predicted for the 2033 DN scenario and would not extend back to J12.

There are some potential safety concerns over queuing within the internal areas blocking exits, especially in the PM. It is evident that the proposal provides significantly better option in terms of capacity than the existing layout with no queues blocking back to the site access on Buckingham Road which was raised previously. It is estimated that you may get partial blocking of the exits on some arms every other cycle based on uniform queue lengths. To mitigate against this additional 'Keep Clear' road markings have been included in the design.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. The mitigation proposal offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF and would not be considered severe.

#### 4. Junction 6: Bottle Dump Roundabout

The junction is a large three arm roundabout with A421 Standing Way being two lane dual carriageway approach and entry. A421 Buckingham Road and Whaddon Road are both single carriageway but with flared two-lane entries onto the roundabout. The junction has been assessed using Junctions 9 (ARCADY) in 'lane simulation' mode to accurately reflect the existing lane markings and uneven usage of the lanes. A capacity correction was applied to A421 Standing Way to match observed queue lengths. A421 Standing Way has unbalanced flow with the outside straight-ahead lane accounting for over 83% of all movements in both peak periods. The remaining arms are well balanced.

Observation of video survey showed blocking back from the Buckingham Road exit into the roundabout, restricting movements from Whaddon Road. The same survey did not show queues extending back from Junction 7 with no obvious cause for temporary blocking except for weight of traffic seeking to pass ahead from the two lane high speed dual carriageway to a narrow single lane carriageway. Therefore, an exit restriction added was to replicate current operation.

#### Junction 6: Bottledump Roundabout – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	LoS	Queue (Veh)	Delay (s)	LoS
<b>2020 Base</b>						
A – A421 Standing Way	5.2	14.35	B	19.9	44.86	E
B - Whaddon Road	4.5	37.88	E	6.5	67.84	F
C – A421 Buckingham Road	4.6	10.21	B	2.9	7.73	A
<b>2033 Do Nothing</b>						
A – A421 Standing Way	31.5	67.74	F	97.8	218.82	F

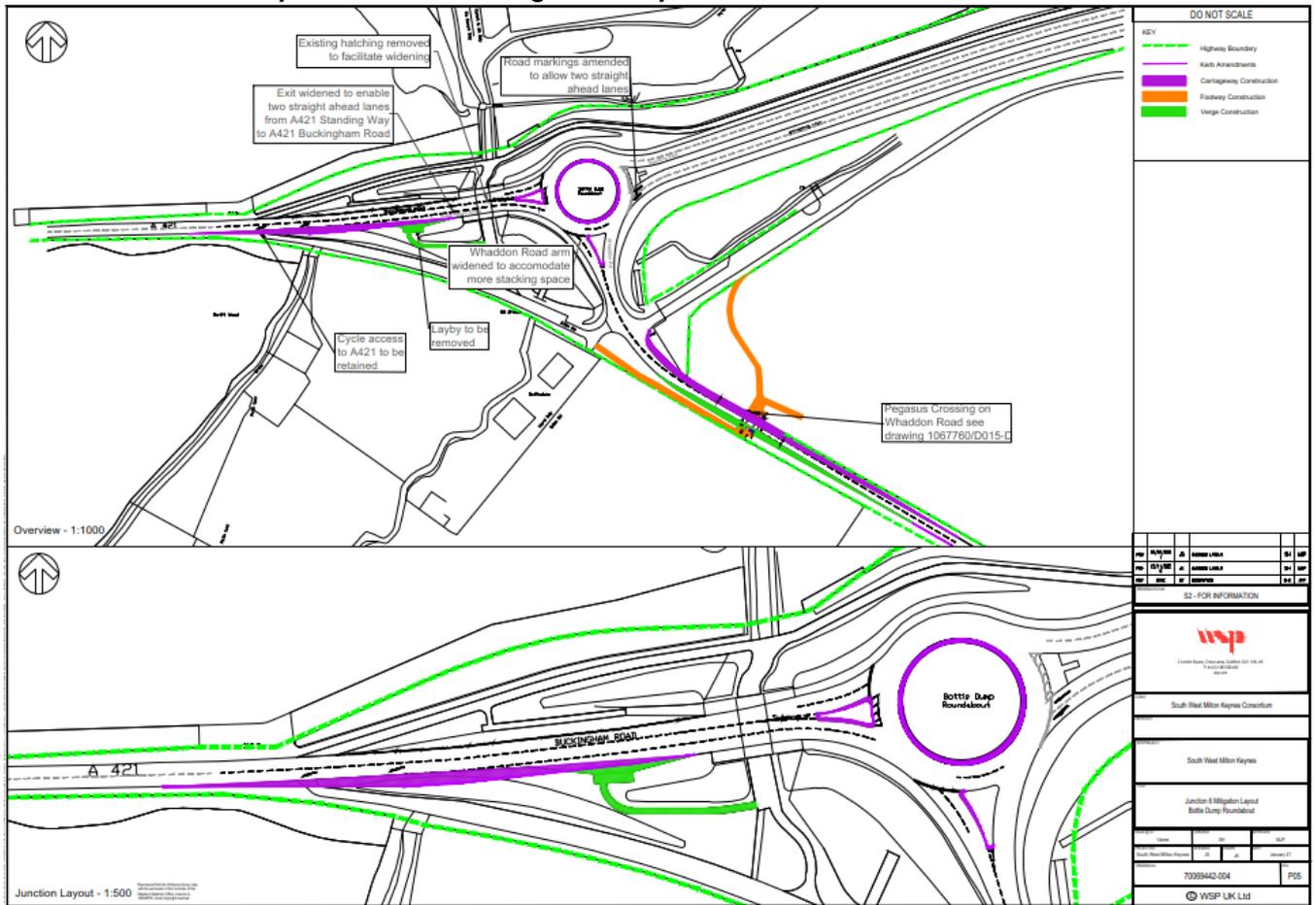
Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	LoS	Queue (Veh)	Delay (s)	LoS
B - Whaddon Road	47.8	350.59	F	19.4	190.36	F
C – A421 Buckingham Road	11.2	22.18	C	4.9	10.61	B
2033 Do Something 1						
A – A421 Standing Way	40.5	85.75	F	125.4	305.45	F
B - Whaddon Road	108.9	658.39	F	31.3	273.81	F
C – A421 Buckingham Road	18.6	34.97	D	6.9	14.99	B
2033 Do Something 2						
A – A421 Standing Way	35.7	75.98	F	117.8	279.15	F
B - Whaddon Road	97.3	624.43	F	40	345.76	F
C – A421 Buckingham Road	18.2	31.58	D	6.5	13.12	B
2033 Do Something 3						
A – A421 Standing Way	18.8	42.94	E	91.7	208.61	F
B - Whaddon Road	81.5	455.66	F	39.8	362.36	F
C – A421 Buckingham Road	23.1	40.6	E	4.8	11.32	B

The results show that in the 2020 Base A421 Standing Way in the PM and Whaddon Road in both peaks operate at/above capacity, but with acceptable queues (maximum of 20 vehicles on A421 Standing Way) and greatest delay of just over 1 minute. Considering local traffic growth, the 2033 Base DN scenario shows A421 Standing Way and Whaddon Road would operate above capacity. A421 Standing Way is predicted to experience queues of approximately 30 in the AM and 100 in the PM which would extend for about 500m, all within the outside lane. This may lead to greater use of nearside lane to bypass queues with potential for conflict in the circulatory carriageway or exit to A421 Buckingham Road. On Whaddon Road the queue would extend for approximately 250 metres with delay of 6 minutes, increased of approximately 5.5 minutes.

The inclusion of development traffic in DS1 would result in further degradation of performance, with A421 Standing Way predicted to experience queues of approximately 40 in the AM and 125 in the PM which would extend for about 750 m, again all in the outside lane. Whaddon Road queues in the AM are now predicted at 109 vehicles which would extend for approximately 530 metres, in the vicinity of the proposed Whaddon Road access.

The predicted decrease in capacity due to development traffic would be considered significant for the A421 Standing Way and Whaddon Road and the Applicant has submitted a mitigation scheme. This includes widening the Buckingham Road exit to two lanes for an extended length to allow straight ahead movements from both lanes on A421 Standing Way, this would require a reduction of the flare available on A421 Buckingham Road. Furthermore, Whaddon Road would be widened slightly and the central island narrowed to better accommodate two lane straight ahead movement. A new Pegasus crossing is also proposed on Whaddon Road south of the junction.

**Junction 6: Bottledump Roundabout – Mitigation Proposal**



The proposed improvement to the Bottledump roundabout has been modelled using Junctions 9 (ARCADY).

**Junction 6: Bottledump Roundabout – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	LoS	Queue (Veh)	Delay (s)	LoS
2033 Do Something 1						
A – A421 Standing Way	2.9	6.67	A	4.5	8.63	A
B - Whaddon Road	1.3	7.35	A	1	6.77	A
C – A421 Buckingham Road	28.1	48.61	E	4.9	12.4	B
2033 Do Something 2						
A – A421 Standing Way	3	6.57	A	4.2	8.41	A
B - Whaddon Road	1.3	7.29	A	0.9	6.56	A
C – A421 Buckingham Road	24.2	42.51	E	5	10.9	B
2033 Do Something 3						
A – A421 Standing Way	2.6	6.36	A	3.5	8.06	A
B - Whaddon Road	1.2	7.17	A	1.1	5.56	A
C – A421 Buckingham Road	32.1	55.86	F	4.2	9.63	A

The results show that with the provision of the proposed mitigation A421 Standing Way would no longer suffer from lane starvation and would be well below existing layout 2033 DN queues and delay results and operates well within capacity. With the addition of the extended two lane exit and relocation of the exit restriction Whaddon Road also now operates well within capacity with negligible queues and delay. However, there is a minor increase in queuing and delay on the Buckingham Road arm results. Queuing on Buckingham Road increases from 11 vehicles in the 2033 DN scenario to 28 in DS1, an increase of 17 vehicles. Delay increases from 22 seconds to 49 seconds, an increase of 27 seconds.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. Overall the junction results would see a significant improvement considering both peaks compared to 2033 DN existing layout and it is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF.

### 5. Junction 12: Kingsmead Roundabout

The junction is a large four arm roundabout with all approach's single carriageway but with flared two-lane entries onto the roundabout. The junction has been modelled using Junctions 9 (ARCADY), the results are shown below for the current layout.

The nearside lane on Chaffron Way takes 75 to 85% of movements during the peak periods, which will likely create some unbalanced usage with overestimation of entry capacity and starvation. A negative capacity correction was applied against observed queue lengths to replicate current patterns and reduce the likelihood of overestimation of capacity for all scenarios modelled.

#### Junction 12: Kingsmead Roundabout – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A – V1 Snelshall Street (N)	1.4	6.16	0.58	0.6	3.85	0.36
B – H7 Chaffron Way	3.5	27.18	0.79	2.3	17.07	0.71
C – V1 Snelshall Street (S)	0.8	5.38	0.45	1.1	6.27	0.54
D - Hayton Way	0.1	2.63	0.08	0	2.6	0.04
<b>2033 Do Nothing</b>						
A – V1 Snelshall Street (N)	4.8	19.16	0.84	1	5.42	0.5
B – H7 Chaffron Way	79	454.91	1.28	110.2	570.72	1.31
C – V1 Snelshall Street (S)	1.3	7.13	0.56	3.2	13.6	0.77
D - Hayton Way	0.7	4.22	0.42	0.2	3.16	0.18
<b>2033 Do Something 1</b>						
A – V1 Snelshall Street (N)	10.6	39.21	0.93	1.5	6.73	0.6
B – H7 Chaffron Way	120	770.76	1.46	168.7	935.63	1.49
C – V1 Snelshall Street (S)	2	9.32	0.67	5.4	20.97	0.85
D - Hayton Way	0.8	4.65	0.44	0.2	3.35	0.19
<b>2033 Do Something 2</b>						
A – V1 Snelshall Street (N)	9.5	35.44	0.92	1.2	5.89	0.54
B – H7 Chaffron Way	114.4	729.81	1.44	130.6	691.13	1.38
C – V1 Snelshall Street (S)	1.9	8.94	0.66	5.1	20.28	0.85
D - Hayton Way	0.8	4.59	0.44	0.2	3.34	0.19
<b>2033 Do Something 3</b>						
A – V1 Snelshall Street (N)	4.6	18.5	0.83	1	5.44	0.5
B – H7 Chaffron Way	84.9	490.73	1.3	114	590.86	1.32
C – V1 Snelshall Street (S)	1.4	7.51	0.59	2.9	12.63	0.75
D - Hayton Way	0.7	4.31	0.42	0.2	3.12	0.18

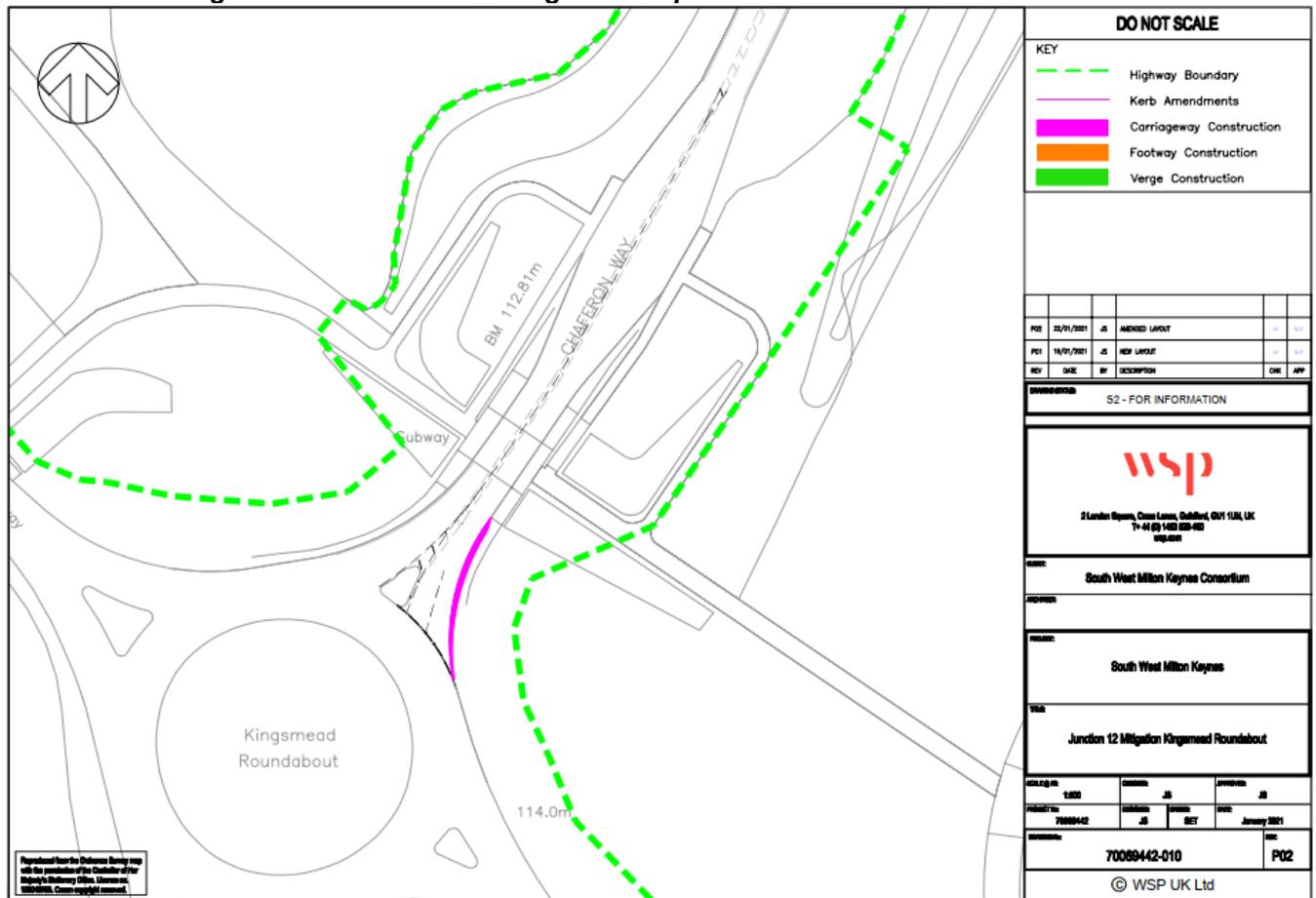
The results show that in the 2020 Base, the junction operates with satisfactory performance with all arms operating within practical capacity (RFC of 0.85) with no queue exceeding 4 vehicles and a maximum delay of 27 seconds. Considering local traffic growth the 2033 Base DN scenario shows All arms bar H7 Chaffron Way still operate under practical capacity (0.85). H7 Chaffron Way now operates over theoretical capacity (RFC of 1.0) with long queues and delay, especially in the PM where delay is now 9.5 minutes (previously 17 seconds) with queues increasing from 2 to 110 vehicles and extending for over 500m.

For all 2033 scenarios the queue on Snelshall Street (N) in the AM and Snelshall Street (S) in the PM may extend beyond the current flare on occasion, this may result in short-term blocking of an entry lane and mean the results are slightly optimistic. However, for the majority of the modelled period this is unlikely to occur and it is anticipated that the results would not alter to a point where significant change would be recorded.

The inclusion of development traffic in DS1 would result in further queues and delay on Chaffron Way in both peak periods with queues blocking back to Junction 13 (Westcroft roundabout) with delay of 15.5 minutes in the PM. Snelshall Street (N) and (S) in the PM operate at or above practical capacity, but still under theoretical capacity, but queues and delay are still small with maximum queue of 10 vehicles on Snelshall Street (N) in the AM and delay of 39 seconds. In DS3 (Shenley Park development) the inclusion of Shenley Park link road would see fewer vehicles through the junction and less impact with DS3 providing very similar results to 2033 DN.

The predicted decrease in capacity due to development traffic would be considered significant for Chaffron Way and the Applicant has submitted a mitigation scheme. This includes kerb widening Chaffron Way to improve capacity.

**Junction 12: Kingsmead Roundabout – Mitigation Proposal**



The proposed improvement to the Kingsmead roundabout has been modelled using Junctions 9 (ARCADY) with the previous capacity correction on Chaffron Way maintained as only kerb changes are proposed.

**Junction 12: Kingsmead Roundabout – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2033 Do Something 1						
A – V1 Snelshall Street (N)	11	40.8	0.94	1.5	6.73	0.6
B – H7 Chaffron Way	72.9	390.88	1.25	104.1	501.33	1.29
C – V1 Snelshall Street (S)	2.1	9.67	0.68	6.1	23.94	0.87
D - Hayton Way	0.8	4.69	0.44	0.2	3.39	0.19
2033 Do Something 2						
A – V1 Snelshall Street (N)	9.4	36.81	0.93	1.2	5.89	0.54
B – H7 Chaffron Way	69	359.63	1.24	79.1	343.04	1.21

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
C – V1 Snelshall Street (S)	1.9	9.27	0.66	5.8	23.11	0.86
D - Hayton Way	0.8	4.62	0.44	0.2	3.37	0.19
<b>2033 Do Something 3</b>						
A – V1 Snelshall Street (N)	4.7	18.94	0.83	1	5.44	0.5
B – H7 Chaffron Way	45.5	226.57	1.13	67.3	272.27	1.17
C – V1 Snelshall Street (S)	1.4	7.74	0.59	3.1	13.74	0.76
D - Hayton Way	0.7	4.34	0.42	0.2	3.15	0.18

The results show that with the provision of the proposed mitigation means that overall the junction results would see an improvement considering both peaks compared to the 2033 DN existing layout with the demand weighted Junction Delay reducing in the AM from 113.41 to 101.68 seconds and in the PM from 185.82 to 155.87 seconds. Chaffron Way still operates above theoretical capacity (RFC of 1.0) but has improved compared to the DN scenario with delay reduced from 7.5 to 6.5 minutes in the AM and 9.5 to 8.3 minutes in the PM, with the queue in the PM no longer blocking back to Junction 13. Minor increases in queuing and delay are evident on the other arms of the junction but overall, the mitigation measures would provide an improvement when compared to the 2033 Do Nothing scenario.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF. It was noted that Chaffron Way has unbalanced lane usage with approximately 82 to 87% of vehicles likely to use the nearside lane to turn left or straight ahead. Altering the lane assignment for Chaffron Way so the nearside lane is left turn only and the outside lane caters for the remaining movements would provide more balanced lane use, with the nearside lane not catering for 48 to 63% of movements. This could be considered as part of detailed design and may aid in reducing queues and delay on this arm further.

### 6. Junction 13: Westcroft Roundabout

The junction is a large four arm roundabout with all approach's single carriageway but with flared two-lane entries onto the roundabout. The junction has been modelled using Junctions 9 (ARCADY), the results are shown below for the current layout. A negative capacity correction was applied against Tattenhoe Street (N) and (S) Chaffron Way (E) in the AM and for Tattenhoe Street (S) and Chaffron Way (W) in the PM to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled.

#### Junction 13: Westcroft Roundabout – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A – V2 Tattenhoe Street (N)	2.9	17.78	0.75	0.5	3.25	0.35
B – H7 Chaffron Way (E)	3.6	24.72	0.79	1.2	5.19	0.55
C – V2 Tattenhoe Street (S)	6	23.77	0.87	1.7	9.08	0.63
D – H7 Chaffron Way (W)	1.4	6.4	0.58	5.1	31.65	0.85
<b>2033 Do Nothing</b>						
A – V2 Tattenhoe Street (N)	57.4	275.31	1.18	0.7	3.72	0.42
B – H7 Chaffron Way (E)	30.6	150.11	1.06	3.6	11.42	0.79
C – V2 Tattenhoe Street (S)	43.5	130.51	1.06	7.1	34.09	0.89
D – H7 Chaffron Way (W)	8.1	26.28	0.9	84.2	378.17	1.24
<b>2033 Do Something 1</b>						
A – V2 Tattenhoe Street (N)	62.9	298.49	1.20	0.7	3.75	0.42
B – H7 Chaffron Way (E)	31.3	153.06	1.06	3.7	11.6	0.79
C – V2 Tattenhoe Street (S)	46.7	138.45	1.07	7.7	36.61	0.90
D – H7 Chaffron Way (W)	8.3	26.89	0.91	87.2	397.2	1.25
<b>2033 Do Something 2</b>						
A – V2 Tattenhoe Street (N)	64.2	303.76	1.20	0.7	3.74	0.42

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
B – H7 Chaffron Way (E)	31.2	153.56	1.06	3.6	11.56	0.79
C – V2 Tattenhoe Street (S)	46.8	138.65	1.07	7.7	36.95	0.90
D – H7 Chaffron Way (W)	8.3	26.87	0.91	88.6	405.81	1.25
<b>2033 Do Something 3</b>						
A – V2 Tattenhoe Street (N)	64.8	306.23	1.20	0.7	3.75	0.42
B – H7 Chaffron Way (E)	31.5	154.32	1.06	3.7	11.62	0.79
C – V2 Tattenhoe Street (S)	49.2	144.73	1.07	7.8	37.29	0.90
D – H7 Chaffron Way (W)	8.4	27.1	0.91	87.7	401.26	1.25

All arms in both peaks operate under theoretical capacity (RFC of 1.0) but Tattenhoe Street (S) in the AM and Chaffron Way (W) in the PM operate at or above practical capacity (RFC of 0.85). No queue exceeds 6 vehicles with a maximum delay of 32 seconds. Considering local traffic growth, the 2033 Base DN scenario shows V2 Tattenhoe Street (N) and (S) and Chaffron Way (E) operate above RFC of 1.0 in the AM and Chaffron Way (W) in the PM. This results in long queues in the PM of Chaffron Way (W) of 84 vehicles (from 5) and delay increasing from 32 seconds to 6.5 minutes. In the AM there is significant increase in queues and delay, with the longest delay now at 4.5 minutes compared to 24 seconds and the longest queue is now 57 vehicles compared to 6.

The inclusion of development traffic would result in only minor increases in results for both AM and PM peaks with queues predicted to stay similar to 2033 DN levels or increase by at worst 6 vehicles and delay by approximately 30 seconds. The residual cumulative impact of the Proposed Development in 2033 at this junction would not be significant and mitigation is therefore not required.

**7. Junction 14: Furzton Roundabout**

The junction is a large four arm roundabout with all approach’s single carriageway but with flared two-lane entries onto the roundabout. The junction has been modelled using Junctions 9 (ARCADY), the results are shown below for the current layout. A negative capacity correction was applied against Fulmer Street (S) and Chaffron Way (E) and (W) in the AM, and for Fulmer Street (N) and (S) and Chaffron Way (E) in the PM to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled.

**Junction 14: Furzton Roundabout – Capacity Results**

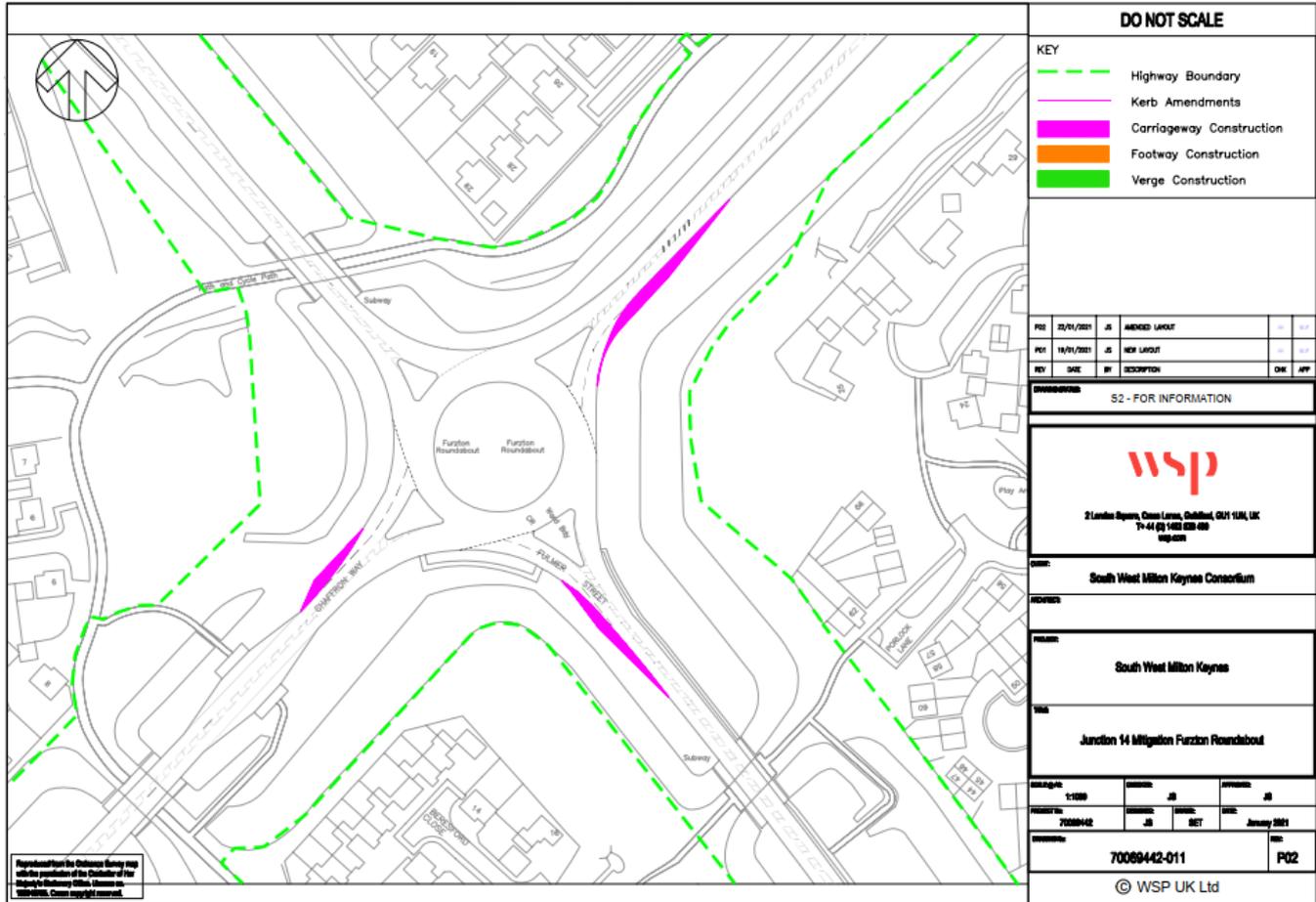
Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A - Fulmer Street (N)	0.7	4.71	0.4	3.1	11.05	0.76
B – H7 Chaffron Way (E)	1.5	9.22	0.6	28.9	109.19	1.03
C - Fulmer Street (S)	6.6	23.58	0.88	3.4	21.82	0.78
D – H7 Chaffron Way (W)	14.7	58.65	0.97	0.5	3.45	0.33
<b>2033 Do Nothing</b>						
A - Fulmer Street (N)	0.9	5.59	0.48	12.2	29.9	0.94
B – H7 Chaffron Way (E)	3.5	17.4	0.78	289.9	1085.76	1.58
C - Fulmer Street (S)	67	176.59	1.1	9.4	53.69	0.93
D – H7 Chaffron Way (W)	264	898.08	1.42	0.8	4.27	0.45
<b>2033 Do Something 1</b>						
A - Fulmer Street (N)	0.9	5.77	0.48	14.9	48.1	0.96
B – H7 Chaffron Way (E)	4.3	20.66	0.82	349	1275.24	1.66
C - Fulmer Street (S)	94.5	240.12	1.16	12.7	67.89	0.96
D – H7 Chaffron Way (W)	274.9	1021.28	1.43	0.8	4.37	0.46
<b>2033 Do Something 2</b>						
A - Fulmer Street (N)	0.9	5.75	0.48	14.5	46.89	0.96
B – H7 Chaffron Way (E)	4.2	20.19	0.82	340	1246.27	1.64
C - Fulmer Street (S)	90.2	230.06	1.15	12.2	65.91	0.96
D – H7 Chaffron Way (W)	273.3	1002.66	1.43	0.8	4.36	0.46
<b>2033 Do Something 3</b>						
A - Fulmer Street (N)	0.9	5.62	0.48	15.1	48.72	0.96

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
B – H7 Chaffron Way (E)	4.4	20.99	0.82	350	1279.48	1.66
C - Fulmer Street (S)	96.8	245.56	1.16	13.8	72.6	0.97
D – H7 Chaffron Way (W)	275.7	1037.51	1.43	0.8	4.39	0.46

The results show that in the 2020 Base, Fulmer Street (S) and Chaffron Way (W) are approaching capacity (RFC of 1.0) in the AM peak, but with relatively small queues (maximum 15 vehicles) and delay not exceeding 1 minute. In the PM peak Chaffron Way (E) operates above capacity (RFC of 1.0) with a queue of approximately 30 vehicles and delay of 110 seconds. By the 2033 (Do Nothing), Fulmer Street (S) and Chaffron Way (W) will operate above capacity (RFC of 1.0) in the AM peak with queues now in region of 70 and 260 vehicles respectively, with Chaffron Way (W) likely to block to and beyond J13 (Westcroft roundabout). In the PM Chaffron Way (E) operates above capacity (RFC of 1.0) with a queue of nearly 300 vehicles which would block back to and beyond The Bowl Roundabout.

With the addition of the development traffic (DS1) those already poorly performing arms would see further increases in queueing and delay, with the largest increase evident on Fulmer Street (S) in the AM peak and Chaffron Way (E) in the PM peak. The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes kerb widening on Chaffron Way (E) and (W) and Fulmer Street (S) to improve capacity.

**Junction 14: Furzton Roundabout – Mitigation Proposal**



The proposed improvement to the Kingsmead roundabout has been modelled using Junctions 9 (ARCADY) with the previous capacity corrections were maintained as only kerb changes are proposed.

**Junction 14: Furzton Roundabout – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2033 Do Something 1</b>						
A - Fulmer Street (N)	1	6.28	0.51	15.2	48.87	0.96
B – H7 Chaffron Way (E)	1.7	7.84	0.63	128.4	356.18	1.23
C - Fulmer Street (S)	24.2	67.88	1.00	8.3	44.71	0.91
D – H7 Chaffron Way (W)	162.6	514.34	1.31	0.7	3.69	0.42
<b>2033 Do Something 2</b>						
A - Fulmer Street (N)	1	6.25	0.51	14.7	47.6	0.96
B – H7 Chaffron Way (E)	1.7	7.77	0.63	123.5	338.58	1.22
C - Fulmer Street (S)	22.1	63.16	0.99	8.1	44.01	0.91
D – H7 Chaffron Way (W)	160.7	501.73	1.31	0.7	3.68	0.42
<b>2033 Do Something 3</b>						
A - Fulmer Street (N)	1	6.33	0.51	15.4	49.55	0.96
B – H7 Chaffron Way (E)	1.7	7.89	0.63	128.8	358.43	1.23
C - Fulmer Street (S)	25.4	70.47	1.00	8.9	47.35	0.92
D – H7 Chaffron Way (W)	163.6	520.99	1.31	0.7	3.71	0.42

The results show that with the provision of the proposed mitigation that overall the junction results would see an improvement considering both peaks compared to 2033 DN with the demand weighted Junction Delay reducing in the AM from 364.45 to 193.91 seconds and in the PM from 389.62 to 143.39 seconds. When comparing DS1 to 2033 DN existing layout both Fulmer Street (S) and Chaffron Way (W) in the AM still operate at or above theoretical capacity (RFC of 1.0) but queues and delay are less with Chaffron Way (W) now no longer blocking back to J13 (Westcroft Roundabout). While in the PM Chaffron Way (E) is also still above theoretical capacity (RFC of 1.0) but queues and delay are less and will no longer block back to The Bowl roundabout.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF with overall improvement in capacity terms. It was noted that Chaffron Way (W) has unbalanced lane usage with majority of vehicles likely to use the nearside lane to turn left or straight ahead. Altering the lane assignment for Chaffron Way (W) so the nearside lane is left turn only and the outside lane caters for the remaining movements would provide more balanced lane use. This could be considered as part of detailed design and may aid in reducing queues and delay on this arm further.

**8. Junction 15: Bleak Hall Roundabout**

The junction is a large four arm roundabout with all approach's dual carriageway with two lane entries, except for both Grafton Street arms which are flared with three-lane entries. The junction has been modelled using Junctions 9 (ARCADY), the results are shown below for the current layout. A negative capacity correction was applied against all arms in the AM and PM to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled.

**Junction 15: Bleak Hall Roundabout – Capacity Results**

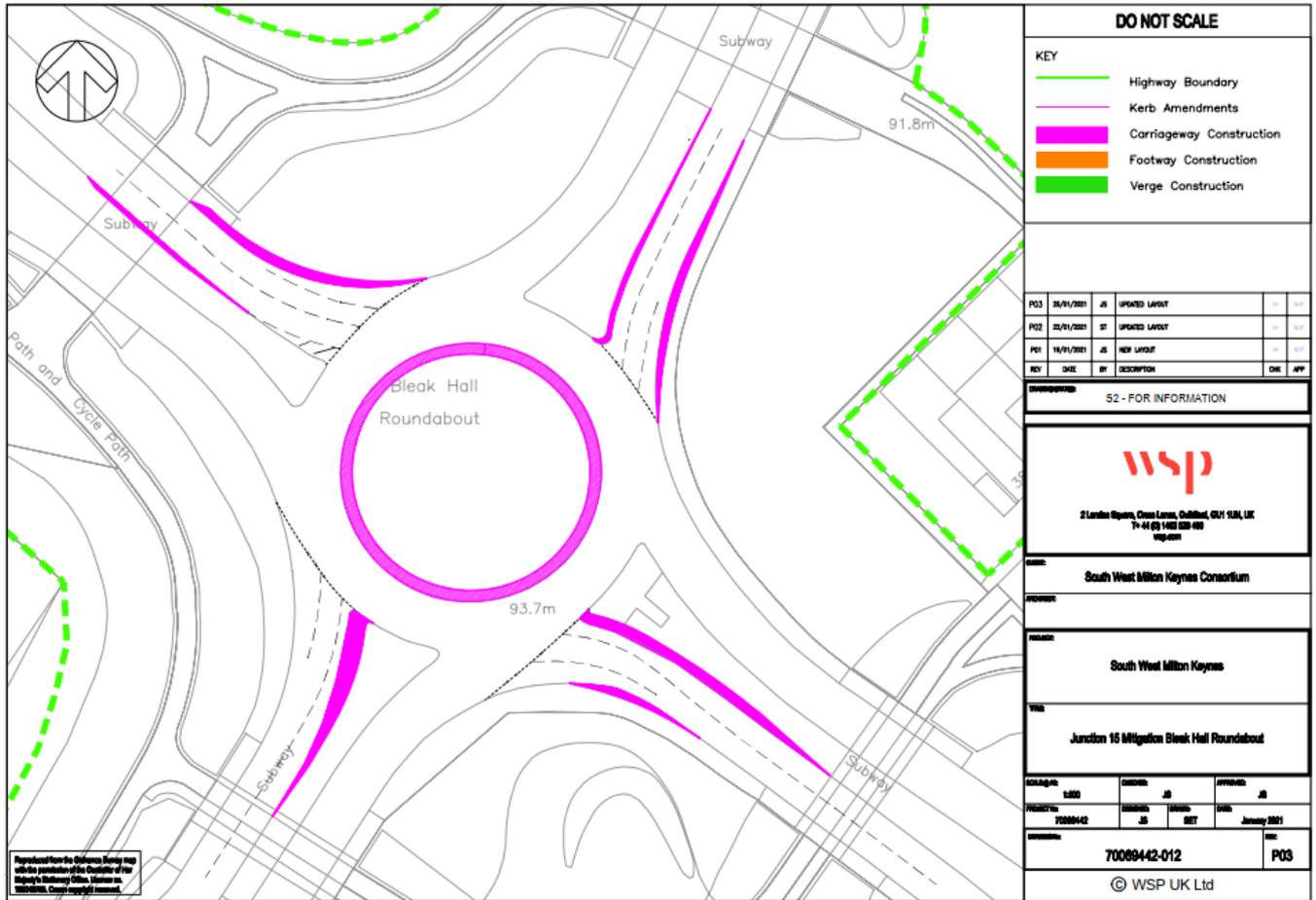
Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A – V6 Grafton Street (N)	33.4	117.36	1.05	41.2	130.15	1.07
B – A421 Standing Way (E)	44.9	109.16	1.05	20	59.55	0.99
C – V6 Grafton Street (S)	35.3	91.15	1.03	26.4	91.12	1.02
D – A421 Standing Way (W)	31.9	85.31	1.02	46.2	98.38	1.04
<b>2033 Do Nothing</b>						
A – V6 Grafton Street (N)	109.3	438.15	1.22	131.7	486.62	1.24
B – A421 Standing Way (E)	153.8	429.08	1.22	99.9	265.99	1.14

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
C – V6 Grafton Street (S)	132.7	365.66	1.19	121.1	456.99	1.23
D – A421 Standing Way (W)	138.2	394.63	1.2	165.6	390.12	1.20
2033 Do Something 1						
A – V6 Grafton Street (N)	157.8	621.85	1.28	214.4	767.85	1.34
B – A421 Standing Way (E)	245.4	653.69	1.3	300.1	830.28	1.36
C – V6 Grafton Street (S)	164.2	476.73	1.23	198.2	757.95	1.33
D – A421 Standing Way (W)	378.5	1050.39	1.42	311.2	689.96	1.31
2033 Do Something 2						
A – V6 Grafton Street (N)	151.8	599.78	1.27	200.9	719.95	1.32
B – A421 Standing Way (E)	232.9	624.16	1.29	262.6	721.02	1.32
C – V6 Grafton Street (S)	159.7	463.31	1.23	186.7	711.19	1.32
D – A421 Standing Way (W)	339.5	934.56	1.39	286.3	641.49	1.30
2033 Do Something 3						
A – V6 Grafton Street (N)	163.1	644.19	1.29	218.4	788.29	1.35
B – A421 Standing Way (E)	256.9	687.61	1.31	304.4	847.26	1.36
C – V6 Grafton Street (S)	170.9	491.02	1.24	217	834.92	1.36
D – A421 Standing Way (W)	406.4	1113.89	1.45	316.9	699.01	1.32

The results show that in the 2020 Base all arms operate above theoretical capacity (RFC of 1.0) in both peaks. In the AM A421 Standing Way (E) experiences the longest queue (45 vehicles) and Grafton Street (N) the longest delay at almost 2 minutes. In the PM A421 Standing Way (W) has the longest queue at 46 vehicles and Grafton Street (N) the longest delay once more at just over two minutes. By the 2033 (Do Nothing) all the arms are shown to have queues at or exceeding 100 vehicles in both peak periods, with A421 Standing Way (W) queues extending close to Junction 16 (Elfield Park Roundabout). Maximum delay in the AM on Grafton Street (N) of just over 7 minutes and just over 8 minutes in the PM.

With the addition of the development traffic (DS1) further reduction in capacity is expected with queues now predicting to exceed 300 or close to reaching 400 vehicles with A421 Standing Way blocking back to Junction 16. The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes kerb widening on all arms to improve capacity.

**Junction 15: Bleak Hall Roundabout – Mitigation Proposal**



The proposed improvement to the Kingsmead roundabout has been modelled using Junctions 9 (ARCADY) with the previous capacity corrections were maintained as only kerb changes are proposed.

**Junction 15: Bleak Hall Roundabout– Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2033 Do Something 1</b>						
A – V6 Grafton Street (N)	112.2	441.54	1.21	206.9	720.32	1.36
B – A421 Standing Way (E)	119.6	265.99	1.15	136.4	323.06	1.17
C – V6 Grafton Street (S)	65.89	139.57	1.08	67	185.02	1.11
D – A421 Standing Way (W)	196.7	465.51	1.25	121.3	206.81	1.12
<b>2033 Do Something 2</b>						
A – V6 Grafton Street (N)	106.7	412.22	1.2	192.8	658.14	1.34
B – A421 Standing Way (E)	112.4	247.14	1.14	113.9	258.81	1.14
C – V6 Grafton Street (S)	62.9	133.47	1.07	60.2	164.72	1.09
D – A421 Standing Way (W)	168.3	404.34	1.22	107.8	176.47	1.11
<b>2033 Do Something 3</b>						
A – V6 Grafton Street (N)	117.6	467	1.22	211.9	744.95	1.37
B – A421 Standing Way (E)	127.3	292.58	1.16	139.4	322.53	1.17
C – V6 Grafton Street (S)	68.8	143.92	1.08	76.8	221.67	1.13
D – A421 Standing Way (W)	219.7	511.31	1.27	124.2	212.55	1.12

The results show that with the provision of the proposed mitigation that overall the junction results would see an improvement considering both peaks compared to 2033 DN exiting layout with the demand weighted Junction Delay reducing in the AM from 405.00 to 326.66 seconds and in the PM from 392.55 to 339.20 seconds. When comparing DS1 to 2033 DN queuing and delay is reduced on the Standing Way (E) and Grafton Street (N) arms in the AM peak. In the PM peak queuing and delay is reduced on the Grafton Street (S) and Standing Way (W) arms. Increases in queuing and delay are

evident on the other arms of the junction when compared to the 2033 Do Nothing scenario but overall sees junction improvements, with A421 Standing Way (W) queue potentially close to blocking to J16 but not predicted to do so.

Buckinghamshire Council also sought clarification on the proposed design in terms of swept path analysis. The Appellant provided swept path analysis on the 7th April 2021, along with other junctions within Milton Keynes. On review of this information no concerns were raised with the major movement considered to be able to be completed satisfactorily.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF with overall improvement in capacity terms. Furthermore, the junction has been identified in two separate Milton Keynes studies (LTP4 Transport Infrastructure Development Plan (TIDP) and MK Multi Modal Model Impacts of Plan MK report, November 2017) as a site for potential capacity improvements due to known capacity issues.

### 9. Junction 16: Elfield Park Roundabout

The junction is a large four arm roundabout with both A421 Standing Way approach's dual carriageway with flared three lane entries. Watling Street (S) is single carriageway approach but widens to two lanes approximately 350 metres from the roundabout with a short flare for a three-lane entry. Watling Street (N) is single carriageway approach with a short flare for a two lane entry. A negative capacity correction was applied against all arms in the AM and PM to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled.

#### Junction 16: Elfield Park Roundabout – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A – V4 Watling Street (W)	9.7	75.94	0.95	36.2	165.84	1.09
B – A421 Standing Way (N)	41.6	98.86	1.04	30.7	68.01	1.01
C – Watling Street (E)	21.3	60.43	0.99	36.3	113.13	1.05
D – A421 Standing Way (S)	27.2	62.48	1.00	47.8	105.18	1.05
<b>2033 Do Nothing</b>						
A – V4 Watling Street (W)	38.9	266.7	1.13	106.4	566.78	1.27
B – A421 Standing Way (N)	150.8	400.19	1.21	153.9	338.51	1.18
C – Watling Street (E)	101.8	260.35	1.14	130.2	474.42	1.24
D – A421 Standing Way (S)	147.3	333.16	1.18	169.5	421.97	1.21
<b>2033 Do Something 1</b>						
A – V4 Watling Street (W)	51.2	394.29	1.18	119.4	640.35	1.29
B – A421 Standing Way (N)	252.1	628.11	1.29	437.4	960.99	1.4
C – Watling Street (E)	125.4	353.14	1.18	157	575.52	1.27
D – A421 Standing Way (S)	386.8	872.97	1.38	348.3	826.33	1.36
<b>2033 Do Something 2</b>						
A – V4 Watling Street (W)	49.6	387.65	1.17	117.8	631.01	1.28
B – A421 Standing Way (N)	237.3	597.08	1.28	386.8	839.51	1.36
C – Watling Street (E)	122.3	341.94	1.18	153.9	563.76	1.26
D – A421 Standing Way (S)	345.5	769.51	1.35	318.8	748.36	1.33
<b>2033 Do Something 3</b>						
A – V4 Watling Street (W)	60.4	473.21	1.21	122.4	651.99	1.29
B – A421 Standing Way (N)	258.6	638.41	1.3	459	1012.13	1.41
C – Watling Street (E)	128.1	364.61	1.19	158.3	580.78	1.27
D – A421 Standing Way (S)	403.8	917.51	1.39	359.1	858.22	1.37

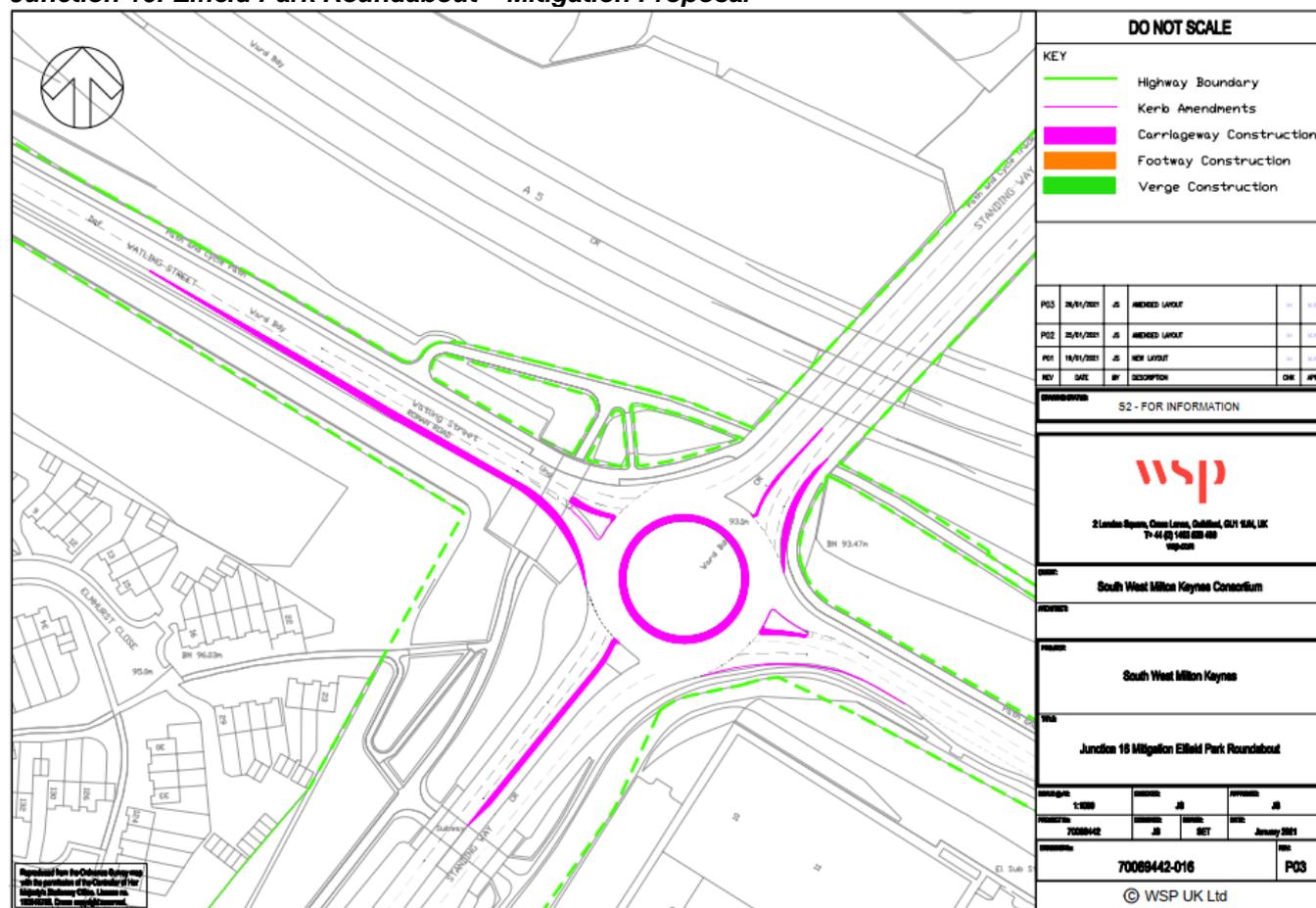
The results show that in the 2020 Base Watling Street (E) and (W) are approaching theoretical capacity (RFC of 1.0) in the AM, while both A421 Standing Way arms operate above theoretical capacity. In the PM all arms operate above theoretical capacity. The longest queue is recorded on A421 Standing Way (S) with nearly 50 vehicles with Watling Street (W) seeing the worst delay at nearly 3 minutes. By the

2033 (Do Nothing) all the arms operate above theoretical capacity with queues on all arms (except Watling Street (W)) exceeding 100 vehicles with the greatest delay experienced on Watling Street (W) in the PM of nearly 10 minutes.

With the addition of the development traffic (DS1) further reduction in capacity is expected with queues on A421 Standing Way (S) and (N) now predicting to exceed 300 or close to reaching 400, with A421 Standing Way (N) exceeding 400 vehicles in the PM, which would block back to and beyond Junction 15 (Bleak Hall Roundabout ). The longest delay would now be found on A421 Standing Way (N) of 16 minutes. Maximum RFC's are lower in the DS2 (travel planning) scenario but indicate similar results to that of the Do Something 1 scenario. In the DS3 (Shenley Park) scenario the results show slightly higher RFCs than the DS1 scenario.

The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes kerb widening on all arms to improve capacity.

**Junction 16: Elfield Park Roundabout – Mitigation Proposal**



The proposed improvement to the Kingsmead roundabout has been modelled using Junctions 9 (ARCADY) with the previous capacity corrections were maintained as only kerb changes are proposed.

**Junction 16: Elfield Park Roundabout – Mitigation Capacity Results**

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2033 Do Something 1						
A – V4 Watling Street (W)	6.9	48.47	0.90	51.9	216.86	1.12
B – A421 Standing Way (N)	140.5	290.58	1.17	292.2	581.67	1.28
C – Watling Street (E)	68.3	151.08	1.09	99.2	329.49	1.17
D – A421 Standing Way (S)	243.6	499.37	1.26	152.3	302.9	1.17
2033 Do Something 2						

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
A – V4 Watling Street (W)	6.6	46.61	0.89	50.5	208.17	1.11
B – A421 Standing Way (N)	131.8	268.5	1.16	247.9	503.26	1.25
C – Watling Street (E)	65.4	144.78	1.08	96.4	316.98	1.16
D – A421 Standing Way (S)	209.8	438.38	1.24	135.5	261.75	1.15
<b>2033 Do Something 3</b>						
A – V4 Watling Street (W)	8.4	57.35	0.92	53.1	222.15	1.12
B – A421 Standing Way (N)	147.5	309.47	1.18	311.8	616.44	1.3
C – Watling Street (E)	70	155.02	1.09	100.4	334.86	1.17
D – A421 Standing Way (S)	259.7	529.51	1.27	159.2	321.49	1.17

The results show that with the provision of the proposed mitigation that overall the junction results would see an improvement considering both peaks compared to 2033 DN existing layout. With the demand weighted Junction Delay reducing in the AM from 327.48 to 310.44 seconds and in the PM from 427.02 to 396.22 seconds. When comparing DS1 to 2033 DN queuing and delay is reduced on the Watling Street (W) and (E) in both peak periods. A421 Standing Way (N) would see reduction in the AM and A421 Standing Way (S) in the PM. A421 Standing Way (N) in the PM and A421 Standing Way (S) in the AM would see increase in queues and delay with A421 Standing Way (N) predicted queues likely to extend back to beyond J15. In DS2 the queues and delay would be reduced while DS3 would see a slight increase in results.

BC highways registered concern over the potential blocking back to J15 Bleak Hall roundabout. The Applicant provided a response on 7th April 2021. This highlighted further review of the junction flows used in the model and that only a slight reduction (5%) in network flow would result in no blocking back. It is agreed that a robust growth has been applied to the flows used in the modelling, with TEMPRO growth factor over 15% along with higher banded of employment rates to provide a 'worst case' flow scenario. The Applicant also made reference to the Department for Transport's 'Appraisal and Modelling Strategy – A Route Map For Updating TAG During Uncertain Times' (July 2020) which recommends the use of scenarios to assist with modelling future outcomes. Although the DfT has yet to publish updated forecasts, there is a clear indication of a downward trend in trips to account for the lower economic output.

BC highways also sought clarification on the proposed design in terms of swept path analysis. The Appellant provided swept path analysis on the 7th April 2021 along with other junctions within Milton Keynes. On review of this information no concerns were raised with the major movement considered to be able to be completed satisfactorily.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF with overall improvement in capacity terms. The issue of blocking back to J15 Bleak Hall roundabout has been discussed and clarified. It is accepted that flows used are the 'worst case' scenario with current indicators that future growth is likely to be less than used in the model. This, along with the proposed travel planning initiatives that will form part of the Developments Travel Plans (along with any wider sustainable travel initiatives implemented as part of Plan:MK) indicates that in actuality blocking may not occur with lower than predicted flows.

### **10. Junction 17: Emerson Roundabout**

The junction is a large four arm roundabout with both A421 Standing Way approach's two lane dual carriageway with flared three lane entries. Fulmer Street and Shenley Road are single carriageway approaches with a short flare for a two lane entry. A negative capacity correction was applied to Fulmer Street, A421 Standing Way (N) and Shenley Road in the AM and all arms in the PM to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled.

**Junction 17: Emerson Park Roundabout – Capacity Results**

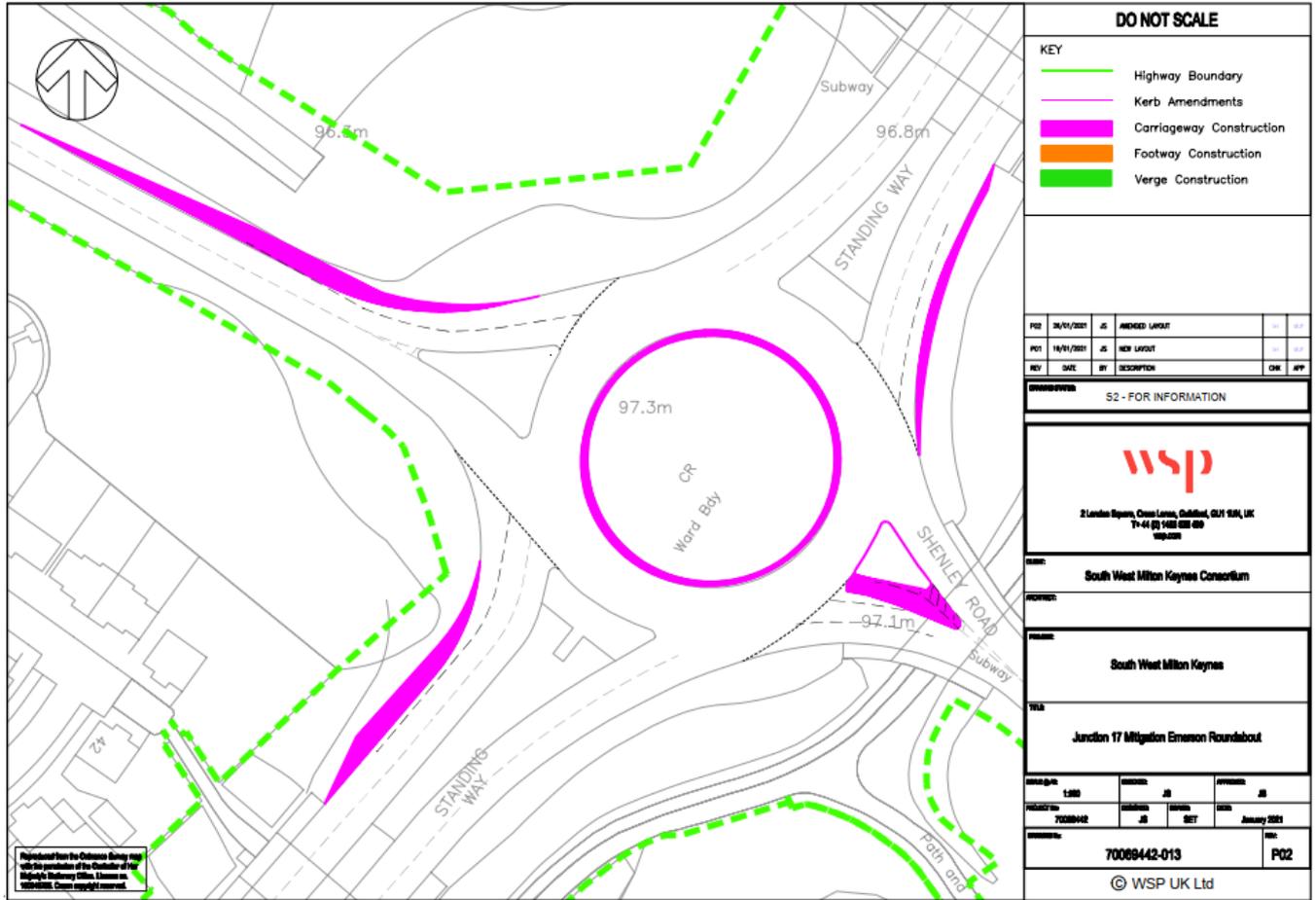
Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2020 Base</b>						
A – V3 Fulmer Street	9.8	60.35	0.94	7.2	44.65	0.90
B – A421 Standing Way (N)	18.5	55.72	0.98	12.7	27.51	0.94
C - Shenley Road	12.6	82.61	0.98	9.6	69.79	0.95
D – A421 Standing Way (S)	4.8	9.43	0.83	8	22.79	0.90
<b>2033 Do Nothing</b>						
A – V3 Fulmer Street	99.1	482.61	1.38	55.4	282.68	1.17
B – A421 Standing Way (N)	78.4	210.98	1.10	106.8	168.11	1.10
C - Shenley Road	55.2	329.81	1.18	58.2	407.73	1.22
D – A421 Standing Way (S)	20.2	34.61	0.97	49	104.87	1.04
<b>2033 Do Something 1</b>						
A – V3 Fulmer Street	203.4	1488.88	1.61	111	645.34	1.3
B – A421 Standing Way (N)	173.5	487.84	1.23	366	675.9	1.31
C - Shenley Road	86.3	582.43	1.27	109.4	839.26	1.35
D – A421 Standing Way (S)	164.3	227.24	1.13	167.7	385.85	1.20
<b>2033 Do Something 2</b>						
A – V3 Fulmer Street	186.8	1227.63	1.59	100.3	587.32	1.28
B – A421 Standing Way (N)	158.7	439.63	1.21	313.1	585.85	1.28
C - Shenley Road	82.4	554.47	1.26	101.9	767.14	1.33
D – A421 Standing Way (S)	137.2	177.4	1.11	146.9	330.55	1.17
<b>2033 Do Something 3</b>						
A – V3 Fulmer Street	214.7	1604.55	1.63	112.2	651.26	1.3
B – A421 Standing Way (N)	181.8	499.23	1.24	377.3	695.4	1.32
C - Shenley Road	88.4	594.55	1.27	115.5	891.99	1.37
D – A421 Standing Way (S)	175.4	247.62	1.14	170.2	391.85	1.20

The results show that all arms, except A421 Standing Way (S), operate above practical capacity (RFC of 0.85) in the AM and all arms in the PM. However, only two arms are predicted to encounter delay at or just above a minute and no queue is predicted to extend for 20 vehicles. By the 2033 DN all arms, except A421 Standing Way (S), operate above theoretical capacity (RFC of 1.0) in the AM and all arms in the PM. With the longest queue now at approximately 100 vehicles on A421 Standing Way (N) and delay at approximately 8 minutes on Fulmer Street in the AM.

With the addition of the development traffic (DS1) further reduction in capacity is expected with queues on Fulmer Street predicted to extend for potentially just over 1 km with delay of 25 minutes in the AM. While A421 Standing Way (N) queues could reach approximately 350 vehicles, which if stacked equally on the dual carriageway could extend for just over 1km in the PM. In the DS3 scenario the results show slightly higher RFCs than the DS1 scenario while the DS2 scenario would see a slight improvement compared to DS1.

The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes kerb or central island widening on all arms to improve capacity.

### Junction 17: Emerson Park Roundabout – Mitigation Proposal



The proposed improvement to the Emerson Park roundabout has been modelled using Junctions 9 (ARCADY) with the previous capacity corrections were maintained as only kerb changes are proposed.

### Junction 17: Emerson Park Roundabout – Mitigation Capacity Results

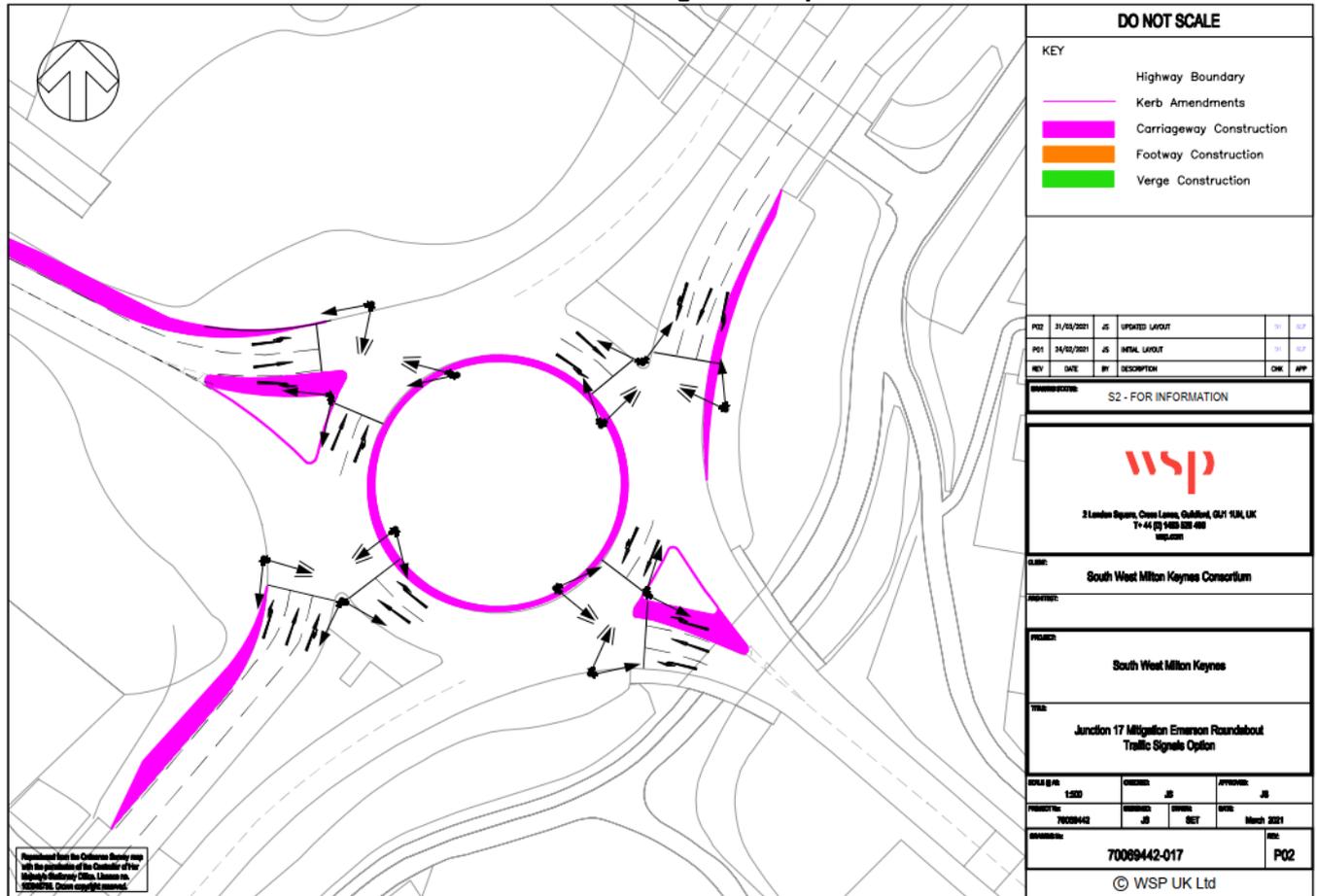
Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2033 Do Something 1</b>						
A – V3 Fulmer Street	70.6	313.99	1.23	21.1	95.01	1.02
B – A421 Standing Way (N)	96	223.51	1.12	242.5	425.54	1.23
C - Shenley Road	45.8	246.53	1.13	62.9	464.09	1.21
D – A421 Standing Way (S)	59.9	75.68	1.03	52.2	93.74	1.04
<b>2033 Do Something 2</b>						
A – V3 Fulmer Street	62.7	273.14	1.2	16.6	77.97	0.99
B – A421 Standing Way (N)	86.6	204.61	1.11	207.6	348.22	1.2
C - Shenley Road	42.7	216.52	1.12	57.4	422.17	1.19
D – A421 Standing Way (S)	41.8	56.87	1.01	39	74.44	1.02
<b>2033 Do Something 3</b>						
A – V3 Fulmer Street	74.9	349.78	1.24	21.5	96.81	1.02
B – A421 Standing Way (N)	101	234.65	1.13	249.9	441.45	1.24
C - Shenley Road	47	257.03	1.14	67.6	496.69	1.23
D – A421 Standing Way (S)	68.3	84.28	1.04	53.8	96.02	1.04

The results show that with the provision of the proposed mitigation that overall the junction results would see a mixed impact, when considering both peaks compared to 2033 DN with the demand weighted Junction Delay reducing in the AM from 186.38 to 169.56 seconds but in the PM increasing from 193.17 to 276.25 seconds. When comparing DS1 to the existing layout 2033 DN scenario queuing and delay is reduced on Fulmer Street and Shenley Road in both peak periods. A421 Standing Way (S) would see reduction in the PM. However, A421 Standing Way (N) would see a worsening of results

in both peak periods and A421 Standing Way (S) in the AM would see increase in queues and delay. No arm is expected to block back or to inhibit movements from upstream major junctions if queuing is equal between the two lanes where dual carriageway. In DS2 the queues and delay would be reduced while DS3 would see a slight increase in results.

BC highways raised concern over the predicted negative impact on demand weighted Junction Delay in the PM and the resultant long queues on A421 Standing Way (N). The Appellant provided a response in a letter dated 7th April 2021. This provided details of a potential further mitigation measures that could be deployed at the junction, this involved conversion of the junction to part-time signal control.

**Junction 17: Emerson Park Roundabout – Further Mitigation Proposal**



The proposed improvement to the Bottledump roundabout has been modelled using the industry standard LinSig software.

**Junction 17: Emerson Park Roundabout – Further Mitigation Capacity Results for DS1**

Arm Description	AM			PM		
	Queue (PCU)	Delay (s)	DoS	Queue (PCU)	Delay (s)	DoS
2033 Do Something 1						
A421 Standing Way (W) Left Ahead	64.5	131.4	105.50%	27	71.4	99.70%
A421 Standing Way (W) Ahead	53.6	125.9	104.80%	12.9	71.9	99.30%
Fulmer Street Left Ahead	3.8	34.4	62.20%	2.5	25.7	40.50%
Fulmer Street Ahead	25.4	166.3	105.40%	24.2	134.8	103.30%
A421 Standing Way (E) Ahead Left	13	24.7	85.90%	28.4	46.8	97.90%
A421 Standing Way (E) Ahead	12.9	25.7	85.10%	27.5	46.5	97.50%
Shenley Road Left Ahead	31.2	219.6	109.30%	11.5	87.7	96.30%
Shenley Road Ahead	2.5	27.5	42.60%	3.4	32.7	57.30%

Such a scheme would have positive impact at the junction with Fulmer Street and Shenley Road both operating below 2033 DN existing layout conditions. A421 Standing Way (N) would now also operate better than the projected DN 2033 scenario with queues in the PM of 56 PCU (compared to 240 vehicles in the TRN3 mitigation scheme). A421 Standing Way (S) would perform better in the PM but would see worse results in the AM in the part-time signal control layout, albeit not as significantly as A421 Standing (N) in the TRN3 mitigation scheme with queues of 118 PCU and delay of just over 4 minutes (compared to 20 vehicle queue and delay of 35 seconds compared to DN 2033). The layout of the part-time signal could be relatively easily retrofitted onto the TRN3 mitigation with limited additional alterations to the junction layout.

The Applicant does not consider that the further mitigation measures are required, with the TRN3 mitigation scheme showing overall junction improvement. The part-time signals are offered on a 'Monitor and Manage' basis and only implemented when considered necessary to do so. The S278 agreement could be developed to allow the flexibility for this approach.

Buckinghamshire Council have reviewed the further mitigation scheme and are content that the model has been coded correctly as per the proposed layout. As per the J5 Tattenhoe roundabout there is the potential that the uniform queues within the internal stop lines partially blocking exits, but this is unlikely to occur every cycle. To mitigate against this 'Keep Clear' marking could be used, and it is acknowledged that during the detailed design stage, the signals would likely be better optimised. Based on the review of further mitigation proposal BC highways would support the use of the 'Monitor and Manage' approach to implement the design as and only if necessary, with the required trigger point to be determined by the respective parties.

Buckinghamshire Council also sought clarification on the proposed design in terms of swept path analysis. The Appellant provided swept path analysis on the 7th April 2021 (attached at Appendix XX), along with other junctions within Milton Keynes. On review of this information no concerns were raised with the major movement considered to be able to be completed satisfactorily.

An independent Stage 1 Road Safety Audit has been undertaken on the TRN3 mitigation proposal and BC highways is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF. It is noted that the scheme will potentially result in long queues on A421 Standing Way (N) in the PM, with the potential alternative part-time signal control scheme that could be retrofitted into the proposed mitigation layout that would resolve this issue, and provide overall improvement in capacity terms. Buckinghamshire Council consider that this potential alternative is appropriate and could be implemented via the 'Monitor and Manage' arrangement.

### 11. Junction 18: Windmill Hill Roundabout

The junction is a large four arm roundabout with all A421 Standing Way approach's being two lane dual carriageway which are flared with three-lane entries. Tattenhoe Street and Tattenhoe Lane are single carriageway approaches with short flares and two lane entries. A negative capacity correction was applied against all arms in the AM and PM to replicate current patterns and reduce likelihood of overestimation of capacity for all scenarios modelled.

#### Junction 18: Windmill Roundabout – Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
2020 Base						
A – V2 Tattenhoe Street	16.8	94.14	1.00	7.6	44.38	0.91
B - A421 Standing Way (N)	6.8	23.74	0.88	4.5	12.07	0.82
C - Tattenhoe Lane	8.8	66.29	0.93	6.4	62.68	0.90
D - A421 Standing Way (S)	15.6	37.58	0.96	5.8	19.71	0.86
2033 Do Nothing						
A – V2 Tattenhoe Street	87.4	502.27	1.26	59.6	257.18	1.17
B - A421 Standing Way (N)	29.1	81.43	1.01	17.7	41.22	0.97

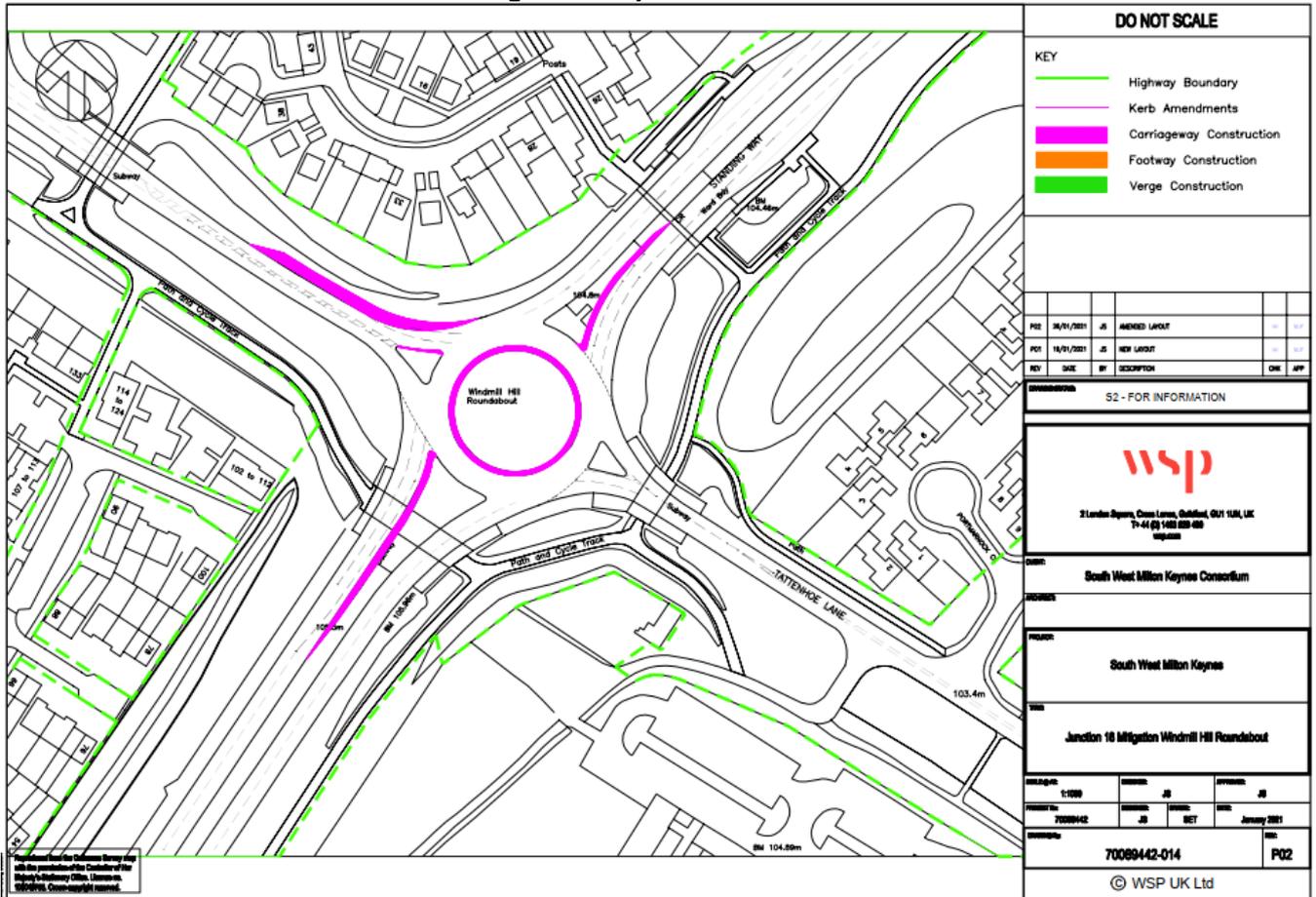
Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
C - Tattenhoe Lane	53.7	322.5	1.20	61.1	471.85	1.36
D - A421 Standing Way (S)	98.5	185.52	1.11	24.6	68.85	1.00
2033 Do Something 1						
A – V2 Tattenhoe Street	138.6	832.06	1.35	103.6	593.24	1.28
B - A421 Standing Way (N)	138.2	391.34	1.20	225.5	478.33	1.23
C - Tattenhoe Lane	99.2	744.73	1.34	151.5	1911.13	1.68
D - A421 Standing Way (S)	367.5	749.17	1.33	140.7	365.59	1.19
2033 Do Something 2						
A – V2 Tattenhoe Street	133.2	790.54	1.34	96.9	554.56	1.27
B - A421 Standing Way (N)	121.4	335.31	1.17	178.7	372.95	1.19
C - Tattenhoe Lane	93.4	700.73	1.32	140.4	1745.09	1.65
D - A421 Standing Way (S)	316.3	653.86	1.30	117.7	296.8	1.16
2033 Do Something 3						
A – V2 Tattenhoe Street	142.7	861.1	1.36	105.4	603.4	1.28
B - A421 Standing Way (N)	144.9	414.59	1.21	237.7	501.1	1.24
C - Tattenhoe Lane	104.5	784.59	1.35	154.5	1949.16	1.69
D - A421 Standing Way (S)	389.2	798.99	1.35	144	375.23	1.19

The results show that in the 2020 Base AM that all arms operate above practical capacity (RFC of 0.85) with Tattenhoe Street at theoretical capacity (RFC of 1.0). In the PM all arms except for A421 Standing Way (N) operate above practical capacity (RFC of 0.85). The longest queue is 17 vehicles on Tattenhoe Street in the AM and greatest delay is 1.5 minutes on the same arm. By the 2033 (Do Nothing) all the arms in the AM and PM are shown to operate at or above theoretical capacity except for A421 Standing Way (N) in the PM. The longest queue would form on A421 Standing Way (S) of nearly 100 vehicles and greatest delay on Tattenhoe Street of nearly 8.5 minutes, an increase of 7 minutes.

With the addition of the development traffic (DS1) further reduction in capacity is expected with all arms in both peak periods now exceeding RFC of 1.0. Queues are predicted to exceed 100 vehicles in both peaks with A421 Standing Way (N) in the PM exceeding 200 vehicles and A421 Standing Way (S) in the PM exceeding 360 vehicles. The greatest delay would still be Tattenhoe Street of nearly 14 minutes.

The predicted decrease in capacity due to development traffic would be considered significant and the Applicant has submitted a mitigation scheme. This includes kerb widening on all Tattenhoe Street and A421 Standing Way (N) and (S) with amended road markings on Tattenhoe Lane to create a longer flare and wider entry, all with the intent on improving capacity.

### Junction 18: Windmill Roundabout – Mitigation Proposal



The proposed improvement to the Windmill roundabout has been modelled using Junctions 9 (ARCADY) with the previous capacity corrections were maintained as only kerb or road marking changes are proposed.

### Junction 18: Windmill Roundabout– Mitigation Capacity Results

Arm Description	AM			PM		
	Queue (Veh)	Delay (s)	RFC	Queue (Veh)	Delay (s)	RFC
<b>2033 Do Something 1</b>						
A – V2 Tattenhoe Street	2.8	13.32	0.74	1.9	8.66	0.66
B - A421 Standing Way (N)	55	119.81	1.06	121.8	185.35	1.12
C - Tattenhoe Lane	23.2	131.76	1.04	44.8	408.84	1.2
D - A421 Standing Way (S)	152.6	253.19	1.15	20.2	47.09	0.98
<b>2033 Do Something 2</b>						
A – V2 Tattenhoe Street	2.7	12.98	0.74	1.7	8.09	0.64
B - A421 Standing Way (N)	42.2	96.55	1.04	85.3	134.42	1.08
C - Tattenhoe Lane	20.4	116.93	1.03	39.7	352.38	1.18
D - A421 Standing Way (S)	123.8	189.24	1.12	14.4	35.39	0.95
<b>2033 Do Something 3</b>						
A – V2 Tattenhoe Street	2.9	13.55	0.75	1.9	8.76	0.66
B - A421 Standing Way (N)	60.9	130.96	1.07	129.7	196.56	1.13
C - Tattenhoe Lane	25.4	141.84	1.05	46.3	424.11	1.2
D - A421 Standing Way (S)	165.3	280.88	1.16	21.2	49.01	0.98

The results show that with the provision of the proposed mitigation that overall the junction results would see an improvement considering both peaks compared to 2033 DN existing layout with the demand weighted Junction Delay reducing in the AM from 225.69 to 163.86 seconds and in the PM from 136.59 to 133.11 seconds.

When comparing DS1 to 2033 DN Tattenhoe Street sees a marked improvement with the arm operating under practical capacity (RFC of 0.85) with negligible queues and delay. Tattenhoe Lane would still operate above capacity but with an improvement in capacity operation and reduction in queues and delay. A421 Standing Way (N) would see an increase in queuing and delay, as well as A421 Standing Way (S) in the AM. Overall junction delay is reduced in both peaks, showing improvements with no blocking of major node junctions.

An independent Stage 1 Road Safety Audit has been undertaken and the Council is satisfied that the problems identified can be resolved during detailed design. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF with overall improvement in capacity terms. It was noted that with the extend flare on Tattenhoe there is the potential alter the lane assignment so the nearside lane is left turn only and the outside lane caters for the remaining movements, this would provide more balanced lane use and could be considered as part of detailed design and may aid in reducing queues and delay on this arm further.

Milton Keynes Council expressed initial concern (prior to the review of TRN2 and TRN3) that the impact of the development within Milton Keynes would be considered severe on the highway network as per NPPF. Furthermore, the static modelling used does not take account of potential redistribution through the network. Buckingham Council are content that the network junction assessment has been performed via the use of industry standard modelling software with the base models undergoing a rigorous calibration process and that the comprehensive mitigation package for the local junctions, as detailed in TRN2 and TRN3, will reasonably accommodate the impact of the Proposed Development on the local junction network. This is taking into consideration the flows used are the 'worst case' scenario. The mitigation modelling with development traffic has shown that overall, most junctions will operate at the same level or better than the current layout using the DN scenario, whilst noting that some arms may perform worse but when considering each junction as a whole across both peak periods improvements can be observed and would therefore not be considered as severe.

## **9. Impact Traffic through the Villages**

The agreed development trip distribution has identified additional trips passing through local villages including Newton Longville, Little Horwood, Mursley and Great Horwood. The Transport Assessment considers the impact of the proposed development on these villages, in terms of capacity, and has been assessed with reference to the 'Guidelines for the Environmental Assessment of Road Traffic' (GEART) produced by the Institute of Environmental Assessment (1993). The GEART states that whilst traffic forecasting is not an exact science, a change in traffic flow of less than 10% creates no discernible environmental impact. As such two rules are presented within the GEART for screening whether a detailed assessment is required which have been used to determine the impact of the development:

- Rule 1 – include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%)
- Rule 2 – include any other specifically sensitive areas where traffic flows have increased by 10% or more.

Traffic flows through the villages were identified via the traffic flow diagrams developed and agreed as part of the development trip generation and distribution process and provided in TRN2. The traffic flows for 2033 Do Nothing and the three Do Something scenarios have then been compared to identify the forecast percentage increase in traffic.

**2033 Do Nothing Village Traffic Flows**

Location		AM Peak			PM Peak		
		N/b	S/b	Total	N/b	S/b	Total
1	Nash	135	104	239	82	110	192
2	Whaddon	154	220	374	138	120	258
3	Great Horwood	396	243	639	280	281	561
4	Little Horwood	103	76	179	30	103	133
5	Mursley	394	295	689	314	284	598
		E/b	W/b	Total	E/b	W/b	Total
6	Newton Longville	347	428	775	416	316	732

The increase in link flow through the Villages as a result of the Proposed Development was updated in TRN and the following tables provide the percentage increase compared to the 2033 Do Nothing Scenario.

**2033 Do Something 1 Percentage Impact**

Location		AM Peak			PM Peak		
		N/b	S/b	Total	N/b	S/b	Total
1	Nash	0%	0%	0%	0%	0%	0%
2	Whaddon	0%	0%	0%	0%	0%	0%
3	Great Horwood	2%	3%	2%	3%	2%	2%
4	Little Horwood	8%	7%	7%	20%	7%	10%
5	Mursley	3%	6%	4%	8%	4%	6%
		E/b	W/b	Total	E/b	W/b	Total
6	Newton Longville	17%	12%	14%	12%	20%	15%

**2033 Do Something 2 Percentage Impact**

Location		AM Peak			PM Peak		
		N/b	S/b	Total	N/b	S/b	Total
1	Nash	0%	0%	0%	0%	0%	0%
2	Whaddon	0%	0%	0%	0%	0%	0%
3	Great Horwood	2%	2%	2%	2%	2%	2%
4	Little Horwood	7%	7%	7%	13%	5%	7%
5	Mursley	2%	5%	3%	8%	4%	6%
		E/b	W/b	Total	E/b	W/b	Total
6	Newton Longville	15%	10%	12%	10%	17%	13%

**2033 Do Something 3 Percentage Impact**

Location		AM Peak			PM Peak		
		N/b	S/b	Total	N/b	S/b	Total
1	Nash	0%	0%	0%	0%	0%	0%
2	Whaddon	0%	0%	0%	0%	0%	0%
3	Great Horwood	2%	3%	2%	2%	2%	2%
4	Little Horwood	8%	7%	7%	20%	7%	10%
5	Mursley	2%	6%	4%	8%	4%	6%
		E/b	W/b	Total	E/b	W/b	Total
6	Newton Longville	16%	11%	14%	12%	19%	15%

The results of this revised assessment indicate that the increase in traffic flow through Nash, Great Horwood, and Mursley are not considered to be significant (do not exceed the 10% traffic growth for sensitive areas) and would not result in a significant impact on the local highway network. Little Horwood does have a conservation area and should therefore be considered 'sensitive' in nature and against the lower GEART threshold (10%) for impact, which is predicted to be 20% increase for both DS1 and D3 scenarios in the PM. However, the actual change in traffic flow in the PM peak is only six vehicles northbound and seven vehicles southbound (a total of 13 vehicles) and this is not considered to be a significant change in traffic flow and I would not result in a severe impact through the village.

Newton Longville also has a conservation area and should be considered against the lower GEART threshold (10%) for impact. The assessment has shown there be 10% or more growth through the village in both peak periods for the scenarios which is considered to constitute a significant impact. The

Applicant has therefore proposed a traffic calming scheme to mitigate the impact of the development, which is addressed later in this response and is to be secured in a S106 Agreement.

Whilst no impact is predicted for Whaddon a consultee has queried the accuracy of the traffic flows, and subsequent traffic impact modelling, may have affected the journey time analysis on the basis that road closures were in place within north Milton Keynes impacting the potential movements through the village. A previous financial contribution of £22,000 to improve road safety and enhance the existing traffic calming was previously agreed, to mitigate against potential redistribution via Whaddon Village and improve road safety through the village discussion are ongoing for the previous agreement is to be maintained and secured in a S106 Agreement.

Some consultees have queried the validity of the impact on local villages, including citing that the assessment does not include neighbouring developments. Buckinghamshire Council are satisfied that the impact on villages performed by the Applicant is robust and founded on 'worst' case whole development trip generation and appropriate trip distribution and includes committed developments in the area and the sensitivity test for Shenley Park and therefore is fit for purpose. Where necessary mitigation measures have been proposed to alleviate potential impacts.

### **10. Impact on Highway Safety**

The agreed development trip distribution has identified additional trips on the network and the Applicant has utilised the computer programme COBALT (Cost and Benefit to Accidents – Light Touch) developed by the Department of Transport (DfT) to undertake analysis of the impact of the Proposed Development on highway safety. The assessment is based on a comparison of collisions by severity and associated costs across an identified network in 'Without-Scheme/Development' and 'With-Scheme/Development' forecasts, using details of link and junction characteristics, relevant collision rates and costs and forecast traffic volumes by link and junction.

COBALT analysis provides a summary of the likely impact on collisions across a defined study area. Each link is coded by the degree to which the Proposed Development will provide benefits in terms of collisions. As the Proposed Development will result in an increase in traffic, the impact will always show negative values. However, the extent to which a negative value is derived will be dependent upon the volume of additional traffic that the Proposed Development would generate. Traffic flows identified via the traffic flow diagrams developed and agreed as part of the development trip generation and distribution process and provided in TRN2 were used to perform the analysis.

The analysis indicates that most links across the study area will see very small changes in 'negative benefits' (as they are described in COBALT), with B4304 Buckingham Road and A421 Standing Way to the east of the site showing the greatest impact of the development traffic, as shown below.

**COBALT analysis**



The COBAL analysis also predicts a change in collisions and casualties (over a 60-year period). The results of which are shown below and predict that there will be an increase of 140 collisions with 202 casualties because of development traffic. This equates to on average 2.4 collisions and 3.4 casualties per year. It should be noted that the analysis does not consider mitigation measures proposed as part of the development application.

**COBALT Collisions - Casualty Prediction Over 60 years**

	Slight	Serious	Fatal	Total Casualties
Without Proposed Development	2,857	356	48	3,261
With Proposed Development	3,037	377	50	3,464
Difference (60 years)	+180	+21	+2	+203
Difference (average per year)	+3.0	+0.35	+0.033	+3.38

Buckinghamshire Council are satisfied that the development will not have a significant impact on highway safety and that overall does not represent an unacceptable impact.

**1. Impact of Construction Traffic:**

The Applicant has produced the following assumptions in relation to construction activity:

*Daily HGV Volumes and type of vehicle*

- Infrastructure Phase – 20 HGVs per day. NB The Earthworks Strategy is to retain everything on Site, so there will be limited vehicle movements associated with removal of earth.

- Residential development - 15 HGVs per day (based on 5 per day for each build phase with 3 build phases per development phase).
- Local Centre - 5 HGVs per day (in the first phase).
- Employment Land – 5 HGVs per day (in the second phase).

*Number of staff*

- Infrastructure Phase – 30 per day.
- Residential development - 195 per day (based on typical 65 per day per build phase).
- Local Centre - 30 per day.
- Employment Land – 30 per day.

*Working Hours*

- Monday-Friday – 08:00-19:00
- Saturday – 08:00-13:00

The table below provides the summary of likely construction traffic per phase of development.

Phase	Land Use	Staff (per day)	Staff Vehicles (75% car driver)	HGVs (vehicles per day)
Infrastructure	Site Setup	30	23	20
1	Residential	195	146	15
	Local centre	30	23	5
	Education	30	23	5
2	Residential	195	146	15
	Employment	30	23	5
3	Residential	195	146	15

Phase 1 of the development is likely to generate the largest number of movements. The table below provides the peak construction phase trip generation presented as an AADT and AAWT.

AAWT/AAWT	Light Vehicle Movements	HGV Movements	Total Movements
AAWT	383	50	433
AAADT	328	43	371

The Applicant has stated the intention to route all construction traffic to and from the site through the Whaddon Road access within Buckinghamshire. The main reason being that this will provide the best segregation between residential and construction traffic through the phasing of the site build. All Heavy Goods Vehicles (HGVs) have been assumed to utilise the A421 to access and egress the site, whilst workers will arrive and depart via using the agreed employment distribution. In this regard it is proposed that a planning condition is agreed in relation to the Construction Environmental Management Plan, which stipulates that HGVs would utilise A421 and would not route via Newton Longville or any other local village in the immediate environs, i.e. those villages included in the Impact on Villages.

The Applicant has performed analysis of the proposed increase in base traffic as a result of construction traffic. This shows that the link with the highest anticipated increase is Whaddon Road

between the new access and Bottledump roundabout. This will not exceed the 10% GEART threshold that would represent a discernible change in traffic volume given day to day fluctuations in traffic.

	2020 Base		2020 Base + Construction Traffic		% increase (All Vehicles)	% increase (HGVs)
	AADT (All Vehicles)	AADT (HGVs)	AADT (All Vehicles)	AADT (HGVs)		
Whaddon Road (between Bottle Dump Roundabout and Site access)	5183	531	5535	573	6.8%	7.9%
A421 (between Whaddon Crossroads and Bottle Dump Roundabouts)	25024	2396	25062	2406	0.15%	0.4%
A421 Standing Way (between Bottle Dump and Tattenhoe Roundabouts)	25392	2130	25708	2162	1.2%	1.5%
Whaddon Road through Newton Longville	5183	531	5201	531	0.3%	0%
B4034 Buckingham Road	8015	724	8047	724	0.4%	0%

To ensure that the impacts of construction are effectively managed and mitigated, a Construction Environmental Management Plan (CEMP) will be secured by a planning condition to outline the measures and initiatives that will be employed to manage the impacts of construction. The CEMP and the Construction Traffic Management Plan (CTMP) will be agreed with both Buckinghamshire Council and Milton Keynes Council prior to the commencement of construction.

Buckinghamshire Council are satisfied with the arrangement for the use of the Whaddon Road access for the primary construction access and egress point and the derived construction traffic flows. The CEMP and CTMP will need to be agreed prior to construction with relevant a planning condition applied to negate any potential impact on the surrounding villages and peak hour traffic.

### 11. Newton Longville Traffic Calming Proposals

An indicative traffic calming scheme for Newton Longville has been submitted as part of the revised Transport Assessment, which includes enhanced gateway features on all roads leading into the village, pinch points along Whaddon Road, raised junction tables and signing/lining. Buckinghamshire Council has undertaken a Stage 1 Road Safety Audit on the scheme and revisions to the proposals have been carried out, including the removal of the mini-roundabout and the installation of raised tables.

A number of consultee responses made reference to the increase in traffic through the village being of detriment to road safety, capacity and the environment. Buckinghamshire Council is satisfied that the scheme would provide the desired effect of deterring traffic that could otherwise use the strategic road network, by slowing journey times through the village. Despite this, the Council is aware that Newton Longville Parish Council has their own aspirations for traffic calming within the village and is of the view that it would be more appropriate for a financial contribution towards the design, consultation and implementation of traffic calming be paid by the Applicant. This will allow the Council to work with the Parish Council to provide a comprehensive traffic calming scheme that meets the aspirations of the local community. A contribution of (exact amount to be determined) is required and will be secured in a S106 Agreement.

### 12. Public Transport Provision

The nearest bus stops that are served by a regular bus service are on Chepstow Drive in Far Bletchley to the east of the Site. The existing bus stops on Chepstow Drive are currently served by Route 28

operated by Red Rose Travel. Between Monday and Saturday, an hourly service operates between Central Milton Keynes and Bletchley Bus Station.

The nearest bus stops to the Site that provide a more frequent level of service are around 950 metres walking distance from the Site boundary on Whaddon Way, and 2km from the centre of the Site. These stops are currently on Route 4, operated by Arriva which provides a 30-minute frequency service from 6:47 am to 10:27pm between Milton Keynes City Centre and Bletchley from Monday to Friday. Routes 30 and 604 also service at this stop but only for school travel Monday to Friday during term time.

To ensure that all new dwellings are within 400m walking distance to a bus stop, it is essential for a bus service to be provided that enters the site. The Applicant has proposed to either enhance an existing bus service or provide a new start up service to operate between the proposed development and Central Milton Keynes (CMK) via the existing rail station. The objective is to provide a high quality, fast, frequent and reliable bus service that serves the social and accessibility needs of those without access to a car. It is also expected that with the effective marketing initiatives included within the Framework Travel Plan, people who would otherwise use a private car will be encouraged to use the proposed bus service for many of their work and leisure-based journeys.

The Applicants preferred option would be to start a completely new high frequency service between the Site, CMK, the rail station and key social infrastructure. The target would be to provide a journey time between the Site and CMK of circa 20 minutes.

The bus service would have a phased operation based on the anticipated 'build-out' of the Proposed Development with the intention to ensure that there is a critical mass of occupied dwellings prior to the commencement of the service, to ensure sufficient potential patronage so that the service would be operationally viable. The proposed bus service between the Site and Central Milton Keynes would commence no later than the occupation of the 100th dwelling. Buckinghamshire Council have requested that a second trigger be applied to the start of the bus service so the service would start no later than the occupation of the 100th dwelling or 12 months from first occupation, this trigger is to be secured through the s106 agreement. Buckinghamshire Council also requires the submission of a bus service phasing plan, which can be secured by condition.

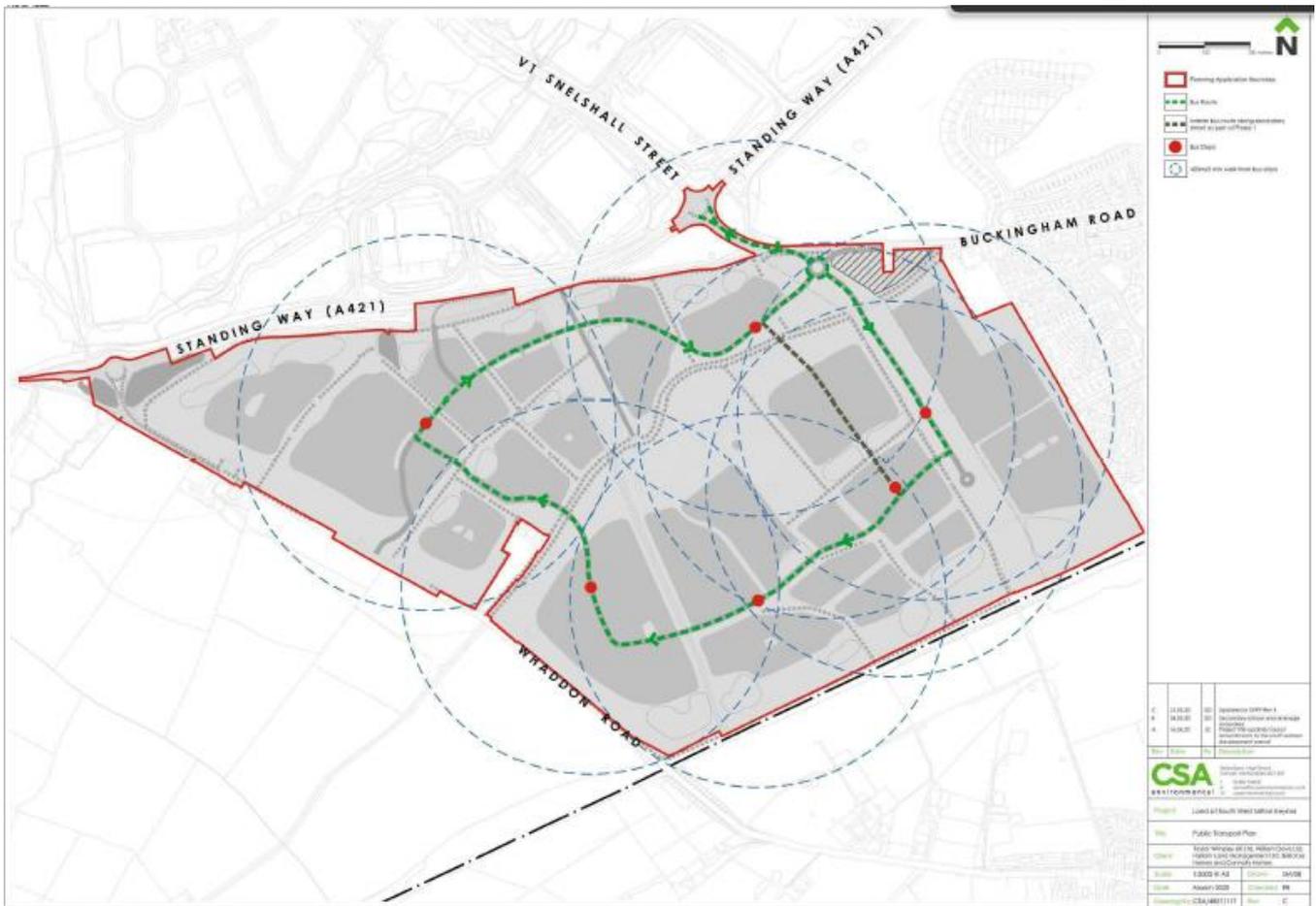
The initial phase of the development will include the construction of the primary school. The new/extended bus service should be available prior to the schools opening and becoming fully operational.

The required hours of operation are detailed below:

Criteria	Monday to Friday	Saturday	Sunday
Full daytime frequency to start with first journey arriving in CMK no later than:	0605	0705	0905
Full daytime frequency to end with last journey departing CMK no earlier than:	2005	2005	1905
Evening service to end with last journey departing CMK no earlier than:	2305	2305	2305

The contract for operating the new service would normally be tendered by Milton Keynes Council in conjunction with the public transport team at Buckinghamshire Council. On this occasion however, the Applicants wish to have a service level agreement directly with the preferred operator and agree the appropriate costs to operate a viable high quality service in perpetuity. This will be provided by way of a S106 obligation, in consultation with both Milton Keynes Council and Buckinghamshire Council.

Indicative locations of the bus stops are shown on the illustrative masterplan and the majority of residential properties are within 400m walking distance of a bus stop, which is considered appropriate.



### 13. Rail Provision

The nearest railway station to the development sites is Bletchley Railway Station, approximately 4km distance to the east via the A421 / B4034. The station has provision for 628 parking spaces with 29 for use by the mobility impaired. There is also sheltered parking for 58 bicycles at the station. It provides an hourly service to Milton Keynes, London Euston, Bedford, Croydon and Clapham Junction and links to the north including Milton Keynes Central and Birmingham New Street.

Bus access to Bletchley Railway Station would be via Bus Route 4 that operates with a frequency of every 20 minutes. The nearest bus stop for Route 4 is on Whaddon Way in Bletchley, a 950m walk from the Buckingham Road site access. Bus users would alight at Sherwood Road, from where it is a 300m walk to the Railway Station. The total journey time for this route would be 20 minutes (11 minute walk, 5 minutes bus, 4 minute walk).

Cycle access to Bletchley Railway Station would be via Buckingham Road. There is an existing Redway along Buckingham Road to Caernarvon Crescent, from where the route would be on-road to the station. The route is 3.2km long, equivalent to a 13 minute cycle (based on an average cycling speed of 15kph). An alternative route would be via the Redway on Buckingham Road initially, then using the quieter on-road routes of Whaddon Way, Shenley Road, Church Green Road, Wilton Avenue and a short cycle path to the station. The route on quieter roads is 4km; equivalent to a 16 minute cycle. The Applicant has proposed a contribution for the provision of additional sheltered and secure cycle parking at Bletchley Station, to promote the use of sustainable travel to and from the station. This is to be secured as an obligation by way of a S106 Agreement.

Milton Keynes Central Railway Station is approximately 7km from the site (via Snelshall Street, Childs Way and Elder Gate). It provides an hourly service to Watford Junction, London Euston, Croydon and

Clapham Junction. Access to Milton Keynes Central Railway Station by public transport would be via a new or extended bus service, with an approximate travel time of 20 minutes from the Site. The station provides sheltered storage for 900 bicycles and can be accessed from the site via the Redway network, a journey of approximately 30 minutes.

Buckinghamshire Council consider that new residents of the proposed development would have ability to access rail services by means other than that of the private car.

#### **14. Cycle and Pedestrian Provision**

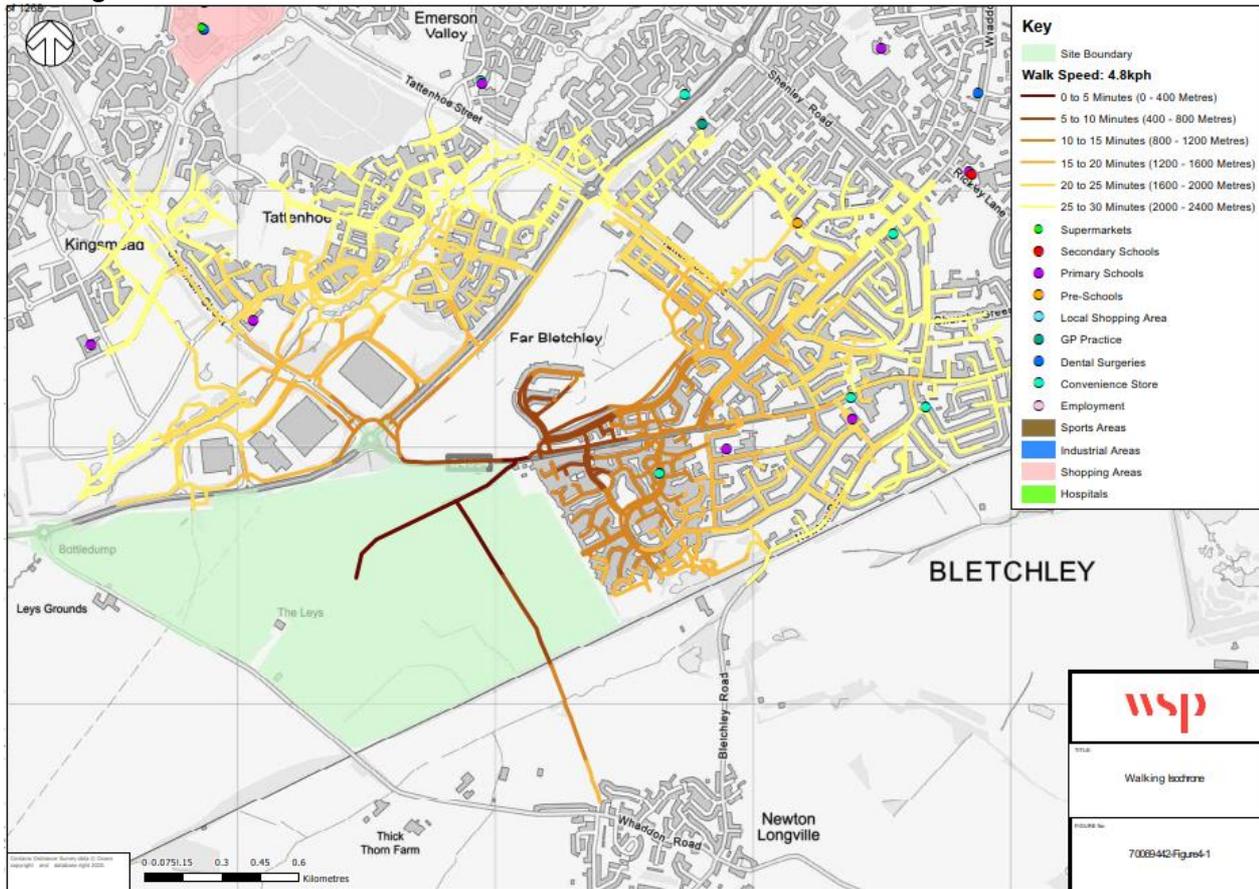
The Site is currently served by a network of existing pedestrian footways and public rights of way predominantly to the north and east of the Site and provide suitable access from the site to local footway/footpaths and the local cycle network, providing connections to services and facilities within the area. The existing opportunities for walking to the south and of the Site are limited given the more rural nature of those locations.

National Cycle Route 51 is the nearest cycle route to the A421 corridor; it runs between Bletchley and Winslow, passing to the south of Salden Chase, before continuing to Bicester. Furthermore, the majority of the A421 corridor consists of unclassified rural roads, where on-road cycling is a viable option.

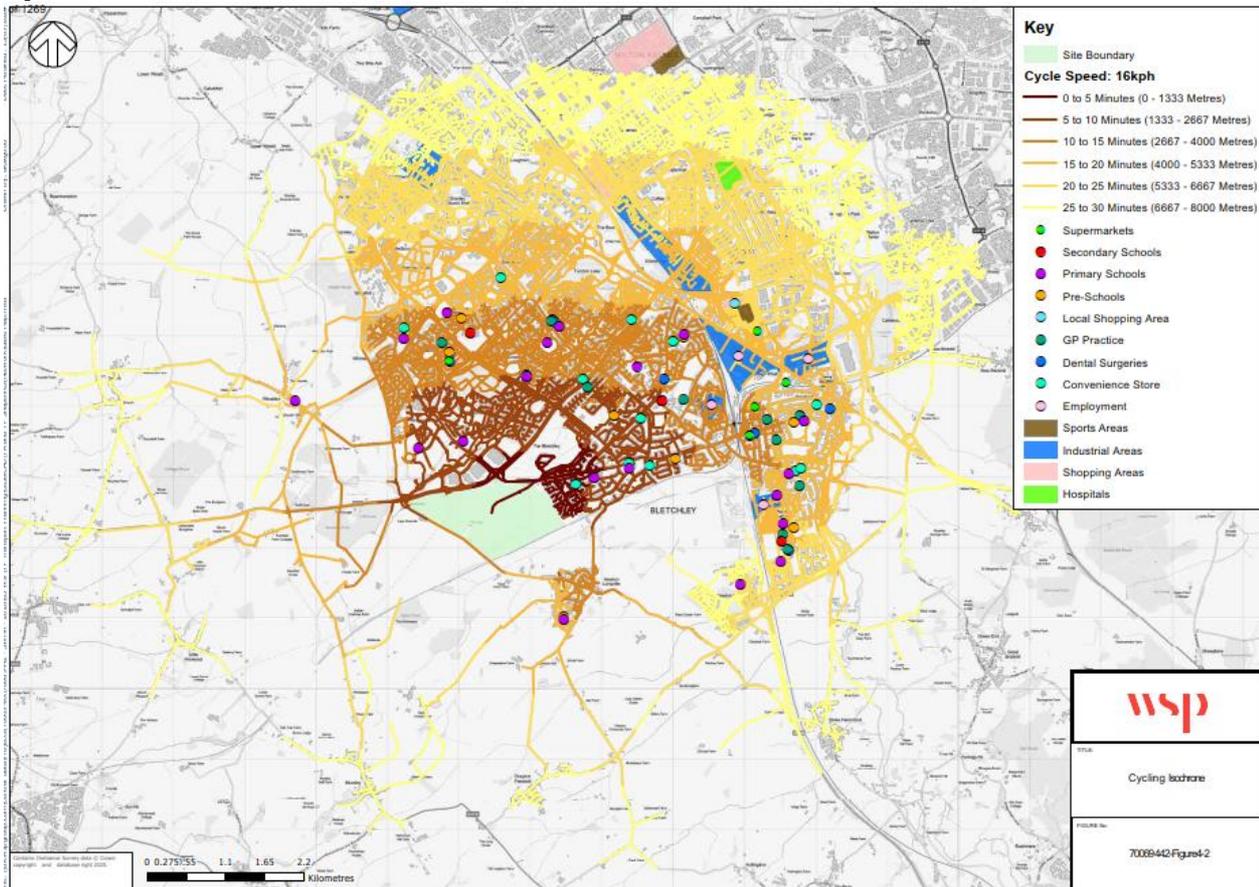
The Milton Keynes Cycle Network, known as the Redway System, commences west of the Bottle Dump roundabout and continues eastbound, north of the A421 Standing Way. The existing infrastructure provides highway quality routes from the site to both Milton Keynes City Centre and Central Milton Keynes Railway Station.

Updated walking and cycling isochrones were provided in TRN1 to highlight the range of facilities and amenities accessible within walking and cycling distance of the Site. These indicate that most of the existing amenities and facilities will be within an acceptable cycling distance but fall outside typical pedestrian distances. This is offset by the proposed development providing on site facilities and amenities which will likely minimise the need for longer walking journeys, with a convenience store, primary and secondary schools, retail space for Café, Pub or Takeaway and community facilities. Furthermore, as part of the S106 agreement the securing of a contribution toward the delivery of healthcare facilities either on or off site has been agreed.

### Walking Isochrone



### Cycle isochrone



An updated illustrated masterplan has been submitted in support of the planning application. The masterplan aims to encourage walking and cycling as realistic alternatives to that of the private car, through high quality infrastructure. Pedestrian access to the proposed development will be achieved as follows (with all but the recreational footpaths being available for use by cyclists):

- The old Buckingham Road south of the current A421 dual carriageway
- Whaddon Road - across the A421 close to Bottle Dump Roundabout via the existing subway
- The existing Subway across A421 to Snelshall West
- Buckingham Road – south east of the Tattenhoe Roundabout

Consideration will need to be paid to pedestrian crossing facilities as part of any future reserved matters application. At this stage the following crossings have been identified:

- A toucan crossing across the Primary Road at Weasel Lane
- A surface crossing to provide safe and convenient access to the secondary school. This should be in the form of a controlled facility
- A Pegasus crossing across Whaddon Road
- Toucan crossings on Buckingham Road East and Buckingham Road West

The application proposes a new connection for walkers and cyclists between Weasel Lane and the Bottle Dump roundabout, along a green corridor. This will provide an important strategic connection between NCN 51; the proposed new cycling route along the old Buckingham Road (A421); and the Redways alongside the new A421.

As this is an outline application with all matters reserved except access, details of the cycle and pedestrian infrastructure within the site will need to form and be considered as part of any future reserved matters application.

Buckinghamshire Council consider that new residents of the proposed development would have ability to access on-site amenities and facilities on foot or on bike, with external trips being achievable by bike but limited local trips on foot due to distance. However, the new high frequency bus service will provide the opportunity for multi-modal journeys to be performed and consider the overall the development will have a positive impact on pedestrian and cyclist movements.

### **15. Public Rights of Way:**

Several improvements to the surfacing of the local footpaths is proposed by the Applicant, as outlined below. Those within the site will be completed as part of the development and a financial contribution is to be secured as part of the Section 106 Agreement for those routes outside of the site.

#### ***Weasel Lane***

Passing south-west to north-east through the centre of the site, Weasel Lane is likely to be a busy walking and cycling route used by new residents. Weasel Lane is restricted by a byway, for use by pedestrians, cyclists and horseback. Notwithstanding its status, Weasel Lane is accessible to motor vehicles from both Whaddon Lane and Buckingham Road and provides access to the existing residential property.

It is proposed as part of this application to improve the surface of Weasel Lane, which will encourage walking and cycling within the site but also longer trips to Milton Keynes and Winslow that National Cycle Route (NCN 51) aims to achieve. A 3m wide walking cycling route should be secured by way of condition and supported by a section 106 to resurface Weasel Lane outside the red line, from Whaddon Road south-east to the property Weasels'. A 2.5m x 1,200m loose surface, such as road planings, was originally suggested, this will be secured by means of the S106 agreement (exact amount to be determined).

### **Connection to Newton Longville**

Footpath 19 Newton Longville Parish connects the parish of Newton Longville with the new development site. As part of the package to mitigate the impact of the development and improve connectivity with Newton Longville, an improvement is required along Footpath NLO/19/2 and NLO/19/3. The footway within the site is to be resurfaced to a sealed carriageway standard to a width of 3m between Weasel Lane and the railway underpass, to be dedicated as a public bridleway. South of the railway bridge, a contribution (exact amount to be determined) is required for the improvement of the footpath between the site and Nos. 36 and 38 Whaddon Road, Newton Longville to provide a 2m wide granite to dust path.

### **16. Internal Road Layout**

As part of the illustrative masterplan submitted in support of the planning application, a new network of Primary Streets will form the principal circulation route for all vehicular traffic. The route will connect with the existing highway network at the three access points. The indicative plans show that the primary street is to be 7.3m wide, with a footway/cycleway of 3m wide, which is considered to be appropriate for the nature of the road.

The primary streets are to form part of the proposed bus route. The primary streets therefore need to be designed to avoid on-street car parking, which could result in obstructions to the bus route. This could be achieved by ensuring appropriate off-street parking is provided, the use of on-street car parking laybys, and frontage car parking with dropped kerbs. This will need to be considered as part of any future reserved matter applications.

The illustrative masterplan shows the tertiary roads to be between 4.8m and 5.5m, which are considered appropriate for the nature of the road. It should be noted that if a shared surface is to be proposed then a minimum width of 4.8m (not including service margins) would be required. All roads will need to be designed to accommodate an 11.2m refuse vehicle in line with Buckinghamshire Council and tracking should be provided as part of any future reserved matters application.

There are two schools (a primary and secondary) proposed as part of the development. The internal road layout will need to be carefully designed as part any future reserve matters application to accommodate these facilities. The design will need to consider drop off provision, widened footways, crossing points, road signage and lining to provide for a serviced school site. In addition, the bus stops serving the school will need to be designed to accommodate the predicted number of buses/coaches, to ensure that they do not obstruct the free flow of traffic. This will require early engagement with Buckinghamshire Council's Education and Highways Development Management team.

### **17. Grid Road:**

Whilst the proposed development only requires a single carriageway road for access, the masterplan has been developed to ensure that a dual carriageway could be provided in the future. The land for the grid road will need to be adequately secured in the S106 Agreement, so that the Councils can develop and implement a scheme in the future. Furthermore, the detailed design should look to limit the future cost of dualling and this will need to be demonstrated as part of a future reserved matters application.

### **18. Framework Travel Plan:**

The Applicant has developed a Framework Travel Plan (FTP) for the Site with the aim in reducing traffic generated by the Proposed Development and increasing the use of sustainable travel modes. The FTP submitted as part of the planning application includes details of the initial targets that will be set regarding modal shift and details of the measures that will be put into place to achieve this modal shift. Buckingham Council requested that the FTP be costed to determine appropriate levels of commitment would be provided to support the initiatives.

A costed action plan was provided in TRN1 for the residential element of the Framework Travel Plan (FTP) including the role of Travel Plan Manager. This cost has been provided for the life of the TP (i.e:

based on the agreed FTP) which is assumed to be 14 years from first occupation of the development through to full occupation (anticipated in 2031) plus five years (i.e. 2036).

Overall, the submitted Framework Travel Plan generally meets the standards set out in the Buckinghamshire Council (BC) Travel Plan Guidance for residential employment and education uses. There are some areas that would require improvement and would be addressed as part of the formal Travel Plan adoption process. Overall Buckingham Council are satisfied that FTP is well thought out with some good measures to reduce single occupancy car use, but the following Planning Conditions will need to be secured to obtain FTP acceptance:

- Education
  - The provision of cycle parking spaces at both schools.
  - The provision of disabled parking spaces, and their locations.
- Residential
  - The provision of cycle parking spaces, and their locations.
  - The provision of disabled parking spaces, and their locations.
- Employment
  - The provision of cycle parking spaces, and their locations.
  - The provision of disabled parking spaces, and their locations.

### **19. Conclusion:**

The Council therefore concludes that the outline application is acceptable to the Highway Authority **subject to appropriate transport planning conditions and a Section 106 Agreement to secure the appropriate works and contributions, which are still being discussed.**

**The final agreed conditions, works and contributions will be provided in a separate letter.**

Yours sincerely



**James Bedingfeld**  
**Highways Development Management**  
**Planning Growth & Sustainability**

*Please note:*

*This advice is given at officer level only and is based on the facts and information you have supplied. It must be understood that the final decision on any planning application that may be submitted in the future rests with the Planning Authority.*



**Directorate for Planning Growth & Sustainability**  
Buckinghamshire Council,  
Walton Street Offices,  
Walton Street,  
Aylesbury  
HP20 1UA

highwaysdm@buckinghamshire.gov.uk  
01296 382416  
www.buckinghamshire.gov.uk

Directorate For Planning, Growth And Sustainability  
The Gateway  
Gatehouse Road  
Aylesbury  
HP19 8FF

Date: 28<sup>th</sup> May 2021  
Your ref: 15/00314/AOP

Sent to: devcontrol.av@buckinghamshire.gov.uk

Dear Sirs,

**Re: South West Milton Keynes, Updated Transport Assessment**

**Location: Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville**

**Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.**

Thank you for your letter dated the 8<sup>th</sup> July 2020 in which you requested comment for the above application. Further to the response provided on the 13<sup>th</sup> April 2021 I write based on the receipt of further consultation documents received relating to Highways and to provide details of conditions, works and contributions.

An objection letter was received on 13<sup>th</sup> April 2021 from Milton Keynes Council (MKC) in which several points were raised in relation to the methodology employed in the Transport Assessment and issues at several specific junctions. These items are addressed within this response.

### **1. Extent of Assessment Work**

MKC have stated their agreement between BC and MKC that the applicant would progress a Transport Assessment (TA) and then Transport Response Notes (TRNs) using a traditional approach which does not refer to wider network traffic modelling, and noted in their letter that the applicant has the options to either:

- Take the conclusions of its TA at face-value and seek to mitigate them in the usual way – e.g. by reducing travel demand and physically mitigating the residual traffic impacts; or,
- If it is to argue the case that traffic would redistribute across the highway network, reducing specific predicted junction/link impacts, it must provide a comprehensive assessment of how much traffic would divert, to where, and with what effects.

MKC then indicate that based on their assessment of TRN3 widespread congestion between junctions along the A421 between Bottledump roundabout and central Milton Keynes would occur. The analysis is considered by MKC to be sufficient so that queues from one junction would often extend back and block the exit of the upstream junction and that the residual impact is shown to be severe with significant reduction in performance even with the mitigation measures in place. Whilst it is acknowledged by BC highways that some arms at certain junctions would worsen even with mitigation,

that overall, all junctions would see improvements in terms of queues and delay when considered holistically across both peak periods and across the wider network. The basis of severe impact as detailed by MKC is on the blocking back and interaction between junctions, the MKC review and assessment of blocking back has been accounted for as a worst-case scenario, whereby all vehicles would queue in the nearside lane only on dual carriageway sections where the straight-ahead movements can occur from two lanes. This is not considered to be a viable conclusion on which to base an assessment. It is BC highways opinion, and which formed the basis of our own assessment that more even queuing is likely to occur, especially during busy peak periods, with drivers and vehicles 'filling' the available road space. Where blocking back has been noted by MKC for each junction this has been noted and responded to in the following individual junction sections. In conclusion, based on more equal queuing assessment it is the opinion of BC highways then the impact of the development would not be covered as severe, and therefore in accordance with Plan:MK and NPPF policies.

MKC then note that the impact on the network is defended in the TA on the basis that, in practice, there will be some redistribution of traffic on the grid road network and that the applicant provides no analysis to show whether the spare capacity exists on alternative routes so, although this may be a possibility, it cannot be accepted as a 'solution' to the predicted issues. BC highways confirm that the assessment of the impact on the assessed network has not relied on any re-routing with all flows sustained on the A421 and Buckingham Road.

It is BC highways opinion that the methodology used provides a robust interrogation of the junctions under review and is likely to represent a worst-case scenario. It is accepted that this may result in movements to adjacent roads however, AECOM strategic modelling of the MKC network forecasts widespread congestion and delay across the highway network within Milton Keynes, as evidenced within the junction modelling with a number of junctions already operating over capacity. By implementing the mitigation package, as detailed in TRN3, it has been shown that overall, most junctions will operate at the same level or better than the current layout using the Do Nothing scenario. It is the view of BC highways that the mitigation proposals along the A421 have the potential to attract greater use, drawing traffic away from currently congested roads, in addition to taking some movements away from the A421 to others following improvements to the local network, with the most likely outcome that this would balance across the surrounding network and that overall changes in route would be limited. As such a wider network model is not considered a requirement and the development of a suitable micro-simulation model, or localised update of the MKMMM to be unnecessary and at this stage in the application to be disproportionate.

BC highways consider that the data collection and subsequent calibration of the junction models is a robust and accepted methodology with no requirement for further assessment or extended modelling.

## **2. Policy**

MKC specify that the development is contrary to Plan:MK and NPPF policies. The first proposed non-compliance is with paragraph 111 of the NPPF, which requires the provision of a TA for developments which will generate significant amounts of movement '*so that the likely impacts of the development can be assessed*'. It is MKC position that evidence base relating to the MKC highway network comprises of part of the 2020 TA and TRN3 and that the Applicant argues that these documents over-predict impacts on the highway network, but provides no further assessment to quantify the extent and effect of any wider re-distribution of trips upon which it relies to mitigate the predicted severe operational impacts. It is BC highways opinion that the Application does comply with the NPPF, with the response to the methodology used, limited re-distribution and the requirement for further wider area modelling responded to in Section 1.

MKC also refers to paragraph 7 of the NPPF and then paragraph 8 which identifies three linked strands to sustainable development – economic, social and environmental objectives. It is MKC position that the level of queuing and delay on the A421 and Buckingham Road, as predicted by WSP in TRN3, would have significant impacts across these strands, including:

- The economic impact on Milton Keynes and Buckinghamshire arising from severe congestion on the A421.

- Social impacts arising from mobility constraints on local residents, delays to public transport services and constraints to emergency vehicle access.
- Environmental impacts including new queues outside of local schools, stationary traffic on the A421, and unknown effects due to re-routing of vehicles across the wider network (not assessed in the TA/TRN or in the Environmental Statement (ES)).

As detailed in Section 1 the MKC analysis of queues and congestion are the worst case of single lane queueing on dual carriageways and is not considered appropriate for the basis of assessment. As such the congestion as stated by MKC is extremely unlikely to occur and BC highways would not consider the impact to be severe. MKC also raise issue with non-compliance with NPPF paragraph 102 that requires that *'the potential impacts of development can be addressed'* and that *'the environmental impacts of traffic and transport infrastructure can be identified, addressed and taken into account'*. The Environmental Impacts have been assessed independently from the Highways Department and a separate response would have been provided on this issue in relation to compliance and acceptability.

MKC also referenced paragraph 104, which states that policies should *'identify and protect...routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development'*, paragraph 108 which requires that *'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree'*. It is MKC's position that the mitigation, as currently proposed, fails to achieve this and, as indicated subsequently, may not be deliverable. BC highways do not agree with this position with regard to the appropriateness of the mitigation to meet these requirements nor their deliverability. Detailed response with regard to the mitigation is provided in Section 3 of this letter. In terms of Highway Safety each mitigation proposal has been subject to a Road Safety Audit, with a designers response provided that would mitigate those issues raised, there is no evidence of severe impact on Highway Safety grounds.

MKC also reference paragraph 110, in that the NPPF requires that developments *'allow for the efficient delivery of goods, and access by service and emergency vehicles'*, and then further stipulates that that the application is refused planning permission given the predicted severe operational impact (contrary to NPPF paragraph 109), and in light of its likely economic, social and environmental impacts which extend across Local Authority boundaries and fail to meet the NPPF definition of sustainable development. As stated previously, it is BC highways opinion that the Application does comply with NPPF, with the response to the methodology used, severity of impact and the requirement for further wider area modelling responded to above and in Section 1.

### **3. Junction Model Updates**

#### ***i. Junction 1: Buckingham Road/Sherwood Drive/Water Eaton Roundabout***

MKC raised a number of points in relation to the relocation of street furniture, including lighting columns to suit revised kerb lines or removal of verge. Whilst these points are raised in the Road Safety Audit, it is considered that details of this nature fall within the scope of the later detailed design stage(s) and s278 review and discussions, and that mitigation could be identified at this later stage to ensure appropriate lighting levels could be maintained. BC highways have no concern that all these matters can be satisfactorily resolved.

MKC raises concern over the relocation of the northern bus stop layby and distance from the existing pedestrian refuge island. The bus shelter would be approximately 40 m east of its current location and would be located at the end of the two-lane section with a combined stacking space of 160 m (or 28 vehicles). Whilst there is a potential for blocking to occur back to the roundabout there is significant storage space to cater for waiting vehicles for what would likely be relatively short stay stopped buses. In regard to the distance from the crossing, it is not considered that the additional 40 m is an excessive distance to access a safe crossing location.

Some comments were provided on the geometric layout of the junction, specifically the entry path curvature on Buckingham Road (E) and visibility for Water Eaton Road. No issues were raised on either of these items in the Road Safety Audit (RSA), nor I am aware of any related collisions that relate



on the eastern side of Newton Road is worsened by the proposals. Neither item was raised a potential issue within the Road Safety Audit, nor do BC officers consider these to be items of concern, in particular the location of the right-turn lane. It should also be noted that as the junction is a double mini-roundabout, motorists have to negotiate each junction as if they are separate junctions. Therefore, the intentions of a motorist would not be apparent until they had exited the Shenley Road mini roundabout. The maximum visibility requirement is therefore from the exit of the Shenley Road mini-roundabout not from the middle of the mini-roundabout as suggested by the image provided in the MKC consultation response. Vehicle speeds are likely to be in the region of approximately 15mph through the junction at this point, which would mean when applying MfS, a 17m SSD would be required, which is available.

Lastly, MKC noted that development traffic would lead to a significant increase in queuing and delay on the westbound approach to the eastern roundabout from Buckingham Road. The increase in queuing on Buckingham Road would block back as far as Cottingham Grove to the east, which would block an additional six side roads, two bus stops, multiple property accesses, a signalised crossing outside of a school. This was raised in the BC highways response on the 13th April 2021, and that while the queuing and delay on this arm in the PM would be extended, the remaining arms on the eastern roundabout would have improved or similar results. At the western junction in the AM queues and delay are reduced with Buckingham Road (W) seeing queue reductions from 60 to 33 vehicles and delay reducing from 7 to 2.5 mins. Newton Road is also expected to see an improvement, with queues and delay reducing by over half.

The conclusion BC highways reached for J2 is the same as per the letter dated 13th April 2021. Concerns over footway and pedestrian provision have been resolved / responded to and that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development with several items of objection already shown to be resolved.

**iii. Junction 5: Tattenhoe Roundabout**

MKC noted several issues with the proposal of Tattenhoe roundabout. The first being the lack of indication for the intention to reduce the speeds on approach to the roundabout as part of the signalisation, in that where the 85th percentile speed on the approach roads are greater than or equal to 104kph (65mph), a signal-controlled roundabout shall not be provided. The Applicant has provided details of the peak hour 85th percentile speeds from the 2020 surveys, these are provided in Table 1 and show that these are below the 65mph threshold and that signal control would be appropriate.

**Table 1: 2020 85th Percentile Peak Hour A421 Approach Speeds to Tattenhoe Roundabout**

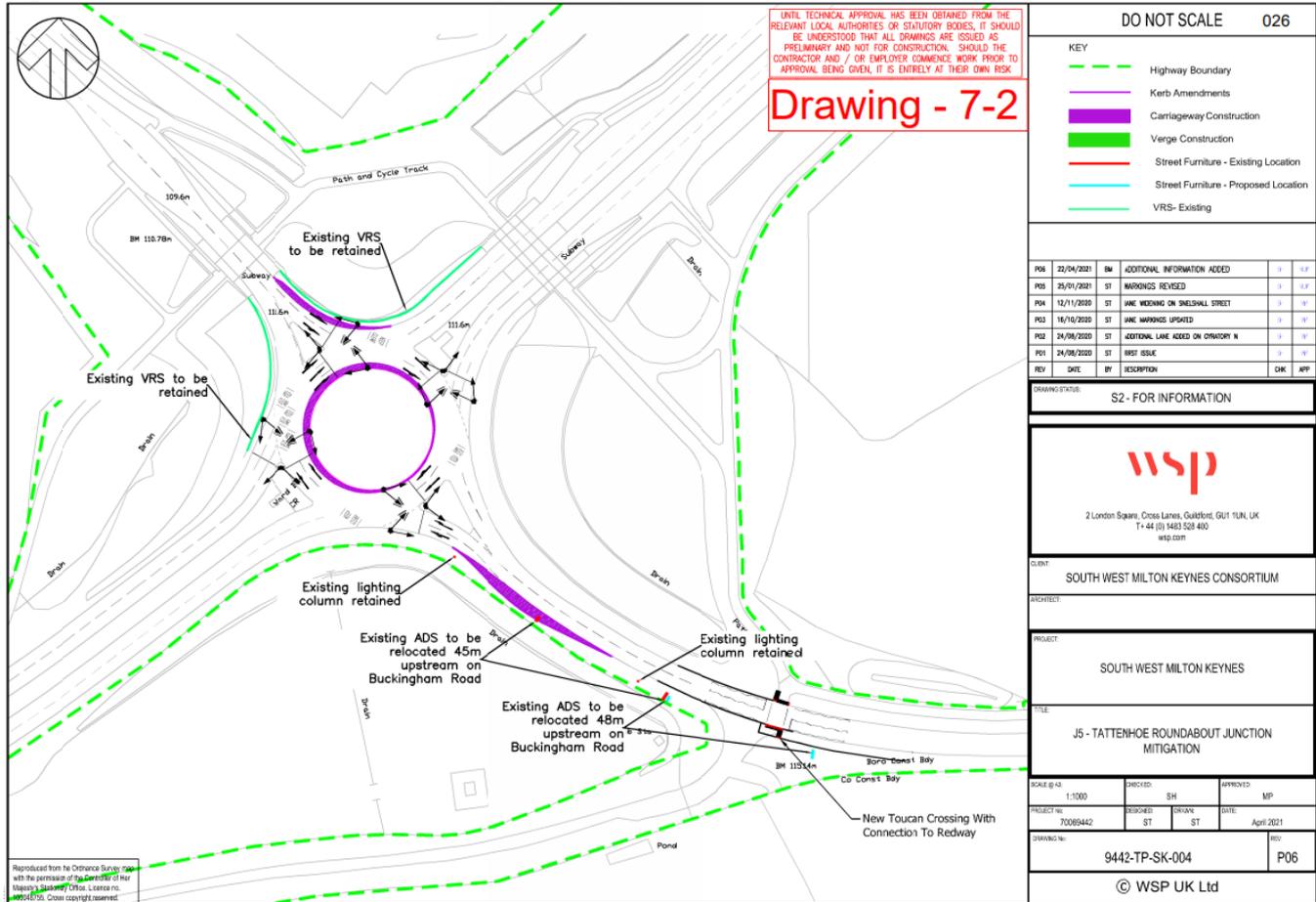
Peak Hour/Location	Eastbound (west of junction)	Westbound (east of junction)
AM Peak (07:45-08:45)	58.9mph	62.4mph
PM Peak (17:00-18:00)	57.4mph	60.7mph

MKC expressed their opinion of a flaw within the model construction concerning lane lengths that have been used for the gyratory, the resulting stacking capacity of these links and the use of Uniform Queues for analysis purposes instead of Mean Max Queue (MMQ). With regard to the use of Uniform Queues these are considered to be the appropriate model output for use, as the roundabout is and should be coordinated effectively with arrivals platooned and non-random. The internal arms remain below 80% DoS, therefore random and oversaturated delay/queuing is not of concern. This is detailed in the LinSig modelling software guidance. Further inspection of the model has been performed with regard to lane lengths and these are appropriate. BC highway officers are confident that the proposed scheme is feasible and that partial blocking may occur every other cycle, but this would be for a matter of seconds before clearing and removing any potential congestion through the roundabout. The junction design would be further optimised and calibrated on site and adjustments made to ensure that queues do not build up that would block the operation of the junction

MKC also raised concerns about lack of guide markings, 'Keep Clear' markings, vehicle tracking and relocation of street furniture. The vehicle tracking was raised in the Road Safety Audit with appropriate mitigation to resolve the concerns and it is considered that this could be addressed as part of the s278

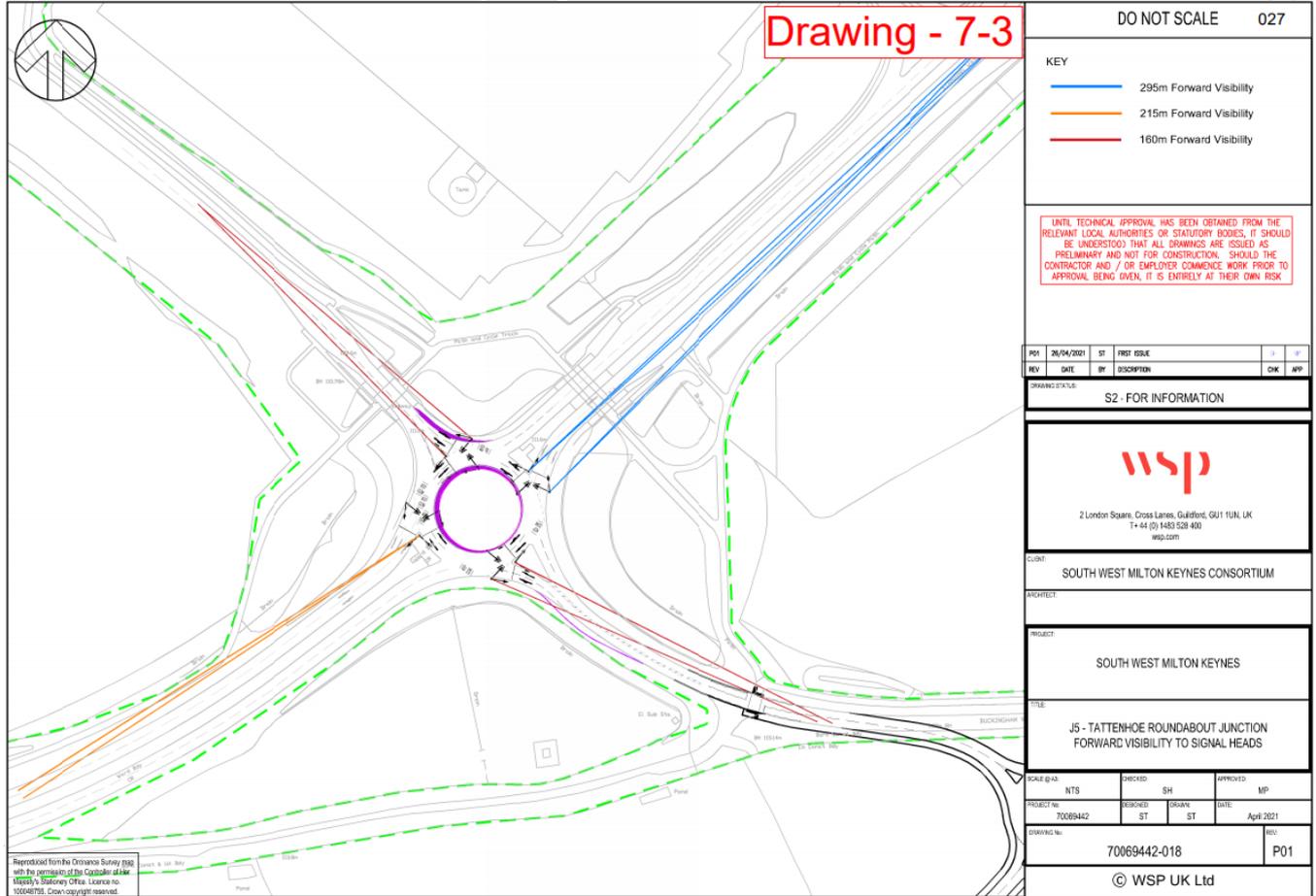
detailed design and approval process. Likewise, final lane markings are not considered to be essential elements as part of overall junction feasibility analysis and would be addressed through the s278 process. The use of keep clear markings at part-time traffic signals can be incorporated into the design and are a viable option as set out in the Traffic Signs Manual. In regard to the relocation of street furniture the Applicant has produced an updated drawing (9442-TP-SK-004 P06) to illustrate how the existing street furniture would be relocated appropriately within the scheme.

**Figure 2: Junction 5 – Amended drawing detailing street furniture relocation**



The issue of attaining clear visibility to the new traffic signals was also raised by MKC. The requirement of visibility of the signal heads would be similar requirements for the existing priority-controlled layout and would continue to be so outside of peak times. However, the Applicant has provided forward visibility measurements for all arms at the junction, as detailed on drawing 70069442-018 P01, and this shows the required visibility can be achieved, especially when considering that on Buckingham Road, the presence of the site access roundabout will significantly reduce vehicle speeds on this approach.

**Figure 3: Junction 5 – Forward visibility to signal heads**



Two items were raised in relation to the amended geometric layout of the junction. The entry path radius on the NW approach and the sharp taper on V1 Snelshall Street. Neither item was raised in the RSA as potential issues and BC highways officers consider that these should not lead to objection, with the entry path radius change being very minor. As for the taper on V1 Snelshall Street, the taper has been designed to maximise queuing space and the existing junction suffers from over-running of the verge during the peak hours and the amended kerb line seeks to address this existing issue.

At the recent Planning Appeal for the Milton Keynes Application 15/00619/FUL further comments were provided on the flare lengths used on the A421 Standing Way arms and the modelling De-silver values. This has resulted in further examination of the model / design and sensitivity testing has been performed. A revised scenario with shorter flare to allow for 3 pcu on the eastern arm nearside lane and 2 pcu on the western arm nearside lane was run. This provided DoS and Queue Results as shown in Table 2 for the A421 Standing Way approaches.

**Table 2: J5 Tattenhoe Roundabout – A421 Entry Flare sensitivity test**

Arm Description	AM Queue	AM DoS	PM Queue	PM DoS
A421 Standing Way (W) Left Ahead	28	100%	13	87%
A421 Standing Way (W) Ahead	28		13	
A421 Standing Way (E) Ahead Left	9	81%	12	84%
A421 Standing Way (E) Ahead	9		11	

When comparing the sensitivity test to the DN 2033 existing layout it is evident that the A421 West queue would worsen slightly (from 32 to 46 vehicles) but this is not considered to be significant with the RFC and DoS both being 100% in the AM. There would still be improvements in the PM compared to DN 2033. The A421 East arm would see similar results for the AM but still obtain improvements in the PM compared to DN 2033. With regard to the De-silver queues the rate is left up to the discretion of the

modeller. While these values should not be unnecessarily high, the values in the model appear to have been used reasonably and the effect on changing these to the queue at the start of the green is largely unchanged with no discernible impact on the results.

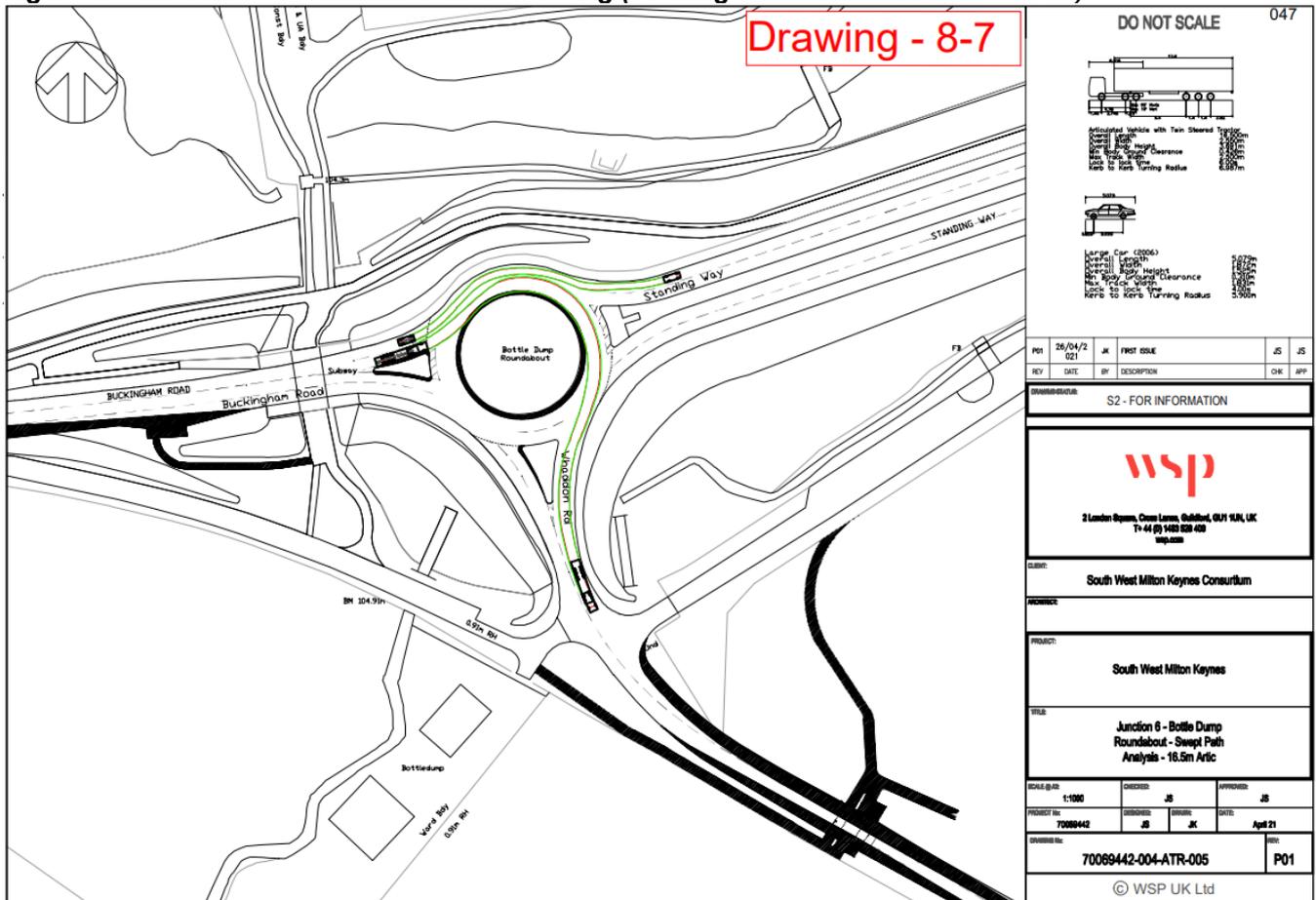
The conclusion BC highways reached for J5 is the same as per the letter dated 13th April 2021. Concerns over geometric design, junction suitability and modelling concerns have been reviewed and, in our opinion, resolved / responded to. The mitigation proposal offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF and would not be considered severe.

**iv. Junction 6: Bottledump Roundabout**

MKC raised several concerns with regard to the proposed modelling and mitigation for Bottledump roundabout. The first related to the flare length of zero being used in the Lane Simulation model. The lack of flare is based on a requirement made by BC highways. There is a known issue in the Junctions 9 software in the lane simulation model where the double counting of flare will negatively impact on the results. An independent review by JCT Consultancy was performed in 2018 that demonstrated the issue in a number of examples where removal of the flare provided greater comparison with observed queues. Therefore, it is considered appropriate to removal the flare in this instance.

MKC raised concern over potential collisions within the circulatory carriageway and that some movements were missing. The Applicant has provided additional swept path analysis (drawings 70069442-004-ATR-005 P01 and 70069442-004-ATR-006 P01) and these demonstrate that there are no issues with potential vehicle collisions at the junction with the amended geometry.

**Figure 4: Junction 6 – Additional vehicle tracking (drawing 70069442-004-ATR-005 P01)**

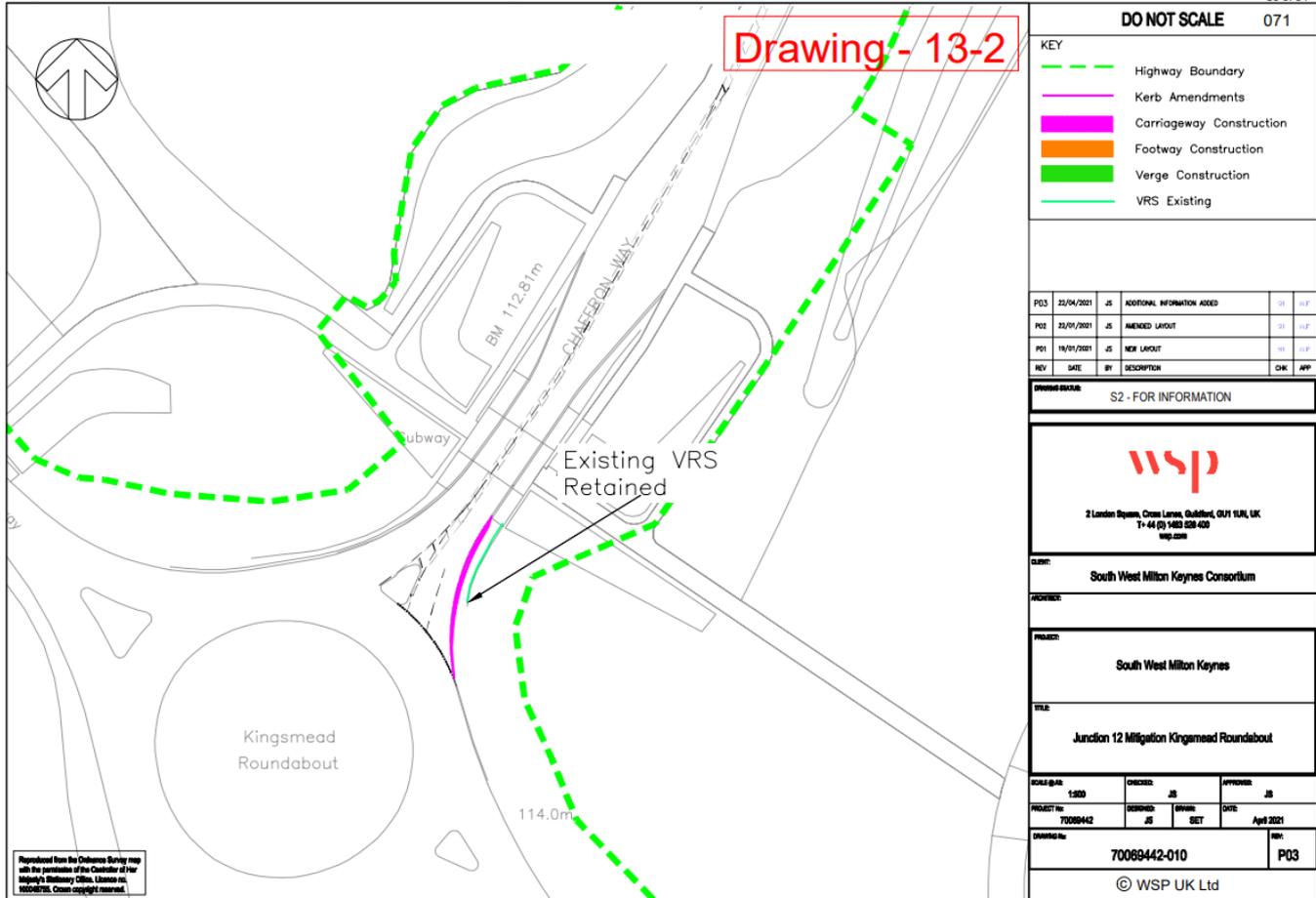




the taper. BC highways have no specific concern over the taper at this location and no issue has been raised by the RSA.

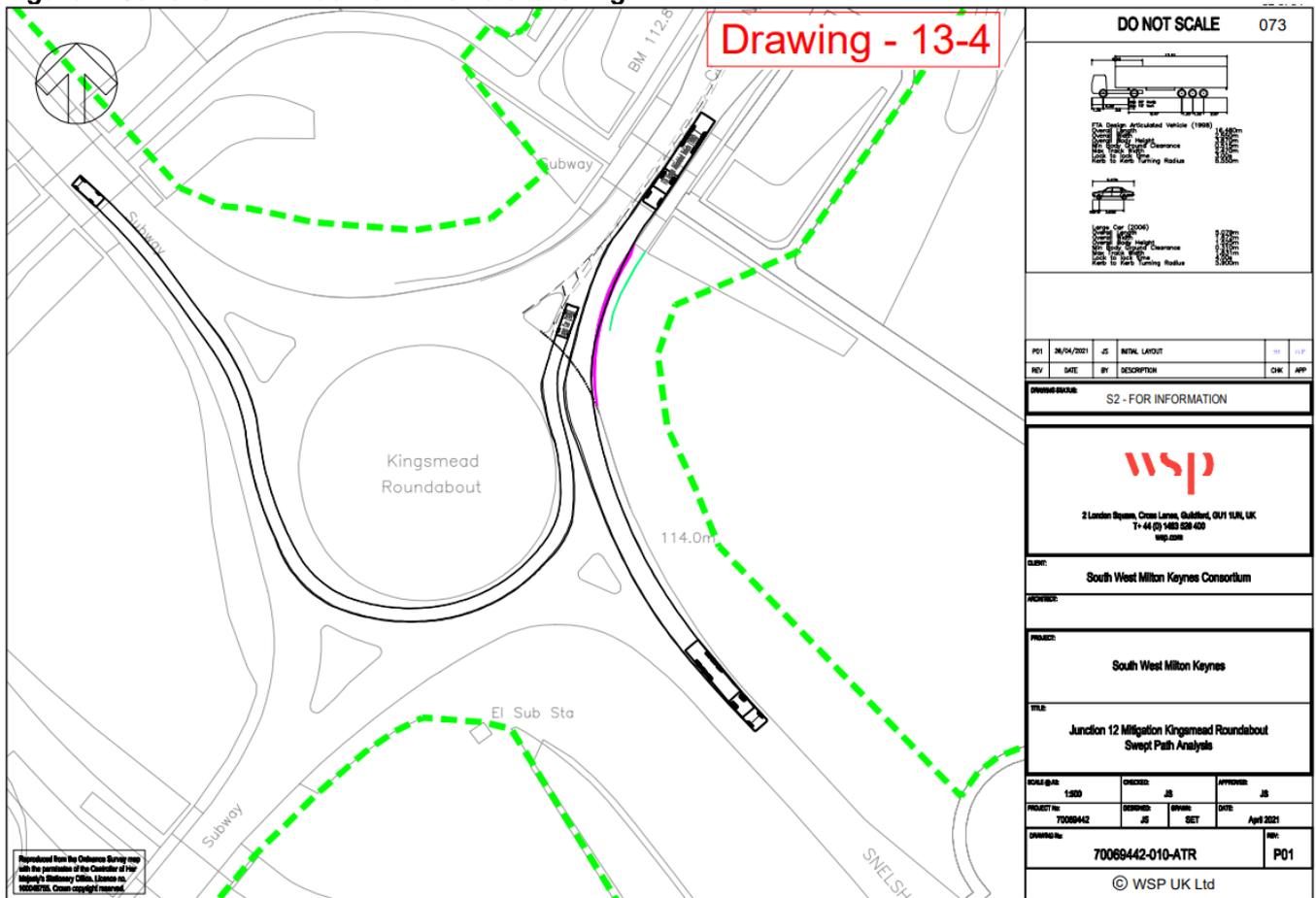
Concern was also raised in relation to the position of the Vehicle Restraint System (VRS) on Chaffron Way and the revised kerblines as its position on the plan appears to be further from the carriageway edge than is the case in reality. The Applicant has produced a drawing showing the location and distance to the VRS (70069442-10 P03) and it has been confirmed that a 1.2m setback from the amended carriageway edge can still be achieved to the VRS which is in accordance with relevant standards.

**Figure 6: Junction 12 – Amended drawing detailing location of VRS**



Lastly, a concern was raised over the lack of tracking as the RSA noted the potential for side-swipe collisions on the junction. As detailed in the BC highways previous response on 13th April 2021 the junction is being improved to slightly widen Chaffron Way; this should not cause any issues with vehicle movements with additional space provided to perform required movements. However, the Applicant has produced vehicle tracking for Chaffron Way which is detailed on drawing 70069442-010-ATR P01 and this confirms that there is not issue with conflict in the circulatory carriageway.

**Figure 7: Junction 12 – Additional vehicle tracking**



The conclusion BC highways reached for J12 is the same as per the letter dated 13th April 2021. Concerns over geometric design have been reviewed and, in our opinion, resolved / responded to as detailed above. The mitigation proposal offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF and would not be considered severe.

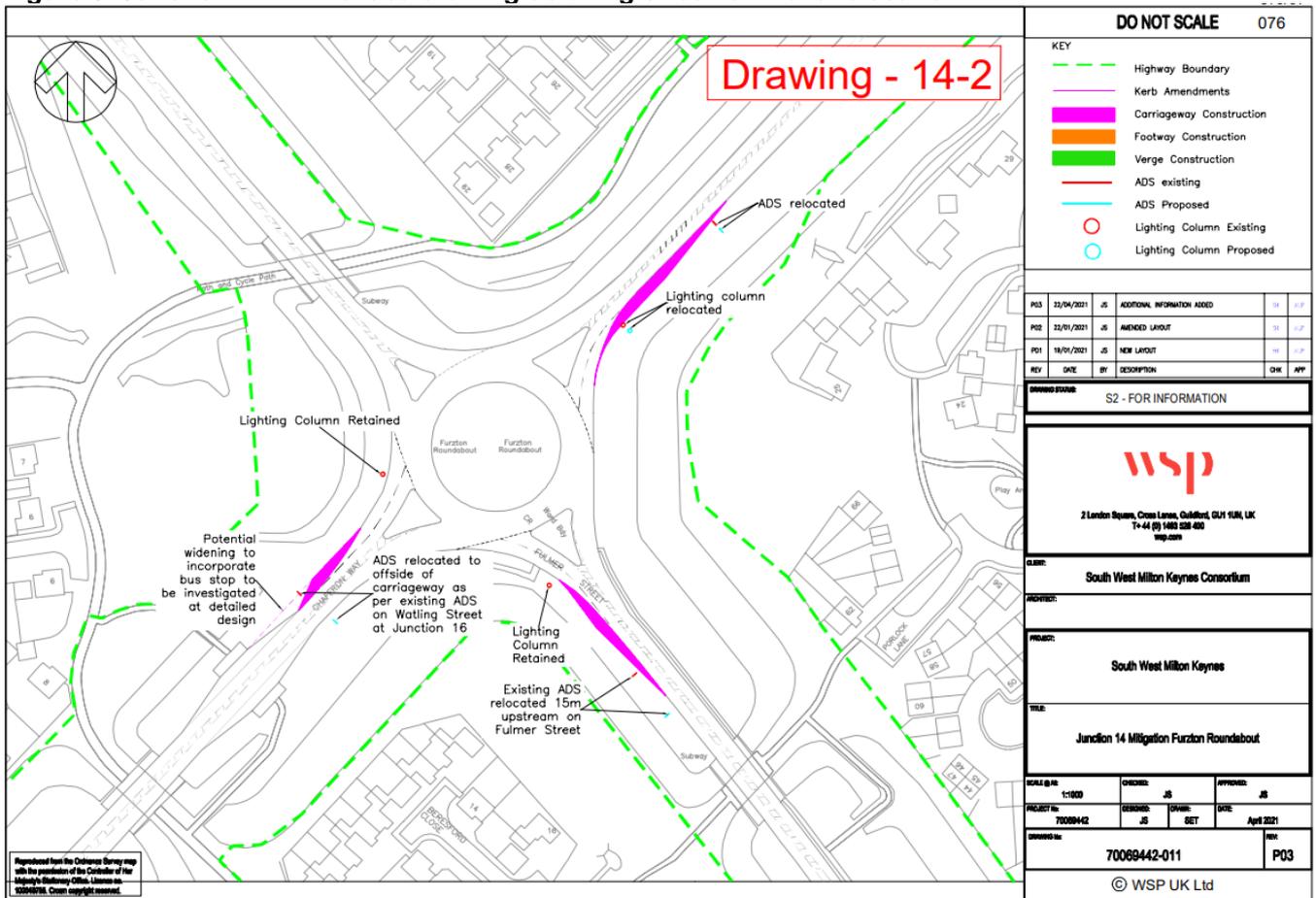
**vi. Junction 14: Furzton Roundabout**

MKC raised three concerns with regard to J14, all relating the proposed geometric changes of the mitigation scheme. The first related to the sharpness of the taper to the east of the bus stop on Chaffron Way. BC highways have no specific concern over the taper at this location and no issue has been raised by the RSA.

The issue of relocated street furniture was also raised. The realignment / movement of street furniture are considered details that fall within the scope of the later detailed design stage(s) and s278 review and discussions. However, the Applicant has produced an updated drawing to illustrate how the existing street furniture would be relocated within the scheme which does not identify any concerns.

The final point revolves around the area of widened carriageway on the western arm of Chaffron Way which may be obscured from view on approach if a bus is using the bus stop immediately upstream. BC highways do not consider this to be a concern and it was not raised as part of the Road Safety audit. At the same location the comment was provided that consideration should be given to whether the nearside lane would better extend from the bus stop itself (with appropriate markings to control inappropriate use of the bus stop). This is considered to be something that could be considered further at detailed design. As a Traffic Regulation Order would not be required for a Bus Stop clearway the impact of providing appropriate markings would be a design choice only.

**Figure 8: Junction 14 – Amended drawing detailing street furniture relocation**



The conclusion BC highways reached for J14 is the same as per the letter dated 13th April 2021. Concerns over geometric design have been reviewed and, in our opinion, resolved / responded to as detailed above. The mitigation proposal offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF and would not be considered severe.

**vii. Junction 15: Bleak Hall Roundabout**

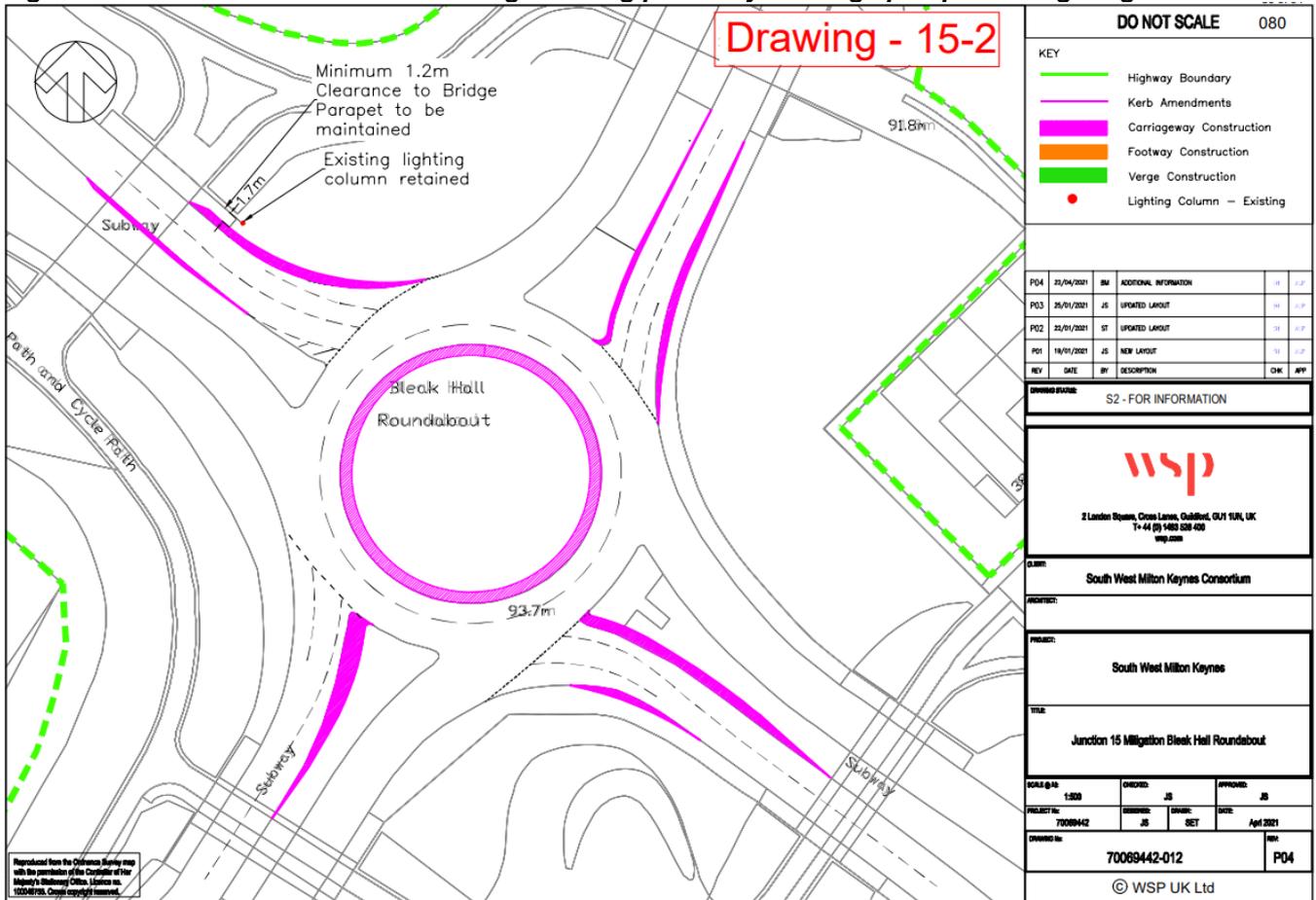
MKC raised several concerns with regard to J15. The first element raises concern over no indication being provided of lane allocations, vehicle tracking and circulatory carriageway width and use. This was raised by BC officers with vehicle tracking provided in a letter 7th April 2021 as detailed in our letter of the 13th April 2021. This indicated that the new nearside entry lane on A421 Standing Way would be lane left-turn only and thereby allowing for a narrower circulatory traffic provision, as already exists for the current three lane entries. On review of this information no concerns were raised with the majors movement considered to be able to be completed satisfactorily.

The next issues relate the revised geometric layout of the junction, in that the widening on Standing Way leads to the right hand lane on approach having an entry angle of greater than the DMRB-recommended 60 degrees. Also, on all four approaches, the entry path curvature is worsened by the proposals and vehicles may enter the roundabout at a higher speed. Neither issue was raised as part of the RSA process and BC highways have reviewed these elements and do not consider these to be a road safety issue.

A point was also raised over the widening on the north side of Grafton Street (NW approach arm), which appears to be partially on the subway structure. Also, the distance from the carriageway edge to the railings on the bridge would need to be reduced, as well as the distance to the lighting column in this location. The realignment / movement of street furniture are considered details that fall within the scope of the later detailed design stage(s) and s278 review and discussions, however the Applicant

has produced a revised drawing (70069442-012 P04) that shows an offset of 1.7m (minimum 1.2 m clearance required) is still achievable to the bridge parapet and lighting column.

**Figure 9: Junction 15 – Amended drawing detailing proximity to bridge parapet and lighting column**



Reference was also made to blocking to J16 Elfield Roundabout, Leadenhall Roundabout and back to and through the upstream Coffee Hall Roundabout in the MKC letter. This has been accounted for as a worst-case scenario with all queues in the nearside lane, as detailed and responded to in Section 1. The BC highway queuing review shows no blocking of the referenced junction but did note that queues would be potentially close to J16 but are not predicted to physically block exit movements.

The conclusion BC highways reached for J15 is the same as per the letter dated 13th April 2021. Concerns over the geometric design have been reviewed and, in our opinion, resolved / responded to as detailed above. Queuing is not anticipated to block between junctions. Increases in queuing and delay are expected on some arms of the junction as detailed in the 13<sup>th</sup> April 2021 BC highways letter, but overall, the junction will experience positive improvements in terms of queuing and delay when considering all arms and both peak periods. The mitigation proposal offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF and would not be considered severe.

**viii. Junction 16: Elfield Park Roundabout**

MKC raises concern in relation to no indication being provided of lane allocations, vehicle tracking and width of the circulatory traffic. This was raised by BC officers with vehicle tracking provided in a letter 7th April 2021. The tracking indicates where a new third entry lane has been provided these would be left-turn only with what is considered to be acceptable vehicle tracking that shows movements can be performed without conflict.

Concern was also raised over non-tangential road markings and flatter entry paths increasing vehicle speeds through the roundabout. A high level review of the collision review in the updated TA details the collision record from 2014 to 2019 does not indicate a current high speed issue or that this may lead to

increases in collisions, nor was the potential impact raised in the RSA process and therefore are not considered to be road safety concerns with the new design.

Issue was raised with the stand-alone modelling which does not recognise exit-blocking on the A421 (N) arm in the AM peak hour. As discussed in the J15 review the exit blocking by MKC has been determined with all queues forming in a single lane on the dual carriageway, this is not considered to be a viable conclusion and the BC highways review indicates blocking will not occur to J16.

Increases in queuing on the A421 (S) entry arm in the AM peak, and on the A421 (N) arm in the PM peak were also raised as a reason for objection with the MKC review indicating the additional queuing on the A421(S) entry arm is predicted to cause queuing back to, and through, the upstream J17 Emerson Roundabout. Likewise, development traffic would add to pre-existing queuing on the A421(N) approach which blocks back through the upstream J15 Bleak Hall Roundabout. As discussed, the exit blocking by MKC has been determined with all queues forming in a single lane on the dual carriageway, BC highways analysis of the queuing has indicated that no blocking to J17 would occur with adequate stacking space provided.

In the BC highways response dated 13th April 2021 it was recorded that BC highways registered concern over the potential blocking back to J15 Bleak Hall roundabout. The Applicant provided a response on 7th April 2021. This highlighted further review of the junction flows used in the model and that only a slight reduction (5%) in network flow would result in no blocking back. It is agreed that a robust growth has been applied to the flows used in the modelling, with TEMPRO growth factor over 15% along with higher banded of employment rates to provide a 'worst case' flow scenario. The Applicant also made reference to the Department for Transport's 'Appraisal and Modelling Strategy – A Route Map For Updating TAG During Uncertain Times' (July 2020) which recommends the use of scenarios to assist with modelling future outcomes. Although the DfT has yet to publish updated forecasts, there is a clear indication of a downward trend in trips to account for the lower economic output. Based on the new analysis and documentation provided, and considering new information pre-pandemic that likely future growth will be reduced it was considered that the potential for blocking would be limited and in fact unlikely to occur by the 2033 assessment year.

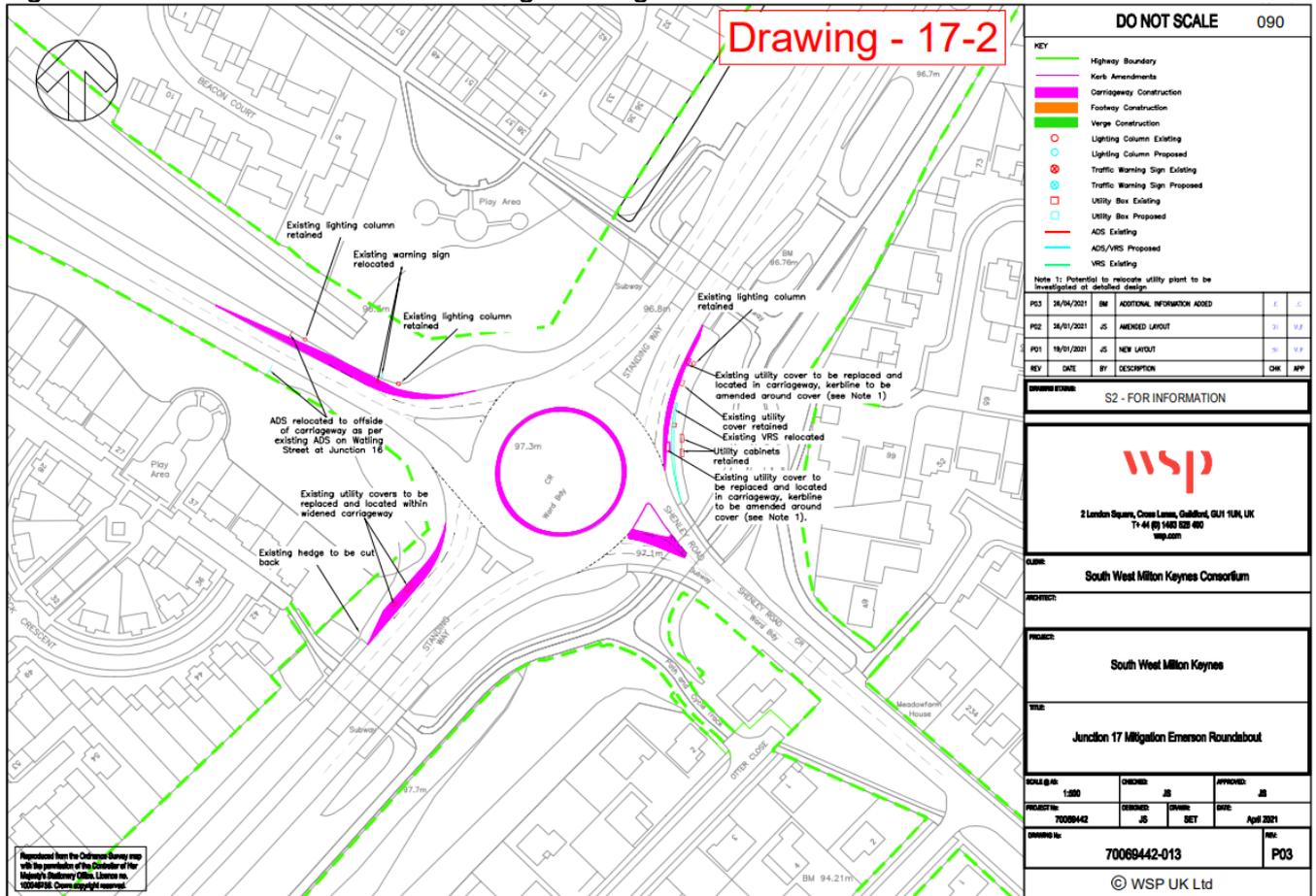
The conclusion BC highways reached for J16 is the same as per the letter dated 13th April 2021. Concerns over geometric design have been reviewed and, in our opinion, resolved / responded to as detailed above. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF with overall improvement in capacity terms. The issue of blocking back to J15 Bleak Hall roundabout has been discussed and clarified.

*ix. Junction 17: Emerson Roundabout*

MKC noted that proposed widening of the Shenley Road approach into the existing splitter island would result in an approach geometry which reduces deflection and may not accord with standards. Shenley Road is a 30 mph speed limit approach until approximately 35 metres from the junction. If the entry deflection is reduced, which BC highways do not consider to be the case, this would not result in a significant increase in vehicle speeds on the final approach to and into the roundabout based on the approach road layout and speed limit. This was not raised in the RSA for the junction.

MKC also raised an issue on the Standing Way (S) approach, the proposed widening includes a sharp flare which may not accord with design standards. Also, the widening would require the removal of a hedgerow and re-siting of street furniture / statutory undertakers' equipment (street furniture relocation would also impact other arms). BC highways have no specific concern over the tapers at this location and no issue has been raised by the RSA. With regard to the existing vegetation and utilities on this arm, the vegetation is overgrown and can easily be removed. The Applicant has provided additional information on drawing 70069442-013 P03 to illustrate how the existing street furniture would be relocated within the scheme and this does not raise any concern.

**Figure 10: Junction 17 – Amended drawing detailing street furniture relocation**



MKC raises concern over the potential impact on the adjacent highway trees on Fulmer Street due to the addition of an extended flare. BC officers’ review of the widening on this arm indicates that no tree removal would be required, with satisfactory distance from the edge of the main carriageway and tree trunks being retained.

MKC also noted that on Standing Way (N) the proposals indicate widening through the provision of a sharp flare to the immediate south of the overbridge, which may not accord with highway design standards. BC highways have no specific safety concern over the tapers at this location and no issue has been raised by the RSA.

MKC raises concern over no indication being provided of lane allocations, vehicle tracking and circulatory traffic. This was raised by BC officers with vehicle tracking provided in a letter 7th April 2021 that indicates the new entry lane on Shenley Road would be a nearside lane left-turn only, thereby allowing for a narrower circulatory traffic provision as already exists for the current three lane entries. Furthermore, the vehicle tracking has shown that the movement of larger vehicles can be achieved with no issue or conflict.

MKC raises concern over flatter entry paths increasing vehicle speeds through the roundabout. A high-level review of the collisions in the updated TA details the collision record from 2014 to 2019. This review of the results did not indicate that entry speed to be a significant contributor to the existing collisions, nor was the potential impact raised in the RSA and therefore the geometric changes as detailed are considered to represent a road safety concern.

Issue was also raised in relation to the A421(N) exit in that this would be blocked by traffic from Junction 16 Elfield Park Roundabout. As detailed in the J16 review blocking to J17 in the MKC analysis has been accounted for as a worst-case scenario, whereby all vehicles would queue in the nearside lane only. This is not considered to be a viable conclusion and the BC highways analysis of the

queuing has indicated that no blocking to J17 would occur with adequate stacking space provided with no exit restriction in place.

Further modelling result concerns were raised in that the A421(S) exit would be blocked by traffic queuing from Junction 18 Windmill Hill roundabout. Also, increased queuing on both Standing Way approaches in the AM peak hour is predicted. In the PM peak worsening queues on Shenley Way and both Standing Way approaches with queuing on the Standing Way (N) arm increasing significantly to the extent that it would block the exit from the upstream J16 Elfield Park roundabout. The blocking back from J18 and to J16 is again based on single lane queuing and the analysis of on more equal queueing performed by BC highways indicates that no blocking back between junctions would occur.

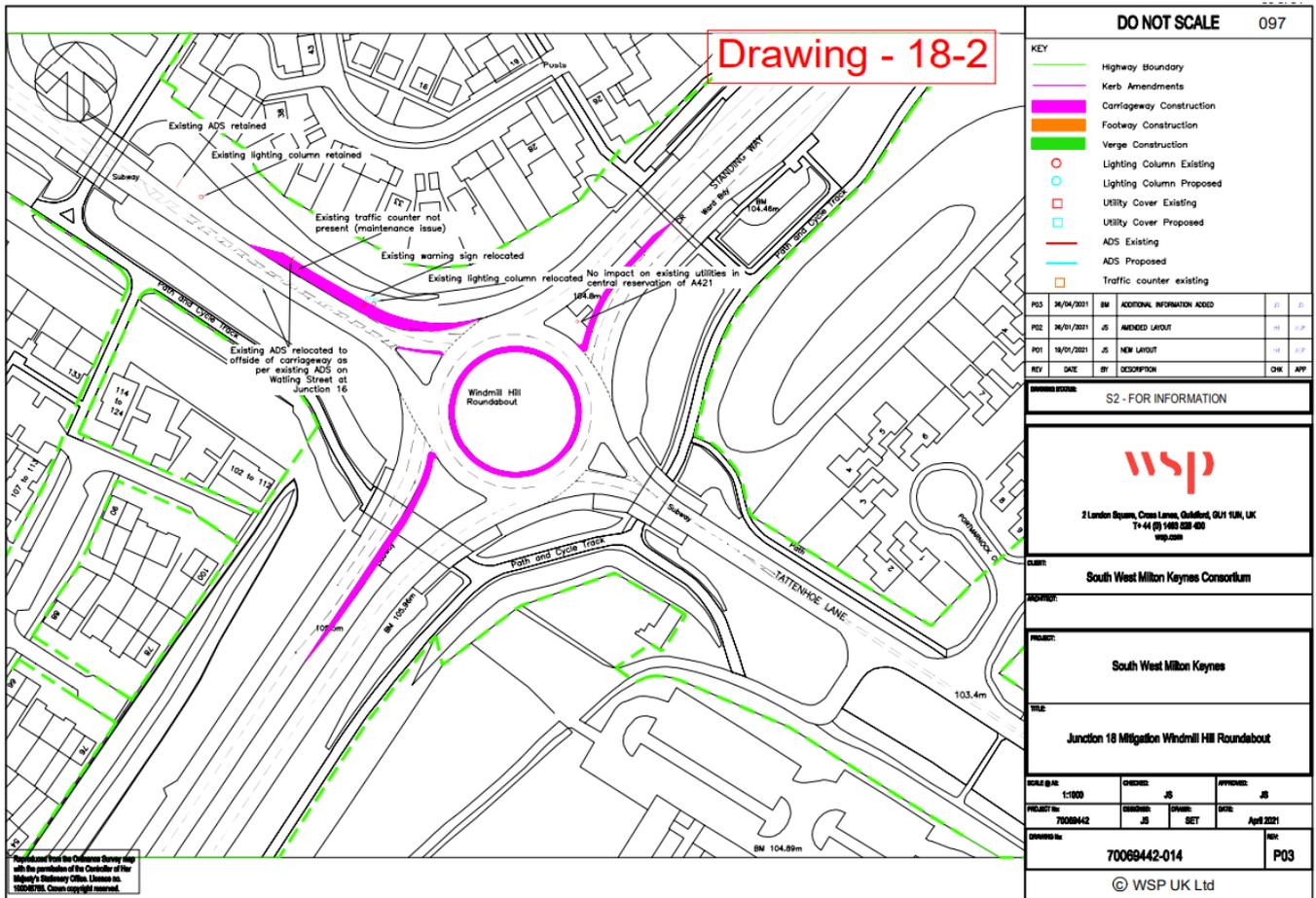
BC highways raised concern over the predicted negative impact on demand weighted Junction Delay in the PM and the resultant long queues on A421 Standing Way (N). The Appellant provided a response in a letter dated 7th April 2021. This provided details of a potential further mitigation measures that could be deployed at the junction, this involved conversion of the junction to part-time signal control. The Applicant does not consider that the further mitigation measures are required, with the TRN3 mitigation scheme showing overall junction improvement. The part-time signals are offered on a 'Monitor and Manage' basis and only implemented when considered necessary to do so. The S278 agreement could be developed to allow the flexibility for this approach. BC highways would support the use of the 'Monitor and Manage' approach to implement the design as and only if necessary, with the required trigger point to be determined by the respective parties.

The conclusion BC highways reached for J17 is the same as per the letter dated 13th April 2021. Concerns over geometric design have been reviewed and, in our opinion, resolved / responded to as detailed above. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the NPPF with overall improvement in capacity terms. The issue of blocking back to adjacent junctions has been discussed and clarified with none considered likely with the potential 'Monitor and Manage' option a viable alternative option.

**x. Junction 18: Windmill Hill Roundabout**

MKC noted that the mitigation scheme would require re-siting of street furniture, an ADS, and electronic traffic count equipment and that the ability to relocate should be confirmed at the planning stage. Whilst it is considered that this would be addressed as part of the s278 detailed design and approval process the applicant has produced a further drawing (7069442-014 P03) detailing relocation requirements and indicates that this can be resolved with no further issues.

**Figure 11: Junction 18 – Amended drawing detailing street furniture relocation**



Concern was also raised about the lack of directional / guidance markings and no vehicle tracking along with the widened entries in relation to the width of the circulatory carriageway. Vehicle tracking was provided by the applicant in a letter 7th April 2021 that indicates the new entry lane on Tattenhoe Street would be left-turn only, thereby allowing for a narrower circulatory lane provision as already exists for the current three lane entries. Furthermore, the vehicle tracking has shown that the movement of larger vehicles can be achieved with no issue.

Concern was also raised in relation to the potential worsening of entry path curvature. A review of the collision review in the updated TA did not indicate entry speed to be a contributor to the existing collisions, nor was the potential impact raised in the RSA and therefore the geometric changes as detailed are considered to represent a road safety concern.

Lastly, MKC raised concern over the proposed mitigation works result in increased AM peak hour queuing on both Standing Way approaches. In the PM peak hour, the predicted queue on Standing Way (N) would increase almost sevenfold, reaching the exit of the upstream Emerson Roundabout. As detailed in the response of the 13th April 2021 the demand weighted Junction Delay reduces in the AM from 225.69 to 163.86 seconds and in the PM from 136.59 to 133.11 seconds when compared to the 2033 DN existing layout. Tattenhoe Street would see a marked improvement operating under practical capacity (RFC of 0.85) with negligible queues and delay. Tattenhoe Lane would still operate above capacity but with an improvement in capacity operation and reduction in queues and delay. A421 Standing Way (N) would see an increase in queuing and delay, as well as A421 Standing Way (S) in the AM. Overall junction delay is reduced in both peaks, however no blocking of major node junctions is predicted to occur based on the BC highways more equal queue analysis.

The conclusion BC highways reached for J18 is the same as per the letter dated 13th April 2021. Concerns over geometric design have been reviewed and, in our opinion, resolved / responded to as detailed above. It is considered that the proposed mitigation scheme offers a viable alternative and is proportionate and reasonably related in scale to the impact of the development, as required by the

NPPF with overall improvement in capacity terms. The issue of blocking back to adjacent junctions has been discussed and clarified with none considered likely.

*xi. Junction assessment conclusions*

The overall conclusion from the MKC objection was to recommend that Buckinghamshire Council objects to the proposed development on traffic impact grounds, given the severe transport impacts predicted by the applicant in its TA/TRNs at locations which provide immediate and more strategic access between the BC and MKC highway networks.

BC highways are content that the network junction assessment has been performed via the use of industry standard modelling software with the base models undergoing a rigorous calibration process and that the comprehensive mitigation package for the local junctions, as detailed in TRN2 and TRN3, will reasonably accommodate the impact of the Proposed Development on the local junction network. This is taking into consideration the flows used are the 'worst case' scenario. The mitigation modelling with development traffic has shown that overall, most junctions will operate at the same level or better than the current layout using the DN scenario, whilst noting that some arms may perform worse but when considering each junction as a whole across both peak periods improvements can be observed and would therefore not be considered as a severe impact. It is further considered that concerns over geometric design and subsequent impacts on road safety have been reviewed and, in our opinion, resolved / responded to within this response with no severe impact in terms of queueing, delay or safety.

MKC stated that they would be liaising with the applicant on these matters and to discuss the scope of the additional work required which is likely to include additional mitigation design, network modelling and revisions to assessment documents including the ES. As detailed above the mitigation proposals are considered to offer viable, and deliverable, alternatives to the current road layout and are proportionate and reasonably related in scale to the impact of the development. In terms of network modelling, including a revised and widened area, is not considered proportionate to the development considering the robust modelling that has already been performed and analysed.

#### **4. Agreed conditions, works and contributions**

Further to the letter of 13<sup>th</sup> April 2021 and mindful of the above, the Highway Authority has no objection to the proposals subject to the obligations subject to a Section 106 Agreement and matters to be secured by condition below:

##### **Obligations:**

**A421 Corridor Improvements** - A contribution to be confirmed towards corridor improvements on the corridor of land and road, within Buckinghamshire Council jurisdiction, known as the A421 between Buckingham and Milton Keynes (index linked).

**Newton Longville Traffic Calming** A contribution to be confirmed towards the design, consultation, and implementation of a traffic calming scheme in the village of Newton Longville to mitigate the impact of the development traffic (index linked).

**Bus Service Provision** - An obligation to enter into a Service Level Agreement with a bus operator in line with the Public Transport Framework Specification dated 2<sup>nd</sup> March 2017, to a maximum agreed value to encourage sustainable modes of travel between the site and Milton Keynes and to support the aspirations and targets set out in the Travel Plan.

**Travel Plan** – To submit for approval a Detailed Travel Plan (for all land uses) in general accordance with the approved Travel Plan Framework and Buckinghamshire Council's Travel Plan Guidance for Developers. The approved Detailed Travel Plan shall be implemented upon occupation of the development and will be subject to annual review thereafter.

**Travel Plan Monitoring - £5,000** (index linked) towards the auditing for each of the commercial and residential travel plans (£1,000 per annum for a minimum period of five years (index linked)). If after 5 years the Travel Plans have not met their agreed targets, the Travel Plan monitoring period will be **extended** for a further 5 years and a further contribution of **£5,000** for each land use (index linked) will be required.

**Upgrade to Footpath 19 Parish of Newton Longville** - A contribution to be confirmed is required for the Off-site improvement of the footpath and associated bridge(s) between the site and the path to the footway between Nos. 36 and 38 Whaddon Road, Newton Longville of a 2m wide granite to dust path (or similar appropriate alternative) to provide greater connectivity between Newton Longville and the site.

**Whaddon** - A contribution to be confirmed towards road safety improvements through Whaddon village.

**Cycle Parking Provision** – A financial contribution to be confirmed to provide additional cycle parking at or within the vicinity of Bletchley Station and at other key locations to encourage sustainable modes of travel between the site, key attractors and the railway station and to support the aspirations and targets set out in the Travel Plan.

**Highway Works** – An obligation to enter into a Highway Works Delivery Plan to secure the delivery of the following works:

- 1) Improvements to Bottle Dump Roundabout and a Pegasus crossing on Whaddon Road in general accordance with drawings 70069442-004 Rev. P05 and to include CCTV camera provision and variable message signs.
- 2) Improvement to Whaddon Road/A421 Roundabout in general accordance with drawing 70069442-005 Rev. P04.
- 3) Improvement to the A421/Nash Road/Winslow Road roundabout in in general accordance with drawing 70069442-008 Rev. P04.
- 4) Site Access to Whaddon Road in general accordance with drawing D014 Rev. D.
- 5) Site Access to Buckingham Road to include toucan crossings on Buckingham Road (East) and the development access road in general accordance with drawing 0017D.
- 6) Improvements to Weasel Lane from Whaddon Road south-east to the property Weasels.

It should be noted that all highway works are subject to detailed design, including the Road Safety Audit process. Unless otherwise agreed by the Buckinghamshire Council, each Highway Agreement shall be subject to the following requirements:

- Payment of a bond, cash deposit, surety or other form of guarantee or security in respect of the works;
- Payment of the Buckinghamshire Council's legal costs in preparing and settling the Highway Agreement;
- Payment of the Buckinghamshire Council's engineers fees in the administration and inspection of the works that are subject to the Highway Agreement;
- Payment of any costs associated with new or amended Traffic Regulation Orders and commuted sums for further maintenance of adoptable highway items.

**Grid Road Reserve** – That the land identified for the grid road reserve is to be safeguarded and dedicated as highway in order to not prejudice the ability of the Buckinghamshire Council to deliver this scheme in the future. This will need to specify ongoing maintenance responsibilities of the verge and planting, either in the form of a commuted sum or a landscaping licence.

**NLO/19/1** – An obligation to dedicate a public bridleway along the alignment of Footpath NLO/19/1 between Weasel Lane and the railway line, under Section 25 of the Highways Act.

**Weasel Lane** – A contribution to be confirmed to resurface Weasel Lane outside the red line, from Whaddon Road south-east to the property Weasels' to provide improved connectivity to the wider rights of way network for leisure purposes.

Requisite highway improvements are to be secured under Section 278 Agreement, rather than a financial contribution.

### **Planning Conditions**

As stated previously, this Highway Authority considers that planning conditions are necessary to secure the following:

1. Construction Traffic Management Plan
2. Internal Infrastructure
3. Bus Service Phasing Plan
4. Whaddon Road Site Access Junction
5. Whaddon Road Site Access Visibility
6. Buckingham Road Site Access Junction
7. Framework Travel Plan

It should be noted that Milton Keynes Council has also recommended that transport related conditions be applied to any planning permission granted. Details of which are to be confirmed.

### **Informatives:**

Any subsequent planning consent as a result of this application will be subject to highway related planning informatives. These will be provided with the detailed conditions.

## **5. Conclusion**

Upon further review and analysis undertaken in response to the MKC consultation letter, the points raised have been resolved / responded to, and BC highways consider the assessment methodology to be appropriate and that the development impact is not considered to be severe. **The Council therefore concludes that the outline application is acceptable to the Highway Authority subject to appropriate transport planning conditions and a Section 106 Agreement to secure the appropriate works and contributions.**

If you have any queries regarding any of the above, please do not hesitate to contact me.

Yours sincerely



**James Bedingfeld**  
**Highways Development Management**  
**Planning Growth & Sustainability**

*Please note:*

*This advice is given at officer level only and is based on the facts and information you have supplied. It must be understood that the final decision on any planning application that may be submitted in the future rests with the Planning Authority.*



This page is intentionally left blank



**PRELIMINARY HIGHWAY OBSERVATIONS FOR: 20/01656/CONS**

**DATE:** 11<sup>th</sup> February 2021

**CONTACT:** SMT  
**TEL:** 01908 690463

**Outline planning application with all matters reserved except for access for a mixed use sustainable urban extension on land to the South West of Milton Keynes to provide up to 1855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school and a secondary school; a grid road reserve; multifunctional greenspace; a sustainable drainage system; and associated access, drainage and public transport infrastructure. (Buckinghamshire Council’s application 15/00314/AOP).**

**Summary of advice from Transport Development Management**

- |  |                                     |
|--|-------------------------------------|
| No objection   | <input type="checkbox"/>            |
| No objection subject to condition(s)                           | <input type="checkbox"/>            |
| Object to the Planning Application                             | <input checked="" type="checkbox"/> |
| Application needs amending and/or further information required | <input checked="" type="checkbox"/> |

---

**Milton Keynes Council requests that this note should be treated as a holding objection until a time that it has had the opportunity to consider new material recently submitted. Milton Keynes’ concerns are outlined in the following response from our Highway department.**

Introduction

This application represents minor revisions to the previous SWMK application (AVDC reference 15/00314/OAP). The changes are related to:

- i) Alignment of the pipeline across the site.
- ii) Changes to standards for climate change mitigation.
- iii) Housing for elderly residents.

These changes are not substantial. It is relevant to note that Milton Keynes Council objected to the previous application but their views were overlooked by AVDC. It is also relevant to note that a parallel application for the previous proposal to Milton Keynes Council (reference 15/00619/FUL) for physical improvement to Bottledump Corner and a new access on to the A421 to accommodate the development of land in

Aylesbury Vale District was refused by Milton Keynes Council and is currently the subject of a planning appeal. The reason for refusal was:

“That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and grid road network with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.”

## Summary

A new Transport Assessment (TA) was prepared as part of the appeal mentioned above and an identical TA accompanied this application, titled as “Updated Transport Assessment” (albeit it represents a completely new analysis and can be considered a new TA).

That new TA is now understood to have been superseded by the submission of TRN3 on 29<sup>th</sup> January 2021, as is the information submitted by the applicant / appellant in the intervening period. BC has very recently consulted MKC on TRN3 (and also on TRN2 which relates to its own highway network). MKC has commenced its own assessment of TRN3 and will respond under separate cover once it is able to do so; in the meantime, we trust that the following response is helpful.

In terms of traffic impact, which was the main concern of the Council last time around, the new TA took an entirely new approach, which is also reflected in TRN3. The previous TA relied on data from the Milton Keynes Traffic Model to test the impact within Milton Keynes but the new TA relies on a ‘count and factor’ approach. This means that new traffic surveys were done at a number of junctions early in 2020 (before the traffic conditions were affected by Covid) to give up-to-date base data. These were then growthed to 2033 using standard factoring (TEMPRO), with traffic from the development added in and junctions analysed using junction capacity models. The two key differences over the previous TA are the fact that there is no redistribution of traffic as congestion builds up (unlike when the traffic model was used) so traffic on a particular route just continues to grow. In addition, the forecast year is now 2033 not 2026, to reflect the time that has passed since the original application and the latest estimates for build out of the development. As a result of this forecast, the 2033 base network (no development) is more congested than the 2026 base in the previous TA.

Concerns have been raised with the applicant over evidence relating both to the ongoing appeal and this planning application. These discussions are ongoing and relate to matters including the Council’s serious concerns with the subsequent capacity analysis and proposed mitigation.

On the basis of the new TA, the final situation with all in place is worse than if the development doesn’t happen. This is defended in the TA on the basis:

- i) In practice there will be some redistribution of traffic on the grid road network.
- ii) The mitigation means that the situation is better than if the development came forward with no mitigation.
- iii) The residual impact is not severe as required in NPPF.

In response to these points it is considered they are not valid because:

- i) There is no analysis to show whether the spare capacity exists on alternative routes so, although this may be a possibility, it cannot be accepted at this stage.
- ii) The correct comparison is with the base situation not with the development with no mitigation.
- iii) The residual impact is considered severe as there is a significant reduction in performance even with the mitigation measures in place.

It is relevant to note that the mitigation package overall is more substantial than for the previous application, where improvements were proposed to the three main A421 roundabouts only.

#### Conclusion

Based on the new TA, the development has an adverse impact on the road network in Milton Keynes which is still judged to be severe with the proposed mitigation in place. On that basis, Milton Keynes Highways would recommend that Buckinghamshire Council objects to the proposed development on traffic impact grounds.

However, it is now understood that TRN3 updates the new TA in relation to junctions within Milton Keynes. The Council therefore reserves its position on the application until such time as it has had time to fully consider it.

Stirling Maynard Transportation

for

Milton Keynes Council – Transport Development Management



## HIGHWAY OBSERVATIONS FOR: 20/01656/CONS

DATE: 9th April 2021

CONTACT: SMT  
TEL: 01908 690463

Outline planning application with all matters reserved except for access for a mixed use sustainable urban extension on land to the South West of Milton Keynes to provide up to 1855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school and a secondary school; a grid road reserve; multifunctional greenspace; a sustainable drainage system; and associated access, drainage and public transport infrastructure. (Buckinghamshire Council's application 15/00314/AOP).

### Summary of advice from Transport Development Management

No objection	<input type="checkbox"/>
No objection subject to condition(s)	<input type="checkbox"/>
Object to the Planning Application	<input checked="" type="checkbox"/>
Application needs amending and/or further information required	<input checked="" type="checkbox"/>

---

**Milton Keynes' concerns are outlined in the following response from our Highway department.**

### Summary

Milton Keynes Council (MKC) has now been able to review the current suite of submissions by the applicant in respect of highways matters.

MKC objects to the proposed development, the supporting assessment for which predicts severe queuing and delay on the A421 corridor which is a key artery linking MK and Buckinghamshire, and on local roads around the site. MKC recommends that Buckinghamshire Council (BC) refuses to grant planning permission due to the practical and policy issues arising, including the predicted severe transport impact.

The Transport Assessment (TA) and TRNs do not meet the requirements of national policy as the severe traffic impact of the scheme would remain even with the proposed mitigation in place. Taking the applicant's alternative view that traffic would re-route, the TA / TRNs remain unacceptable as they provide no evidence of the scale, location and impact of that re-routing.

Chapters 10-12 of the Environmental Statement (ES) are based on the traffic flows used in TRN3. The Proof of Evidence of Martin Paddle (WSP)<sup>1</sup> on behalf of the applicant / appellant for the related MKC appeal<sup>2</sup> states:

6.10 The use of a manual spreadsheet-based approach to distribute and assign traffic is unable to account for the benefits of any dynamic reassignment that would arise in a congested urban network. It assumes that traffic volumes would increase at a junction indefinitely and ignores the fact that motorists will only accept a certain level of queueing and delay before either re-routing (i.e. to balance traffic flows across the network), re-timing (to outside of peak hours), or re-moding (i.e. to sustainable transport options) their journey. When used on a congested urban network, a manual-spreadsheet based approach would therefore present a robust assessment of the development impacts in that the extent of the impacts it identifies are unlikely to occur to the same extent.

Similarly, in the draft Highways Statement of Common Ground (SoCG) between WSP and MKC in relation to the Appeal for the planning application in the MKC area, WSP states:

*'this 'static' junction modelling approach would make no allowance for the dynamic reassignment of traffic across the wider highway network'*

Whilst WSP uses this as justification for arguing that its assessments present a worst-case in traffic terms, the argument undermines the validity of the traffic assumptions used in ES Chapters 10-12 which should be revisited based on evidence which accounts for rerouting of traffic across the network.

This is particularly pertinent given the strategic regional/national role of the A421, identified by Government as part of the Major Road Network, the operation of which is protected in Plan:MK policy.

MKC also raises serious questions as to the deliverability of much of the proposed mitigation on the Council's highway network for reasons including geometry/design standards, safety, impacts on street furniture (which it may not be feasible to re-site), utilities and arboricultural effects.

In the case of Bottledump roundabout (on the BC boundary) and the Tattenhoe roundabout, the WSP traffic models must be revised to more accurately reflect the likely operation of those junctions before the nature and extent of mitigation can be accepted.

In summary:

- The TA/TRNs need to be updated to fully illustrate the likely impacts of the proposed development, along with the identification of NPPF-compliant mitigation.
- Dependent upon the approach taken by the applicant, this will either require network traffic modelling, alongside updates to the ES, and/or the identification of deliverable mitigation schemes in line with the requirements of policy.

---

<sup>1</sup> 15<sup>th</sup> September 2020.

<sup>2</sup> Application 15/00619FUL and Appeal Ref APP/Y0435/W/20/3252528.

With regard to network traffic modelling, MKC would be happy to discuss options put forward by the appellant, which may include the preparation of new models covering a suitable area. Given that the approach taken in the TA/TRNs/ES diverges from the methodology used in existing models (e.g. in respect of trip generation), no direct comparisons can currently be drawn between WSP's latest analyses and the earlier strategic models held by the Council.

## **Introduction**

MKC objected to the previous application. A parallel application for the previous proposal to Milton Keynes Council (reference 15/00169/FUL) for physical improvement to Bottledump Corner and a new access on to the A421 to accommodate the development of land in Aylesbury Vale District was refused by Milton Keynes Council and is currently the subject of a planning appeal. The reason for refusal was:

“That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and grid road network with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.”

A new (2020) Transport Assessment (TA) was prepared as part of the appeal mentioned above and an identical TA accompanied this application, titled as “Updated Transport Assessment” (albeit it represents a completely new analysis and can be considered a new TA). That new TA is now understood to have been largely superseded by the submission of Transport Response Notes (TRNs), including TRN3 which was issued on 29<sup>th</sup> January 2021.

BC has recently consulted MKC on TRN3 (and also on TRN2 which relates to its own highway network). MKC is now able to provide the following initial comments.

## **Extent of Assessment Work**

Having agreed with BC and MKC that it would progress a TA (and then TRNs) using a traditional approach which does not refer to wider network traffic modelling, the applicant has the options to either:

- Take the conclusions of its TA at face-value and seek to mitigate them in the usual way – e.g. by reducing travel demand and physically mitigating the residual traffic impacts; or,
- If it is to argue the case that traffic would redistribute across the highway network, reducing specific predicted junction/link impacts, it must provide a comprehensive assessment of how much traffic would divert, to where, and with what effects.

At present, TRN3 indicates widespread congestion between junctions along the A421 between Bottledump roundabout and central Milton Keynes. The extent of queuing predicted by WSP is sufficient that queues from one junction would often extend back and block the exit of the upstream junction. Based on WSP's assessment within TRN3,

the residual impact is shown to be severe, as there is a significant reduction in performance even with the mitigation measures in place.

This is defended in the TA on the basis that, in practice, there will be some redistribution of traffic on the grid road network. However, the applicant provides no analysis to show whether the spare capacity exists on alternative routes so, although this may be a possibility, it cannot be accepted at this stage as a 'solution' to the predicted issues.

None of the submitted assessment work shows where/to what extent redistribution might occur and, given the extent of predicted queuing/delay as a result of the development, it is possible that the residual impact could still be unacceptable.

In coming to this view, MKC is mindful of matters including the potential social, economic and environmental impact of excessive queuing and delay which would undermine accessibility between Buckinghamshire and Milton Keynes, and would have a significant adverse impact on public transport reliability and emergency vehicle access. It is noted that the A421 is identified as part of the national Major Road Network, protected in policy.

The National Planning Policy Framework (NPPF) requires the provision of a TA for developments which will generate significant amounts of movement 'so that the likely impacts of the development can be assessed' (para 111). The NPPF defines a TA as a 'comprehensive and systematic process that sets out transport issues relating to a proposed development. It identifies measures required to improve accessibility and safety for all modes of travel...and measures that will be needed to deal with the anticipated transport impacts of the development'.

The present evidence base relating to the MKC highway network comprises of part of the 2020 TA and TRN3. The applicant argues that these documents over-predict impacts on the highway network, but provides no further assessment to quantify the extent and effect of any wider re-distribution of trips upon which it relies to mitigate the predicted severe operational impacts.

The applicant also refers to the initial agreement by BC and MKC of the scope of the 2020 TA. MKC Officers accepted the assessment methodology proposed by WSP, but did not and could not have accepted at that stage that the conclusions of the TA would be acceptable to the LHA, or that further work would not be required. The requirement for additional assessment is further evidenced by the subsequent submissions by WSP which include TRNs 1-3, reflecting the comments of BC Highways.

The current evidence base submitted by the applicant does not meet NPPF requirements for a TA, nor those set out in the National Planning Practice Guidance (NPPG) because:

- WSP states that actual effects would be different from those indicated in its reports, meaning that WSP's current evidence does not indicate the 'likely impacts of the development' as required;
- It does not assess the potentially-significant levels of re-routing, meaning that it is not 'comprehensive';

- Given that TRN3 predicts severe queuing and delay, the assessment does not identify the 'measures that will be needed to deal with the anticipated transport impacts of the development';
- No further studies have been presented – e.g. an assessment of the likely environmental and operational impact of roads and junctions affected by queuing and/or re-routing traffic<sup>3</sup>.

Consequently, MKC does not accept the transport evidence base submitted by the applicant. As noted, this must logically be updated either to address the predicted severe queuing and delay indicated in TRN3, or to provide an extended assessment including a network model capable of illustrating the location, extent and effect of rerouting (along with any required mitigation measures).

## Policy

In addition to the Plan:MK and NPPF policies quoted previously, the development would be contrary to NPPF:

Paragraph 7, which states that the purpose of the planning system is to 'contribute to the achievement of sustainable development', which is defined as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'.

Paragraph 8, which identifies three linked strands to sustainable development – economic, social and environmental objectives. The level of queuing and delay on the A421 and Buckingham Road, as predicted by WSP in TRN3, would have significant impacts across these strands, including:

- The economic impact on Milton Keynes and Buckinghamshire arising from severe congestion on the A421.
- Social impacts arising from mobility constraints on local residents, delays to public transport services and constraints to emergency vehicle access.
- Environmental impacts including new queues outside of local schools, stationary traffic on the A421, and unknown effects due to re-routing of vehicles across the wider network (not assessed in the TA/TRN or in the ES).

In the same vein, NPPF paragraph 102 requires that 'the potential impacts of development can be addressed' and that 'the environmental impacts of traffic and transport infrastructure can be identified, addressed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains'.

Paragraph 104 states that policies should 'identify and protect...routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development'.

At paragraph 108, the NPPF requires that 'any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree'. The

---

<sup>3</sup> NPPG Paragraph: 015 Reference ID: 42-015-20140306.

mitigation, as currently proposed, fails to achieve this and, as indicated subsequently, may not be deliverable.

Reflecting the above, paragraph 110, the NPPF requires that developments 'allow for the efficient delivery of goods, and access by service and emergency vehicles'.

The development as proposed does not accord with the NPPF in the above regard. The Council recommends that the application is refused planning permission given the predicted severe operational impact (contrary to NPPF paragraph 109), and in light of its likely economic, social and environmental impacts which extend across Local Authority boundaries and fail to meet the NPPF definition of sustainable development.

## **Junction Model Updates**

### *Junction 1: Buckingham Road/Sherwood Drive/Water Eaton Roundabout*

TRN3 proposes that the existing roundabout is retained and a scheme is implemented which involves footway narrowing around the roundabout in order to provide additional carriageway area.

On Sherwood Drive, it is proposed to remove much of the verge between the carriageway and footway. Street lighting columns are currently present within this area and it is unlikely that they can be retained/re-provided within the limited area of verge that would remain. The footway would therefore need to be moved to the west in order for street lighting to be retained, the achievability of which must be confirmed in relation to land availability and conflicts with utilities infrastructure.

On Buckingham Road, east and west of the roundabout, the footway and foot/cycleway would be narrowed in order to create additional exit lanes on the carriageway. It is again unclear whether street lighting could be retained as required.

The bus stop on the north side of Buckingham Road (eastern arm) is to be moved from a layby to on-carriageway, 86 metres upstream of the roundabout exit. This could cause a conflict if enough cars back up behind a stopped bus to cause a queue onto the roundabout. The bus stop is also to be moved further from the pedestrian refuge that currently allows pedestrians to cross the road. This move could encourage pedestrians alighting the bus to cross the carriageway away from the crossing point.

The proposals significantly affect the entry path curvature of the eastern (Buckingham Road) arm. The proposals effectively remove any entry path curvature at all. The applicant should review accident data and consider whether the slackening of the entry path could exacerbate any safety problems.

Visibility to the right from Water Eaton Road (southern arm) looking right along Buckingham Road (eastern arm) is limited when approaching the roundabout, which is slightly exacerbated by the proposals. If accident records show that visibility is an issue, it could be considered that the proposals are detrimental to highway safety – this should be reviewed by the applicant.

Issues relating to the position of street furniture post-widening are raised in the Road Safety Audit (RSA) undertaken by WSP. Whilst it is accepted that the junctions would

be subject to detailed design / Stage 2 RSA at s278 stage, the potential impact of accommodating street lighting in particular needs to be confirmed, given that it relates to the overall nature and deliverability of the proposed scheme.

*Junction 2: Buckingham Road / Shenley Road Mini-Roundabout*

The proposed scheme largely comprises carriageway widening into existing grass verge. It is proposed to remove around half the width of the footway on the northern side of Buckingham Road, to the west of the roundabouts, which is unacceptable in terms of pedestrian provision.

Furthermore, it is proposed to remove the layby on Shenley Road, to the north of the roundabouts, which currently provides a degree of protection for a vehicular property access 12m north of the junction. As noted in the RSA, this has potential safety implications for pedestrians and motor vehicles. The RSA and Designer's Response (DR) note this issue, and also a further problem in that it is unclear from the current drawings whether the pedestrian crossing islands around the junction are to be retained. Whilst it is reassuring that the DR states that drop-kerbs would be provided in relation to the Shenley Road property access, and that the pedestrian crossing islands are to be retained, this should be shown on the planning-stage drawings, rather than at s278 stage.

Under the proposals, the approach from Newton Road (southern arm) aims drivers in the right hand lane directly at the central island. This could make manoeuvring around the island difficult.

The forward visibility to pedestrians waiting to cross on the eastern side of Newton Road is worsened by the proposals. Taking an MfS SSD (given the speeds and environment), there is currently space to accommodate an approximately 41.9m SSD to the centre of the footway at the crossing. Under the proposals this is reduced to approximately 31.9m (both distances measured along the driver's path), as shown below:

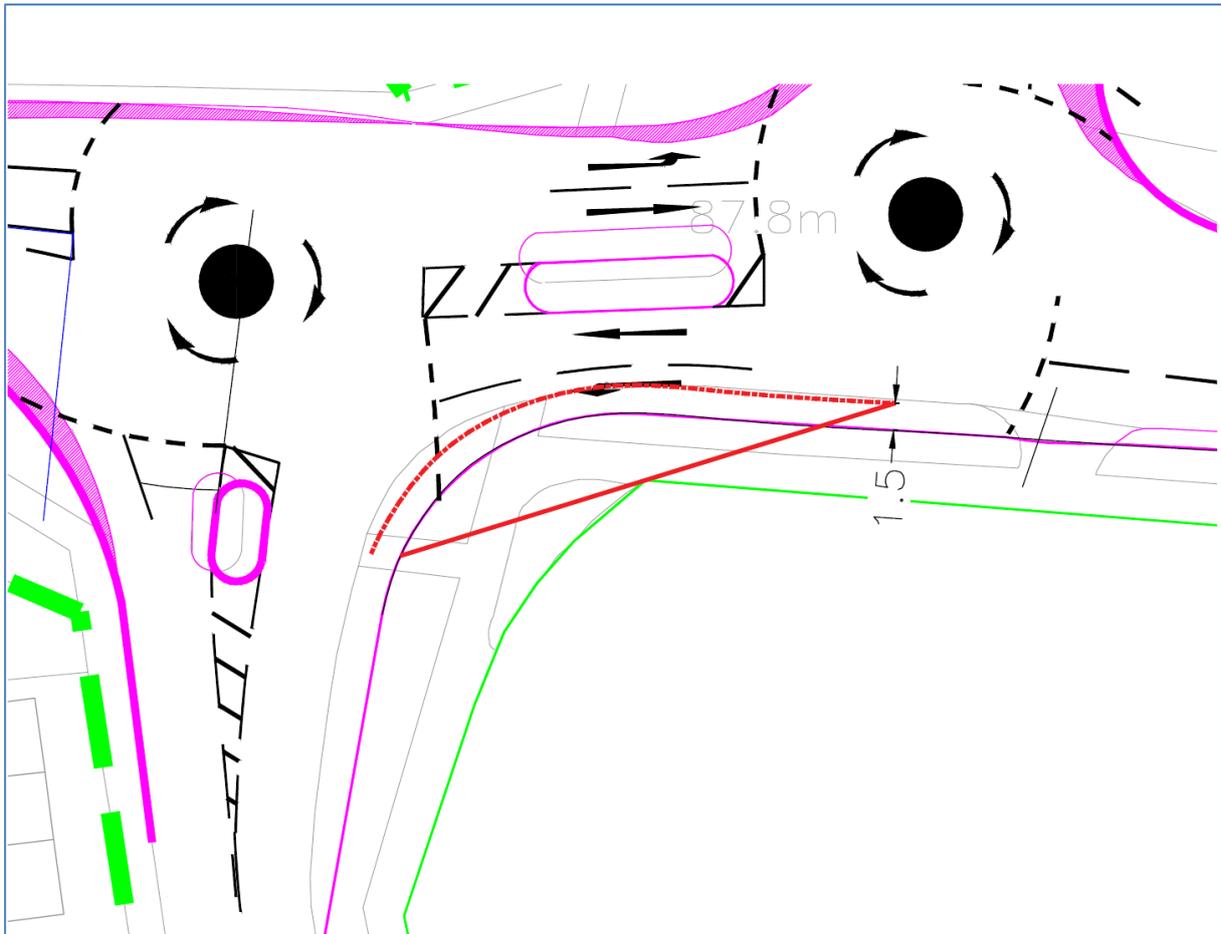


Figure 1: Forward visibility onto pedestrian crossing

Modelling indicates that development traffic would lead to a significant increase in queuing and delay on the westbound approach to the eastern roundabout from Buckingham Road. Queuing is predicted to increase from 47 to 133.5 vehicles, an increase of around 519m, with delay increasing from 129.22 seconds to 448.74 seconds per vehicle on that arm (an increase of 5.3 minutes).

The conclusion reached in TRN3 seems to erroneously compare the Do Something 1 Pre-Mitigation and Do Something 1 Post-Mitigation scenarios. The correct comparison is between the operation of the highway with and without development traffic - i.e. a comparison of 2033 Do Nothing (Pre-Mitigation) and the mitigated Do Something scenarios.

The increase in queuing on Buckingham Road would block back as far as Cottingham Grove to the east. By comparison with the without-development scenario, this queue would block an additional six side roads, two bus stops, multiple property accesses, a signalised crossing outside of a school, and would create congestion adjacent to that school (Holne Chase Primary) where none presently exists.

In summary, the scheme drawings are incomplete and unacceptable for planning determination purposes, and the proposed mitigation would not address the severe / unacceptable impact of development traffic.

### *Junction 5: Tattenhoe Roundabout*

Mitigation includes the signalisation of the junction.

The design drawings do not indicate an intention to reduce the speeds on approach to the roundabout as part of the signalisation. DMRB CD 116 states:

*4.1 Where the 85th percentile speed on the approach roads are greater than or equal to 104kph (65mph), a signal-controlled roundabout shall not be provided.*

Given that the proposed signalisation is on the A421, a national speed limit dual carriageway, the 85th percentile speeds should be confirmed, if the 85th percentile speeds are above 65mph then the viability of the signalisation is questionable.

There is a fundamental flaw with the model construction concerning the lane lengths that have been used for the gyratory and the resulting stacking capacity of these links.

This has previously been discussed, and WSP has therefore provided an explanation at TRN3 paragraphs 5.2.11 and 5.2.12. WSP implies that blocking back is of no concern as the longest queue on the gyratory is 3.1 PCU before the lights turning green, when considering the back of a Uniform Queue (UQ) (Table 5.5 within TRN3). 3 PCU equates to approximately 17m of queuing from the stop line, and a corresponding stacking capacity of 16-20m has been provided. However, a fluctuation of one vehicle on the gyratory could cause blocking back and impact on the junction's operation, as a single PCU (5.75m) would exceed the provided stacking capacity.

The UQ does not allow for such variations, and is not the appropriate queue measure. LinSig models queue lengths in three components, of which UQ is one. The Mean Max Queue (MMQ) is an average of those three components, and provides a more realistic indication incorporating the random and oversaturated queues. Lanes 1 and 2 on the west gyratory have a MMQ of 6.3 and 6.7 respectively, which is in excess of 34m of queuing space.

In any case, an articulated HGV stopped at the lights would completely or partially block the exits of the roundabout as shown in Figure 2:

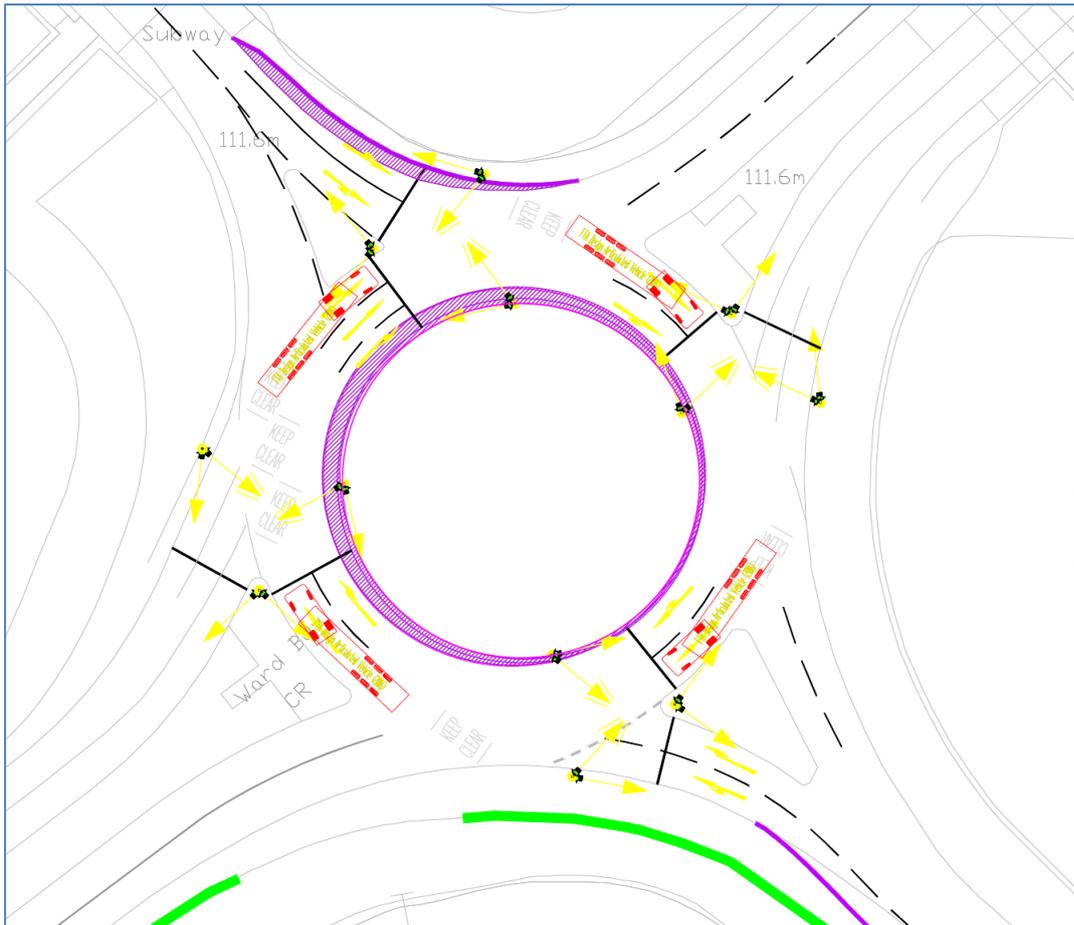


Figure 2: Roundabout exits blocked by HGVs

Keep Clear markings have been proposed to mitigate against this potential blocking back. Given that the junction is signalised and would be congested at busy periods, it is unlikely that these markings would be observed by drivers and they are not enforceable.

Keep Clear markings are not commonly used at roundabouts and the Traffic Signs Manual (6.9.2)4 states:

*'Although the Directions do not prohibit the use of the "KEEP CLEAR" marking (diagram 1026, S11-4-16) on roundabouts, there are still the potential problems of obscuration of sight lines and re-establishing priorities. These risks should be assessed carefully when considering whether the marking might help resolve problems caused by exit blocking.'*

By contrast, yellow box markings are enforceable, increasing compliance. However, there must be full time signal control on the roundabout entry where they are to be used. The Traffic Signs Manual explains that (6.9.1):

*'This is because a circulating vehicle has priority over those entering. If it stops to avoid obstructing the box when its exit is blocked, thereby releasing the flow*

*of entering vehicles, there is likely to be uncertainty over re-establishing right of way when the exit is clear again. Moreover, a vehicle stopped in an outer lane might obscure vehicles lawfully continuing to circulate on the inner lanes (whose exit might not be blocked) from the view of drivers entering the roundabout. Yellow box markings must not be used where part time signals are in operation.'*

In this case, the appellant proposes part-time (peak-hour) signalisation of the junction, which is incompatible with yellow box markings.

The gyratory lane lengths in the model would still need to be updated so that vehicles could not extend back onto these markings - this would reduce the stacking capacity of 16-20m to c.10m, sufficient for 1-2 PCUs, below both the UQ and MMQ measurements.

In relation to visibility, CD116 states:

*On an external approach to a signal-controlled roundabout, each traffic lane shall have clear visibility of at least one primary traffic signal associated with its particular movement, from a distance equivalent to the desirable minimum SSD of the approach road.*

It would appear that a desirable minimum stopping sight distance of 295m to any signal head on Standing Way (SW approach arm) can not be achieved within the highway boundary indicated on the drawings. It would also appear that a desirable minimum stopping sight distance of 215m to any signal head on Buckingham Road (SE approach arm) can not be achieved within the highway boundary indicated on the drawings.

The mitigation scheme drawing is lacking details such as road markings for the A421 approaches and guide markings on the circulatory carriageway. Vehicle tracking has been provided which indicates that Heavy Goods Vehicles (HGVs) would slightly over-run adjacent lanes and, in one location, would collide with a car running parallel. It would be normal for this to be examined in more detail and the matter resolved, including the assessment of two large vehicles travelling in parallel through the junction. This point is raised in the RSA and should be resolved in advance of determination of the application.

The NW approach arm currently has an entry path radius in the region of approximately 140m and the proposed geometry will worsen the situation.

The V1 Snelshall Street approach indicates a relatively sharp taper to two lanes immediately south of the overbridge north of the junction. This needs to be checked against design standards, as any requirement for a more gradual taper would require works to the bridge structure.

The RSA notes the potential requirement to relocate street furniture around the junction in order to accommodate carriageway widening. This should be confirmed at planning stage, particularly given the level differences and potential requirement for earthworks to accommodate any significant re-siting.

Additional detail is also required on the Buckingham Road approach, as the proposed widening does not illustrate how the carriageway centreline would be accommodated, how the exit lanes would operate, and over what length the approach lanes would develop. Neither does the drawing show the proposed extent of carriageway construction. An Advance Direction Sign for the roundabout is presently sited within the area indicated for carriageway widening and, given the importance of its location relative to the nearby junctions, the location for its re-provision needs to be confirmed.

In summary, the modelled operation of the junction is not accepted, as queuing around the roundabout would likely lead to exit blocking. Furthermore, the design needs to be worked-up in additional detail as there are matters which need to be confirmed in advance of determination, as they affect the deliverability of the design concept (and are therefore not detailed design matters as proposed by WSP).

#### *Junction 6: Bottledump Roundabout*

At Junction 6: Bottledump Roundabout, lane simulation has been used to effectively model the entry to the junction with a flare of 0 which, given that the approach to the roundabout has a clear flare, is inconsistent with the mitigation drawings that have been provided. TRN3 does not explain why lane simulation has been used in this way and it is noted that the percentage of vehicles using each lane has not been altered from the 50/50 default.

This removal of the flare effectively undermines the entry capacity formula by approximately 300 vehicles per hour (vph), and a revised model with the correct flare lengths must be prepared. This is likely to demonstrate that the mitigation proposed is unacceptable.

In relation to the proposed mitigation measures, the nearside kerb on the A421 westbound approach is already over-run by large vehicles turning left into Whaddon Road, but remains unaltered in the WSP design.

Whilst some limited widening is proposed on the A421 eastbound and Whaddon Road approaches, these already have two-lane entries to the junction, meaning that the actual benefit of such widening may not be as great as the model suggests.

Swept path analysis plans in TRN3 show that a HGV would collide with a car running in parallel around the junction for the westbound A421 movement, due to the significant encroachment of that HGV into the adjacent lane. No such tracking plans have been provided by WSP for movements including the left-turn into Whaddon Road, and the right-turn from the A421 into Whaddon Road. These should be provided in advance of determination.

Owing to the widening of the circulatory carriageway through reducing the size of the central island, the entry path curvature on all arms is reduced, which could lead to higher entry speeds.

A standalone Pegasus crossing is proposed on Whaddon Road, within the BC area, with links to/from the MKC area. It is recommended that BC requires the applicant to provide evidence that vehicle speeds in this area are, or could be, reduced to a level commensurate with the introduction of this crossing.

The RSA notes (problem 9) that the tie-in for WCHR to Buckingham Road is at the recycling centre access, which could cause conflicts. The auditors recommended that:

*It is recommended that good visibility splays, removal of vegetation, signing and enhanced visual features are proposed at this tie-in, warning vehicle users to expect WCHR activity.*

*The Designer's Response is:*

*2.9.1. Noted. Vegetation will be trimmed to ensure good visibility for WCHRs in this location and advance signage and markings will be used to ensure drivers using the recycling centre access are warned of the equestrian route. The specification and location of the features will be provided at the detailed design stage, which will be subject to a Stage 2 RSA.*

Although visibility within the highway boundary can likely be improved, there is also a fence around the recycling centre (within the BC boundary). This fence could obstruct horse riders emerging into the carriageway from the view of drivers leaving the recycling centre.

RSA (problem 11) highlights the lack of visibility of the new Pegasus crossing for vehicles traveling from the roundabout down Whaddon Road. The Designers state that the vegetation will be cut back and maintenance of this visibility will be the responsibility of Buckinghamshire Council. However, it seems from the design drawing that the visibility splay (as well as some of the widening) is outside of the highway boundary. There is no mention in the Designer's Response of any plans for this area to become Adopted. This should be clarified as it relates to the deliverability of the scheme.

In summary, the junction modelling is not accepted, as there would actually be significantly less capacity - and, hence, more queuing and delay, than predicted in TRN3. The proposed mitigation drawings should take account of the existing operation of the junction, including verge overrunning, and should be updated to address the above matters and avoid conflicts between vehicles that are currently shown on the tracking plans.

#### *Junction 12: Kingsmead Roundabout*

The proposed nearside widening on the Chaffron Way approach should be checked against design standards, as the taper to the immediate west of the overbridge appears sharper than would be expected. The position of the Vehicle Restraint System (VRS) barrier to the west of the overbridge should be checked, as its position on the plan appears to be further from the carriageway edge than is the case in reality.

The RSA notes the potential for side-swipe collisions on the junction, and WSP should provide tracking plots to demonstrate that it would operate safely.

These are matters which affect the potential deliverability of the proposed junction works and need to be confirmed at planning stage.

#### *Junction 14: Furzton Roundabout*

The junction design should be checked in terms of the need to relocate street lighting and ADS signage. Likewise, the sharp flare to the east of the bus stop on Chaffron Way should be checked against design standards, and consideration should be given to whether the nearside lane would better extend from the bus stop itself (with appropriate markings to control inappropriate use of the bus stop).

The area of widened carriageway on Chaffron Way is obscured from view on approach if a bus is using the bus stop immediately upstream. This could be an issue if vehicles are queuing in this lane.

These are matters which affect the potential deliverability of the proposed junction works and need to be confirmed at planning stage.

#### *Junction 15: Bleak Hall Roundabout*

The proposed mitigation scheme increases all approaches to three lanes. However, the drawing provides no indication of lane allocations, and no guide markings are indicated on the roundabout circulatory. These points are raised in the RSA. No vehicle tracking plots have been provided.

DMRB states that Circulatory Carriageway Width shall be between 1.0 and 1.2 times the maximum entry width, excluding any overrun area. The circulatory carriageway width (9.4m) is 0.86 times the maximum entry width (10.8m), below the standard set by DMRB. It is not clear whether, under the proposals, the three lane entries will allow three vehicles to circulate at once or if all three lane entries include a left turn only lane.

It appears that the widening on Standing Way leads to the right hand lane on approach having an entry angle of greater than the DMRB-recommended 60 degrees.

On all four approaches, the entry path curvature is worsened by the proposals and vehicles may enter the roundabout at a higher speed. The associated risks should be qualified by reference to the accident record.

The widening on the north side of Grafton Street (NW approach arm) appears to be partially on the subway structure. The distance from the carriageway edge to the railings on the bridge would need to be reduced, as well as the distance to the lighting column in this location. The drawings are not detailed enough to determine what the existing or proposed remaining distance from kerb to railing would be; however, it could be below the minimum 1200mm prescribed by CD127 (Cross Sections and Headrooms).

The addition of development traffic to the proposed mitigation scheme results in a further 58.5 vehicles queued on the A421 eastbound approach in the AM peak hour. This approach has queues which block back to the upstream junction, Elfield Park

Roundabout, in the base (without development) scenario. Consequently, this additional queuing would create further congestion at that location.

In the PM peak, there would be significant increases in queuing on Grafton Street (N) and A421 (E). With development traffic, the queue on Leadenhall Street would extend to the exit of the upstream junction (Leadenhall Roundabout). Similarly, the queue on the A421 (E) approach would block back through the upstream Coffee Hall Roundabout whereas, in the without-development scenario, the queue would be close to that junction but would not reach the roundabout itself.

The junction model takes no account of predicted exit-blocking from the downstream Elfield Park Roundabout (Junction 16) and consequently over-predicts capacity.

In summary, the proposed mitigation drawing is inadequate for planning determination purposes and does not address points raised in the RSA. Even with mitigation, development traffic would lead to either increased queuing at upstream junctions, or queues which would now block the exits from those junctions. The stand-alone model does not address exit blocking from the downstream Elfield Park Roundabout.

#### *Junction 16: Elfield Park Roundabout*

The proposed mitigation scheme comprises of localised entry, exit and circulatory carriageway widening.

TRN3 uses a stand-alone model which does not recognise the exit-blocking on the A421 (N) arm in the AM peak hour. However, the with-mitigation development scenario indicates significant increases in queuing on the A421 (S) entry arm in the AM peak, and on the A421 (N) arm in the PM peak.

The additional queuing on the A421(S) entry arm due to development traffic is predicted by WSP to cause queuing back to, and through, the upstream Emerson Roundabout. That queuing would not exist in the 2033 baseline.

Likewise, development traffic would add to pre-existing queuing on the A421(N) approach which blocks back through the upstream Bleak Hall Roundabout.

As indicated in the subsequent section, the A421(S) exit would be blocked by queued traffic from Emerson Roundabout.

As with other junction mitigation proposals, no lane or guide markings are shown within the drawing. Neither is vehicle tracking included within TRN3.

The proposed circulatory carriageway is marginally narrower than the maximum entry widths (not the 1.0-1.2 times recommended by DMRB).

The Watling Street (SE arm) exit has some road markings which are not tangential to the traffic island and should be corrected.

On all arms the entry path is made flatter and therefore vehicle speeds made faster by the proposals.

In summary, the scheme results in a worsening of conditions for pedestrians and queuing which interacts with other junctions in the vicinity. The scheme drawings lack the required level of detail and assessment for planning stage.

#### *Junction 17: Emerson Roundabout*

The proposed widening of the Shenley Road approach into the existing splitter island would result in an approach geometry which reduces deflection and may not accord with standards.

On the Standing Way (S) approach, the proposed widening includes a sharp flare which may not accord with design standards. This widening would require the removal of hedgerow and re-siting of street furniture / statutory undertakers' equipment, the acceptability of which must be established at determination stage.

On the Fulmer Street arm, the proposed approach widening would impact on street furniture and signage which could only be re-provided in that location with the significant loss of highway trees. Due to the level of the verge, above the carriageway, it is likely that the proposed widening would impact on the root systems of all trees along that carriageway frontage. An arboricultural impact assessment should be provided to determine the likely scope of impact.

On Standing Way (N), the proposals indicate widening through the provision of a sharp flare to the immediate south of the overbridge, which may not accord with highway design standards. This widening also impacts on services and street furniture including lighting columns and the VRS for the nearby subway.

The traffic islands on Shenley Road (SE Arm) and Fulmer Street (NW Arm) are directly in front of traffic emerging from the left hand lane of Standing Way on both arms. If these are to remain as a left turn only lanes, then this should be acceptable, but if drivers can now go straight on from this lane, it should be redesigned to point them at the circulatory carriageway.

The proposals include 10.5m wide, three-lane entries going into an 8.9-9.4m wide circulatory carriageway, i.e. 0.85 times the max entry width. This is below standard, and an 8.9m width is narrow for three lanes of traffic to negotiate, particularly if one of those lanes of traffic includes an HGV.

All entry path curvatures will be made flatter by the proposals to reduce the size of the central island, and could therefore lead to increased vehicle speeds.

As noted above, WSP predicts that the A421(N) exit would be blocked by traffic from Junction 16 Elfield Park Roundabout. Given that TRN3 utilises stand-alone junction models, this has not been accounted for by WSP, meaning that the junction model over-predicts capacity.

Likewise, TRN3 modelling indicates that the A421(S) exit would be blocked by traffic queuing from Junction 18 Windmill Hill roundabout.

However, taking the modelling at face-value, WSP predicts increased queuing on both Standing Way approaches in the AM peak hour. In the PM peak, TRN3 predicts worsening queues on Shenley Way and both Standing Way approaches - queuing on

the Standing Way (N) arm would increase significantly to the extent that it would block the exit from the upstream Elfield Park roundabout.

The proposed mitigation would appear to be outside of design standards, requires re-siting of street furniture / VRS, and has a potentially significant adverse impact on trees. The operation of the junction is predicted to create, and be impacted by, queuing at other junctions on the surrounding network. These are matters which affect the potential deliverability of the proposed junction works and need to be confirmed at planning stage.

#### *Junction 18: Windmill Hill Roundabout*

The proposed widening on the Tattenhoe Street approach would require re-siting of street furniture, an ADS, and electronic traffic count equipment. The proposed works to the Standing Way (N) arm would similarly impact on existing street furniture and statutory undertakers' equipment.

The scheme drawing omits to show a Give Way marking on the Tattenhoe Street arm, and has no directional / guidance markings, despite the proposed increase in entry lanes. No vehicle tracking plots have been provided to confirm the operation of the roundabout for large vehicles.

The entry widths have been enlarged to 10.5m. The carriageway width is 9.1m. This means that the carriageway width is 0.86 times the max entry width.

On all arms the entry path curvature is made worse by the proposed widening. The proposals may cause the Tattenhoe Lane arms to become sub-standard; however, more precise locations of existing road markings would need to be provided to confirm this.

With the addition of development traffic, the proposed mitigation works result in increased AM peak hour queuing on both Standing Way approaches. In the PM peak hour, the predicted queue on Standing Way (N) would increase almost sevenfold, reaching the exit of the upstream Emerson Roundabout.

The physical effects of the proposed mitigation should be confirmed at planning stage, and a complete scheme drawing / tracking plots should be provided. However, the proposed scheme still results in interaction with other nearby junctions, the impact of which has not been assessed in the current modelling.

### **Conclusion**

On the basis of the information set out above, Milton Keynes Highways would recommend that Buckinghamshire Council objects to the proposed development on traffic impact grounds, given the severe transport impacts predicted by the applicant in its TA/TRNs at locations which provide immediate and more strategic access between the BC and MKC highway networks.

MKC would be please to liaise with the applicant on these matters and to discuss the scope of the additional work required which is likely to include additional mitigation design, network modelling and revisions to assessment documents including the ES.

Stirling Maynard Transportation

for  
Milton Keynes Council – Transport Development Management

This page is intentionally left blank



---

### Appeal Decision

Inquiry opened on 11 May 2021

Site visits made on 10 May 2021 and 26 May 2021

**by Martin Whitehead LLB BSc(Hons) CEng MICE**

**an Inspector appointed by the Secretary of State**

**Decision date: 26<sup>th</sup> July 2021**

---

**Appeal Ref: APP/Y0435/W/20/3252528**

**Land at Buckingham Road, Tattenhoe Roundabout, Standing Way to Bottledump Roundabout, Milton Keynes**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by South West Milton Keynes (SWMK) Consortium against the decision of Milton Keynes Council.
  - The application Ref 15/00619/FUL, dated 30 January 2015, was refused by notice dated 15 November 2019.
  - The development proposed is described on the decision notice as: *'physical improvements to the Bottledump roundabouts and a new access onto the A421 (priority left in only) to accommodate the development of land in Aylesbury Vale District reference 15/00314/AOP (for Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure - EIA development).'*
- 

#### Decision

1. The appeal is allowed and outline planning permission is granted for physical improvements to the Bottledump roundabouts and a new access onto the A421 (priority left in only) to accommodate the development of land in Aylesbury Vale District reference 15/00314/AOP (for Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure - EIA development) on land at Buckingham Road, Tattenhoe Roundabout, Standing Way to Bottledump Roundabout, Milton Keynes in accordance with the terms of the application 15/00619/FUL, dated 30 January 2015, subject to the conditions in the attached schedule.

#### Preliminary and Procedural Matters

2. The above descriptions of the appeal site and the development proposed are those given on the decision notice and have been agreed with the appellant.

The application was submitted in outline form with all matters of detail, except access, to be considered later. The application describes the site as being 'Land south of the A421, west of Far Bletchley, north of the East West Rail Link and east of Whaddon Road, Aylesbury Vale'. However, all the development site, except two of the proposed accesses, are within Aylesbury Vale District, the Council of which is now part of Buckinghamshire Council (BC). In these circumstances, I consider that the descriptions of the site and development given on the decision notice are more applicable to the proposal that was considered by Milton Keynes Council (the Council) and I have therefore determined the appeal based on these descriptions.

3. Separate applications for costs have been made against the appellant by the Council and by Newton Longville Parish Council & Bletchley Town Council (the Rule 6 Party). These 2 applications are the subjects of separate decisions.
4. The Inquiry opened on 11 May and sat for 9 days. I closed the Inquiry in writing on 17 June 2021, following the receipt of written closing submissions. I made an unaccompanied site visit between 1400 hours and 1500 hours on 10 May, before the Inquiry opened, and another unaccompanied site visit between 1330 hours and 1730 hours on 26 May to observe the site accesses and the relevant junctions, including during the PM peak traffic conditions.
5. The Government has published an update to its National Planning Policy Framework on 21 July 2021 (2021 Framework) which replaces the previous version of the Framework published in February 2019. It sets out the Government's latest planning policies for England and how they are expected to be applied. Whilst most of the paragraph numbers to the policies in the February 2019 version that were referred to at the Inquiry have changed, the wording has not been altered. I have therefore used the paragraph numbers in the 2021 Framework that relate to those policies referred to in the 2019 version.

### **Main Issue**

6. The main issue is the effect of the proposed development on highway safety and the flow of traffic and congestion on the highway and Grid Road network, and in particular the A421 Standing Way and B4034 Buckingham Road.

### **Reasons**

#### ***Development Plan***

7. The development plan includes Plan:MK 2016-2031, which was adopted in March 2019. The reason for refusal refers to the following 2 policies in Plan:MK.
8. Policy CT1 indicates that the Council will promote sustainable patterns of development, including a safe, efficient, and convenient transport system, transport choice to provide a genuine alternative to the car, and the management of congestion.
9. Policy CT2 seeks to ensure that new development minimises the need to travel, promotes opportunities for sustainable transport modes, improves accessibility to services, and supports the transition to a low carbon future. Part A of the Policy lists criteria to be considered in determining whether new development should be permitted. Criterion A1 requires the development to integrate into

the existing sustainable transport networks and to not have an inappropriate impact on the operation, safety, or accessibility to the local or strategic highway networks.

10. The Council has also referred to Plan:MK Policy SD15, which establishes place making principles for sustainable urban extensions in adjacent local authorities. These include, in part B6, the requirement that technical work be undertaken to fully assess the traffic impacts of the development on the road network within the city and nearby town and district centres and adjoining rural areas, and to identify necessary improvements to public transport and to the road network.

***Development under planning application reference 15/00314/AOP***

11. This appeal development would provide access to the proposed South West Milton Keynes (SWMK) development in Aylesbury Vale District that has been submitted for outline planning permission under planning application ref 15/00314/AOP and is to be considered by BC. Whilst at the time of the Inquiry no decision had been made by BC regarding the application, none of the parties at the Inquiry disputed the principle of this mixed-use development on land which is allocated for that purpose in the emerging Vale of Aylesbury Local Plan (VALP), and the Council has not objected to this allocation.

***Design***

12. I have considered the use of the Design Manual for Roads and Bridges (DMRB) to design the mitigation measures at the existing roundabout junctions, as suggested by the Council. However, the existing layouts do not meet the standards set in the DMRB and no records of any existing safety problems at these roundabout junctions have been provided. Furthermore, the Stage 1 Road Safety Audits (RSAs) that the appellant has had independently carried out to assess the mitigation proposals have not indicated any significant road safety issues that would not be able to be addressed.
13. DMRB Document GG 101: Introduction to the Design Manual for Roads and Bridges advises that the DMRB provides requirements which shall be applied to the appraisal, design, maintenance, operation and disposal of motorway and all-purpose trunk roads, and notes that they can be applied to other roads with the approval of the specific highway or local authority acting as the 'Overseeing Organisation'. It then advises that, where DMRB requirements are applied to other roads, the specific highway or local road authority acting as the Overseeing Organisation should decide on the extent to which the requirements are appropriate in any given situation.
14. The roads within the Grid Road network are not trunk roads and therefore the DMRB indicates that it is discretionary whether the standards should be applied. At my site visit I observed that the roads in the network do not convey the same characteristics as a trunk road or motorway, being more within an urban setting, with accesses to industrial and commercial premises and housing estates taken directly from the roads.
15. Although the A421 Standing Way is dual carriageway and subject to national speed restrictions, there are a significant number of junctions and crossings, together with bus lay-bys, along it which do not meet DMRB standards of design, in terms of such things as deceleration lanes and flare lengths. As

such, I consider that it would be inappropriate and disproportionate to expect any design of mitigation at the roundabout junctions to be to the DMRB standards, particularly as I have no substantive evidence to show that there are any significant safety issues that need to be addressed, as indicated by the RSAs.

### ***Transport Assessment and Modelling Approach***

16. The evidence indicates to me that, following the refusal of planning permission, the appellant's transport experts agreed with transport experts representing BC and the Council the scope of an updated Transport Assessment (TA). This included the appropriate study area, the extent of data collection, trip generation and the modelling methodology.
17. The methodology that has been agreed is that which has been used by the appellant for the Updated TA. That agreement appears to me to have been reached with detailed and local knowledge of the highway network concerned, including existing congestion, congestion predicted through the Milton Keynes Multi-Modal Model (MKMMM), and the potential for re-routing. This methodology uses a static spreadsheet model, collecting baseline traffic flows and applying TEMPro growth factors to 2033, and does not use the strategic MKMMM. Whilst the MKMMM was used for the 2016 TA that was considered with the application and was used as evidence base for the recently adopted Plan:MK, it has a 2009 base date.
18. The static spreadsheet model approach does not account for modal shift to alternative means of transport or the re-timing of trips to avoid peak periods. Neither does it account for dynamic reassignment away from congested areas. As such, I am satisfied that it provides a robust, worst case analysis of traffic impacts, particularly on the A421, and the traffic impact that has been modelled does not rely upon the redistribution of traffic to other routes in order to avoid any unacceptable congestion. As the redistribution of traffic has not been modelled, I have not taken it into account in my assessment of the traffic impacts on the Grid Road network.
19. I find that it would be unnecessary and disproportionate to undertake a microsimulation modelling exercise, as suggested by the Council. Potentially it would result in an unrealistic representation of traffic reassignment on the routes which were included, given that it would need to cover an extensive area. In addition, further detailed static junction models would be required using junction modelling software.
20. I agree with the appellant that an update to the MKMMM would require considerable work and would take a significant time to complete, needing further calibration and validation surveys. A manual reassignment would also be impracticable and unreliable, as it would have to cover an extensive area to fully calibrate and validate the model. Furthermore, it may well not have any better results from those used, given that the A421 corridor has been found to be the most congested part of the network.
21. The MKMMM Reference case, which includes the proposed SWMK development, was used as part of the Examination of Plan:MK, at which the Council advised that it assumed little in terms of behavioural change and so was likely to represent a worst-case scenario, given the aims of its Mobility Strategy for 2018 – 2036. In his Report on the Examination of Plan:MK, the Inspector

- appears to me to have accepted the advice given by the Council that the 'unique' Grid Road network provides fast roads with limited congestion and comparatively good journey times, and that, even taking account of the SWMK development, additional development would not add significantly to journey times.
22. The Plan:MK Inspector did accept in the Report that committed growth is likely to increase average journey times across Milton Keynes but considered that, overall, the road network will experience limited congestion in comparison to other similar urban areas, irrespective of the potential for modal shift. The MKMMM Reference case indicates that many of the junctions where the Updated TA and Transport Response Notes (TRNs) show that mitigation is required based on static modelling perform within capacity when considering the redistributive effects accounted for in the strategic model, even with an unmitigated SWMK development in place.
23. The appellant has taken the results of the Updated TA and sought to mitigate the impacts through junction improvements. I accept the position of the appellant and BC that some redistribution of traffic is likely, but the appellant does not appear to me to have relied upon this in determining the mitigation and reaching its conclusions as to the acceptability of the traffic impacts of the SWMK development. As such, I am satisfied that it is not necessary to attempt to model any redistribution effects over the wider area, especially as the amount of extra work that would be required to provide anything that would be accurate enough to assess would be disproportionate in time and expense.
24. In terms of the robustness of the TEMPro growth factors, the Office for Budgetary Responsibility's (OBR) March 2020 population and economic projections show a reduction in growth of GDP per capita of 23.7% between 2019 and 2069 and an 8.4% reduction in population growth, compared to previous estimates. The appellant has indicated that, as a result, the DfT requires all new transport schemes to undergo sensitivity testing to assess the impacts of the changes in the OBR forecasts.
25. The appellant has suggested that, adopting a low growth sensitivity as set out in the DfT's TAG Unit M4 Forecasting and Uncertainty (May 2019) would result in a growth rate of 6% from 2020 to 2033, as opposed to the 15% assumed in its TA and TRNs. Furthermore, an up to date survey-based research report regarding the effects of Covid-19 restrictions on travel, referred to by the appellant, indicates that future commuter trips to work by car will reduce significantly and by as much as 13.8% with employees working from home. Whilst the effects of homeworking as a result of the Covid-19 restrictions may not be long term, overall, the above matters indicate to me that the TEMPro growth factors applied by the appellant will result in traffic flows well above those that are likely to occur in 2033.
26. I have had regard to other concerns expressed about the robustness of the modelling approach. Those regarding the number of vehicle trips to and from secondary schools have not been substantiated, given the likely level of walking and cycling and the large residential area adjacent to the school in West Bletchley. Concerns about the adjustment made to the TEMPro growth assessment because of the occupation of households in Kingsmead South and Tattenhoe Park have not been justified and would make very little difference to traffic flows. Concerns about the survey data due to road closures in place to

the north of Milton Keynes have also not been justified and the appellant has suggested that they were known about and would have had no effect on the robustness of survey data. This has not been contested using any substantive evidence. I am satisfied that the appellant has adequately addressed these, and the other, concerns raised.

### ***Planned Future Initiatives and Development***

27. In support of the appeal, the appellant has referred to some of the Council's recent documents. These include its Milton Keynes First/Last Mile Travel document (2017) in which the Council has outlined strategies to achieve its objectives given in Plan:MK of improving public transport services and cycling and walking networks and managing congestion. This document recognises that, without much greater investment in the public transport system, greater growth in the economy beyond 2031 could be stifled.
28. The Milton Keynes 2050 Growth Study Mobility and Mass Rapid Transit Study (2019) recognises that the Council's aspirational growth of Milton Keynes needs to be intrinsically linked to the delivery of an efficient, 21st century public transport system. The Study has investigated the delivery of a Rapid Transit network that would include 'Line 10' to serve allocated growth to the south west of Milton Keynes and has identified a park and ride location near to the proposed SWMK development. The Mobility Strategy aims to reduce private car use for inter-borough commuter trips from 85% to 60%. I am satisfied that the measures that have been put forward would be achievable and, although there does not appear to be any immediate commitment by the Council, would be likely to come forward before 2050.
29. The Mobility Strategy for Milton Keynes 2018 – 2036 (LTP4): Transport Infrastructure Delivery Plan (2019) is the most up-to-date Local Transport Plan for the area. Amongst the transport strategies that it sets out are pinch point junction improvements to be carried out within 5 to 10 years, including some on the A421. Sources of funding for the improvements have also been identified in LTP4. The appellant has suggested that improvements to the A421 would be eligible for Government funding through the Major Road Network scheme, being able to comply with the scheme's objectives of reducing congestion and supporting the delivery of housing. I find that such improvements would be likely to take place and be funded by 2029 at the latest, particularly as they accord with Policy CT8A of Plan:MK, which provides for enhancements to the Grid Road network.
30. The LTP4 includes an initial 'Modal Action Plan' which covers infrastructure priorities over the next 3 years. The infrastructure priorities would, amongst other things, seek to provide new cycle routes to extend the Redway network; review car parking in Central Milton Keynes; enhance Smarter Travel Team services to support, undertake and monitor residential education and employment travel planning; and improve bus stop infrastructure and bus fleets. These initiatives should have an impact on reducing congestion on roads in and around Milton Keynes.
31. The Council's Strategy for 2050 (2020) identifies seven 'big ambitions' which include the aim to '*make it easier for everyone to travel on foot, by bike and with better public transport*'. The Strategy acknowledges that traffic congestion in Milton Keynes is not at the levels seen in other United Kingdom towns and cities but, without intervention, some grid roads would exceed their

capacity. To address this concern, it commits the Council to future measures which include improving and extending the Redways and delivering a mass rapid transit network.

32. None of the impacts from the above planned initiatives have been allowed for in the forecast traffic. I am satisfied that at least some of them would be likely to come forward in the short to medium term, or at least by 2033, which is the projected year for the appellant's assessment. As such, the assessment will have most likely overestimated the traffic volumes and need for mitigation, especially if the initiatives for junction improvements at some of the identified pinch points on the A421 are implemented. Furthermore, Milton Keynes Strategy for 2050: Growth Options Assessment (2020) includes the SWMK development in one of its spatial options that also includes additional land delivering 10,000 new homes and does not identify congestion on the network as a constraint to development.

### **Travel Plan**

33. The appellant has provided a revised (2020) Framework Travel Plan, which is an update of the 2016 document. Whilst the Council has criticised the provisions of the Travel Plan, I am satisfied that an appropriate planning condition under the SWMK development approval to secure an approved travel plan would overcome these criticisms. BC has indicated that the implementation and monitoring of commercial and residential full travel plans would specifically be secured through a Section 106 Agreement for the SWMK development, in accordance with the draft document, along with substantial funding for highways matters, including up to £2million of funding for bus provision.
34. I have noted that the trip rates from TRICS used in the 2020 TA and subsequent TRNs 1-3 refer to some sites that already have travel plans. However, as BC has pointed out, the TRICS data used in the trip generation is based on 'person total trips', and not 'modal trips', which are not affected by travel plans. Therefore, I consider that this matter gives no justified reason to discount any modal shift as a result of a travel plan being implemented for the SWMK development, even if it only offers measures that would be expected from a travel plan. The Government, in its Planning Practice Guidance (PPG), indicates that it is supportive of travel planning and that its benefits can be considered in a TA.
35. The appellant has suggested that it agreed with the Council and BC that a sensitivity test to take account of the benefits of a development travel plan should be based on an assumption of a 12% reduction in car driver trips to/from the SWMK development. Although it seems to me to be an ambitious target, there is nothing before me to indicate that it would not be achievable. Furthermore, the Plan:MK Inspector suggested in paragraph 183 of his Report that *'the ambitions for modal shift are realistic reflecting the current low base in public transport patronage and walking and cycling and the potential to upgrade and extend infrastructure for non-car based travel'*.

## **Access Design**

### *A421 Left-in Site Access*

36. I am satisfied that the proposed left-in only access on the A421 has been designed in accordance with relevant design standards, and there is no requirement for a capacity assessment as it would be a free flow access to the development. It would include a deceleration taper that would be longer than most of those at other accesses to development from the A421 Standing Way.
37. Whilst Old Buckingham Road would need to cross the access, at my site visit I observed that it does not appear to me to be an official route for cyclists and pedestrians and has a barrier across its ends at Buckingham Road and Whaddon Road to prevent vehicular access. It is not designated as a Public Right of Way, cycle route or Redway and the only measure that the Stage 1 RSA recommended was the introduction of a Vehicle Restraint System.
38. The proposed diverted route of Old Buckingham Road would not be the most direct. However, I accept that it would provide a safe crossing location and it is not unusual that a balance needs to be struck between the 5 criteria, given in the DfT Local Transport Note 1/20 (LTN1/20): Cycle Infrastructure Design, of being coherent, direct, safe, comfortable and attractive. I am satisfied that the evidence demonstrates that an acceptable crossing, which would be subject to further detailed design following any recommendations in a Stage 2 RSA, would be deliverable to ensure that Old Buckingham Road would be available for use by pedestrians and cyclists without compromising their safety.

### *Buckingham Road Site Access*

39. Access to the SWMK development site from Buckingham Road would be provided by a new roundabout junction as part of the appeal development. Buckingham Road is a 'B' classified road and therefore the strict application of the DMRB is not required, including for the design of the entry widths. I am satisfied that, based on the actual surveyed 85th percentile speed of traffic along Buckingham Road, the required 'Stopping Site Distance' for vehicles approaching the junction along Buckingham Road from the east would be able to be accommodated within the public highway and on land within the appellant's control. Furthermore, should the Stage 2 RSA recommend any changes, these would be able to be accommodated within the land that would be available.
40. The Toucan crossing proposed on Buckingham Road between the site access and the Tattenhoe Roundabout has been shown on the drawings as being sited to tie into the existing uncontrolled crossing point from the shared cycle/footway which forms part of the Redway. I am satisfied that amendments could be made to the bellmouth of Old Buckingham Road to ensure that this crossing would be safe without preventing access to Old Buckingham Road, given vehicular rights over it have been extinguished. It would integrate with the existing 3m wide Redway route on the northern side of Buckingham Road, and the design guidance for cycle tracks provided by LTN1/20 allows for shared cycle/footways of 3m in certain circumstances.
41. I conclude on this junction that it has been designed in sufficient detail to demonstrate that it would be safe, or would be able to be made safe with minor amendments that might be recommended by a Stage 2 RSA, particularly

with regard to the provision of adequate visibility, its entry widths and pedestrian and cycle crossings.

### **Mitigation**

42. The appellant has listed and numbered 18 junctions at which the modelling identifies the greatest impact on traffic congestion. It has submitted plans and details of the form of mitigation that it has proposed to be carried out at some of these junctions. This mitigation would be subject to agreements under Section 278 of the Highways Act 1980 and these agreements would be secured by a Grampian Condition. Under these agreements, detailed designs with Stage 2 RSAs will need to be presented to the respective highway authorities for approval. The drawings provided for assessment at this appeal are to be used to determine whether the overall principle of the junction design is achievable and acceptable. Therefore, I accept that the use of Ordnance Survey mapping rather than topographical surveys is appropriate.
43. I have examined those junctions where concerns have been raised about whether the proposed mitigation would be deliverable, safe, and effective in reducing congestion.

#### *Junction 1: Buckingham Road/Sherwood Drive/Water Eaton Road Roundabout*

44. With regard to the proposed mitigation at this existing roundabout junction, I find that there would be sufficient provision for pedestrians/cyclists and the improvements would allow a wide enough footway for pedestrians to safely pass at the pinch points and for lighting columns to be relocated where necessary. There are no accidents identified at this location from the data presented in the Updated TA, and insufficient evidence has been provided to show that the proposed reduction in visibility to the right at the roundabout on Water Eaton Road would present a safety concern, given that it has not been raised by the Stage 1 RSA. As such, I am satisfied that the proposed mitigation at this junction would be deliverable, would not cause any safety concerns and would be effective in reducing congestion.

#### *Junction 2: Buckingham Road/Shenley Road/Newton Road Double Mini roundabouts*

45. The junction comprises two mini roundabouts separated by a short length of Buckingham Road. The easterly roundabout forms a junction with Shenley Road to the north and the westerly roundabout forms a junction with Newton Road to the south. All the roads at this junction are single carriageway and are constrained by buildings and property, including shops and houses. Due to these constraints, vehicle speeds through the junction are likely to be significantly less than the 30mph speed limit.
46. The proposed mitigation includes the removal of the lay-by on Shenley Road and its replacement by an additional lane to provide greater capacity at that junction. At my site visit I observed that, although it has double yellow lines at the side of the road, the lay-by was being used for parking either side of the driveway access from it. In my opinion, its removal would improve safety for this access as well as for pedestrians.
47. The entries to the roundabouts would be widened and the islands at the pedestrian crossings would be retained. Whilst there would be a resulting reduction in footway widths and a change to the carriageway alignment, I find

that the footways would be wide enough and, given the likely speed of the traffic, the visibility would be sufficient to ensure that safety would not be compromised. Furthermore, the Stage 1 RSA did not raise any concerns.

48. The worst case of queuing at the roundabouts in 2033 would be in the PM peak on Buckingham Road East. However, I am satisfied that it would not be for long enough to cause any significant harm to access along that part of Buckingham Road, including near Holme Chase Primary School, particularly as the traffic generated by that school during the PM peak would not be as high as during the school drop-off and pick-up times.
49. The modelling shows that, with the provision of the proposed mitigation, overall, there would be an improvement in the operation of the junction when considering both peaks and the level of queuing on all the approaches. Therefore, I find that the mitigation for this junction would be deliverable and would be proportionate and appropriate to provide an overall improvement in the performance without resulting in any unacceptable harm to highway safety.

#### *Junction 5: Tattenhoe Roundabout*

50. The junction consists of an existing four-armed roundabout on the A421, with the south eastern arm being the B4034 Buckingham Road that leads to the proposed access to the SWMK development. The roundabout is included within the boundary of the appeal development. The mitigation proposed would include part time signalisation of the roundabout as well as realignment of the roads at the entries onto the roundabout.
51. Concerns have been raised about potential blocking on the circulatory carriageway and Heavy Goods Vehicles (HGVs) not having sufficient width to prevent them from colliding with other vehicles using the roundabout. In this respect, I accept that 'Maximum Back of Uniform Queue' (UQ) rather than the 'Mean Maximum Queue' (MMQ) is the appropriate way in the LinSig model to test whether blocking would occur within the internal circulatory of the proposed signalisation of the roundabout. As all the arms into the junction would be signalised, the traffic entering the circulatory arms would be fully controlled and would be platooned and non-random. In addition, signal timings could be co-ordinated to ensure the circulatory stop lines would be kept within capacity.
52. The appellant's latest document, TRN3 has given the longest UQ as 3.13 Passenger Car Units (PCUs), which is about an 18m queue, and 16m to 20m stacking capacity has been provided. Furthermore, there is potential for greater capacity enhancement through the inclusion within the Council's Urban Traffic Control (UTC) systems. I am therefore satisfied that there would not be a problem with blocking across the circulatory carriageway because the signal staging would be able to be set up to ensure that the arms would run with a 'green wave' to enable the circulatory traffic queues to clear.
53. The appellant has provided plans with swept paths of large HGVs and cars through the roundabout that show that they would be able to avoid each other without a collision. Also, the number of large HGVs using the roundabout has been shown to be relatively small and other vehicles would be capable of taking avoiding action if any overrunning of lanes occurs, as they would at any other similar type of controlled roundabout junction.

54. The existing roundabout junction does not meet the DMRB standards for design and it would be unreasonable and unnecessary to expect any changes to the junction to meet such standards. Furthermore, the proposed changes to entry widths and radii as part of the mitigation works have not been highlighted as a concern in the Stage 1 RSA. I therefore find that the proposed mitigation works would be able to be accommodated at the junction, albeit that some street furniture and lighting would need to be relocated, would not harm highway safety, and would improve the overall performance of the junction compared with the Do Nothing 2033 scenario, where there would be significant delay and queuing at the junction.

*Junction 6: Bottledump Roundabout*

55. This existing 3-armed roundabout junction on the A421 is included within the appeal development boundary. At my site visit I observed that there are signs of vehicles having overrun the nearside kerb on Standing Way. However, no substantive evidence has been provided to show that this would have any significant effect on the performance of the roundabout in 2033 with the proposed mitigation in place, and the appellant's swept path analysis indicates that large HGVs would be accommodated without overrunning the kerb. Also, no substantive evidence has been provided to support the suggestion that changes to the entry path curvature and increasing the circulatory width would result in higher vehicle speeds through the junction in 2033. Furthermore, the junction safety should be improved by lane markings at the approaches, as recommended by the Stage 1 RSA, which raised no concerns with either the entry widths or the entry path curvature.

56. The proposed increased entry widths should result in an increase in the capacity of the roundabout, as modelled by ARCADY. I have not been referred to any existing safety concerns at the roundabout junction and the Stage 1 RSA has not raised any concerns that would not be able to be addressed. I am satisfied that the lane simulation model has been used correctly to accurately reflect the existing situation at the roundabout. As such, I find that the modelling is reasonably accurate and robust. Therefore, based on the above, I conclude that the proposed mitigation would be deliverable, would not result in any highway safety concerns, and would increase the capacity of the junction to cater for the forecast traffic flows in 2033.

*Junction 12: Kingsmead Roundabout*

57. Only minor improvements are proposed at this existing roundabout junction. The appellant has provided swept path analysis to show that there are no safety issues relating to side-swipe collisions, and there are no accident records to show that they currently occur at the junction. Although it was raised in the Stage 1 RSA, the appellant has addressed it with such measures as the provision of lane markings. I find that none of the concerns raised about this junction have any highway safety or future capacity implications that cannot be addressed.

*Junction 14: Furzton Roundabout*

58. At the Inquiry, no concerns were raised about the junction. Therefore, I am satisfied that this junction would be capable of accommodating the traffic flows in 2033 without any significant mitigation.

*Junction 15: Bleak Hall Roundabout*

59. The proposed mitigation scheme at this existing roundabout on the A421 would increase all approaches to three lanes. The Council has provided plans showing queue lengths if only one of the lanes on the dual carriageway is used for the queue. This identifies from the modelling data that in the 2033 PM peak there would be queues on the A421 south west approach that would block back towards the upstream junction, Elfield Park Roundabout, and queues on the north east approach that would block back through the upstream Coffee Hall Roundabout. However, this and the other queue lengths would be very unlikely to occur, as I consider the use of only one lane to be totally unrealistic. Even though the nearside lane is the one that would be most used in free flow conditions, in circumstances when there are long queues on this lane it is probable that the other lane would be equally used, as modelled by the appellant.
60. The appellant's modelling has demonstrated that in 2033 there would be no interaction between Junction 15 Bleak Hall Roundabout and Coffee Hall Roundabout to the northeast, to Junction 16 Elfield Park Roundabout to the southwest, nor to the A5 Redmoor Roundabout to the southeast. Furthermore, it shows that there would be a reduction in the queue on the eastbound arm and on Grafton Street South in the 'Do Something' scenarios with mitigation as compared to the baseline (without the SWMK development) scenario. The appellant also confirmed at the Inquiry that the modelling accounts for slow moving traffic at the back of the queue with an allowance being made of 5.75m per vehicle such that vehicles are not assumed to queue bumper to bumper. I accept these results as being a more accurate representation of the maximum queues that could occur in 2033 with the SWMK development in place than those presented by the Council.
61. It has not been disputed that, even without the SWMK development, this junction would be operating over capacity in 2033 in the AM and PM peaks. The appellant has shown that over both the AM and PM peaks, there would be an overall improvement in the performance of the junction with the proposed mitigation as compared to the Do-Nothing scenario. Furthermore, the junction is identified in the LTP4 as a junction to be upgraded within the next 3 to 8 years (between 2024 and 2029) as part of the Council's proposed capacity improvements strategy on the A421.
62. No substantive evidence has been provided to support the concern that the proposed minor changes to the entry widths and the entry path radii would result in either higher vehicle speeds through the junction or give rise to any unacceptable safety impacts. Also, I note that these have not been raised as matters of concern in the Stage 1 RSA. Therefore, based on the above, I find that the proposed mitigation would not result in any highway safety concerns and would increase the capacity of the junction to ensure that the forecast traffic flows in 2033 would not cause a severe impact on the operation of this junction and the other nearby junctions.

*Junction 16: Elfield Park Roundabout*

63. The proposed mitigation scheme comprises of localised entry, exit and circulatory carriageway widening at the existing roundabout junction on the A421. The Council has suggested that the A421(South) exit would be blocked by queuing traffic from Junction 17 Emerson Roundabout, and increased

queuing from this roundabout would cause blocking-back through to Emerson Roundabout. However, I have found that the Council's modelling of queue lengths is unrealistic and is very unlikely to occur.

64. The Council has expressed concerns regarding blocking-back to Junction 15 Bleak Hall Roundabout. The appellant has indicated that there is queuing space for 203 vehicles between Junctions 16 and 15, assuming equal usage of both lanes and not accounting for HGVs, and Table 5.10 of TRN3 predicts a PM peak hour queue of 292 vehicles on this link. It has suggested that only a very small reduction in traffic flow of 5% would be required to avoid interaction between junctions 15 and 16 in the PM peak, and that this would be the case if the downward reduction in the OBR's growth projections and DfT's low growth sensitivity were used to model the traffic rather than the 15% assumed in the Updated TA and TRNs. However, even if there would be queue lengths as shown in Table 5-10 of TRN3 for 2033, this would be likely to occur over a relatively short time and, in my opinion, would be insufficient to result in any severe impact on the road network, taking into consideration the urban nature of the Grid Road network in Milton Keynes.
65. The appellant has demonstrated that the proposed mitigation would reduce delays on 3 of the arms, including the A421, in the AM peak, and improve queuing on 3 of the arms, including on the A421, in the PM peak. I am satisfied that, overall, the proposed mitigation would result in an improvement to the operation of the junction in 2033. Furthermore, it is another one of the junctions on the A421 that has been identified in the LTP4 as being upgraded between 2024 and 2029.
66. Based on the findings of the Stage 1 RSA and vehicle tracking provided by the appellant, I find that the minor changes that are proposed to the geometry of the roundabout would not cause any significant harm to highway safety. As the roundabout does not currently conform to DMRB standards and there is no history of serious or fatal accidents, it would be unreasonable and unrealistic to expect any changes to comply with the DMRB. Therefore, taking the above into account, I conclude that the mitigation proposed at the junction would not result in any highway safety concerns and would improve its capacity to an acceptable level to ensure that there would not be any severe impacts on the operation of it and the other nearby junctions in 2033 with the SWMK development in place.

#### *Junction 17 Emerson Roundabout*

67. The proposed mitigation scheme at this existing roundabout junction on the A421 comprises of localised entry, exit and circulatory carriageway widening. The Fulmer Street arm widening would impact on street furniture and signage which could also affect nearby trees that I observed are at the top of an embankment adjacent to a children's play area. However, the appellant has claimed that the carriageway would be widened to be 2.9m from the nearest tree and arboricultural measures would be able to be secured through the Section 278 process. As the retention of the trees that would be most likely to be affected do not appear to me to be essential, with the band of trees being relatively wide at this location, I find that there would not be any insurmountable obstacles that would prevent the implementation of this localised carriageway widening.

68. Concerns about the entry widths and deflection not complying with DMRB standards have not been substantiated by the evidence, particularly as the Stage 1 RSA did not raise this as an issue.
69. The Council has suggested that in the PM peak, TRN3 predicts worsening queues on Shenley Way and both Standing Way approaches, with queuing on the Standing Way (North) arm extending as far as the upstream Elfield Park Roundabout. The appellant has provided evidence to the Inquiry to demonstrate that there would not be any interaction between these roundabout junctions and that no further mitigation would be necessary at Junction 17 Emerson Roundabout.
70. Table 5-10 of TRN3 shows that, with the proposed mitigation measures in place, there would be improvements in queuing and delay on the Fulmer Way northern arm and Shenley Road arm in the AM peak hour when compared to the 2033 Do Nothing scenario, and improvements on the Fulmer Street and Standing Way southern arm of the junction in the PM peak. Also, the junction as whole would have an overall reduction in delay with minimal additional queuing.
71. In response to issues raised by BC regarding queuing and delay arising during peak times from the proposed mitigation scheme shown within TRN3, the appellant provided at the Inquiry a plan of part-time signalisation of the roundabout. BC's highways expert indicated at the Inquiry that he was satisfied that this proposal for part-time signalisation, to be installed if necessary, would provide sufficient mitigation. A planning condition would secure a 'Monitor and Manage' strategy at the roundabout, which would include the Council's involvement and require its approval. This would set out a programme for the future review of traffic demand, capacity, queuing/delay and delivery of the alternative mitigation measures comprising part time traffic signals.
72. Whilst the future use of part-time signals at the junction would be unlikely to be necessary, given that revised growth forecasts suggest reduced traffic flows from those used in the model, it would ensure that there would be a workable solution to avoid any interaction of queues between Emerson Roundabout and Elfield Park Roundabout. Therefore, I find that the appellant has demonstrated that it would be able to provide mitigation at this junction that would not result in any safety concerns and would prevent any severe impact on the highway network due to queuing traffic in 2033.

*Junction 18: Windmill Hill Roundabout*

73. The proposed mitigation scheme at this existing roundabout junction on the A421 includes localised changes to kerb lines to increase the widths of the carriageway. The Council has provided evidence to show that, with the addition of SWMK development traffic, the proposed mitigation works would result in increased AM peak hour queuing on both Standing Way approaches and in the PM peak hour, the Standing Way (North) queue would extend towards the exit of the upstream Junction 17 Emerson Roundabout. However, this is based on an unrealistic representation of the queue lengths, as previously mentioned. The appellant has provided a more realistic representation of the PM Peak maximum queue lengths which shows that there would not be any interaction between junctions, and that queuing on 3 arms of the roundabout would be improved as a result of the proposed mitigation.

74. The appellant has provided details to show that the mitigation proposals would not require amendments to accommodate the street furniture and are deliverable. It has also carried out swept path analysis which demonstrates that the proposed widening would not result in a safety issue on the highway network. The Stage 1 RSA concluded that the junction proposals would be safe if minor amendments to signage and lining are included at detailed design. Concerns over entry paths are not justified as a review of the collision record from 2014 to 2019 given in the Updated TA does not indicate that the entry speed through the entry path to be a contributor to the existing collisions, nor was the potential impact raised in the Stage 1 RSA process.
75. I conclude on this junction that the proposed mitigation would be deliverable and would ensure that the impact of the SWMK development on the junction would not be severe in terms of traffic and would not result in any unacceptable harm to highway safety in 2033.

#### *Overall Effects of the Mitigation*

76. The modelling has shown that there would be increased congestion on some arms of some of the junctions by 2033, with the forecast traffic growth. However, this would be expected in an urban area and, when all parts of the junctions are considered across the AM and PM peaks, the modelling shows that with the mitigation there would be an improvement in 2033 compared to the 'Do-Nothing' scenario. With regard to an assessment of the overall effect on the network, I accept that the MKMMM Reference case is based on out of date data, but it does not indicate that there would be any significant problems due to congestion on the Grid Road network as a result of the identified additional development in Plan:MK, including the SWMK development.
77. For the reasons given above, I have found that the proposed mitigation is deliverable and would not result in any unacceptable impact on highway safety. I conclude that the appellant has demonstrated that the residual cumulative impact during peak travel periods with the SWMK development fully occupied in 2033 on a worst-case basis would not be severe. The mitigation would address the impact of the SWMK development and assist with accommodating the predicted wider growth in traffic. This view is also supported by the BC highways expert that provided evidence to the Inquiry.

#### **Other Matters**

78. Regarding concerns about highway safety, BC has indicated that the appellant performed a review of the highway safety of the SWMK development using the computer programme COBALT (Cost and Benefit to Accidents – Light Touch) developed by the DfT. The analysis predicts an increase of 140 collisions with 202 casualties because of development traffic over a 60-year period. As the development would result in an increase in traffic, it would inevitably show an increase in collisions. This has been calculated as averaging 2.4 collisions and 3.4 casualties per year, in the context of 37.4 collisions in the 2033 base year. I agree with BC Highways that this demonstrates that the SWMK development would not have an unacceptable impact on highway safety, particularly as the analysis does not take account of proposed mitigation measures.
79. The Council has expressed concern late in the proceedings that an assessment of re-routing traffic needs to be included in the Environmental Statement (ES). The adequacy of the ES is not given in the reason for refusal and, if it were

considered to be inadequate, it should have been raised earlier in the appeal process. I have not been provided with sufficient evidence to substantiate the claim that the ES is inadequate, given that the traffic impact assessment presents a worst-case scenario and the methodology was agreed on this basis, and an acceptance by all parties that there would be no likely significant effects beyond those assessed in the TA/ES.

### ***Planning Balance***

80. I have found that the appeal proposal, which would facilitate the SWMK development, with the identified mitigation in place would result in an overall improvement to the highway network. It would accord with Plan:MK Policy CT1, as the appellant has demonstrated that it would manage congestion and provide for consistent journey times; and Policy CT2, as it has been shown that it would mitigate impacts through the provision of, or contribution towards, necessary and relevant transport improvements and would not have an inappropriate impact on the operation of the highway network. These are the only policies in Plan:MK given in the reason for refusal.
81. In so far as Policy SD15 applies, I am satisfied that the technical work carried out by the appellant fully assesses the traffic impacts of the scheme and identifies the transportation improvements necessary to mitigate impacts. I find that the proposal would also comply with Plan:MK Policy CT3, with regard to walking and cycling; and Policy CT5, with regard to the needs of public transport operators and users. The public transport issues would be addressed by the Section 106 contribution of £2 million and the delivery of bus priority measures within LTP4's 3-year initial action plan.
82. I therefore conclude on the development plan that the appeal proposal accords fully with the relevant policies in Plan:MK. Therefore, the presumption in favour of sustainable development in paragraph 11c) of the 2021 Framework applies in that planning permission should be granted without delay.
83. In addition to the above presumption in favour of the proposed development, the appeal scheme would secure substantial benefits in facilitating the delivery of a key strategic development in a sustainable location. I have therefore taken account of the benefits of the SWMK development in the planning balance for the appeal development.
84. I agree with the Council and appellant that the SWMK development would make a significant contribution to boosting the supply of housing, in accordance with the Government's policy. The delivery of 1,855 new homes is relied upon by BC to meet its housing needs over the plan period of the emerging VALP. It would also contribute 30% (557) affordable homes.
85. The SWMK development would deliver a mix of uses, including residential, community, retail, employment and education, and thereby reduce the need to travel off-site. It would also deliver walking, cycling and public transport infrastructure which would connect into the existing networks and provide alternatives to the private car. The Framework Travel Plan would secure measures to support the use of sustainable transport modes.
86. Other benefits that the appellant has claimed of the SWMK development include the delivery of a biodiversity net gain, open space for the benefit of existing and future residents, landscaping, woodland planting, and green

infrastructure to both mitigate and enhance the surrounding landscape. In addition, it would create jobs both in the construction and operational phases and support local business and services through the additional expenditure from future residents.

87. I have also considered the proposal in relation to the policies in the 2021 Framework. Regarding paragraph 110, I am satisfied that the appellant has demonstrated that any significant impacts from the SWMK development on the transport network, in terms of capacity and congestion, and on highway safety, would be able to be cost effectively mitigated to an acceptable degree. I have also assessed the appeal proposal having regard to paragraph 111, which states that *'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.'*
88. For the above reasons, I have found that the appellant has demonstrated that mitigation would be able to be provided to adequately address the highway impacts, and the proposal would not have an unacceptable impact on highway safety or on the flow of traffic and congestion on the Grid Road network. The residual cumulative impacts on the road network would not be severe and there are no highways related grounds for refusing planning permission. The proposal would accord with the statutory development plan, and policies in the Framework taken as a whole, and would facilitate the delivery of substantial benefits in the public interest through the SWMK development.

### **Planning Conditions**

89. I have considered the suggested conditions should the appeal be allowed that formed the basis of discussions at the Inquiry. It is necessary to impose the conditions regarding the time scale for submission of reserved matters to ensure that development would be carried out expediently. I consider that the condition requiring the standard 3-year period for the application of reserved matters is an appropriate timescale, as the appellant has emphasised how important it is that there is no unnecessary delay. The appellant has not given sufficient justification to extend it to its originally suggested 5 years or to include a non-standard extension of one year from the determination of any subsequent application under Section 288 of the Town and Country Planning Act 1990, given that I have not been provided with any evidence to show that such an application would be likely to be made.
90. A condition referring to the relevant detailed plans of the accesses is necessary to provide certainty, given that access is not a reserved matter. A condition to ensure that trees, woodland and hedges would be appropriately protected is necessary in the interests of the character and appearance of the area. Conditions requiring the approval of temporary accesses and details of how the proposed permanent accesses would be constructed are necessary to safeguard highway safety and local amenity. A condition to ensure that Shenley Brook End Bridleway would be kept open and unobstructed is necessary in the interests of public amenity and safety.
91. Conditions to ensure compliance with the Environmental Impact Assessment in relation to drainage and ecology are necessary to protect the environment, with particular regard to matters of drainage, flooding and ecology. A condition to prevent the permitted development commencing until the grant of planning permission for the SWMK development that it would serve is necessary to

ensure that the works would not be carried out before there is any certainty over the associated development in the interests of visual amenity.

92. A condition to secure a Highways Works Delivery Scheme is necessary to ensure that highway mitigation would be provided to reduce the impact of traffic generated by the SWMK development on the junctions at which the mitigation works would be provided. A condition to secure a Monitor and Manage Strategy at Junction 17 Emerson Roundabout on the A421 is necessary to prevent an unacceptable impact on the flow of traffic at this junction.
93. I am satisfied that all the conditions that I have included are reasonable and necessary, satisfy the tests given in the 2021 Framework and reflect the advice in the PPG.

### ***Overall Conclusions***

94. I have found that the proposal would accord with the development plan as a whole and the other material considerations that I have given above weigh in its favour. Therefore, for the reasons given, and having regard to all relevant matters raised, I conclude that the appeal should succeed.

***Martin Whitehead***

INSPECTOR

## **APPEARANCES**

### FOR THE LOCAL PLANNING AUTHORITY: MILTON KEYNES COUNCIL

Tom Cosgrove	Queens Counsel, instructed by Nazneen Roy, Solicitor for Milton Keynes Council
He called	
James McKechnie BA(Hons) DipTPHE CILT CIHT	National Transportation Divisional Director, Hydrock Consultants Ltd
Paul Keen MA MRTPI	Team Leader, Development Management, Milton Keynes Council

### FOR THE APPELLANT: SOUTH WEST MILTON KEYNES CONSORTIUM

Craig Howell Williams and Isabella Tafur	Queens Counsel Of Counsel, both instructed by Carter Jonas LLP
He called	
Martin Paddle BSc CEng CWEM MICE FCIHT MCIWEM	Director, WSP
Mark Hyde BA(Hons) BTP MRTPI PIEMA	Partner, Planning & Development Team, Carter Jonas LLP,

### FOR BUCKINGHAMSHIRE COUNCIL:

Hugh Flanagan	Of Counsel, instructed by Laura Lee-Briggs, Buckinghamshire Council
He called	
James Bedingfeld HNC(CivEng) CIHT	Principal Transport Planner, Jacobs Ltd
Claire Bayley BSc(Hons) MRTPI	Associate Planner, Buckinghamshire Council

### FOR NEWTON LONGVILLE PARISH COUNCIL & BLETCHLEY TOWN COUNCIL:

Meyric Lewis	Of Counsel, instructed by Robert McGeady, Ashtons Legal
He called	
Clive Burbridge BSc(Hons) MSc MRTPI FCIHT FIHE CMILT	Equity Director and Director of Transportation, Iceni Projects Ltd

## **Other Interested Parties**

Steve Heath	Local Resident
-------------	----------------

## **DOCUMENTS SUBMITTED AFTER OPENING THE INQUIRY**

- CD22 Round table drawing package, submitted by the appellant on 11 May
- INQ1 Appellant's Opening Statement, submitted by the appellant on 11 May
- INQ2 Milton Keynes Council Opening Statement, submitted by Milton Keynes Council on 11 May
- INQ3 Buckinghamshire Council Opening Statement, submitted by Buckinghamshire Council on 11 May
- INQ4 Rule 6 Party Opening Statement, submitted by Newton Longville Parish Council & Bletchley Town Council on 11 May
- INQ5 Statement – Steve Heath, submitted by Steve Heath on 11 May
- INQ6 Highways England Document GG 101 Introduction to the Design Manual for Roads and Bridges, submitted by the appellant on 20 May
- INQ7 Inquiry Note SWMK HGVs at J5 Tattenhoe Roundabout, submitted by the appellant on 20 May
- INQ8 Draft Conditions, submitted by the appellant on 20 May
- INQ9 The Council's suggested amendments to the draft conditions, submitted by the Council on 21 May
- INQ10 Appellant's suggested amendments to the proposed conditions, submitted by the appellant on 25 May
- INQ11 Mr Burbridge response to Mr Paddle CD16C Table 5.5 Clarification, submitted by Newton Longville Parish Council & Bletchley Town Council on 25 May
- INQ12 Closing submissions of Rule 6, submitted by Newton Longville Parish Council & Bletchley Town Council on 15 June
- INQ13 Closing submissions of Buckinghamshire Council, submitted by Buckinghamshire Council on 15 June
- INQ14 Closing submissions of Milton Keynes Council, submitted by Milton Keynes Council on 15 June
- INQ15 Closing submissions of the appellant's, submitted by the appellant on 16 June

## **SCHEDULE OF CONDITIONS**

- 1) Details of the appearance, landscaping, layout, and scale (hereinafter called 'the reserved matters') shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the local planning authority not later than 3 years from the date of this permission.
- 3) The development hereby permitted shall take place not later than 2 years from the date of approval of the last of the reserved matters to be approved.
- 4) The development hereby permitted shall be carried out in accordance with the following approved details:
  - i) Buckingham Road Access – drawing ref 1067760-D016 Rev B insofar as the toucan crossing at the end of Weasel Lane and drawing ref 1067760-D017 Rev D; and
  - ii) A421 'Left in' Access – drawing ref 1067760-D013 Rev A and details of a cycle/pedestrian crossing in accordance with details to be first submitted to and approved in writing by the local planning authority.
- 5) No site clearance, preparatory work or development shall take place until a scheme for the protection of the retained trees (the tree protection plan) and the appropriate working methods (the arboricultural method statement) in accordance with paragraphs 5.5 and 6.1 of British Standard BS 5837: Trees in relation to design, demolition and construction - Recommendations (or in an equivalent British Standard if replaced) shall have been submitted to and approved in writing by the local planning authority. The scheme for the protection of the retained trees shall be carried out as approved.

[In this condition 'retained tree' means an existing tree which is to be retained in accordance with the approved plans and particulars.]
- 6) Prior to the commencement of the development hereby permitted details of any temporary accesses to site compounds/storage yards and any construction accesses shall be submitted to and approved in writing by the local planning authority. The temporary access works shall be carried out in accordance with the approved details.
- 7) Prior to the commencement of the development hereby permitted details of the construction of the A421 and Buckingham Road accesses shall be submitted to and approved in writing by the local planning authority. The development works shall be carried out in accordance with the approved details.
- 8) Prior to the commencement of the development hereby permitted details showing how Shenley Brook End Bridleway 009 shall remain open and unobstructed at all times shall be submitted to and approved in writing. The development shall be carried out in accordance with the approved details.
- 9) The development hereby permitted shall be carried out in full accordance with the recommendations and mitigation measures outlined within the submitted Environmental Impact Assessment relating to drainage strategy.
- 10) The development hereby permitted shall be carried out in full accordance with the recommendations and mitigation measures outlined within the submitted Environmental Impact Assessment relating to ecology.

- 11) The development hereby permitted shall not be implemented prior to a grant of planning permission for the Proposed Development of South West Milton Keynes in Buckinghamshire, as provided for in the planning application reference 15/00314/AOP to Buckinghamshire Council, or for an alternative planning application for substantially the same development as provided for by the site’s allocation in the Vale of Aylesbury Local Plan.
- 12) No development shall commence until a Highways Works Delivery Scheme (HWDS) has been submitted to and approved in writing by the local planning authority. The HWDS shall set out a programme for the delivery of highways mitigation works in general accordance with the drawings referenced in the schedule below. The highways mitigation works shall only be undertaken in accordance with the HWDS.

<b>Junction ID</b>	<b>Junction Name</b>	<b>Mitigation Drawing Reference</b>
Junction 1	Buckingham Road j/w Sherwood Drive and Water Eaton Road	70069442-001B-P04
Junction 2	Buckingham Road j/w Shenley Road and Newton Road	70069442-015-P04
Junction 5	Tattenhoe Roundabout	9442-TP-SK-004-P06
Junction 6	Bottledump Roundabout	70069442-004-P05
Junction 12	Kingsmead Roundabout	70069442-010-P03
Junction 14	Furzton Roundabout	70069442-011-P03
Junction 15	Bleak Hall Roundabout	70069442-012-P04
Junction 16	Elfield Park Roundabout	70069442-016-P03
Junction 17	Emerson Roundabout	70069442-013-P03
Junction 18	Windmill Hill Roundabout	70069442-014-P03

- 13) No development shall commence until a Monitor and Manage (M&M) Strategy has been submitted to and approved in writing by the local planning authority. The M&M Strategy shall set out a programme for the future review, assessment, and delivery of alternative mitigation measures at Junction 17 Emerson Roundabout on the A421. The alternative highway mitigation works shall only be undertaken and implemented in accordance with the M&M Strategy.

## Objection by Newton Longville Parish Council

### Application: 15/00314/AOP “Salden Chase”

**For:** Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

**At:** Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville

**(Note: The description above is as quoted by Buckinghamshire Council in their consultation letter to NLPC and site notices. It is not accurate, see 19 below.)**

1. For the reasons detailed below, we respectfully request Buckinghamshire Council:

**Reject the application now** in accordance with the decision of the AVDC Strategic Development Management Committee on 7<sup>th</sup> June 2017 that:

*“That application 15/00314/AOP be Supported and Deferred and Delegated to officers subject to the completion of a legal agreement (with Bucks County Council, Aylesbury Vale District Council and if appropriate Milton Keynes Council) as outlined in the officer’s report and subject to conditions as considered appropriate by officers. **If this cannot be achieved, then the application will be refused for reasons as considered appropriate by officers.**”*

Amongst other things it is clear there is no executed, or even agreed, section 106 agreement. Surely three years is more than enough time for a Section 106 agreement to be completed.

2. Failing that, then Buckinghamshire Council should undertake a far more comprehensive and legally compliant meaningful and effective public consultation exercise which should be ongoing for as long as the applicants keep submitting changes in what they propose. Newton Longville Parish Council is more than happy to work with Buckinghamshire Council to ensure the appropriate consultation is carried out on this (as it has on planning application 20/03539/APP <https://bit.ly/GasTankerBletchleyRoad> which has attracted over 1,100 objections in less than a month due to efforts of NLPC and others).
3. The fundamental objections to this application and how it has been incorrectly handled by Aylesbury Vale District Council, is well documented and reproduced as an Appendix to this objection.

4. The application is a cross-boundary application. How a cross boundary application should be dealt with is detailed in our letter of 6<sup>th</sup> June 2016. It is not two different applications, but identical applications submitted to each planning authority each of which must be made considered holistically, not for each planning authority to act as if in a silo without any regard for the application site as a whole.
5. The consultation letter sent to Newton Longville Parish Council by Buckinghamshire Council required comments by 20<sup>th</sup> November, however it is clear, that far from adequate consultation has been undertaken by Buckinghamshire so far, as is demonstrated by the very low number of public comments as a result of the re-consultation on the amended proposals.
6. It is clear, from what has said by the QC representing Buckinghamshire Council as a Rule 6 party in the Appeal against the refusal of the application by Milton Keynes Council, that the applicants have been asked by Buckinghamshire Council to provide further information which is to be submitted by the applicants in December. This will inevitably mean further consultation is needed.
7. Under the temporary publicity requirements due to Coronavirus (as explained at <https://bit.ly/335K3Q9>) it is clear that Buckinghamshire Council should have done much more than the minimal efforts made so far to consult on the very significant, and ongoing, material changes made to this application since it was submitted over five years ago, but still not determined.
8. Given the size of this proposed development and particularly that it is subject to an Environmental Impact Assessment, Buckinghamshire Council is under an obligation to take reasonable steps to inform any persons who are likely to have an interest in a planning application.
9. The temporary changes allow local planning authorities to take a flexible and pragmatic approach according to their local circumstances. This means that Buckinghamshire Council are required to publicise an application “**in a manner which is proportionate to the scale and impact of the development**” but so far have not done so. Flimsy notices on generally inaccessible lamp columns are of little use when they are nowhere near people affected, particularly when people are subject to lockdown, nor is an advert in a newspaper which is not generally in circulation in the area.
10. Site notices were erected dated 14<sup>th</sup> August 2020 at various locations requiring comments by 13<sup>th</sup> September (Annex 1). Further site notices were erected dated 30<sup>th</sup> October requiring comments by 29<sup>th</sup> November (Annex 2). The Town and Country Planning (Development Management Procedure) (England) Order 2015 gives interpretation of “by site display” as “the posting of the notice by firm fixture to some object, **sited and displayed in such a way as to be easily visible and legible by members of the public**”.
11. Given the current closures of most rights of way around the site, due to works being carried out by East West Rail, there is even less chance of site notices being seen. Similarly, displaying notices on such as on Whaddon Road and

Standing Way in isolated locations subject to National Speed Limits are not “sited and displayed in such a way as to be easily visible and legible by members of the public”.

12. The detail within the site notices and press advert(s) do not comply with the requirements the Town and Country Planning (Development Management Procedure) (England) Order 2015.
13. Schedule 3 to the order contains the appropriate form for the notices to be published in the local press and posted on site, which subject to the temporary Coronavirus regulations, must (inter alia):
  - state that a copy of the Environmental Statement is included in the documents which will be open to inspection by the public and give the address where the documents can be inspected free of charge
  - state the latest date by which any written representations about the application should be made to the local planning authority (being a date not less than 30 days later than the date on which the notice is published).
14. The most recent press advert in the Milton Keynes Citizen, for which a copy is on the planning register, was on 16<sup>th</sup> July 2020 (Annex 3). Yet it was not until 29<sup>th</sup> September, over two months later that a copy of the advert was uploaded to the planning register. It appears a further advert was placed on 29<sup>th</sup> October but not copy is on the planning register. Advertising in Milton Keynes Citizen is not an appropriate way to make residents of Newton Longville and nearby villages in Buckinghamshire aware of a planning application.
15. The Environmental Statement must be placed on Part I of the planning register ... **as soon as possible** after publication, but this was not done.
16. An Environmental Statement should be in an easily accessible form, but it has been uploaded to the Buckinghamshire Council website in a haphazard way, making navigating through it a “paper chase” contrary to the principles laid down by Lord Hoffman in Berkeley v SSETR [2000].

*“It may consist of one or more documents, but it must constitute a single and accessible compilation of the relevant environmental information and the summary in non-technical language”*
17. As the government guidance on the temporary regulations makes clear “**Greater and more frequent publicity** would be appropriate where the **potential impact** of the planning application is **expected to generate a large volume of representations**. This may be the case, for example, **for large scale applications** ... or where there has been a **previous application which has attracted interest.**”
18. As has already been made clear in earlier correspondence (See Appendix) the Environmental Statement for this application was already an inappropriate “paper chase” by 2016. Then as part of their appeal an “updated” Environmental Statement was produced in May 2020 and submitted to

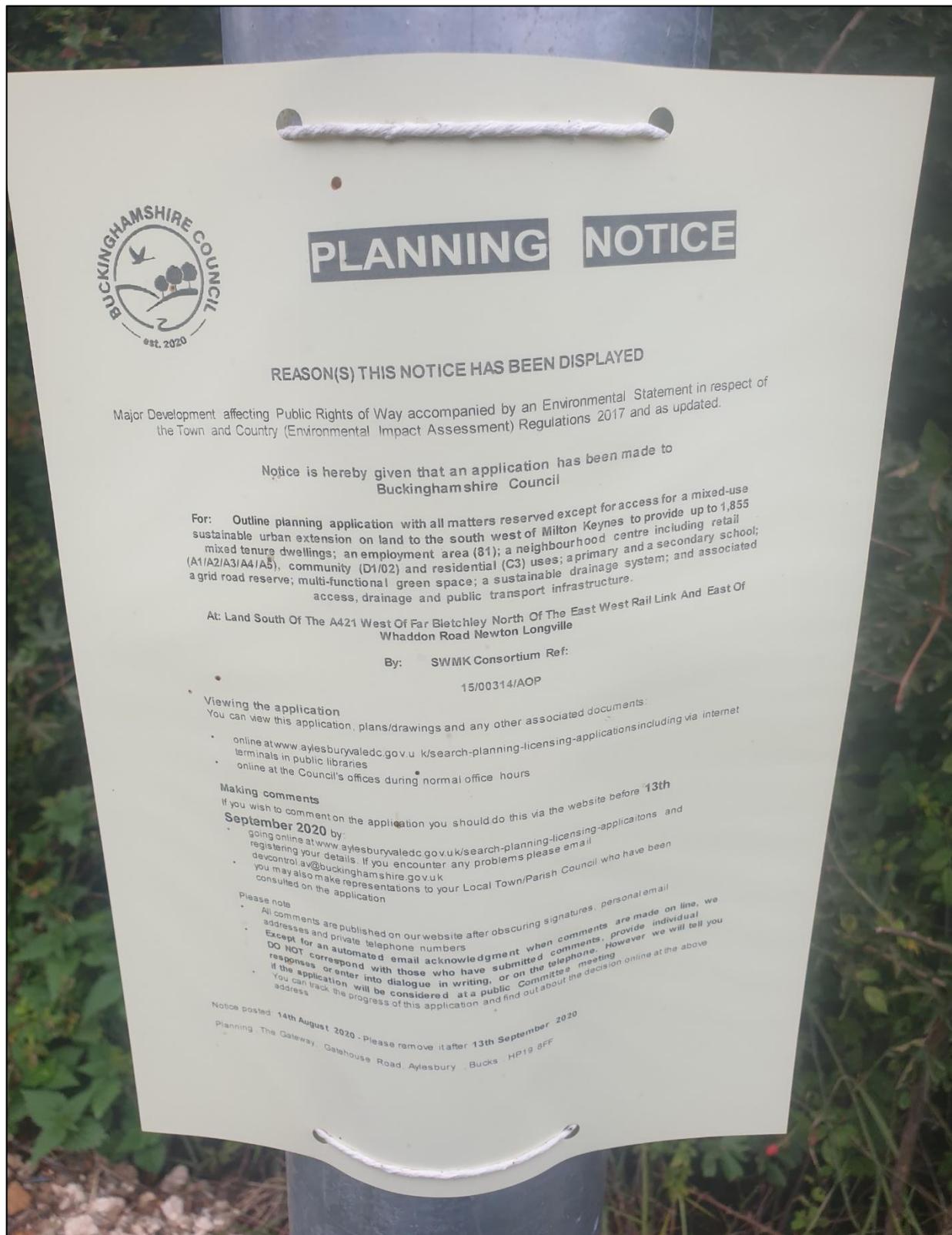
Buckinghamshire Council by email on 19<sup>th</sup> June. This included yet another new TA with much changed or remodelled, but fundamental errors still there.

19. There had been an ongoing issue of AVDC, and now Buckinghamshire Council, failing to put documents on the public planning file in good time, if at all. For example, the letter from the agent (Annex 4) sent by email on 19<sup>th</sup> June was not uploaded until 19<sup>th</sup> August, two months later. The letter sent by email on 8<sup>th</sup> October 2020 (Annex 5) was not uploaded until 19<sup>th</sup> and 23<sup>rd</sup> October 2020. Despite several requires for an explanation for these and other delays no explanation has been provided by Buckinghamshire Council.
20. Since then there have been even more changes submitted applicants/appellants in September and October purporting to amend the Environmental Statement submitted in May 2020. Overall, this amounts to an even bigger paper chase than before.
21. The description used for the application has not been amended to include the addition a 60 bed care home as detailed in the letter from the applicant's agent on 8<sup>th</sup> June 2020, nor does it include any mention of provision for a 6 GP surgery. The letter gives the description as:

*“Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings, including 60 extra care units (C3); an employment area (B1) including provision for a 6GP surgery (D1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school; a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.”*
22. The applicants and their highways consultants have had over five years to get this right, but it seems they are either unable or unable to defend the “data” submitted which led to the refusal by MKC. So, what should have been a new application for a fundamentally scheme was submitted, but which is still not correct. As a result, every week or so it seems another change is submitted.
23. As soon as a change is submitted, it does not take long for those very competent highways experts supporting and advising NLPC/WBC and MKC as well as Buckinghamshire Council Highways to find and point out the latest errors and/or omissions. So, there is yet another change and so the circle goes on. This is an abuse of process that should be stopped now.
24. How many attempts does it take to sort this out?
25. Within the Appeal Case Management Conference Call on 20<sup>th</sup> November it became clear that there has been multiple correspondence between Buckinghamshire Council and the applicants/appellants or their consultants which has not as yet all been made available on the public register. That these may have been Highways matters is no justification for not placing them on the planning register as required by law. The planning system is meant to be open and transparent.

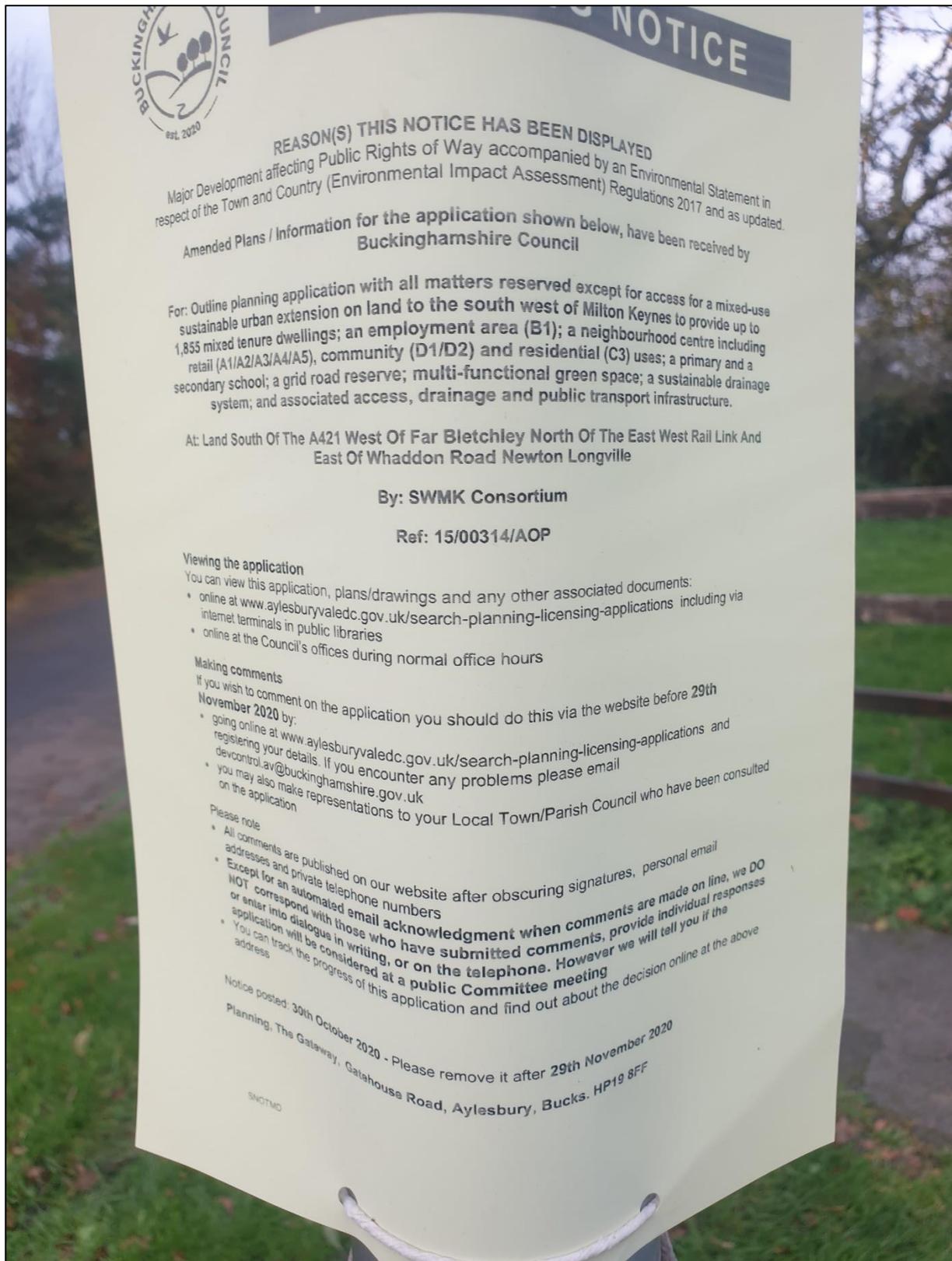
Example of site notice dated 14<sup>th</sup> August 2020

Requiring comments by 13<sup>th</sup> September (30 days)



**Example of site notice dated 30<sup>th</sup> October 2020**

**Requiring comments by 29<sup>th</sup> November (30 days)**



Press advert in Milton Keynes Citizen on Thursday 16<sup>th</sup> July 2020

Thursday, July 16, 2020

## PUBLIC NOTICES

---

### PUBLIC NOTICES

---

**Buckinghamshire Council**

has received the following applications, which can be viewed via the internet or online at our offices during normal office hours. Comments can be made online at [www.buckinghamshire.gov.uk](http://www.buckinghamshire.gov.uk) within 21 days. We publish every comment we receive on our website.



**Within the Conservation Area - 20/02185/APP - METHODIST CHURCH NEWTON ROAD STOKE HAMMOND - Two-storey rear extension, internal alterations and permitted change of use to D1 Nursery.**

---

Buckinghamshire Council has received the following application for which amended plans have been received. These can be viewed via the internet or online at our offices during normal office hours. Comments can be made online at [www.buckinghamshire.gov.uk](http://www.buckinghamshire.gov.uk) within 30 days. We publish every comment we receive on our website.

**Major affecting PRW accompanied by EIA (Environmental Impact Assessment) Regulations 2017 and receipt of an Environmental Statement - 15/00314/AOP - LAND SOUTH OF THE A421 WEST OF FAR BLETCHLEY NORTH OF THE EAST WEST RAIL LINK AND EAST OF WHADDON ROAD NEWTON LONGVILLE - Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.**

Letter from Applicant's Agent by email on 19<sup>th</sup> June 2020 (page 1)

**Carter Jonas**

One Station Square  
Cambridge  
CB1 2GA

T: [REDACTED]  
F: [REDACTED]

Your ref:  
Our ref: 5738688v1

Claire Bayley  
Associate Planner  
Planning, Growth & Sustainability Directorate  
Buckinghamshire Council  
The Gatehouse  
Gatehouse Road  
Aylesbury  
HP19 8FF

**BY EMAIL**

19<sup>th</sup> June 2020

Dear Ms Bayley,

**SOUTH WEST MILTON KEYNES (15/00314/AOP)**

I write further to our meeting on the 12<sup>th</sup> June 2020 at which we discussed a revision to the extant planning application for the proposed SWMK development.

The revision has been prepared to address a number of minor amendments that have been made to the proposed development and to address changes in regulation, policy and guidance since the original application was submitted. The amendments to the proposed development have arisen for the following reasons:

- The alignment of the oil pipeline crossing the application site was not identified correctly in the original application drawings and as a result needs to be amended to show the correct alignment. It should be noted that the oil pipeline continues to be located within an area identified as a green infrastructure corridor in the proposed development;
- The standards required for climate change mitigation have been enhanced since the planning application was submitted. As a result, larger surface water attenuation ponds need to be included, which has required minor changes in the size and disposition of the proposed development parcels;
- The housing needs of older people is identified as a specific issue in the emerging Vale of Aylesbury Local Plan and this type of housing is supported by policy (Policy H6b as modified) on those sites identified as suitable in the Housing and Economic Land Availability Assessment. The application site is identified as a suitable housing site and is a draft housing allocation. As a result, the applicant has decided that an element of elderly persons' accommodation (within use class C3) should be included in the proposed development within the total quantum of housing.

**Letter from Applicant's Agent by email on 19<sup>th</sup> June 2020 (page 2)****Carter Jonas**

These changes are not substantial. The oil pipeline remains in an area identified for a green infrastructure corridor within the proposed development. The surface water attenuation ponds have increased in size but are located within similar areas of the proposed development. The proposed extra care housing will be within use class C3 and is located within an area previously identified as a residential development parcel. However, in light of these minor amendments, certain revisions need to be made to the extant planning application, including the consequential amendment of the description of development and the submitted plans and drawings.

The following amendment to the description of development is proposed:-

*Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings, including 60 extra care units (C3); an employment area (B1) including provision for a 6GP surgery (D1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school; a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.*

The only change to the description of development is the reference to the 60 extra care units.

There have also been a number of changes in regulation, policy and guidance that have a bearing on the proposed amendments and which will need to be considered in determining the planning application. These updated requirements include the Town and Country Planning (Environmental Impact Assessment) Regulations which were revised in 2017. There have also been changes to relevant adopted and emerging development plan documents and policies since the planning application was submitted; Plan:MK was adopted in 2019 and the emerging Vale of Aylesbury Local Plan (VALP) was prepared and submitted for examination in 2017. The Government published a revised version of the National Planning Policy Framework in 2019, which updated national guidance from 2012 that was originally referred to in the planning application.

The updated documentation and drawings (listed on the accompanying enclosure) include an Environmental Statement reflecting the requirements of the 2017 Regulations and address the up-to-date policy and regulatory framework. It should be noted at the outset that the likely significant impacts of the proposed development, as identified and assessed in the updated Environmental Statement, are not materially different from the previous findings in the 2015 Environmental Statement and its 2016 update.

I should be grateful for early confirmation that the Council is willing to accept the updated documentation and to determine the extant planning application as proposed to be amended. In the meantime, should you have any queries, then please do not hesitate to contact me.

Letter from Applicant's Agent by email on 8<sup>th</sup> October 2020 (page 1)**Carter Jonas**

Claire Bayley  
Associate Planner  
Planning, Growth & Sustainability Directorate  
Buckinghamshire Council  
The Gatehouse  
Gatehouse Road  
Aylesbury  
HP19 8FF

One Station Square  
Cambridge  
CB1 2GA

T: 01223 368771

F: 01223 346627

Your ref:

Our ref: 5738688v1

**BY EMAIL**

08 October 2020

Dear Ms Bayley,

**SOUTH WEST MILTON KEYNES (15/00314/AOP & APP/Y0435/W/20/3252528)**

I write further to our telephone conversation of the 2<sup>nd</sup> October 2020.

Firstly, thank you for confirming safe receipt of TRN1 prepared by WSP. This, as you know, has been prepared in order to provide a response to matters raised by your colleagues upon the updated Transport Assessment (May 2020) dated 29<sup>th</sup> July 2020.

In preparing TRN1 and addressing queries raised by your colleagues in relation to the proposed crossing arrangement of the Old Buckingham Road, our attention was drawn to a drafting error in the suite of drawings that accompanied the update of the planning application submitted in June 2020 and which incorrectly illustrated the alignment of the 'left in' access from the A421 Standing Way. This has been corrected in the accompanying suite of drawings with consequential minor amendments to the disposition of the attenuation feature, housing development parcel and the alignment of the primary route corridor immediately adjacent to the access. For clarity, the table below sets out the drawings that are now superceded by the accompanying drawings.

Drawing	Drawing Reference	Superceded by
Development Framework Plan	CSA/4857/100 Rev K	CSA/4857/100 Rev L
Open Space Plan	CSA/4857/113 Rev C	CSA/4857/113 Rev D
Illustrative Masterplan	CSA/4857/112 Rev E	CSA/4857/112 Rev G
Residential Density	CSA/4857/119 Rev C	CSA/4857/119 Rev D
Public Transport	CSA/4858/117 Rev C	CSA/4857/117 Rev D
Building Heights	CSA/4857/114 Rev C	CSA/4857/114 Rev D

Letter from Applicant's Agent by email on 8<sup>th</sup> October 2020 (page 2)

Carter Jonas

<b>Key Structural Elements</b>	CSA/4857/120 Rev F	CSA/4857/120 Rev G
<b>Landscape Character Areas</b>	CSA/4857/121 Rev E	CSA/4857/121 Rev F

We have been monitoring the consultation responses that have been made upon the updated documentation that was submitted in June 2020. We have prepared documentation to respond to issues raised in relation to ecology and surface water drainage.

Ecology

Please find accompanying this letter the following documentation:-

- Addendum to Chapter 7 Ecology of the updated Environmental Statement (May 2020)
- Appendices to Addendum
- Response Note (October 2020)

The addendum to Chapter 7 Ecology of the Environmental Statement sets out the findings of confirmatory ecological survey work conducted between April and August 2020. The addendum supports the assessments made of the likely significant effects of the proposed development in terms of Ecology and Nature Conservation within Chapter 7 of the updated ES.

The Response Note has been prepared to address comments received from the Council's Ecologist (19<sup>th</sup> August 2020) and the BBOWT (27<sup>th</sup> July 2020) and should be read in conjunction with the ES addendum.

Surface Water Drainage

The Council's Sustainable Drainage Team provided comments on the updated Flood Risk Assessment and Surface Water Drainage Strategy (May 2020) on the 21<sup>st</sup> July 2020, additional information was also requested in relation to greenfield run-off rates.

The attached Technical Note dated 1<sup>st</sup> October 202 has been prepared by WSP to respond to the comments made and provide the additional information requested. The Indicative Surface Water Drainage Strategy drawing in Appendix A of the FRA & SWDS (May 2020) reference 1442-D-003 Rev P17 is superseded by the updated drawing contained in the Technical Note reference 1442-D-003 Rev P19. The revision reflects the corrected access arrangement noted above.

I trust that this is all clear. As ever, should you have any further queries, please do not hesitate to contact me.

## **Appendix 1**

Rather than repeat what has been said before, appended to this objection are:

- Letter on 26<sup>th</sup> September 2016 to AVDC (and MKC)
- Letter on 5<sup>th</sup> June 2017 to AVDC with extracts of minutes of MKC meetings
- Letter on 6<sup>th</sup> June 2017 to AVDC Strategic Development Management Committee
- Letter on 30<sup>th</sup> May 2017 to AVDC Corporate Planner

26<sup>th</sup> September 2016

By email to:

Claire Bayley, Aylesbury Vale District Council  
Sarah Hine, Milton Keynes Council

Dear Claire and Sarah

**AVDC Planning Application: 15/00314/AOP**  
**MKC Planning Application: 15/00619/FUL**

In my email to you on 7<sup>th</sup> September I forwarded on to you an email I had sent to the SWMK Consortium. The response from the applicants is attached to this letter.

This is therefore a formal submission to both planning authorities seeking action on what we believe are primarily procedural matters as detailed below. I stress that the parish council is not being critical of the planning authorities in the handling of this. For the avoidance of doubt this letter is not intended for the planning file unless you wish add it.

## **1. Environmental Statement - Compliance with Environmental Impact Regulations – Avoidance of a “Paper Chase”**

- 1.1. We believe that what has currently been produced is not compliant with the Environmental Impact Regulations and amounts to a “Paper Chase”. We ask that both planning authorities issue Regulation 22 notices requiring revised documents to be submitted which completely replace those documents which currently require a reader to jump to and fro between two versions.
- 1.2. What we now have is effectively little different to a new application. It has significantly changed proposals and plans. A revised Environmental Statement (ES) has been submitted, however it has only been replaced in parts and to read through the ES means jumping from old to new.
- 1.3. Replacement of the odd page or part of a page may be acceptable in isolation, but if the documents are fundamentally changed as here then the relevant sections of the ES should be produced as a new document.
- 1.4. The updated Design and Access Statement is a short but complex example of the need to navigate two different documents together. The Transport Assessment is far worse.





# NEWTON LONGVILLE PARISH COUNCIL



- 1.5. Planning Policy Guidance Paragraph: 035 Reference ID: 4-035-20140306  
“What information should the Environmental Statement contain?” states:

*“It may consist of one or more documents, but it must constitute a “single and accessible compilation of the relevant environmental information and the summary in non-technical language” (Berkeley v SSETR [2000] 3 All ER 897, 908).”*

- 1.6. A quotation from Lord Hoffman in the above case is included in Query 9 in the attached as put to the applicants.
- 1.7. A later part of the same PPG paragraph on outlining alternatives has not been done, even though by virtue of the changes now proposed alternatives have been considered. In general, the rationale for the changes is not explained in either the main ES or the Non-technical summary.

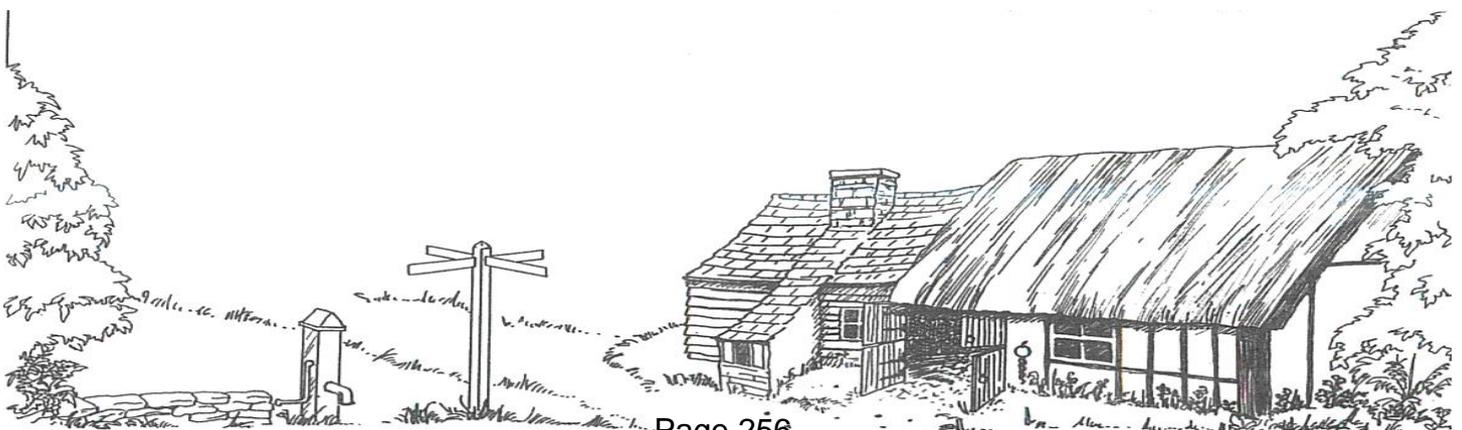
*“Where alternative approaches to development have been considered, the Environmental Statement should include an outline of the main alternatives studied and the main reasons for the choice made, taking into account the environmental effects.”*

## 2. Missing Data

- 2.1. See details in Queries 1 to 3 in the attached. In brief the Transport Assessment does not contain the raw data of Automatic Traffic Counts and Manual Classified Counts. There does not appear to be any justification for this.
- 2.2. Please require this data to be required to be produced.

## 3. Details of matters agreed with highways authorities and other consultees.

- 3.1. The applicants have made various claims about matters having been “agreed” with AVDC/BCC/MKC. This is both within the Environmental Statement (ES) and within presentations made at recent meetings at West Bletchley and Newton Longville Parish Council.
- 3.2. They have referred to matters having been specified by AVDC/MKC/BCC consultees but no details of this is included in the ES or planning files.
- 3.3. We understand that this may in part be because the highways authorities and other consultees have had direct contact with the applicants without details being provided to the planning authorities.
- 3.4. Full details of discussions with the highways authorities and other consultees should be on planning files. In particular it should be clear what has and has not been “agreed”.
- 3.5. Please ensure all the consultees that have been involved in direct contact with the applicants provide full details to the planning authorities and details of all exchanges are added to the planning files.



## 4. Other issues with Environmental Statement

- 4.1. There are two other related matters detailed in 5 and 6 below, which are also more of a procedural nature and we ask that these are both also addressed now and where considered appropriate further information be required from the applicants.

### Validation of traffic models

- 4.2. Google Maps traffic layer has been used to validate the traffic modelling.
- 4.3. We do not believe use of Google Maps traffic layer is appropriate to validate models. The traffic layer does not show queue lengths at all, but is an approximation of the traffic flow and should not be used to validate models. The applicants have stated (at our public meeting) that it was Buckinghamshire County Council that instructed that Google Maps traffic layer be used.
- 4.4. Even if use of Google Maps traffic layer to validate models was acceptable (which we do not accept), the quality of the screenshots in Appendix P is far too poor. If such screenshots are to be used then they should be much larger.
- 4.5. The tables in Appendix P appear to use data which purports to be derived from Google Maps. However the traffic layer cannot be used to measure queue lengths. The traffic layer colour coding is only an indication and not actual data.
- 4.6. Whilst the issue with use of Google Maps traffic layer primarily relates to roads within Buckinghamshire, it has also been used for Milton Keynes as well, see for example paragraphs 9.88 and 9.91 in the TA addendum. Note that for this, though a larger screenshot has been included and use made of Google typical rather than live traffic.

*“9.88 The queue lengths recorded for the PM peak were compared to Google Traffic ‘typical’ conditions for validation purposes. The recorded queue length compares well to the Google typical traffic screen shot.”*

## 5. Stage 1 Safety Audit

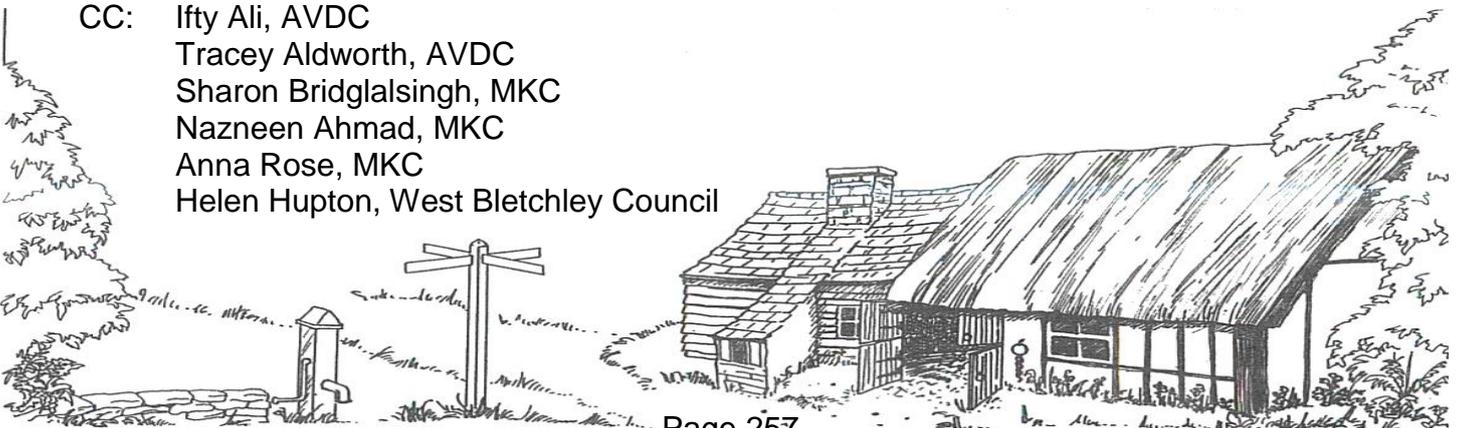
- 5.1. A Stage 1 Safety Audit was carried out on junctions in the original proposals but has not been done on the revised proposals. In addition, not all the junctions where changes are proposed have been subject to a Stage 1 Safety Audit at all. Of particular interest to Newton Longville is the proposed traffic calming within the village.

Yours sincerely



Mike Galloway  
Clerk to the Council

CC: Ifty Ali, AVDC  
Tracey Aldworth, AVDC  
Sharon Bridglalsingh, MKC  
Nazneen Ahmad, MKC  
Anna Rose, MKC  
Helen Hupton, West Bletchley Council



# NEWTON LONGVILLE PARISH COUNCIL

Tel: 01908-367799  
Email: newtonlongvillepc@hotmail.co.uk

Longueville Hall  
Whaddon Road  
Newton Longville  
Buckinghamshire  
MK17 0AT

Office Hours: Mon, Wed & Fri 9:30 am – 3:30 pm

5<sup>th</sup> June 2017

By email to:  
Claire Bayley, Aylesbury Vale District Council

Dear Claire

**AVDC Planning Application: 15/00314/AOP**  
**MKC Planning Application: 15/00619/FUL**

Attached to this letter is an extract of the minutes of the three meetings of the Milton Keynes Council Development Control Committee meetings held to consider the application. As you will see each time it was deferred for various matters to be resolved including but not limited to highways matters. The matters remain unresolved.

There has been one meeting with the MKC Highways officer, their Highways consultant and the then case officer. Their consultant acknowledged he had information including data which had been provided by Mouchel but which had not all been passed to the case officer. He undertook to do so. However so far, the bulk of the information and information referred to has yet to be provided and a further meeting is being arranged.

The minutes also cover the consideration by Milton Keynes Council of the consultation by Aylesbury Vale.

Yours sincerely



Mike Galloway  
Clerk to the Council



**Milton Keynes Council**

**Extracts from minutes of Development Control Committee**

**Consideration of planning application to Milton Keynes Council 15/00619/FUL  
Salden Chase (South West Milton Keynes)**

**17<sup>th</sup> November 2016 - DCC49**

**RESOLVED:**

That determination of the application be deferred to allow for further information to be provided in respect of the modelling processes used to complete the transport assessment and any further legal implications.

**2<sup>nd</sup> February 2017 – DCC70**

**RESOLVED:**

That determination of the application be deferred to allow further modelling and testing of the Transport Assessment.

**9<sup>th</sup> March 2017 – DCC81**

Councillor Bint stated that in the event that the determination was deferred it should also be to allow Officers of the Council to engage with the relevant objectors, and in particular Mr Heath, to examine the modelling used to complete the transport assessment and consider any evidence provided by other parties. There was also a need to consider what the nature of the school on the estate would be to assess the impact on traffic that would have and also a need to assess adequately whether those who later occupy the estate would use facilities such as employment, shopping and Rail links in Milton Keynes or Aylesbury.

**RESOLVED:**

That determination of the application be deferred until such time as Aylesbury Vale District Council have determined the Salden Chase application.

Full minutes available at <http://cmis.milton-keynes.gov.uk>

## **Milton Keynes Council**

### **Extracts from minutes of Development Control Committee**

#### **Consideration of consultation by Aylesbury Vale DC on AVDC application reference 15/00314/AOP (MKC reference: 15/00223/CONS)**

##### **17<sup>th</sup> November 2016 – DCC50**

The Committee considered a report in respect of a Consultation on application 15/00223/CONS.

The Committee was told that the Officers recommendation was that Milton Keynes Council submit a formal objection to the proposal for the reasons stated in the report.

The Committee heard from Councillor Witt (Newton Longville Parish Council) Mr S Heath, Councillor E Thomas (West Bletchley Council), Ms. E Rawlinson (Chair of Residents Association), Councillor J Nicholas (Shenley Brook End and Tattenhoe Parish Council), Ms A Ravn-Aagaard (Chair of Bletchley Park Residents Association), Mr A Franks, Councillor K Geaney (Shenley Brook End and Tattenhoe Parish Council), Mr M Hyde (Applicants Agent) Councillor Clancy Councillor Wales and Councillor Geaney.

Speakers made reference to the following issues;

The existing facilities at Milton Keynes Hospital did not have capacity for the increase in population and no funding would be made available through the application to improve facilities.

- The development would result in significant traffic problems for existing communities.
- There has been a lack of disclosure of traffic data between the developer and local authorities resulting in significant uncertainty as to the potential impact of the proposed development and thereby make a decision process impractical.
- The A421 did not have the capacity to take the additional traffic that this development would create.
- Development already underway within Milton Keynes Borough on land abutting the A421 should have been taken into account when assessing the transport implications of this development.
- There would also be unsustainable increase in traffic on the V1 and V2 grid roads.
- There was uncertainty as to the legal position of proposed highways works.
- There is a misuse of models in determining the traffic flow and potential impact from the development.

- The traffic plan relies on a northern flow of traffic, which was unrealistic when considering the financial benefit of using Bletchley or Leighton Buzzard for commuting to London.
- Any objection to the scheme should be supported by evidence as Aylesbury Vale do not presently have a local plan and may have no alternative but to approve the application which would have significant detrimental impact on Bletchley and surrounding Communities.
- Any plans should take account of the proposed Oxford/Cambridge Expressway and East/West railway.
- The potential S106 contributions are unlikely to be adequate to address the full infrastructure requirements of the proposed development.
- The proposed development did not provide for infrastructure before expansion.

The applicant's agent told the Committee that duplicate applications had been submitted to Aylesbury Vale District Council and Milton Keynes Borough Council two years previously and discussions had been had with both authorities to seek to address the issues identified. This resulted in revisions having been submitted in August 2016 to address those features.

The Committee heard that from the outset the Developer had acknowledged that there would be implications for Milton Keynes and that they would require mitigation, however the S106 contribution would be with Aylesbury Vale District Council to accord with relevant regulations and that it was for the two Authorities to negotiate settlements that complied with the regulations.

The Committee heard representations from Councillors Clancy, Wales and Geaney reiterating the points raised by previous speakers.

Councillor A Geary asked the Committee to consider the Senior Planning Officer's recommendation at paragraph 6.0 of the committee report as this provided a succinct summary of the objections raised in so far as;

'The application fails to take account of the level of services and facilities required to meet the day-to-day needs of its future residents and fails to make a proportionate contribution towards an increase in the capacity of existing facilities within Milton Keynes to satisfy these increased demands and to mitigate the impact of the proposed development on existing services and infrastructure in Milton Keynes'

He further advised the Committee that he welcomed the recommendation that the Committee reserve the right to make further comment as the process progresses, and suggested that the Chair and Vice Chairs take responsibility for discussing any future issues with Ward Councillors and provide feedback as required, rather than have the matter put before the Committee.

Councillor A Geary also sought the Committees approval that he or a subsequent Chair or responsible Cabinet Member, attend any meeting of the Aylesbury Vale

District Council Development Control Committee to represent the views of Milton Keynes Council.

Members of the Committee confirmed their support for the recommendation to object to the application on the grounds identified in the report and the comments made to the Committee, but urged the Officers to ensure that the objections were evidence based and in the terms of the relevant policies held by Aylesbury Vale District Council.

## **RESOLVED**

1. That the Committee support the recommendation to object to the application, taking further account of the impact on Health Facilities and the Traffic implications for the immediate vicinity and the wider negative impact on the existing residents of Milton Keynes whose existing services would face further and unsustainable demand.
2. That objections be made in written form taking account of relevant policies held by Aylesbury Vale District Council.
3. That any written representations be circulated to the Committee and be agreed with the Chair and Vice Chairs of the Committee in advance of submission to Aylesbury Vale District Council.
4. That the Chair and Vice Chairs write a joint letter in support of the objections on behalf of the Committee.
5. That the Chair or any subsequent Chair and/or the responsible Cabinet Member be requested to attend any relevant meeting of Aylesbury Vale District Council Development Control committee to make representations on behalf of the Committee and Council.

Full minutes available at <http://cmis.milton-keynes.gov.uk>

6<sup>th</sup> June 2016

To: Members of Strategic Development Management Committee  
Aylesbury Vale District Council

By email

Dear Councillors

## Planning Application 15/00314/AOP – Objection

### Introduction - Process

1. We do not believe this application is ready to be determined for the reasons given in earlier correspondence.
2. However, if it is going to be considered then before you go further please consider amending your procedure and treat the speakers from the parish councils within Milton Keynes in whose area part of the application site is, as well as Milton Keynes Council (MKC) itself, in the same way that parishes within AVDC are by MKC and allow 5 minutes each to speak rather than treating them as part of the “objectors” speaking limit. MKC has regularly afforded similar courtesy to AVDC parishes and principle authorities on its boundary and we believe it is only right this is reciprocated by AVDC.
3. If despite all you will hear you are nevertheless minded to grant permission then we urge you to defer for officers to bring back to the committee when full details all conditions and the full proposed section 106 agreement are available. The parish council and others should have the opportunity to make representations on these matters. We therefor urge the committee to retain control over this application.
4. An impression has been put forward that there are different applications to the two planning authorities, there are not. The applications to both Aylesbury Vale and Milton Keynes Council are identical (as they are required to be by the law).
5. We apologise to members that matters are being raised now in such detail, however the points have been highlighted to officers since 26<sup>th</sup> September 2016 by letter attached but not dealt with despite reminder. Following a letter sent on 30<sup>th</sup> May 2017 a response was sent on 2<sup>nd</sup> June however we do not believe this deals with all the points raised.

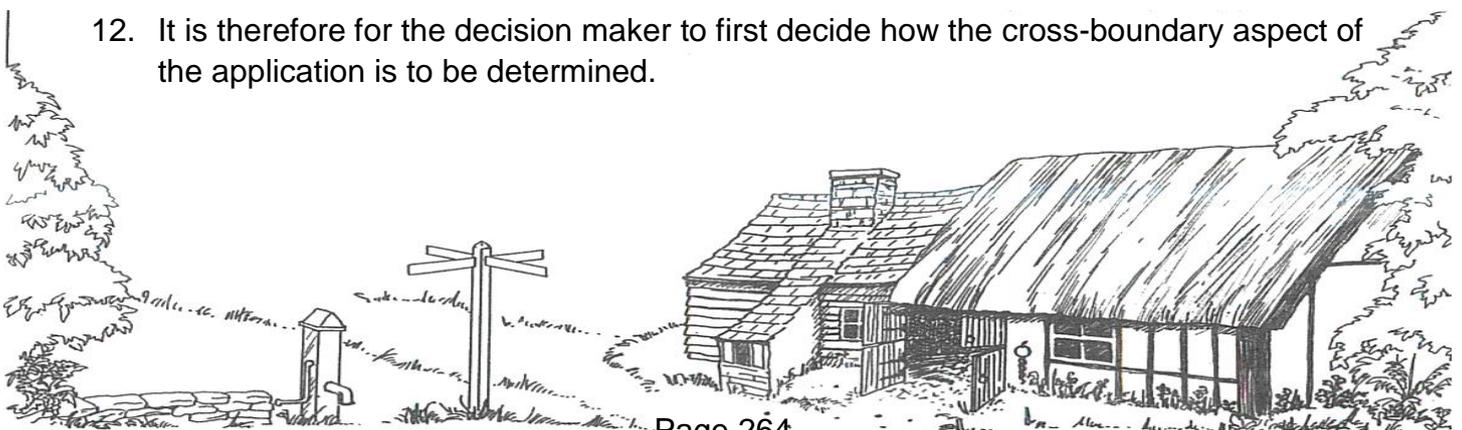
6. Amongst other things, despite being requested over eight months ago, on 26<sup>th</sup> September 2016, we have still not been provided with the raw data used within the Transport Assessment section of the Environmental Statement, nor various communications which justify claims by the applicants that aspects have been agreed by AVDC, BCC and MKC.
7. For the reasons given in more detail below, we hope the committee will defer consideration of the application and require the applicants to submit a fresh Environmental Statement. This should be a new complete single (albeit multi-volume) Environmental Statement with does not constitute a “Paper Chase” as ruled out by the House of Lords in Berkeley.

## **Application not dealt with in accordance with Environmental Regulations**

8. The report to committee purports to deal only with the aspects of the application within the Aylesbury Vale DC boundary, however we contend that is a fundamentally flawed approach and that in particular account needs to be taken of the overall transport implications of the complete application, not simply those parts which happen to be within Aylesbury Vale. Traffic does not respect administrative boundaries.
9. Whilst the government guidance does give any more detail about handling cross-boundary applications under planning law as such, the Environmental Impact Regulations clearly apply to the site as a whole.
10. We asked DCLG for clarification on how cross boundary applications should be considered. Their response makes clear that whilst it is for each planning authority to decide how it deals with the application:

*“I can confirm that where a site which is the subject of a planning application straddles one or more local planning authority boundaries, the applicant must submit identical applications to each local planning authority. We would expect neighbouring local authorities in such situations to work closely together in handling the application, and on the timing of any decisions.”[DCLG]*

11. Given this is a cross-boundary application we contend that this requires a holistic approach which does not simply consider the actual land within each planning authority boundary but considers the development overall and the effect on all surrounding communities. To imagine that either Aylesbury Vale or Milton Keynes Council should simply ignore the effect on communities not within its own boundaries is plainly in conflict with the ethos of joint working and cooperation within the National Planning Policy Framework.
12. It is therefore for the decision maker to first decide how the cross-boundary aspect of the application is to be determined.



13. We urge the committee to consider the application for the site as a whole rather than an artificial boundary running along the local authority boundary as if the world ceases at a local authority boundary. Traffic within Milton Keynes impacts traffic within Aylesbury Vale and vice-versa.

14. Issues raised on 26<sup>th</sup> September 2016 included:

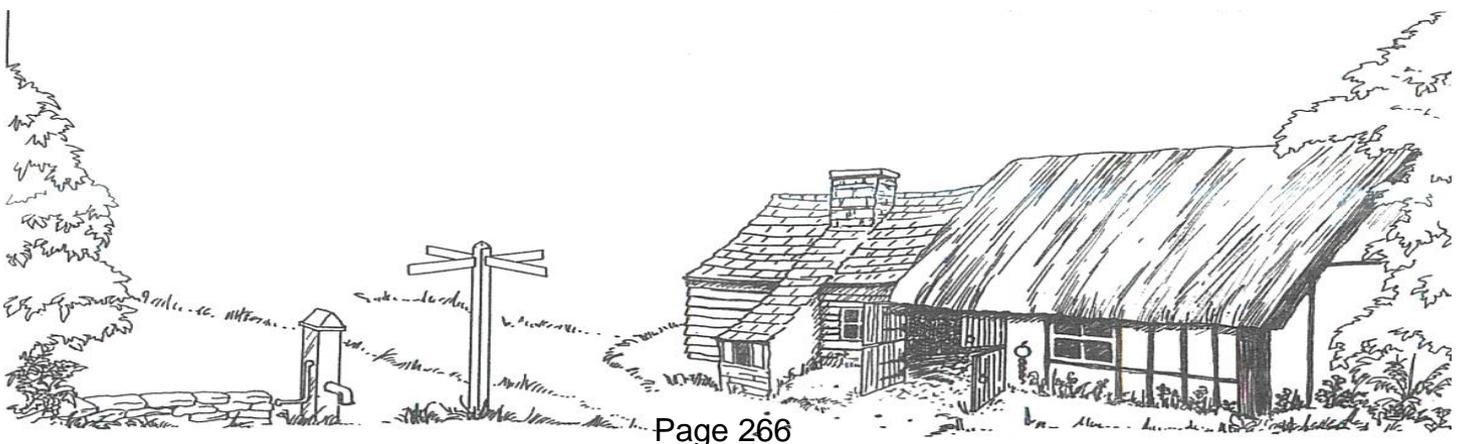
- Environmental Statement (ES) – Failure by the applicants to comply with Environmental Impact Regulations – Avoidance of a “Paper Chase” As the government’s Planning Practice Guidance makes clear, an ES may consist of one or more documents, but it must constitute a “single and accessible compilation of the relevant environmental information and the summary in non-technical language” (Berkeley v SSETR [2000] 3 All ER 897, 908).” What has been submitted does not comply with this.
  - A revised Environmental Statement (ES) has been submitted, however it has only been replaced in parts and to read through the ES means jumping from old to new.
  - Replacement of the odd page or part of a page may be acceptable in isolation, but if the documents are fundamentally changed as here then the relevant sections of the ES should be produced as a new document.
  - The updated Design and Access Statement is a short but complex example of the need to navigate two different documents together. The Transport Assessment is far worse. Over the past four months the applicants’ consultants Mouchel have made repeat changes to junction proposals. For each change proposed a further error or omission has been found. This does not indicate a robust or sustainable proposal.
- Missing Raw Traffic Data and correspondence between the applicants and the highways authorities and planning authorities.
- That at public meetings in West Bletchley and Newton Longville the applicants and their representative claimed that various matters had been “agreed” with the highways authorities and other consultees, but there is little or no detail of these discussions on the planning file.
- Other issues with Environmental Statement – inappropriate use of Google Maps Traffic data to “validate” models and failure to carry out stage one safety audits on the junctions affected other than the proposed Whaddon Road junction – and not to have carried out a revised safety audit on the Whaddon Road junction after making significant changes to the proposed junction.

## Milton Keynes Council planning policies

15. We ask members to carefully consider Milton Keynes Council policy CS6 (attached) including the delivery arrangements and how it should be applied to this application. Amongst other things there is a need to avoid the sort of situation described by residents in the wilderness of “Newton Leys South” that they are finding by being within the AVDC administrative boundary but largely looking to Milton Keynes for services.

## Consideration of Highways and Transport Implications

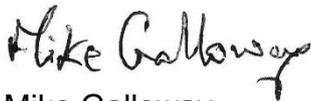
16. You already have a copy of the report commissioned from Transport Consultants by David Tucker Associates (DTA) which was commissioned NLPC and West Bletchley Council (WBC) as well as in the submissions from Steve Heath.
17. There is a recent High Court decision that makes clear that account must be taken of the existing highway situation and not simply that a development proposal must “wash its own face” from a highways impact point of view - see attachment reviewing a recent High Court decision. In it not sufficient to say “the problem already exists therefore we can ignore it”.
18. There appears to be an ongoing fundamental misunderstanding as to who is responsible for decisions on highways matters within a planning application. This is a matter for AVDC as the Local Planning Authority, not BCC as the local Highways Authority (HA). Whilst the BCC as HA may provide advice, the actual decision is for the planning decision maker. Whilst highways works may well be subject to a Highway Act section 278 agreement with MKC as the local Highways Authority, this may only follow a planning approval and the details of what is proposed including an adequate demonstration of the impact on the existing highway network is a planning matter for consideration by the Local Planning Authority.
19. So far no explanation has been provided by the applicants to explain the rational or justification for the removal of a left in, left out junction to the A421 as originally proposed. We understand the only reason for the change is the applicants do not wish to pay the costs of the infrastructure changes that would be needed to support provision of the out part of the proposed junction. So instead they are merely assuming the traffic that would have used that junction can instead use the remaining two proposed junctions.



20. The applicants' consultants Mouchel contend that the majority of the highways impact of the site will be towards Milton Keynes – and from a public transport point of view in particular would point towards Central Milton Keynes rail station in particular rather than to Bletchley or Leighton Buzzard. The traffic that would have exited the development from the A421 junction will now instead have to exit to Whaddon Road and access the MK highways network via Bottledump Roundabout. The T-junction proposed is only a short distance from the MK boundary and yet is the sort of junction that is now being either closed off or limited to left-only out with in MK due to the number of serious and fatal road traffic collisions they have been at such junction on the MK grid road network in recent years.
21. Much extensive analysis of the highways aspects has been undertaken by Steve Heath, a Newton Longville resident, he will detail this in a separate submission. We urge you to challenge the applicants on the issues raised.

Overall, we believe there is sufficient justification in the objections you have to reject this application now and urge you to do so. In the alternative please require the applicants to submit a new compliant Environmental Statement and ensure that all outstanding requests for data and other information are complied with.

Yours sincerely



Mike Galloway  
Clerk to the Council



# NEWTON LONGVILLE PARISH COUNCIL

Email: newtonlongvillepc@hotmail.co.uk

Longueville Hall  
Whaddon Road  
Newton Longville  
Buckinghamshire  
MK17 0AT

30<sup>th</sup> May 2017

Ms Susan Kitchen  
Corporate Planner  
Aylesbury Vale District Council  
The Gateway  
Gatehouse Road,  
Aylesbury  
HP19 8FF

Dear Ms Kitchen

## **Planning Application 15/00314/AOP – Salden Chase (South West Milton Keynes)**

The aim of this letter is to advise you on the Parish Council current views on the revised application of the development of nearly 1,900 houses on an arable, greenfield site only 200 metres from our village of some 850 houses.

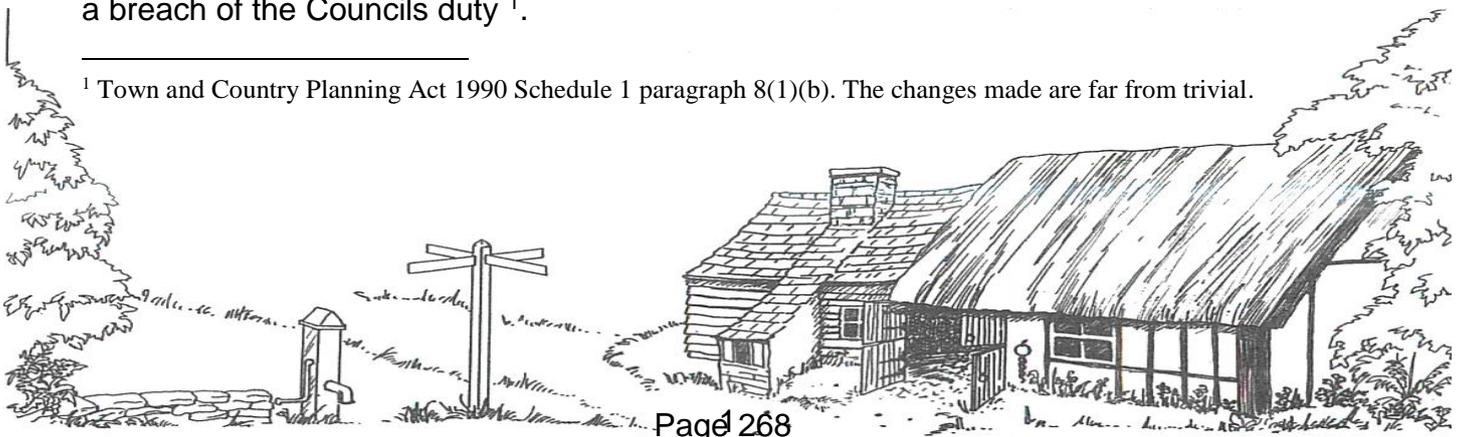
We believe it is inappropriate to take the application to a meeting on 7<sup>th</sup> June, for the reasons below and in addition as this is the day before the general election and hope you can confirm to us that this meeting will not take place. We believe it unfair to have such a critical development for our village discussed at that time, when participants are likely to be consumed with other matters.

In addition, there remain matters of substance that we feel need to be explored before the application is considered by the committee.

We, our residents, West Bletchley Parish council and Whaddon Parish council are equally affected by the proposed development. By the meeting going ahead as planned we will all be afforded an unfairly short of time to respond. There has been no consultation with residents on any of the changes made after August last year. The later changes are far from trivial, they are key to how traffic is supposed to flow through a development and on existing roads.

This situation has been exacerbated it appears by the fact that AVDC was in receipt of key documents from the applicants six weeks before the cancelled committee meeting, on May 17<sup>th</sup> 2017, but these were not all made public. Some documents were put online on 8<sup>th</sup> May, but as of today no formal notification of these changes have been made to either ourselves, West Bletchley Parish Council or Whaddon Parish Council. We feel that this is a breach of the Councils duty <sup>1</sup>.

<sup>1</sup> Town and Country Planning Act 1990 Schedule 1 paragraph 8(1)(b). The changes made are far from trivial.



# NEWTON LONGVILLE PARISH COUNCIL

Bucks County Council Highways have told us that their report for this application (as attached to the report for 17<sup>th</sup> May) was based on updated documents provided by Mouchel (applicants specialist) in April 2017 and the BCC report quotes from the updated documentation.

These are not the documents that were placed online by AVDC on 8<sup>th</sup> May which are dated February 2017 and March 2017. All submissions from the applicant and particularly the most recent ones should be on the AVDC planning website. As of this morning (30<sup>th</sup> May) the documents referred to by BCC are not listed, despite having been specifically requested from officers on 19<sup>th</sup> May and followed up twice since then.

We trust that situation will be resolved as a matter of urgency and that consultation for an appropriate minimum period will be undertaken of at least 21 days with all those who have commented before and all relevant other consultees and parish councils being notified of the changes.

Applying the Wheatcroft<sup>2</sup> principles we believe mean that if the current changes to the application are to be accepted by AVDC, then as a minimum AVDC should notify the proposed changes to all who have responded so far to the application.

In the same vein, we are not convinced that the changes made in August 2016 should have been accepted as valid changes to an application.

Our understanding is that AVDC should at that point have rejected the changes and advised the applicants to either withdraw their application and submit a new application, or that the application as submitted in January 2015 would be determined.

In the circumstances, we believe that AVDC should now call a halt to this and ask the applicants to withdraw their application. Therefore, leaving to the applicants to submit a new application if they wish to do so.

Any new application should include:

- a new Environmental Statement
- updated traffic surveys and accident records from a current date within 2017
- take account of the current housing supply situation in Aylesbury Vale.

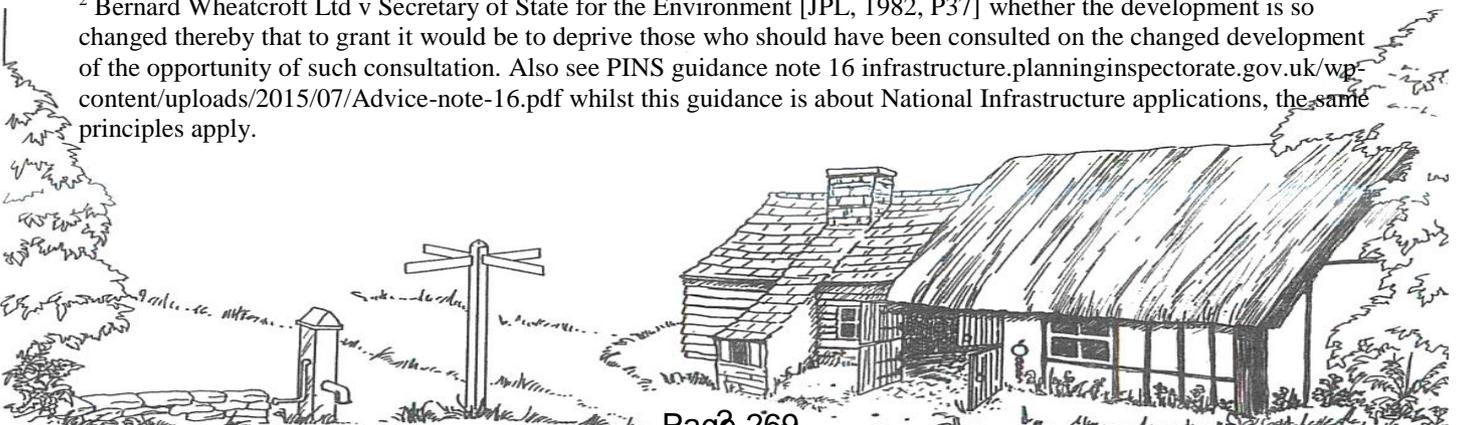
Much of what the application relies on is out of date and fails to take account of recent growth.

## Challenges

We have challenges on multiple issues. This letter confines itself to those which in our opinion are the most serious.

---

<sup>2</sup> Bernard Wheatcroft Ltd v Secretary of State for the Environment [JPL, 1982, P37] whether the development is so changed thereby that to grant it would be to deprive those who should have been consulted on the changed development of the opportunity of such consultation. Also see PINS guidance note 16 [infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/07/Advice-note-16.pdf](http://infrastructure.planninginspectorate.gov.uk/wp-content/uploads/2015/07/Advice-note-16.pdf) whilst this guidance is about National Infrastructure applications, the same principles apply.



# NEWTON LONGVILLE PARISH COUNCIL

Highways and Transport is inter alia a key and major focus. Our transport analysis expert is currently completing another paper, which we will shortly be sending to all appropriate parties. This will provide a detailed and definitive rebuttal of the latest iteration of the application submission revised by Mouchel.

We believe that this is such a substantial issue that as a matter of urgency the application should be withdrawn until consensus has been reached - based on verifiable traffic data information that can be properly and thoroughly audited and analysed.

However, in that context we are being unfairly hampered by the following:

- The consistent and egregious failure by the applicants to provide the background data to justify their various proposals;
- The apparent failure by the AVDC to provide records of the communications about the application as part of the online planning file. These records would, we believe, address at least the following:
  - the changes to the application; and
  - what may, or may not, have been agreed between the applicants and AVDC, Buckinghamshire County Council Highways, Milton Keynes Council by whom and on what basis. Various documents submitted by the applicants are littered with claims that certain things have been “agreed” by AVDC, BCC and MKC.

Until this missing data is provided we cannot fairly and fully assess what the applicants have put forward.

## Amendments to the application

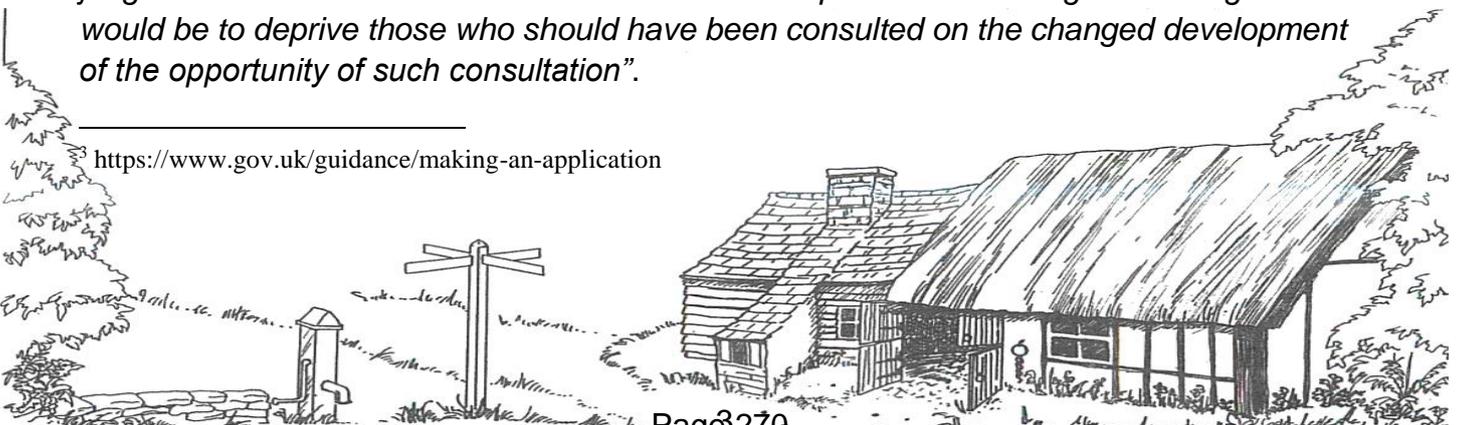
Returning to the repeat amendments to the details of the application, we note the relevant paragraph from the governments Planning Practice Guidance on amending applications:

*"Can an applicant amend an application after it has been submitted?"<sup>3</sup>*

*It is possible for an applicant to suggest changes to an application before the local planning authority has determined the proposal. It is equally possible after the consultation period for the local planning authority to ask the applicant if it would be possible to revise the application to overcome a possible objection. It is at the discretion of the local planning authority whether to accept such changes, to determine if the changes need to be re-consulted upon, or if the proposed changes are so significant as to materially alter the proposal such that a new application should be submitted."*

In the 'Wheatcroft' judgement the High Court considered the issue of amendments in the context of conditions and established that *"the main, but not the only, criterion on which... judgment should be exercised is whether the development is so changed that to grant it would be to deprive those who should have been consulted on the changed development of the opportunity of such consultation"*.

<https://www.gov.uk/guidance/making-an-application>



# NEWTON LONGVILLE PARISH COUNCIL

Therefore, we do not believe the changes made in August 2016 should have been processed as amendments.

Our position is firm: we believe the nature of the amendments in August 2016 and the further amendments, the missing data and the timing of the meeting where they are to be discussed are major and as such that the development is so changed that the application should not be considered on 7<sup>th</sup> June 2017. We believe that we and others should have been consulted on the changes and to do so would be to deprive us and others of our rights to be consulted and comment with sufficient time to do so.

Despite what is said about the need to re-consult on the most recent changes, we contend the correct approach is that the applicants should have already been compelled to have withdrawn their application, on the basis of the proposals which contain inaccurate, incomplete analysis and factual flaws but primarily as a result of the changes made since the application was submitted in January 2015.

In our letter of 26th September 2016 about "amendments" to the Environmental Statement being inappropriate, we said it had caused a "paper chase" contrary to the House of Lords' decision in Berkeley<sup>4</sup>.

This would have been avoided had a new application been required by AVDC, in turn requiring updated traffic information – which would have obviated one of our major concerns and issues.

## Consultation

The Court of Appeal summarised the general principles relating to consultation within the context of administrative law<sup>5</sup>.

*"108 It is common ground that, whether or not consultation of interested parties and the public is a legal requirement, if it is embarked upon it must be carried out properly. To be proper, consultation must be undertaken at a time when proposals are still at a formative stage; it must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response; adequate time must be given for this purpose; and the product of consultation must be conscientiously taken into account when the ultimate decision is taken."*

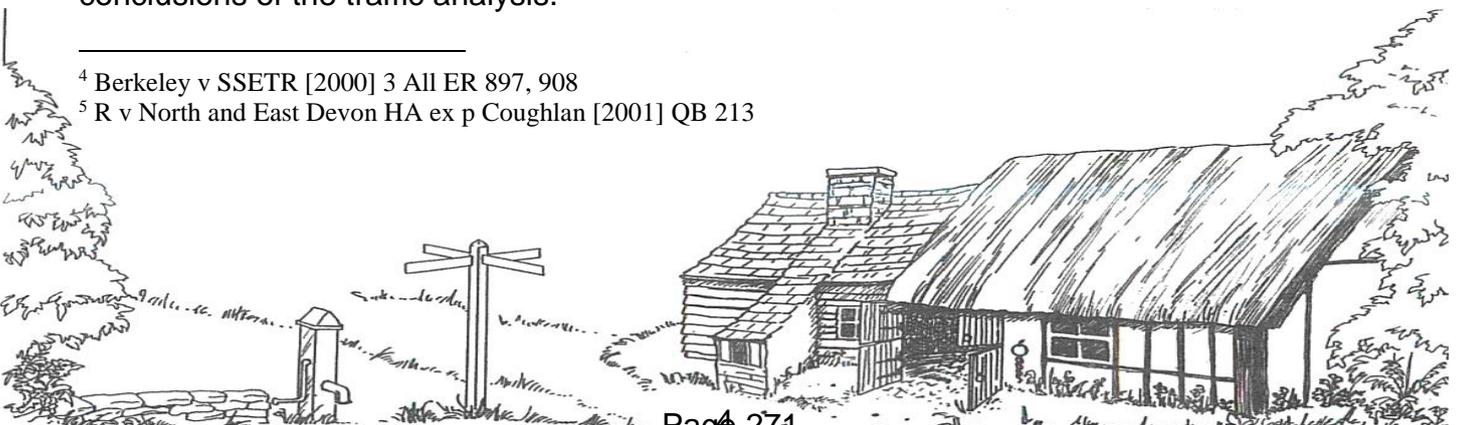
This shows the lack of detail provided so far and lack of sufficient reasons for the changed proposals mean the consultation process, in our opinion has been flawed.

## Traffic flow data

Turning now to an issue that has disturbed us greatly: on behalf of the applicants, Mouchel have failed adequately, correctly and properly to produce verifiable evidence to support the conclusions of the traffic analysis.

<sup>4</sup> Berkeley v SSETR [2000] 3 All ER 897, 908

<sup>5</sup> R v North and East Devon HA ex p Coughlan [2001] QB 213



# NEWTON LONGVILLE PARISH COUNCIL

It is a matter of record that the applicants have failed to do so in at least three subsequent revisions to their proposals.

As you will no doubt concur: the planning system is not meant to permit amendments to be repeatedly made. It is not a system that provides endless resubmission until the right answer in the eyes of the applicants has been reached. Traffic analysis is not a hypothetical process. It is an empirical process based on the collection of verifiable data, rigorous analysis and modelling using industry-approved software.

Furthermore, we believe Mouchel have used incorrect data, incorrect modelling, and out of date versions of software tools.

Mouchel have, by their own admission, done none of the preceding. It therefore follows inevitably that their traffic analysis without credibility or substance.

## Summary

Given the inability of the applicant to produce an accurate, proper, well-researched traffic analysis; the failure to consult or cooperate with us in any substantive way, we request that the applicants are asked to withdraw their application, and only resubmit once a proper, verifiable traffic analysis has been conducted to that is agreed by all sides in advance.

We believe the applicants have not complied with the requirements to serve appropriate notice on all owners<sup>6</sup>. In particular that they have not served notice on the Milton Keynes Parks Trust.

Finally, the timing and scheduling of the meeting and the apparent lack of crucial papers on the website have not afforded us adequate time to prepare.

Yours sincerely

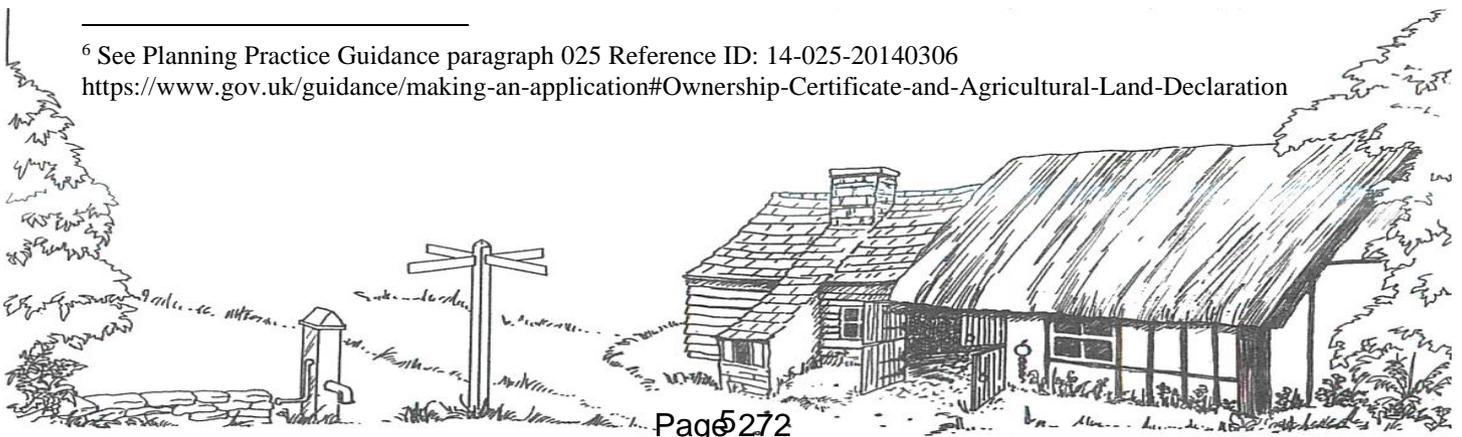


Cllr Nigel Gausden  
Chairman  
Newton Longville Parish Council

CC: Chairman and members of SDMC and local ward members

---

<sup>6</sup> See Planning Practice Guidance paragraph 025 Reference ID: 14-025-20140306  
<https://www.gov.uk/guidance/making-an-application#Ownership-Certificate-and-Agricultural-Land-Declaration>





PARISH/TOWN COUNCIL COMMENTS ON PLANNING APPLICATION:-

15/00314/AOP - NEWTON LONGVILLE

Email: parishclerk@whaddonbuckspc.org.uk

Land South Of The A421 West Of Far Bletchley North Of The East West Rail Link And East Of Whaddon Road Newton Longville

Outline planning application with all matters reserved except for access for a mixed-use sustainable urban extension on land to the south west of Milton Keynes to provide up to 1,855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary and a secondary school; a grid road reserve; multi-functional green space; a sustainable drainage system; and associated access, drainage and public transport infrastructure.

CASE OFFICER: Mrs Claire Bayley  
CONTACT NO: 01296 585335

DATE COMMENTS REQUESTED BY:- 5 August 2020 (Extended to 11 August 2020)

15/00314/AOP - NEWTON LONGVILLE

The Parish/Town Council:-

- 1. Has NO OBJECTIONS
- 2. SUPPORTS the application - For the reasons given below:
- 3. OPPOSES the application - For the reasons given below:

PLEASE SEE ATTACHED LETTER  
-S BRONKFIELD - C BAYLEY 11/9/20

Signed: ..... S.S. Lindley ..... Date: 11/9/20 .....  
CLERK - PO WHADDON PARISH COUNCIL

# WHADDON PARISH COUNCIL

11<sup>th</sup> September 2020

Reply to; Suzanne Lindsey  
Clerk to Whaddon Parish Council  
1 Vicarage Rd  
Whaddon  
MK17 0LU

Tel: 01908 507970

Email: ParishClerk@WhaddonBucksPC.org.uk

James Bedingfeld  
Highways Development Management  
Planning Growth and Sustainability  
Buckinghamshire Council  
Walton Street Offices  
Walton Street  
Aylesbury  
HP20 1UA

Copy to Claire Bayley, Planning Officer, Development Management, The Gateway.

Dear Mr Bedingfeld and Ms. Bayley.

**Re: South West Milton Keynes - Updated Transport Assessment,  
Bucks Council planning ref: 15/00314/AOP**

**Milton Keynes Council (highway access refusal planning appeal ref: 20/00038/REF -  
Land at Buckingham Road.)**

**15/00314/AOP - NEWTON LONGVILLE. (Land south of A412; west of Far Bletchley  
etc)**

Whaddon Parish Council (WPC) would ask Officers that this response, made within the agreed extended time period to 11th September 2020, is treated as this Council's formal **OBJECTION** to 15/00314/AOP, being the mixed use sustainable urban extension for up to 1855 mixed tenure dwellings etc. at Newton Longville. WPC reserves the right to submit further comments, once answers have been provided to all the various questions contained within this document.

Following letters dated 12th February and 10th July 2020 to Buckinghamshire Council (BC), Whaddon Parish Council (WPC) have been directed by BC Parish Support, to your response dated 29th July 2020 posted on the planning website on the same date. Having considered your response, at a Zoom meeting of this Council last evening, councillors do not believe that it provides, as requested, the *'clear and understandable response - that sets out the*

*differences between the earlier TIA's and the latest updated TA, what has changed and how do those changes impact on Whaddon village?'. Mr Bedingfield's final (page 20) response to the Whaddon Parish Council fails to answer our concerns and indeed raises further questions, upon which answers are now requested, which will enable this council to properly discuss the impact that this development will have on the highway safety of our community.*

Therefore may we please ask you to respond to the following points, as quickly as possible:-

1. Can Mr Bedingfield firstly confirm that he received both WPC letters (12th February and 10th July) together with the plan attached to the 12th February 2020 letter. Secondly, although we are informed that a site visit will have been made, can you confirm that you are aware of, and understand the concerns that this community has been making for many years about the rat-running problems between the A421 (junction 7 - Whaddon crossroads/roundabout) and Central and North MK that have been steadily worsening, almost year on year, ever since MK began 50 years ago?
2. As WPC understands it, WSP have been asked to verify and review all comments on your tables, after which you will provide a full and comprehensive response to the application. Can you confirm that this further response will be made before the MKC appeal commences in October?, in order that the Planning Department can include the findings within their submission to the Inspector. Furthermore, can you confirm whether or not WSP has been asked to comment specifically on this Council's expressed concerns that you attempted to answer on your page 20?
3. Your reply states *"The traffic surveys in January and February 2020 were performed at locations agreed between the consultants acting on behalf of the SWMK (Salden Chase) development and BC officers'.* When were these discussions held and who with? When WPC contacted BC on 7th February (see our 12th February letter) we were informed that 'Yes consent had been granted for the ATC's to be placed, but BC officers did not know the purpose for them or who the applicant was'.
4. You explain the types and duration of the surveys varied from the previous data collection exercise, but you provide no data details, nor can WPC locate any within the updated TA. Are you able to provide all the data (from both 2015 and 2020) relating to the three junction arms at junction 11 please? (Stock Lane/Coddinmoor Lane/Shenley Road)
5. You state that *"as part of the approval process (for the location of the ATC's) a review of the roadworks within BC was performed ...."* The problems and road closure works at Calverton Lane, that clearly impact on Whaddon Village, are wholly within MK district. Were MK Highways consulted prior to the ATC locations being agreed?
6. It is absolutely clear, both from our own on-site observations, and the ATC location plan (Figure 3.27, page 67 of updated TA by WSP dated May 2020) that Stock Lane, Whaddon (close to the village primary school) was one of 55 agreed locations yet it appears that these data readings have been completely ignored and excluded. You say

in your response "The extent of the SWMK assessment network is the junction of Coddimore Lane/Stock Lane/ Shenley Road just to the south of the village of Whaddon itself" Why then was an ATC location agreed along Stock Lane? (refer to our point 3 above). Your reply attempts to explain diversion routes following the closure of Calverton Lane and V4 Watling Street, but you are misinformed on the signage and have ignored the reality of the rat-running traffic movements. Now that these two routes are both re-opened the level of traffic along Stock lane and through the centre of Whaddon village is steadily increasing and will continue to do so as the rat-runners realise that the road to and from MK is once again available to them, and Covid-19 concerns allow drivers to return to work as normal.

The only reason that Shenley Park (a very late candidate for VALP, and as yet far from being an accepted or adopted site), was mentioned is simply because WPC were unable to ascertain from BC the exact purpose of the sudden appearance of the ATC equipment. In truth, neither of these 'diversionary issues' have any bearing on our main concern, being that of the extra traffic arising from some 1588 new homes etc, at Salden Chase where drivers may choose to use the Whaddon short-cut and exacerbate the current rat-running problems along unsuitable roads through the village. The Stock Lane ATC data must be made available, or in the event that 'someone' has chosen to exclude them, then new data must be collected at this location to evaluate the extent of current rat-running and establish how this would increase in the future once further major development adjacent to the A421 occurs.

7. You make comparisons between the 2015 and 2020 data collection exercises and conclude that on average a 25% greater flow was seen on all arms of both junctions (7 and 11) apart from an AM peak decrease at one arm of both. WPC would like detailed clarification on this statement, including the figures which justify your findings. Do these figures take into account the Calverton Lane closure, or make any attempt to estimate the increased rat-running that WPC anticipate will occur along Stock Lane/Stratford Road, once and if Salden Chase is built out?
8. WPC estimated from our own traffic calming (Including MVAS data) that even before the Covid-19 epidemic, traffic flows along Stock Lane (to and from MK) due to the Calverton Lane closure were dramatically reduced. If these figures are correctly factored in (as they should be) then your 25% may be understated, as WPC believe that the actual figure could be as high as 40/45% along Stock Lane/Stratford Road. This possible disparity should trigger the requirement of additional traffic surveys to collect reliable data for assessing the proper potential impact of traffic using the Stock Lane arm as part of the rat-run from the A421 to central and north MK. You suggest in your final sentence that you would not rule out additional traffic surveys if deemed necessary. The Whaddon traffic calming scheme may remind drivers that they are travelling through a rural built-up area, but in reality it does absolutely nothing to reduce the amount of rat-running traffic - which was the original intention when first installed some seven years ago.
9. Referring to your tables at para no. 7.3.34 you make comments about the 'Minor Road Visibility to the left'. As you refer to the 'Value of 51.2 passing through the hedge

boundary' (a point that WPC does not understand) clearly this refers to turning the corner into Stock Lane. This is not the minor road, but the main uninterrupted road that runs through the village, upon which the majority of village traffic travels. The minor arm is the right turn (from Coddinmoor Lane into Shenley Road), which then passes the entrance to the recreation ground. This is a dangerous junction, with many recorded - and unrecorded - accidents, and making the right hand turn is in fact a very difficult manoeuvre - made more difficult by the presence of the hedgerow - which reduces forward visibility considerably, meaning that vehicles have to venture well round the bend - often straddling the centre line - before they can see enough to safely complete their turn. As traffic is likely to increase as a result of this and possibly other developments, then this council would like to suggest that BC consider changing the priority of this junction, making Coddinmoor Lane a 'T' junction, with priority given to Stock Lane and Shenley Road, with appropriate visibility splays. Subject to safety design, audit and local consultation, this could make this junction much safer, improve visibility and act as a further traffic calming facility to enhance that which already exists. WPC contend that developments which impact on and increase traffic volumes through and along minor roads must be made responsible for making appropriate safety improvements, and whilst you say at 7.3.34 within your chart "Very unlikely to alter results or overall outcome" WPC would argue that the hedgerow does indeed raise a question of safety. Staying with para no. 7.3.34 within the WSP revised TA councillors note that this junction 11, has been assessed using junction 9 (PICARDY). This statement needs explanation because junction 9 relates to Shucklow Hill and Little Horwood (off the A421) and councillors firmly believe that this is not a fair comparison. WPC does not agree with para no. 7.3.35 that states "*No development traffic is routed via this junction within this TA and therefore there is no impact as a result of the proposed development. Mitigation is therefore not necessary*". WPC believes that if true and accurate data is collected once the rural road network is fully functioning (as occurred before Covid-19 and road closures), including an origination and destination survey then further mitigation is required - perhaps including changing the junction priority as discussed above? Bucks Council should be fully and properly investigating this council's legitimate concerns, and ensure that the developers undertake mitigation works as found necessary.

10. Summing up, WPC's point - which consistently appears to be ignored - is that even if Shenley Park - and the hypothetical V0 grid road - gets approved in the emerging VALP, or any subsequent BC Local Plan, it is WPC's contention (as confirmed by experience and village data) that drivers will always seek the quickest and easiest route (even if it is a little longer in travel distance) to Central and North MK. The well tried and tested rural Whaddon 'rat-run' has and will continue to appeal to drivers who wish to avoid having to compete with 9/10 roundabouts and in the process have to cross various H and V grid roads ..... especially at AM and PM peak travel times, when congestion and queuing already present huge problems - even before one or two major developments and the traffic from some 2800 new homes is fed onto an already congested A421. The idea/guess that 35% of incoming A421 traffic would divert onto the V0 - if ever constructed - as suggested by BC to WSP, totally ignores the fact that the Whaddon short-cut is located just 1km further out from the new V0's intended

location, and will prove to be a more attractive magnet to those drivers looking to access central and north MK. Coddinmoor Lane/Stock Lane is clearly not a 'grid road', but does unfortunately represent 'the first' opportunity for drivers to change their route into MK - which happens now and will continue to do so - an important point overlooked by both BC and WSP.

11. WPC would like to hold discussions with the Highway authorities regarding the traffic impact that these, and potentially other developments will have on Whaddon village. There is an acceptance that mitigation must happen in Whaddon due to the SWMK development, and if you have not already seen it, WPC refer you to para 2.2.3, on page 3 of 11, of the WSP SWMK Technical note 18 : Review of Transport Modelling, dated June 2019, which states at bullet 6 "*Whaddon Village - there is concern over potential 'rat-running' and a contribution of some £22.000 has been agreed*". This is a problem historically understood by Government's Milton Keynes Partnership and the developers of the Western Expansion Area - who paid the 'Lion's Share' of the Whaddon Traffic Scheme some seven years ago, but which WPC now firmly believes - is being 'sidestepped' by BC and MKC now that the MK powers have been effectively devolved to the new Unitary MK Council - as opposed to being under the control of Government agencies. WPC wishes to stress that the 'already agreed' mitigation may not be sufficient, once the true traffic situation and data figures are recorded and properly understood, - which WPC repeats, could and probably should include a manual 'origination and destination' survey along Stock Lane/Stratford Road to be undertaken to fully understand why Whaddon is being consistently used as a shortcut to and from the A421 to central and north MK.

Having addressed the points in Mr Bedingfeld's response to WPC concerns, WPC would now turn specifically to the Updated TA prepared by WSP, dated May 2020 and placed online on 30th June 2020, and Mr Bedingfeld's 'initial' response dated 29th July made to BC Planning Growth and Sustainability. WPC would be pleased to receive your comments on the further observations made by this council below - where specific questions and relevant observations are shown in Italics below. Items in normal type are copied extracts from the revised TA document that should be read in conjunction with the questions. WPC regrets some duplication of points being made, but consider this is the best way of ensuring nothing is overlooked.

**SOUTH WEST MILTON KEYNES - (Previously known as Salden Chase).**  
**UPDATED TRANSPORT ASSESSMENT.**  
**AUTHOR - WSP. DATED - MAY 2020**  
**TYPE OF DOCUMENT (VERSION) PUBLIC.**

**EXECUTIVE SUMMARY.**

Para 12. A comprehensive data collection exercise was undertaken in February 2020 to inform this updated TA. The data collection exercise was completed prior to any travel restrictions being introduced by the UK government associated with the Covid-19 Pandemic. The dataset collected therefore represents a robust picture of traffic conditions at that time, and forms the base from which the highway network assessment contained within this TA has been undertaken.

Para 13. A transport network assessment has been undertaken that considers the impacts of the development on all modes of transport during both the construction and operational

phases of the development. Consideration has also been given to impacts on surrounding villages, highway safety and the strategic road network.

Para 14. The results of the highway network assessment of the 18 off-Site junctions and two Site access points identified that the development would potentially have an impact at a number of junctions across the study area. The assessment is based on a distribution analysis using census data and a number of static junction models developed using industry standard software tools and presents an analysis that is robust and reliable. The static model makes no provision for the dynamic reassignment of traffic that would be likely to occur during peak travel periods. The transport modelling underlying Plan:MK and the emerging Vale of Aylesbury Local Plan (VALP) both use strategic models which do account for traffic reassignment, and reference is made in this TA to their outputs where appropriate in order to draw correlation with future year congestion and delays.

Para 16. A package of 'off-Site' highway mitigation measures has been developed to accommodate the development proposals on the highway network. At some locations, there is significant background traffic growth even without taking account of the Proposed Development and these impacts of wider growth in the area must also be considered.

## **1.5 SCOPING DISCUSSIONS WITH HIGHWAY AUTHORITIES.**

Para 1.5.2. A Transport Assessment Scoping Note (TASN) was issued to BC and MKC in mid-January 2020. A meeting was held with representatives from both authorities shortly afterwards where the TASN was discussed. The starting point for assessment of the development proposals on the highway network was to use one of the strategic models held by BC and MKC. During this meeting it was agreed that as neither the Buckinghamshire Countywide Model nor the Milton Keynes Multi Modal Model (MKMMM) covered the study area for the TA in sufficient detail, a manual spreadsheet-based approach to the assessment would be required to provide a consistent approach across the study area, albeit recognising that this 'static' junction model approach would make no allowance for the dynamic reassignment of traffic across the wider highway network.

Para 1.5.3. An updated TASN was then issued and the following key parameters were agreed with BC and MKC as part of this. The full TASN is included within Appendix C:

Bullet 7 : Inclusion of Tattenhoe Park as a committed development

Bullet 8 : Provision of a sensitivity test to test the impacts of the Proposed Development in combination with Shenley Park.

***WPC Comment :-** If the trip generation and distribution associated with the committed development at Tattenhoe Park (TP) is required, then why not the Western Expansion Area (WEA), which is served by the same rural road network (i.e. Coddinmoor Lane from the A421)? After all, TP is only some 1280 units, whilst the WEA is 7000 units (almost 6 times larger) - please refer to the plan attached to WPC original letter to BC, dated 12th February 2020, which clearly shows the accepted 'rat-run' routes marked in blue, and all the developments referred to within this response.*

### **Figure 1.2 - TA Study Area, (plan)**

Para 1.6.4. (Data Collection) A comprehensive data collection exercise was undertaken in February 2020 across the study area agreed with BC and MKC as part of the scoping process. The data collection exercise was completed prior to any travel restrictions being introduced by the UK government associated with the Covid-19 Pandemic. The dataset collected

therefore represents a robust picture of traffic conditions at that time and forms the base from which the highway network assessment contained within this TA has been undertaken.

*WPC Comment :- The Plan clearly shows the study area extending beyond the Coddimoor Lane/Shenley Road junction into Stock Lane and up to High Street (the direction to the 7500 new homes currently under construction at the WEA via Stratford Road which is a continuation of Stock Lane). Figure 1.3 identifies this junction as No 11. Why therefore have both Stock Lane and the ATC - an agreed location - been ignored and completely excluded from the overall TA exercise? This is not acceptable.*

## **2.4 EMERGING POLICY - DRAFT VALP 2013-2033.**

**Para 2.4.4 -bullet point 5.** • In order to mitigate the potential impact in Whaddon a financial contribution is required towards road safety improvements on Coddimoor Lane and Stock Lane.

*WPC Comment. The figure agreed at an earlier stage of this extended planning process is £22,000 to provide kerbing improvements around junction 11, and to establish a variable 20mph speed limit on both approaches to Whaddon Primary School situated along Stock Lane. WPC cannot find confirmation within the new revised TA that this funding commitment remains, and requires confirmation that this still applies, should the development proceed. Additionally the previous TA recognised the traffic problems through the village by way of this already agreed financial contribution, so why has the TA assessment area suddenly excluded Stock Lane, and why has the data updates from the Stock Lane ATC not been included or continued within the new document?*

## **2.5 GUIDANCE (PPG) (2014)**

**Para 2.5.2.** The PPG (Reference ID: 42-004-20140306) explains that Transport Assessments (TAs) and Travel Plans (TPs) are ways of assessing and mitigating the negative transport impacts of development in order to promote sustainable development and that they are required for developments which generate significant amounts of traffic movements. A TA may propose mitigation measures which may be required to avoid unacceptable or severe residual impacts. TPs are identified as playing an effective role in taking forward approved mitigation measures which relate to on-going occupation and operation of the development.

**Para 2.5.5.** It is necessary for a TP to set out explicit outcomes rather than just identify processes to be followed. A TP should also address all journeys resulting from a Proposed Development by anyone who may need to visit or stay, and it should seek to fit in with wider strategies for transport in the area.

*WPC Comment :- The route through the WEA (via Stratford Road/Stock Lane, Whaddon to the A421 at junction 7 - and then onwards to the SWMK) must be included as an important journey, as this route (a recognised rat-run) provides drivers the quickest - whilst possibly not the most direct route - to and from Central and North MK, Stony Stratford, Wolverton, and all the employment destinations in those areas, some, if not all of which will be target destinations for many SWMK residents.*

**Para 2.5.7.** The PPG also requires the appropriate consideration of the cumulative impacts of any adopted Local Plan allocations or committed developments where there is a reasonable degree of certainty of proceeding within the next three years. Through discussions with BCC

and MKC, the appropriate level of committed/allocated development has been included within the assessments through the use of TEMPro7 growth factors and inclusion of specific developments.

*WPC Comment:- Was the WEA considered as part of the cumulative impact, especially as both authorities are well aware - over many years - of the Whaddon traffic concerns relating to short-cutting traffic and increasing impact of HGV's? If not, why not?*

### **3.3 LOCAL ROAD NETWORK**

**Para 3.3.2 :-** To the west, A421 provides links to Buckingham and A43. A421 extends west from Bottle Dump Roundabout in the north-west corner of the Site and has a number of junctions along its length providing links to minor roads that serve the surrounding villages. A421 continues west and meets A413 at a roundabout to the east of Buckingham, some 12.5km west of the Site, before continuing west bypassing Tingewick to the south before joining the A43 approximately 4km south of the centre of Brackley.

*WPC Comment :- This paragraph fails to identify that Coddimore Lane (off Whaddon crossroads - junction 7) serves not only Whaddon Village, but is a recognised and well-known local shortcut to Central and North MK (see para 2.5.5 above).*

### **3.10 TRAFFIC SURVEYS**

**Para 3.10.1 :-** A comprehensive data collection exercise was undertaken in February 2020 to provide an up to date baseline for consideration within this TA. The study area was agreed with BC and MKC as part of the TA Scoping process and includes the roads most likely to be affected by the Proposed Development. Figure 3.27 provides details of the data collection exercise undertaken with the full scope provided in Appendix B.

#### **Figure 3.27 - Traffic Survey Study Area (plan)**

*WPC Comment :- This plan clearly shows an ATC cable location (one of 18 junctions) close to Whaddon Primary School along Stock Lane, so WPC is persuaded that this location must have been agreed with BC and MKC as part of their TA scoping process. However, WPC can find no reference to this location, nor any data record of traffic passing this point. Equally WPC is concerned that you yourself have stated " The extent of the SWMK assessment network is the junction of Coddimore Lane/Stock Lane/Shenley Road, just to the south of the village of Whaddon itself". Why this blatant error, which is crucial to the WPC case for further thorough investigation? WPC would reiterate that this is the well-known short-cut route to Central and North MK referred to earlier, and finds it impossible to accept that the TA should only consider the minor arm figures along Shenley Road that leads via a convoluted residential development to South MK and the Westcroft shopping centre.*

**Para 3.10.2 :-** A total of 18 junction turning counts alongside 55 automatic traffic counts, three journey time surveys and three radar surveys were commissioned. Junction turning counts were undertaken on three separate weekdays to reduce any uncertainty regarding daily fluctuations in traffic flow. The Automatic Traffic Count (ATC) and radar surveys were conducted over 14 days to provide two weeks of data.

*WPC Comment :- Can WPC be provided with all the counts taken from the three ATC locations around Junction 11 during the 2020 traffic count. In order that WPC can make a sensible comparison can we also receive the same data collected from the 2015 count?*

Para 3.10.3 :- From the analysis of the survey data across the 18 junction turning counts it was established that the weekday network peak hours were 07:45-08:45 and 17:00-18:00.

*WPC Comment:- WPC do not dispute these peak hour times. But would suggest that the actual weekday peak travel times through Whaddon village are extended between 07:00 - 09:00 and 04:30 - 06:30.*

## **TRIP GENERATION**

### **5.2 : Residential Trips and 5.3 : Employment Trips**

*WPC Comments :- The tables and comparisons shown within pages 105 through 122 make little sense to WPC, and because it is impossible for cost reasons for WPC to employ consultants this Council must rely on BC Transport experts to analyse the data and protect our resident and community environmental interests, which importantly includes highway safety. What is eminently clear to WPC however is that somehow the traffic generated from the development seems to miraculously have lessened in some areas without clear reasons as to why, but more importantly to WPC the resultant trips take absolutely no account of the likely (indeed already known) trips from the proposed development to Central and North MK along Stock Lane and then Stratford Road. WPC cannot understand why this known and obvious route has been excluded, yet the minor route via Shenley Road has been included. Worse still are the assumptions built in at BC's request to analyse the impacts of a possible Shenley Park and extended V0 grid road system to further relieve the impacts on the existing road network should these developments proceed. WPC contend - with some considerable knowledge, backed up by MVAS data - that even if Shenley Park proceeds, thereby allowing the V0 to materialise, or even if the existing MK grid road network is utilised - then many drivers will still use the 'rat-run/short-cut' through Whaddon Village to Central and North MK. This fact cannot be disputed, and to try and do otherwise or 'hide behind' unfathomable data is both irresponsible and dangerous for the Whaddon community. Drivers, whether for work, shopping or leisure will always, and very quickly work out the quickest route to their destination (distance is a factor, but not necessarily the most important one), and a pleasant drive through the countryside is eminently more enjoyable and less stressful than battling with some 9-10 roundabouts within MK - especially at 'peak travel' times. This does not account, in addition for having to cross the notorious congestion roundabouts along MK grid roads, such as the V2, V4, H6 and H7 to mention just a few. This is clearly spelled out by the authors of this TA at para 6 2.3. Which states " It also assumes that traffic volumes would increase at a junction indefinitely and ignores the fact that motorists will only accept a certain level of queuing and delay before either re-routing (to balance traffic flows across the network), re-timing (to outside of peak hours), or re-moding (to sustainable transport) their journey." WPC asks again, why did the revised TA not include or take account of the known A421 to north and central MK rat-run through Whaddon village?*

### **6.5 COMMITTED DEVELOPMENT.**

**Para 6.5.1 :-** It was agreed with BC and MKC that the only committed developments requiring consideration within the core scenarios of this TA are Tattenhoe Park and Kingsmead South. These developments are both currently under construction and are considered certain to take place.

*WPC Comment :- For all the reasons stated above, WPC would like to know why The WEA was not included as 'Committed Development' that impacted on this TA. It should be remembered that once Tattenhoe Park and Kingsmead South are completed some 1760 new homes will be added to South MK - hence the Shenley Road/Coddimore Lane junction 11 ATC data, but the Western Expansion Area which will add some 7000 new homes (almost six*

times larger) is excluded even though it runs from Stock Lane, where the ATC was placed - presumably for data collection purposes. WPC requires an explanation as to why the WEA was excluded from Committed Development, when clearly that much larger site with a direct access from the A421 has just as much - if not more potential for inter-reaction with this SWMK (Salden Chase) development area. It is also worth noting that the travel time and distance between the WEA and the Tattenhoe/Kingsmead areas, from the SWMK site is not that dissimilar if approached from the A421 Whaddon crossroad/roundabout (junct. 7).

## **6.6 SHENLEY PARK SENSITIVITY TEST**

**Para 6.6.1:-** Owing to the limited information available within the public domain regarding the development proposals for Shenley Park discussions were held with BC regarding how Shenley Park should be assessed within the TA. It was agreed with BC and MKC that the trip generation for 1,150 homes and a secondary school would be considered within the Shenley Park sensitivity test.

*WPC Comment :- It is clear to WPC that the main reason for including Shenley Park is the opportunity to provide a new V0 MK grid road which would - it is assumed by BC - reduce pressure on the A421 and the Tattenhoe roundabout by some 35 percent, as drivers diverted to MK destinations. Even though this is not a Committed Site it is being 'thrown into the mix' to presumably help the TA and development prospects of the SWMK site look better - a dangerous and unfair assumption. WPC are very concerned that the Shenley Park site is considered as an appropriate development site to assess, (even though it is not yet confirmed in an approved Local Plan), but the WEA (six times the size) with its known detrimental impacts on Whaddon village is not. An explanation is required.*

**Para 6.6.3 :-** BC indicated that they would run the Buckinghamshire Countywide Model to ascertain the potential trip reassignment given that Shenley Park includes provision of a new grid road, V0, which could considerably alter trip patterns in the local area, however the information has not yet been made available by BC.

*WPC Comment:- WPC wishes to see this information when it is made available and requests that Stock Lane/Stratford Road be fed into the same model once a percentage figure is derived for the known, and predicted rat-running traffic between the A421 and Central and North MK (see comment below). When is this extra data expected?*

**Para 6.6.6. :-** To account for the potential redistribution of traffic from the A421 Standing Way/V1 Snelshall Street a review was undertaken of turning movements at the Tattenhoe Roundabout (A421 Standing Way/V1 Snelshall Street). The reason this junction was selected for analysis was that it is the first 'V' road encountered by traffic when heading into Milton Keynes and therefore the first opportunity for traffic to change course if heading to/from the town centre.

**And Para 6.6.7. :-** It is considered likely that a significant volume of traffic that currently makes the movement from A421 Standing Way to V1 Snelshall Street would divert and reassign onto the new Grid Road V0. BC requested that 35% be considered to limit the reduction in trips on the corridor of A421. This TA has therefore adopted the 35% diversion rate requested by BC, albeit a significantly higher diversion rate would be more realistic to conclude that the business case for provision of a new grid road would be acceptable.

*WPC Comment :- The V1 may be the first 'MK Grid Road' encountered for traffic heading to/from the town centre but it is certainly not 'the first opportunity' for traffic to change its heading to/from the town centre'. This statement totally ignores the fact that many drivers*

may have already chosen the 'country rat-run route' through Whaddon Village ..... as happens NOW, and has been increasing steadily, almost year on year since MK development began. Proper ATC readings taken at the Stock Lane location when Covid-19 has passed and all roads (including Calverton Lane) are re-opened and properly functioning again, will allow more accurate percentages to be calculated - rather than the 35% suggested by BC to the authors WS, if the V0 materialises. WPC requires BC comment on this fact?

#### **7.4 IMPACT ON VILLAGES.**

7.4.1. An assessment of the likely impact on traffic flows through the villages of Newton Longville, Mursely, Great Horwood, Whaddon, Nash and Little Horwood (the 'Villages') has been completed.

**WPC Comment .:-** *An assessment of the likely impact on traffic flows through Whaddon has certainly not been completed as stated. Stock Lane (as highlighted many times in this document) is the route 'through' Whaddon village, and this has been deliberately or by error excluded from the traffic assessment, despite being shown as part of the TA Study Area (fig 1.2 shows the entire length of Stock Lane up to the junction with High Street/Stratford Road) and having an ATC location agreed and placed centrally along it. It is only the minor arm from junction 11, being Shenley Road, that has been included and this road only passes one very small development and effectively 'bypasses' the village to the south-east. Shenley Road is included apparently due to the committed development at Tuttonhoe Park (para 1.5.3. Bullet 7) but, if this is accepted and is the true reason, then it is surely perverse to exclude the MK Western Expansion Area which must be seen as a similar (but much larger, and more impactful) committed development which is accessed directly from Stock Lane/Stratford Road. WPC would also suggest that the minor arm at Shenley Road was included because of its relationship with the as yet unallocated site at Shenley Park, which might possibly deliver a further MK grid road if the development is eventually granted planning approval. It should also be noted the ATC locations were marked (fig. 3.27) on all three arms of junction 11 - Coddimore Lane, Stock Lane and Shenley Road. Why therefore has Stock Lane suddenly been excluded from the agreed Study Area?*

**Para 7.4.2.:-** The impact on the Villages is considered with reference to the 'Guidelines for the Environmental Assessment of Road Traffic' (GEART) produced by the Institute of Environmental Assessment (1993). The GEART states that whilst traffic forecasting is not an exact science, a change in traffic flow of less than 10% creates no discernible environmental impact. As such two rules are presented within the GEART for screening whether a detailed assessment is required: Rule 1 – include highway links where traffic flows will increase by more than 30% (or the number of heavy goods vehicles will increase by more than 30%) Rule 2 – include any other specifically sensitive areas where traffic flows have increased by 10% or more.

**WPC Comment:-** *Whaddon should certainly be treated under Rule 2, as a 'sensitive' area. Stock Lane (as part of the agreed study area) when connecting with Stratford Road runs through two separate Conservation Areas, and in doing so passes a primary school, a village Hall and the entrance to the village Church as well as several listed buildings including the village Public House. On street and pavement parking are an increasing issue, as is the increasing number of HGV's and short-cutting vehicles using this rural route as a direct result of MK growth over 50 years where the amount of traffic has increased well beyond an 'acceptable' level, and is creating considerable environmental and safety concerns. Whether the 10% increase in traffic flows is pre or post development WPC believes Stock Lane*

*qualifies and should therefore have a detailed assessment prepared when assessing the impact of the SWMK 1855 house and employment development.*

*Additionally, WPC asks the question, "if BC are requesting the 'Provision of a sensitivity test to test the impacts of the development in combination with Shenley Park', (1.5.3. Bullet 8) is it not surely reasonable to do the same with Stock Lane in relation to both Shenley Park and the WEA accordingly, to test the likely traffic impact that will result?"*

#### **Tables 7.21 - 7.25.**

*The forecast percentage increase in traffic volume in all five tables shows a 0% change (i.e. no difference) in all scenarios, which WPC finds incredible and certainly does not accept. The villages of Great Horwood and Mursley show small percentage changes and Newton Longville in parts, creeps above the 10% level. The Newton Longville figures are understandable (and probably understated in reality) and this presumably has 'triggered' the need for traffic calming through the village as shown in detail at appendix AA and within the separate TfB Road Safety Assessment Report.*

*WPC wishes to see these tables redrawn following proper ATC data having been collected at Stock Lane, and having considered the full and proper traffic impact of the SWMK, TP, WEA and possibly SP developments. It is WPC's belief that the result will make the 'Modelling Results and Proposed Mitigation Strategy', which currently reads at Table 8.13 (page 264) 'No mitigation required as there is no impact of development', a gross and very misleading calculation from a reputable Highway Consultancy. WPC asks BC to instigate further ATC testing once the traffic along Stock Lane is 'back to normal' pre Covid-19 and road closure levels. This possibility is suggested in Mr Bedingsfeld's final sentence which states "We would not rule out requesting further additional traffic surveys in the future through parts of the network if deemed necessary on full review and analysis of the available data and the potential impact".*

#### **NEWTON LONGVILLE TRAFFIC CALMING SCHEME.**

*WPC would like to make a simple but meaningful comment on the appropriateness of the suggested scheme, but in the full appreciation that this matter is really down to Newton Longville residents, and their Parish Council in discussion with the developer consortium and Bucks Council.*

*We refer to Mr Bedingsfeld's statement in his 14.11.2019, 'Highway Authority Comments' made to AVDC as the then Planning Authority handling this application, which reads "Even though the revised junction modelling predicts a worse set of results, particularly for the future year assessment, it is still considered that the most appropriate mitigation for the junction is the implementation of the traffic calming scheme. This will deter the use of the route and junction and encourage the use of more suitable alternative routes."*

*Having inspected the NI, scheme details, it is very similar in form and construction to that that has been established in Whaddon village for some seven years. WPC speaks with some authority, and evidence, when it says: Yes such a scheme may slow some traffic (those that are not rushing at peak times), and will remind drivers that they are travelling through a built up village area encouraging the respectful and careful driving by those happy to embrace such a scheme. However, what it does do is increase the irresponsible driving of some who race to beat the narrowings and oncoming traffic, but more importantly such a scheme WILL NOT AND DOES NOT reduce the number of drivers intent on finding the quickest and most*

direct route to their destination ..... In other words, the 'rat-runners' whose actions will continue to blight the lives of Newton Longville residents should the SWMK development proceed. In WPC's opinion, Mr Bedingsfeld is wrong to make the assumption that the traffic calming scheme will encourage the use of alternative routes, especially where there are no sensible alternative routes. The only solution to the Newton Longville traffic problem is a full bypass around the village in the form of the long planned western bypass, or indeed a bypass connected to and designed as part of the Oxford - Cambridge Expressway ..... but that solution, WPC accepts cannot be planned for and may never happen. There is a grid road reserve of 80m width reserved within the SWMK development and perhaps if this development is to proceed there is sufficient justification for the development to pay for the completion of the first section making it's delivery more likely within an acceptable time scale, if County or additional Government funding can be found?

### **JUNCTION 11 - STOCK LANE/SHENLEY ROAD/CODDIMOOR LANE.**

#### **Table 7.9**

*WPC Comment:- This table excludes the all-important Stock Lane data .... WHY?, WPC would like to see the data collected from this ATC.*

Para 7.3.35 :- The results presented in Table 7.9 show that the junction operates with satisfactory performance (RFC below 0.85) in all scenarios assessed. No development traffic is routed via this junction within this TA and therefore there is no impact as a result of the Proposed Development. Mitigation is therefore not necessary

*WPC Comment:- Once the WEA 'Committed Development' is properly included and the accurate Stock Lane ATC traffic figures are known (post driving patterns getting back to normal) WPC believes that some further and additional mitigation to that already agreed may be necessary - possibly a change of junction 'priority' making Coddimoor Lane a 'T' junction giving priority to Stock Lane/Shenley Road for safety reasons (as discussed earlier in this response). Do BC accept that no additional mitigation is required within Whaddon, given the weight of concern and amount of justifiable questions within this response?*

### **8.3 HIGHWAY MITIGATION SUMMARY**

**Table 8.13 - Junction 11:-** Coddimoor Lane/Shenley Road/Stock Lane No mitigation required as there is no impact of development.

*WPC Comment:- WPC disputes this point for two reasons. a) The ATC figures for Stock Lane have not been included within this TA, and are vitally important to get a true understanding of the traffic already using this route into MK, and b) This T.A. at para 2.4.4 acknowledges that a section 106 agreement is already agreed within the emerging VALP, that includes Highway Improvements 'In order to mitigate the potential impact in Whaddon a financial contribution is required towards road safety improvements on Coddimoor Lane and Stock Lane'.*

*This statement contradicts what table 8.13 says above. WPC require assurance that the £22,000 agreed figure ( for kerbing improvements and variable 20 mph signs outside the Primary School) is 'cast in stone' if this development proceeds, together with an understanding/agreement that the Stock Lane 'rat-run' to MK (which will worsen with this SWMK development) will be investigated further, with appropriate action/mitigation being taken as found necessary.*

Finally, WPC notes the response by Highways England to 20/01656/CONS, posted on the BC planning website on 5th August 2020. WPC can find no reference to this planning reference number and asks 'Can you direct us to it please, so that councillors may review the content?' If as we assume it relates to 15/00314/AOP can you confirm that BC (Highways and Planning departments) will make no formal decision until at least 3rd December 2020 - unless Highways England have responded earlier with their further review of the updated TA, or have withdrawn their 'holding objection'.

This letter has been copied to Claire Bayley at BC planning department, at the request of BC Parish Support, and represents WPC's formal 'OBJECTION' to the 15/00314/AOP planning re-consultation. WPC reserves the right to make further comment as and when a response to all our queries contained has been received. As any further response from BC to this letter may be after the commencement date (mid-October 2020?) of the MKC appeal, Ref no: 20/00038/RI:F (against the refusal of the highway access to the SWMK development) this letter is also being copied to the Planning Inspectorate for their information, as they were included in all earlier WPC correspondence on these important highway matters.

Yours sincerely,



Suzanne Lindsey  
Clerk to Whaddon Parish Council

Copies to :-  
Claire Bayley, Planning Officer, BC Development Control.  
Christine Urry, Head of Highways Development Management.  
Joanna Thornton, Highways DM team leader.  
Louise St John Howe, Planning Inspectorate Office.

This page is intentionally left blank



## Report to Buckinghamshire Council – Strategic Planning Committee Report

---

<b>Application Number:</b>	20/03539/APP
<b>Proposal:</b>	Installation of a gas tanker off loading facility for injection of renewable gas into the national gas distribution network
<b>Site location:</b>	SGN Gas Depot, Bletchley Road, Newton Longville, Buckinghamshire
<b>Applicant:</b>	Bawden Energy Limited
<b>Case Officer:</b>	Karen Fossett
<b>Ward affected:</b>	GREAT BRICKHILL
<b>Parish-Town Council:</b>	NEWTON LONGVILLE
<b>Valid date:</b>	19 October 2020
<b>Determination date:</b>	14 January 2021
<b>Recommendation:</b>	The application be deferred for approval subject to the recommended conditions, the satisfactory completion of a legal agreement and the receipt of no new material representations or if these are not achieved the application will be reported back to Committee for further consideration.

---

### 1.0 Summary & Recommendation/ Reason for Planning Committee Consideration

- 1.1 The site is an existing gas depot which has been distributing Natural Gas since the 1960s. The proposal for an “offloading” facility which comprises the plant and equipment to allow for methane gas to be delivered to the site in heavy good vehicles (HGVs). At the site the HGVs will park in the loading bays and connect into the gas network to allow the bio-methane gas to be injected and thereby allowing it to blend with the existing natural gas supply. This relatively new innovation is intended to minimise the use of fossil fuels and their associated pollutants. The blending of methane gas with natural gas helps to minimise carbon dioxide and nitrox emissions.
- 1.2 Many objections have been received to this application which raise concerns about the number of associated vehicular movements through Newton Longville village and about the health and safety implications of the gas depot use.
- 1.3 The number of vehicle movements associated with the process of blending methane with the natural gas at the depot is considered in detail within the report. The number of vehicles that can access the site is limited by the number of vehicle bays available and the time it takes to download the bio-methane gas into the natural gas network. The

Transport Addendum identifies 6 deliveries which equates to 12 movements per day at roughly one per hour, per bay over 24 hours.

- 1.4 The application has been evaluated against the Development Plan which comprises the Vale of Aylesbury Local Plan. and the Minerals and Waste Plan 2016-2036. The NPPF is a material consideration. The application has been assessed against the objectives of the NPPF and whether the proposals deliver 'sustainable development'
- 1.5 Noise, air quality and residential amenity have been assessed as having only very small impacts on the environment and on residential quality of life and therefore do not result in demonstrable harm.
- 1.6 The site is already hard surfaced and there is little difference in the visual impact of the alternative and additional features on the site.
- 1.7 The proposal complies with the development plan policies. Within a broader national context, it seeks to increase the quantum of renewable energy produced to help reduce the greenhouse gas emissions generated in the UK.
- 1.8 The application has been called in for consideration by committee by Councillor Scott Raven and supported by Councillor Ben Everitt. It has been decided to refer this application to Strategic Committee because it is considered to have implications for residents in Newton Longville and Milton Keynes given its location on the border between Buckinghamshire and Milton Keynes Council areas.
- 1.9 It is therefore recommended that the application be deferred for approval subject to the satisfactory completion of a legal agreement to secure the provisions as set out on page 17 of this report subject to the receipt of no new material representations and conditions as set out in this report, or if these are not achieved the application will be reported back to Committee for further consideration.

## **2.0 Description of Proposed Development**

- 2.1 The site is 0.37 ha in size and is situated in the southwest corner of the SGN gas distribution depot. The proposed compound area is 0.25 hectares, solely in SGN ownership, with the remaining application area comprising the private access road from the highway which is in shared ownership.
- 2.2 There are existing structures within the wider depot (not part of the application site) which include gas distribution plant and equipment, a 37.5m high telecommunications mast and a storage and distribution building with offices and storage yard.
- 2.3 Access to the site is via the existing access road off Bletchley Road. This access serves the existing gas depot and a delivery company on the adjacent site.
- 2.4 The site is situated on Bletchley Road, a single carriageway of 6.3m width, close to Milton Keynes administrative boundary. The road has a 40mph speed limit in this section of road. The A4146 to the east and the south provides access through Newton Longville to the M1, the A505, A509 and A5.

- 2.5 The railway line to the north of the site is disused but is being reinstated and upgraded as part of the East West Rail (EWR) scheme. The works are part of Phase 2 which is anticipated to completed by the end of 2023.
- 2.6 The proposal is for the installation of a gas tanker off loading facility for the injection of renewable gas (biomethane) into the natural gas grid. The development includes a gas entry unit, pressure reduction system, portacabin (providing mess facilities) a generator, 4 vehicular bays, security fencing and gates and car parking. There are a number of elements of the proposal some of which require planning permission, some of which benefit from permitted development and some of which would not constitute development. The table below itemises the different elements and identifies which aspects of the proposal require planning permission.
- 2.7 Proposed Plant and Equipment

Item	Description	Dimensions	Material	Colour	Permitted development
Gas Entry Unit	Housed in a container includes automated testing equipment and controls	2.6m H X 8m X 3m	Steel	Moss Green	Only the container requires planning permission as it exceeds 29 cubic metres, the plant does not as it benefits from permitted development. (GPDO schedule 2, Part 15, Class A, Power Related Developments)
Generator	Housed in a container	2.6m H X 6m X 2.6m	Steel	Moss Green	As above
Pressure management system	Housed in a container includes boiler and automated testing equipment and controls	3.4m H X 5m X 12.2m	Steel	Moss Green	As above
Vehicles bays	Parking areas	17m X 4m	Concrete	Asphalt	Permitted

	for biomethane trailers X 3. 1 spare parking area during maintenance				development under part 15 class A of GPDO 2015 schedule 2.
Portacabin	Mess facilities for drivers and maintenance personnel	2.6m H X 10.36m X 2.4m	Steel	Moss Green	Planning permission required
Car Parking	Parking for maintenance personnel	4 spaces	Concrete	Asphalt	Planning permission not required.
New fencing	To provide security	1.8 m high-(now increased to 2.4m)	Chainlink	Galvanised steel	Planning permission required
New gates	To provide security		Chainlink	Galvanised steel	As above
Lighting	Required for health and safety and security	2.4m to 8m height	Steel	Steel	Planning permission required for free standing lighting does not benefit from permitted development.
Surfacing (new and existing)	Mixture of permeable and impermeable areas		Concrete, asphalt and stone		Planning permission not required

- 2.8 The existing site surface comprises a mixture of concrete, tarmac, and rough ground. The concrete and tarmac will be retained; the area of rough ground will be tarmacked and will form the tanker bay, other areas will be dressed with stone, except for localised concrete slabs which will house individual items of plant and equipment. Site levels will remain unchanged.
- 2.9 Biomethane will be delivered to the site from Anaerobic Digestion (AD) plants in dedicated trailers. (Biomethane is a renewable low carbon energy source and can be used as a direct substitute for natural gas). The trailers will be reversed into an available vehicle bay and

manually uncoupled from the lorry by the driver. The gas offload involves a simple manual connection and thereafter is an automatic download process directly adding to the distribution network along with the natural gas. Once the trailer is empty which takes around 4 hours to download, the empty trailer is removed and taken back to the AD facility for refilling. The layout consists of 4 bays of which three tankers can be accommodated at any one time and the fourth bay is a maintenance bay.

- 2.10 It is intended that there would be a maximum of 20 deliveries a day, as explained in the Transport Addendum, with 6 deliveries and 12 movements per bay per day. There will be only one vehicle arriving/leaving at any one time and they will be staggered to avoid queuing.
- 2.11 The biomethane in the trailers is compressed gas and this depressurised on site in the Pressure Management System. The site will be surrounded by an ultrasonic gas detection system and each container will carry a gas detector over the equipment. Safety valves will close automatically, and gas supply would be shut down in the unlikely event of any leak being detected.
- 2.12 There are no permanent storage facilities for biomethane on the site. There are Health and Safety regulations which govern the operation of the plant.
- 2.13 The Gas Depot access from Bletchley Road will be widened slightly and visibility splays of 2.4x 120m are provided either side of the existing access as it also serves other users and vehicle tracking shows that gas tankers can enter and exit the site in forward gear.
- 2.14 The application is accompanied by:
- a) *Planning Design and Statement and subsequent revision*
  - b) *Lighting Scheme Plan*
  - c) *Light Spill Plan*
  - d) *Transport Statement and Transport Addendum*
  - e) *Traffic Management Plan*
  - f) *Flood Risk Assessment*
  - g) *Swept Plan analysis*
  - h) *Air Quality Assessment*
  - i) *Noise Impact Assessment, etc*
- 2.15 During the course of the application the proposal was amended to exclude the originally proposed standby flarestick and the propane tanks, to which specific objections were raised

### **3.0 Relevant Planning History**

- 3.1 The existing operation has been present on this site since the 1960s with Natural gas being piped to the site underground, before distribution locally at low pressure and nationally into the National grid at high pressure. Before then, it is quite likely to have been a

distribution site for manufactured gas but this is unconfirmed. Reference: 78/00224/AV

Development: LAYING OUT SITE AS AN INDUSTRIAL AND/OR WAREHOUSE ESTATE

Decision: REFUSE Decision Date: 11 May 1978

Reference: 80/02128/AV

Development: CONSTRUCTION OF REGULATOR HOUSE SILENCER PIT INSTRUMENT ROOM AND NEW ACCESS ROAD AND SECURITY FENCE

Decision: FPP1 Decision Date: 19 February 1981

Reference: 83/00239/AV

Development: EXTENSION TO EXISTING SOUTHERN GAS SERVICE AND DISTRIBUTION DEPOT

Decision: APPROV Decision Date: 14 April 1983

Reference: 85/01705/AV

Development: ERECTION OF SECURITY FENCE AND EXTENSION OF PARKING AREA

Decision: APPROV Decision Date: 27 February 1986

Reference: 88/02117/APP

Development: SITING OF PORTAKABIN FOR TEMPORARY OFFICE ACCOMMODATION

Decision: APPROV Decision Date: 17 October 1988

Reference: 89/02894/APP

Development: 37.5 METRE HIGH RADIO MAST

Decision: APPROV Decision Date: 1 October 1990

Reference: 92/01169/APP

Development: SITING OF PORTACABINS (RENEWAL OF APP/2117/88)

Decision: APPROV Decision Date: 8 September 1992

Reference: 99/01583/APP

Development: Change of use to an internal & external storage & distribution depot together with ancillary office uses

Decision: FPP1 Decision Date: 7 October 1999

Reference: 19/04102/ACL

Development: Application for a Lawful Development Certificate for the proposed removal of most above ground equipment and pipework, Dismantle of below ground concrete pits, Installation of above ground equipment (reduced in extension compared to the existing), Installation of 1 new kiosk (GPR material) to contain the pressure reduction equipment, and Installation of 1 new, smaller, Boiler House (GPR material), Other minor civil works

including but not limited to, underground cable ducts for the new equipment are required.  
Decision: Certificate granted. Decision Date: 17 January 2020.

(Officer note - The biomethane connection was a permitted installation under a Lawful Development Application approved in 2020 (ref 19/04102/ACL) along with the removal of much groundwork equipment and pipework and installation of a smaller boiler house in preparation for this installation

#### **Relevant Background Information.**

- 3.2 **The Governments 2017 Clean Growth Strategy** will help the UK meet its net zero emissions target by 2050 and is driving the achievement of the UK's heat consumption from renewable sources up towards the target, which it failed to meet in 2019 to reduce greenhouse gas emissions by 34% by 2020.
- 3.3 This objective depends on biomethane production from anaerobic digestion plants which do not currently connect directly to the national grid, hence, rely on remote connection points such as the one proposed. Purified Biomethane production, involving the removal and upgrading of bio gases at the AD plant, has the potential to generate heat for 4.5million homes by 2030, by injecting a pure stream of bio-methane into the Main gas grid to replace natural gas or used as road fuel with increases in technology in this area. This site would enable around 5000m<sup>3</sup> per hour of biomethane to be injected into the grid, equivalent to providing renewable heat for up to 30,000 households. Any gas not in compliance with a strict quality regimes will be returned to the A.D plant for further purification before being returned for injection. This is a rare occurrence.

#### **4.0 Policy Considerations and Evaluation**

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are determined in accordance with the development plan unless material considerations indicate otherwise. This is reiterated within paragraph 47 of the NPPF (2021). The development plan is defined in Section 38(3)(b) of the 2004 Act as "the development plan documents (taken as a whole) that have been adopted or approved in that area".

The development plan for this area comprises of:

- Buckinghamshire Minerals and Waste Local Plan 2019 (BMWLP)
- Vale of Aylesbury Local Plan (15th September 2021)
- Newton Longville Neighbourhood Development Plan is at the early stages. The Plan is undergoing initial consultation and the currently suggested settlement boundaries exclude this site which is outside the main village area.

In addition, the following documents are relevant for the determination of the application:

- National Planning Policy Framework (NPPF)
- National Planning Policy for Waste (NPPW)
- National Planning Practice Guidance (NPPG)
- National Design Guide (NDG)
- Buckinghamshire Council Climate Change and Air Quality Strategy to be adopted

on 19 October 2021.

Vale of Aylesbury Local Plan (Adopted 15th September 2021)

The following policies are relevant to the application:

- S1: Sustainable development for Aylesbury Vale
- S2: Spatial strategy for growth
- S3: Settlement hierarchy and cohesive development
- T1: Delivering the sustainable transport vision
- T6: Vehicle Parking
- BE2: Design of New Development
- BE3: Protection of Amenity
- NE1: Protected Sites Biodiversity and Geodiversity
- NE5: Pollution, Air quality and Contaminated land
- C3 Renewable Energy
- C4: Protection of Rights of way
- I1: Green Infrastructure
- I4: Flooding

#### **Minerals and Waste Local Plan 2016-2036, adopted 2019**

The MWLP continues the presumption in favour of sustainable development in line with national policy by promoting resource efficiency by driving waste up the hierarchy of sustainable considerations and diverting waste away from landfill, thereby reducing landfill tax costs. The waste hierarchy is explained in detail in Para 5.11 of the MWLP and the hierarchy moves upwards in 5 steps from disposal to recycling and finally prevention.

There are a number of existing waste management facilities permitted in Buckinghamshire which include 2 Anaerobic Digestion (AD) facilities. Once digested, processed and purified, this waste can be used to generate clean energy and reduce greenhouse emissions.

Policy SO4 Facilitating the Delivery of Sustainable Waste Development. Paragraph 5.72 identifies a table which indicates that there is future facility needs for up to 5 medium or 2 large composting or another biological treatment process e.g. AD.

Policy SO8: Tackling Climate Change. This policy seeks to facilitate the move to low carbon future by planning positively for sustainable development that includes measures to reduce greenhouse gas emissions, minimise vulnerability and increase resilience to the impacts of climate change.

**Buckinghamshire Council Climate Change and Air Quality Strategy**, adopted on 19<sup>th</sup> October 2021

and this document replaces the former County Council Energy Strategy.

The Strategy sets out how the Council will achieve net zero carbon emissions by 2050 and improve air quality across Buckinghamshire.

The strategy focusses on the Council reducing the emissions of its own assets as well as encouraging others to follow suit with the provisions of necessary infrastructure such as electric vehicle charging points and installation of LED street lights.

It encourages input from all stakeholders and recognises the complex and interconnectedness of activities impacting climate change.

The Strategy identifies that transport is the largest source of carbon emission with the domestic use of gas representing 20% of carbon emissions. Removing emissions from domestic gas supplies might require removing or replacing 180,000 gas boilers in Buckinghamshire.

One of the other objectives in the strategy concerns the re-procurement of gas and electricity contracts to a more sustainable offer in term of carbon impact as well as minimising waste.

#### The National Planning Policy Framework

The NPPF Para 152 states that the planning system should support the transition to a low carbon future in a changing climate. There is a clear requirement to support renewable and low carbon energy and associated infrastructure. Para 155 states to help increase the use and supply of renewable and low carbon energy and heat, plans should:

- (c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems for co-locating potential heat customers and suppliers.

Para 158 requires that when determining planning applications for renewable and low carbon development that local planning authorities should recognise that even small-scale projects provide a valuable contribution to cutting greenhouse gas emissions and approve applications if its impacts are (or can be made) acceptable.

In addition the **NPPF revision in 2021** supports and explains the agreement to pursue the 17 Global Goals for Sustainable Development in the period to 2030, which arose from the commitments of the Government in the 1992 Rio Earth Summit and have now been adopted by the United Nations Department of Economic and Social Affairs. Goal 7 seeks to 'ensure access to affordable, reliable, sustainable and modern energy for all. There are 5 targets for achievement of this goal. Target 7.2 – by 2030 increase substantially the share of renewable energy in the global economy mix; Target 7.a – by 2030 enhance global co-operation to facilitate access to clean energy research and technology, including renewable energy, energy efficiency and advanced and cleaner fossil fuel technology , and promote investment in energy infrastructure and clean energy technology.

#### **National Planning Policy Guidance**

Advises that Planning has an important role to play in the delivery of new, renewable and low carbon energy infrastructure in locations where the environmental impact is acceptable.

## **Principle and Location of Development**

VALP Policy S1 sustainable Development for Aylesbury Vale, Policy S7 Previously developed land, Policy C3 (Energy Strategy - requires all development schemes to achieve greater efficiency in the use of natural resources.

- 4.1 The Plan identifies within its Strategic objectives that the Council will manage development in a way that ensures that climate change is adapted to and mitigated against and this includes making appropriate provision for the generation and use of renewable or low carbon energy, and locally distributed energy.
- 4.2 The proposal is for gas related development within an existing gas depot. It would not constitute a change of use as land because in effect it would be an extension to existing facilities. As such it would represent the effective and efficient use of land and in principle be acceptable subject to compliance with relevant development plan policies.
- 4.3 Anaerobic digestion plants produce the bio methane gas but are unable to feed that directly into the grid without accessing depot linking facilities. Therefore, there is a requirement to bring the bio-methane gas to appropriate facilities as the existence of a suitable grid connection is a constraint in delivery of clean gas. The proposal arises from the development of this new technology which allows natural gas to be blended with a “greener gas”. The current intention is to roll out this technology at a small number of sites which includes the gas depot at Newton Longville.
- 4.4 Policy C3 states that planning applications involving renewable energy development will be encouraged provided that there are no unacceptable adverse impacts. In this instance the key issues for consideration would be highways and access issues and residential amenity.

## **Employment issues Policy**

VALP policy E2 (Other Employment sites)

- 4.5 The current gas depot provides some employment opportunities and as such would be considered as an employment site. Policy E2 provides protection for such employment sites seeking to retain their employment opportunities. Whilst there is likely to be more activity from the depot site, there is unlikely to be any significant increase in employees, other than drivers, attending the site. No permanent presence is required on site. Emergency situations already have cover by existing SGN 24 hour call out staff and visiting truck drivers will not be present for more than a short respite as they detach one trailer to download the gas and the attach an empty trailer to return to the next location. The proposal does not conflict with E2 but little weight is given to this because it will not generate additional employment.

## **Transport matters and parking**

VALP policies T5 (Delivering transport in new development), T6 (Vehicle parking), Appendix B (Parking Standards) and T8 Electric vehicle parking.

- 4.6 This is a key area of consideration. The transport statement Addendum Forecasts the traffic generation from the site to be modest and not result in an environmental impact on the local highway network.
- 4.7 The estimated vehicular movements equate to a maximum of 6 deliveries per bay, per day equating to 18 deliveries with a maximum capacity of 20 per day allowing for variations to occur. The 4<sup>th</sup> bay on the site will be used for any required maintenance. The deliveries are limited by the physical and practical capacity of the site and equipment. It is on this basis that the application has been assessed.
- 4.8 The operation requires each truck to book a slot and the scheduling factors in, any unavoidable delays that occur and will deny access to additional trucks. The management arrangements can be controlled because the operation is managed by a single company. In the event of a misjudgement, an extra truck will be denied access and will have to wait its turn along the entrance roadway, for which there is sufficient space without compromising the operation of the adjacent distribution company or stop up at a previously agreed location if there is a known delay en route.
- 4.9 Some surveys were carried out on the local transport network in combination with the pallet depot on the adjoining site in February 2021. Peak rate flows were 54 HGVs per day and Bletchley road caters for 150 HGVs per day indicating that the one or two extra per hour will have little material effect on the network even in peak times. The local roads have also been assessed and HGV tracking applied using the biggest vehicles and indicates that in either direction the vehicles can safely access the site. Phase 2 of the EWR will introduce some additional activity during its construction but the gas depot will not operate at capacity until the EWR nears completion.
- 4.10 The visibility splays adjacent to the existing site access would be extended to 2.4mx120m in both directions in line with the 40mph speed limit on Bletchley Road. The submitted Transport statement tracking demonstrates that articulated vehicles can already adequately access and turn within the site to exit in forward gear, despite the access being tight along Bletchley road and Newton Road under the railway bridge and on the bend which measures only 5.2 width at that point.
- 4.11 The Highways engineer also acknowledges the difficulty in negotiating Newton Longville village especially at the crossroads along this route which is the most likely direction for incoming traffic to flow due to the proximity of the main road network in Milton Keynes. Consequently, a traffic routing plan has been agreed with the applicant and is to be the subject of a S106 agreement. The traffic routing plan shows more than 1 access route to spread the traffic between routes Milton Keynes Council have raised concerns about the bridge width and height and its unsuitability for HGV movements, the applicants state that their vehicles will have a height of 3.6m and be able to pass comfortably underneath the 4.2m high bridge on Bletchley Road . Furthermore, to clarify the point raised regarding the left turn into the site, this access is currently used by the neighbouring pallet company and their HGVs without any highway safety issues resulting. This company operates between

5am to 7pm and generates 5 HGV movements at night and 10 during the day.

### **Raising the quality of place making and design**

VALP policy BE2 (Design of new development) and NE4 (Landscape character and locally important landscape).

4.12 BE2 states that all new development proposals should respect and compliment the characteristics of the site and character of the surrounding area. In relation to the gas depot, it is already an open, hardsurfaced site containing gas pipes and plant as well as cabins containing pressure measurement equipment. It is all relatively low level and low key with very little activity on site. The character of the site would change very little in visual appearance apart from the ingress and egress of the large HGV delivery trucks. The proposed minor alterations on site would be in character with the local surroundings and appropriate for the prevailing business activity.

### **Amenity of existing and future residents**

VALP policy BE3

4.13 There will be very little change on the wider SGN site that can be seen from nearby houses as they will only have an oblique and distant view. Other local operations including the EWR works have resulted in the removal of significant elements of the former boundary tree screening making the larger gas depot site more visible to neighbouring property but the new facility proposed would not be in the direct line of view from the rear of the nearest properties

4.14 The visual impact of the proposed development would be minimal although it is recognised that some of the pre-existing tree and boundary screening has been removed by other local activities. The view from the rear of the nearest houses will be very oblique as the siting of the new operations will be in the SW corner of the site out of direct view and at considerable distance. The visual impact from local residences will be similar to the current situation. The structures proposed on site will contain the majority of the plant necessary for the operation, as they do now, and those cabins will be noise insulated. The site is relatively isolated, and the nearest properties will not experience any material increase in noise, emissions, vibration or odour and lighting impact has been minimised and concentrated in the operational areas. A noise assessment was submitted during the application and is considered in more detail in the Environmental Issues section of the report.

4.15 The main objections relate to the traffic movement proposed which has been outlined above. Concerns about traffic have been considered in the relevant section and it has been established that other than a possible small time overlap in 2023, between the EW Railway construction and the start of the gas offload facility, the traffic movements are unlikely to significantly worsen the traffic conditions on a relatively main road.

### **Environmental issues**

NE5 Pollution, air quality and contaminated land. BE3 Protection of the amenity of residents.

#### Air Quality

- 4.16 The applicants commissioned an air quality assessment from Redmore Environmental to measure the pollutant emissions from road traffic vehicles visiting the site. All delivery trucks will be fuelled by biomethane gas. The results suggest that the air quality impacts created as a result of traffic generated by the site, from nearby sensitive location was not significant. Based on the DEFRA Air Quality Standards in 2007, which is recognised national standard.
- 4.17 The assessment area was based on the proposed location and access routes in relation to the nearest residential properties in order to calculate maximum potential changes. It also considered worst case scenarios. The conclusion suggested that the annual mean predicted change in NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> emissions was negligible based on December 2020 data and as assessed under the Air Quality Standards Regulations 2010, for the pollutants listed.

#### Noise

- 4.18 A noise assessment was also undertaken by Professional Consult to identify the key sources of noise associated with the operation of the site from key locations such as 120 Bletchley Road and Fontwell Drive and it was found that the internal noise levels fall below the typical background noise level of 30dB with a window open. The potential change in ambient noise level is classed as none/not significant under the 2019 British Standard (BS 4142) and is classed, from the closest residential properties, as being 'no observed effect level' (less than 2.9 dB). The methodology was also confirmed by Buckinghamshire's Environmental Health Department.

#### Lighting

- 4.19 The most relevant policy is NE5 which states that external lighting will only be permitted where it is the minimum required and light spill is minimised so as not to prejudice wildlife. It also states that air quality is governed by the National Air Quality Strategy Standards.
- 4.20 A lighting scheme was also submitted as part of the application which undertook a thorough assessment of the site and proposed lighting. It concluded that the new facility would offer an environmentally sympathetic lighting scheme, minimising luminance.

#### Odour

- 4.21 In terms of odour, gas is odour free until the smell is added at the point of network distribution.
- 4.22 In conclusion, the evidence presented in terms of environmental impacts demonstrates that there are no material adverse impacts. As such it is considered to comply with the relevant policies.

#### **Flooding and drainage**

Policy I4 - Flooding

- 4.23 A small part of the red edge land which lies to south of the site, adjacent to the river Ouzel, lies within Flood Zone 3a. With regard to the Hazardous Substance Consent the Applicants and the HSE have confirmed that this is not required and therefore the flood risk category is Less vulnerable.
- 4.24 An initial objection was received from the Environment Agency for failure to submit a Flood Risk Assessment due to the site being within Flood Zone 3a. The objection was withdrawn once the FRA Addendum was submitted and considered by the EA.
- 4.25 While a small part of the site is within Flood zone 3a the relevant flooding policy requires a Sequential Test to be undertaken. However, because the nature of the development is classified as Less Vulnerable an Exceptions Test is not required.
- 4.26 The aim of the Sequential Test is to ensure that a sequential approach is followed to steer development to areas with the lowest possibility of flooding. This site is a gas depot and the development is associated plant and equipment to allow for the blending of gas coming into the gas network. On this basis it is considered that a pragmatic approach is required to the availability of alternative locations. This development can only be in this location because of the existence of the gas depot and necessary infrastructure. Therefore, the development meets the sequential test and this approach is in line with the advice in para 33 of the National Planning Policy Guidance (Flood risk and coastal change)
- 4.27 Any tidal flooding risk was assessed as LOW in the FRA submitted in September 2020 by the applicants consulting engineers, as the adjacent watercourse is not tidally influenced in this location. Surface Water flooding is also assessed as low risk from the surface water flooding risk map scenarios in high rainfall events. In a 30-year storm event, the area to the south of the site has been measured as a depth less than 300mm and the existing vehicular route leading onto Bletchley Road has a very low risk rating. In a 100-year storm event, the area of flooding would increase but the depth projected remains below 300mm. This would increase if a 1000-year storm event occurred, at which point the site might well temporarily close.
- 4.28 As the proposed development does not involve any below ground construction the FRA considers the flood risk to be LOW and no artificial flood risk have been identified.
- 4.29 The porta cabin to be sited on the south of the site for the mess facility would be raised off the ground to mitigate any potential flood risk from rare storm events and would sit 300mm above the fluvial 100year+ climate change level. The steel containers securing equipment would be raised on concrete plinths set above 86.95mAOD which is 300mm above 100yr+ climate change flood level.
- 4.30 In terms of odour, gas is odour free until the smell is added at the point of network distribution and consequently there is no impact on residential amenity.
- 4.31 Subject to proposed conditions the application is considered to satisfy the policy requirements.

## **Landscape Issues**

VALP policies NE4 and NE8 Landscape character and locally important landscape trees, hedgerows and woodlands

4.32 The site has been hard surfaced and in a gas distribution use for at least 50 years, so this character is well established. There is no additional harm to the landscape from the proposal.

### **Ecology**

VALP NE1 (Biodiversity and geodiversity)

4.33 The Preliminary Ecological Assessment was an accurate assessment of the habitats and features for biodiversity present on the site. The best practice recommendations put forward as part of the PEA are largely acceptable with further consideration required in relation to Great Crested Newts, due to the presence of ponds within 250m of the site, whilst recognising that the negligible suitability of the landscape for amphibians and reptiles and the works proposed being unlikely to impact such species. A precautionary method statement is therefore recommended, prior to the commencement of works, highlighting best practice methods and suitable mitigation. A condition is therefore recommended.

### **Sustainability**

Policy C3 (Renewable Energy) of VALP

4.34 The applicants have responded directly to the concerns raised in the objection from Milton Keynes Council. In terms of the MK Sustainability comments they states firstly in para 4.12 of the Design and Access Statement that the proposed development could provide up to 30,000 households a year with renewable heat with significant greenhouse gas savings over using natural gas supplies. Studies have been carried out by specialist consultancy, Aardvark which suggest that greenhouse gas savings within a 50km radius would be in the order of 58,128 tonnes a year, equivalent to removing 19,221 cars from the road or planting 2.7 million trees. This also includes the 2019-2050 Sustainability Strategy use of bio methane fuelled transport.

4.35 In direct relation to the Milton Keynes area, many homes in the district, which are currently served by the medium pressure gas main ring around Milton Keynes would be served by the renewable gas source. This would meet their own targets for a green energy revolution in their 2019-2050 Sustainability Strategy.

4.36 The greatest environmental impact of this renewable energy proposal is the HGV movements and their use of fossil fuels. As part of the discussions which have taken place during the course of the application the applicant has undertaken to use bio methane fuelled trucks for delivery of the gas and for the drivers to follow a routing plan agreed with the Council , other than in exceptional circumstances. Greenhouse gas savings of bio methane fuelled vehicles can be significant as they have extremely low emissions of local pollutants including NOx and particulates when compared to petrol and diesel vehicles.

- 4.37 The applicant has agreed to a voluntary S106 Legal Agreement by way of Unilateral undertaking to secure these environmental benefits. The fleet is under the control of the same company and therefore it is possible to achieve a position that would be difficult to deliver in most other circumstances. There is also space to park an HGV truck off the road outside the depot without compromising the business activities of the neighbouring pallet, delivery company who also have a fleet of HGVS using the same access point from Bletchley Road.
- 4.38 These measures are welcomed and help towards the strategic objectives of the VALP however they are additional benefits being offered by the applicant. Failure to provide these benefits would not make the development unacceptable or lead to reasons for refusal.

### **Other Matters**

- 4.39 It is acknowledged that the development has received unprecedented levels of objection. Much of the concerns are round highway impacts and health and safety. The necessary consultations have been undertaken and the responses indicate that these concerns are not supported by the evidence. Additional information in relation to some of these issues is provided within this section, although it should be noted that they are not material planning considerations.
- 4.40 The gas facility is also controlled by other Regimes than Planning and Building Control. The HSE and licencing regimes have stringent control and enforcement measures which will ensure that the facility is properly managed and controlled in accordance with legislation and guidelines, thereby allaying some of the fears expressed in the objections received. Planning Guidance discourages the Planning System from duplicating other legislation and therefore discourages the overzealous imposition of planning conditions which may be neither reasonable nor enforceable under planning regulations. This would also render them inappropriate under the NPPF paragraph 55 criteria. For example, there is a Quality Protocol for Bio methane from Waste which sets out the end of waste criteria for the production of bio methane arising from the degradation of organic waste from landfill or anaerobic digesters. That requirement falls outside Planning.
- 4.41 There has been some suggestion of a path running along the railway boundary to the site. This is NOT a public footpath and access to the area will be limited in future by the re-emergence of the railway. The path previously crossing the railway bridge is also likely to disappear with the railway construction.

### **Infrastructure and Developer Contributions**

- 4.42 It is not considered that there would be other types of infrastructure that will be put under unacceptable pressure by the development to justify financial contributions of the direct provision of infrastructure.
- 4.43 However, as mentioned in the section on sustainability the applicant has undertaken to limit the impact of their development in terms of carbon emissions in accordance with the

objectives of the VALP and specific policies. The applicant has volunteered a unilateral undertaking which has been submitted to the Council.

4.44 The drafted s106 legal Undertaking states in schedule 2: -

- From the date of first operation of the development, the operator shall ensure that the HGV movements to and from the site are in compliance with the Traffic Management Plan and for the avoidance of doubt this paragraph 6 shall not apply in the event of and for the duration of emergencies, where the police, officer of the emergency services, or officer of the Council direct HGVs to use another route, where road works or natural events(including but not limited to snow or floods) prevent or render unsafe the use of the route, where highway works are being undertaken or there are relevant changes to the highway network.
- From the date of the first operation of the development, the operator shall transport biomethane to and from the site using biomethane powered HGVs save where exceptionally it is not operationally feasible as a result of one of the following occurrences: -
  - The bio methane fuelling infrastructure is not in operational use
  - There is insufficient number of biomethane powered HGVs in operational use in use; or
  - There is an insufficient number of appropriately licenced drivers available

4.45 An annual report will be submitted to the local Planning Authority indicating the frequencies of such occurrences.

4.46 Schedule 2 also requires a further Traffic Management Plan to be submitted and approved by the Council prior to the commencement of the development to ensure that HGV movements are managed appropriately and in compliance with the TMP.

4.47 This is not a requirement to make the development acceptable but is a voluntary undertaking and has not been given weight in the planning balance.

## **5.0 Weighing and balancing of issues / Overall Assessment**

5.1 This section brings together the assessment that has so far been set out in order to weigh and balance relevant planning considerations in order to reach a conclusion on the application.

5.2 In determining the planning application, section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the development plan unless material considerations indicate otherwise. In addition, Section 143 of the Localism Act amends Section 70 of the Town and Country Planning Act relating to the determination of planning applications and states that in dealing with planning applications, the authority shall have regard to:

- a. Provision of the development plan insofar as they are material,
  - b. Any local finance considerations, so far as they are material to the application (such as CIL if applicable), and,
  - c. Any other material considerations
- 5.3 As set out above it is considered that the proposed development would accord with development plan policy C3.
- 5.4 The culmination of all the factors involved in this proposal, all be they complex and emotive, point to the planning concerns having been satisfactorily addressed.
- 5.5 The site is a small area within a long existing gas distribution compound which has been successfully operating on this site since 1969.
- 5.6 The additional facility proposed here, complies with all the national and local policy ambitions concerning energy production, reducing both waste and greenhouse gas emissions.
- 5.7 Concerns about safety have been addressed and fall within other Regulatory regimes than planning.
- 5.8 Therefore, in the circumstances, it is considered that a highly regulated and licenced operation by a nationally recognised and supported operator and delivering environmental and climate change gains is acceptable in planning terms and meets with policy objectives. The harm to the environment, Highway and residential amenities is not so significantly harmful as to warrant a defensible refusal of planning permission
- 5.9 This facility will offer the dual opportunity of using digested degradable waste as well as providing an opportunity for clean gas generation and distribution and fully complies with Policy with insignificant additional harm to local areas, landscape character and their residential amenities.
- 5.10 The s106 undertaking although not required, does help to achieve further environmental benefits from the development and meet overall strategic objectives in the Vale of Aylesbury Plan 2021.
- 6.0**
- 6.1 Local Planning Authorities, when making decisions of a strategic nature, must have due regard, through the **Equalities Act**, to reducing the inequalities which may result from socio-economic disadvantage. In this instance, it is not considered that this proposal would disadvantage any sector of society to a harmful extent.
- 6.2 There may be implications under Article 8 and Article 1 of the First Protocol regarding the right of respect for a person's private and family life and home, and to the peaceful enjoyment of possessions. However, these potential issues are in this case amply covered by consideration of the environmental impact of the application under the policies of the development plan and other relevant policy guidance.

## **7.0 Working with the applicant / agent**

- 7.1 In accordance with paragraph 38 of the NPPF (2019) the Council approach decision-taking in a positive and creative way taking a proactive approach to development proposals focused on solutions and work proactively with applicants to secure developments.
- 7.2 The Council work with the applicants/agents in a positive and proactive manner by offering a pre-application advice service, and as appropriate updating applications/agents of any issues that may arise in the processing of their application.
- 7.3 In this instance
- the applicant/agent was involved at every stage of the consideration and responses positively and constructively to all the matters of concern as they were raised .
  - The application will be considered by the Strategic Planning Committee where the applicant/agent has the opportunity to speak to the committee and promote the application.

## **8.0 Recommendation**

Therefore, the recommendation is that planning permission be granted subject to the Unilateral Undertaking under s106, and the following conditions.

1. The development hereby permitted shall be begun before the expiry of three years from the date of this permission.

Reason: To comply with the requirements of section 91(1) of the Town and Country Planning Act 1990, as amended by s51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby approved shall only be carried out in accordance with the following drawing and documents no's:
  - i. Site location Plan for offload facility No. JMJ/NL/003 17/09/2020
  - ii. Lighting scheme Plan AOA SEPT 20
  - iii. Light Spill Plan – SK-03 A 12/12/20
  - iv. Site layout plan R6 Dec 2020, (removing propane tank and flarestack)
  - v. Portacabin elevation plan no. JMJ/NL/004 7/10/2020
  - vi. Gas Load facility –Revision 7 without propane tank and flarestack and with fencing and elevations updated.
  - vii. Portacabin elevations Drwg No JMJ/NL/004 Reva 7/10/2020
  - viii. Transport Statement by David Tucker Associates
  - ix. Transport Addendum 15/02/2021with routing plan – Figure 1.
  - x. Flood risk assessment Addendum A 16/12/2020 to FRA BLI.2020.3 Sept 2020 Rev 01
  - xi. Lighting Scheme Sk-02 Rev A Dec 20
  - xii. Lighting assessment Dec 2020 with items removed.
  - xiii. Light Spill SK-03 Rev A Dec 20
  - xiv. Swept path analysis – 22195-02
  - xv. Planning Design and access statement - Revision Feb 2021

- xvi. Air Quality Assessment 16/06/2021
- xvii. Noise Impact Assessment – 18/06/2021
- xviii. Visibility splays sept 2020 no. 22195-01, David Tucker Assoc.
- xix. Preliminary Ecological Appraisal (Scales Consultancy Ltd, 8/10/2020)

Reason: for the avoidance of doubt and to ensure that the details of the development are acceptable to the Local Planning Authority and to comply with National Planning Policy.

3. Prior to the commencement of the development minimum vehicular visibility splays of 120m from 2.4m back from the edge of the carriageway from both sides of the access onto Bletchley Road shall be provided and the visibility splays shall be kept clear of any obstruction between 0.6m and 2.0m above ground level

Reason: to provide adequate visibility between the access and the existing public highway for the safety and convenience of users of the highway and of the access.

4. Prior to the commencement of the operation, vehicle and HGV parking and manoeuvring shall be provided as shown on the approved plans and not thereafter be used for any other purpose

Reason: To enable vehicles to draw of, park and turn clear of the Highway to minimise danger, obstruction and inconvenience to users of the adjoining highway.

5. Prior to the commencement of the operation a Construction Traffic Management Plan (CTMP) shall be submitted to and approved by the Local Planning Authority and the approved CTMP shall be adhered to throughout the construction period. The CTMP shall provide for the following:

- Construction access and routing details
- The parking of vehicles of the site operatives and visitors off the highway
- Loading and unloading of plant and materials storage off the highway
- Delivery hours
- The erection and maintenance of site security hoarding.
- Wheel washing facilities
- Pre-condition highway surveys

Reason: In order to minimise danger, obstruction and inconvenience to users of the highway and of the development.

6. The development shall be implemented in accordance with the agreed mitigation and best practice methods detailed within the preliminary Ecological Appraisal (Scales Consultancy Ltd, dated 8th October 2020).. Any variation to the agreed plan shall be agreed in writing by the Local Planning Authority before such change is made. The condition will be considered discharged following; a written statement from the ecologist acting for the developer testifying to the plan having been implemented correctly.

Reason: To ensure that biodiversity is preserved and enhanced and 10% net gains in biodiversity are delivered in accordance with adopted policy and the NPPF and the conservation of habitats and species regulations and s99 of ODPM circular 06/2005.

7. No development shall take place (including site clearance, demolition and ground works) until a method statement for the Great Crested newts has been submitted to and approved by the L.P.A. The content of the method statement shall include
- a) the purpose and objectives for the proposed works
  - b) the detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
  - c) extent and location of proposed works shown on appropriate scale maps and plans;
  - d) timescale for implementation, demonstrating that works are aligned with the proposed phasing of construction;
  - e) persons responsible for implementing the works
  - f) initial aftercare and long term maintenance (where relevant)
  - g) disposal of any wastes arising from works

The works shall be carried out strictly in accordance with the approved method statement and shall be retained in that manner thereafter.

Reason: To ensure that biodiversity is preserved and enhanced and 10% net gains in biodiversity are delivered in accordance with adopted policy and the NPPF and the conservation of habitats and species regulations and s99 of ODPM circular 06/2005.

8. The development shall be carried out in accordance with the submitted flood risk assessment Addendum BLI Consultant Engineers, ref BLI.2020.3, Dec2020. Rev 01 and the following measures it details:
- The portacabin located to the south of the site will be raised of the ground on stilts. The FFL will be set at 86.75AOD which is 300mm above the fluvial 100-year (70%) plus climate change flood level.
  - The steel containers/ kiosks will be raised up on a concrete plinth. The top of the concrete base will be set at 86.59AOD which is 300mm above the fluvial 100-year (70%) plus climate change flood level.

Reason: To reduce the risk of flooding to the proposed development and future operatives.

9. There shall be no storage of biomethane gas anywhere on the site independent of the trailers within which it is delivered

Reason: To ensure that the development is operated in accordance with this permission.

## **APPENDIX A: Consultation Responses and Representations**

### Councillor Comments

Councillor Scott Raven wrote in support of the application but recognised that there were a number of aspects of the scheme that needed serious discussion at Committee and hence called in the application to Committee for decision.

Councillor Ben Everitt (no longer elected Councillor) - has supported Councillor Scott Raven's call in and says that he objects on the following grounds:-

It's a stupid idea??

Explosion risk next to EW Rail works and a key railway network

Serious concerns about the traffic from the tankers

Explosion risk of the tankers

- The proposed site is too close to a residential area
- Also worth pointing out that the engagement from the applicant has been woeful and the community are rightly angry

### Parish/Town Council Comments

#### **Newton Longville Parish Council**

An informal meeting took place between the Parish Clerk and the then case planning officer where concerns about the application were raised. However, no formal comments have been received by the Parish Council Clerk.

**West Bletchley Parish Council** objected to the lack of HSE objections to the proposal and also raised serious concerns about the traffic movements and the delivery of propane to the site as well as air pollution, noise and the leakage of gas from the site in a residential area, as well as the location of a hazardous site.

Following subsequent consultation the Parish Council raised the following concerns

- The traffic generated would be detrimental to the community.
- The proposal would generate unacceptable levels of noise and air pollution.
- There would be an adverse impact on residential amenity.
- This is an inappropriate location for a hazardous site

**Bletchley and Fenny Stratford Town Council** comments:

- Lack of HSE report.
- Negative impact on traffic.
- No detailed information on whether the vehicles will be able to handle specific local road

junctions.

- Unacceptable levels of noise and air pollution from the site.
- Impact on visual amenity
- This is an inappropriate location for a hazardous site.

**Whaddon Parish Council** also objected along similar lines to the other Parish Councils citing traffic and residential amenity concerns as their reasons for objection and expressing concerns about the physical and mental health issues arising from the anticipated noise and pollution.

**Milton Keynes** - Councillors Samantha Brown, Katherine Ward, Elaine Wales and James Lancaster also object on the same grounds of residential amenity, traffic, noise and safety as well as raising concerns that the lorries would be delivering effluent from anaerobic digestion plants and would be unsafe and odorous.

Councillor Allan Rankine (Milton Keynes Councillor - Bletchley Park Ward) - has requested a committee decision on this application due to the high level of local interest from residents of Newton Longville and Bletchley in the application and the fact that this facility should be not be in or near residential areas. He also comments on the risks of connecting and disconnecting high pressure gas mains raising the potential for a catastrophic leak which he considers is not adequately addressed by the HSE in the context of the emerging rail line to the North. He suggests restoring the land opposite, formerly a landfill site, to a nature reserve which will be visited by many people. Councillor Rankine also expresses concern about the lack of physical barriers alongside the public pathway adjacent to the site and alongside the railway line and serves Chepstow Park via an underpass. Security fencing would be insufficient in the event of any emergency. He expresses concern about introducing a new facility in an urban area and objects on this basis. He further objects in April 2021 on the basis of the landfill site opposite becoming a nature reserve.

#### **M.P for Buckingham**

Matthew Walsh on behalf of Greg Smith M.P visited the site with the Parish Council Clerk and raised objection to the proposal on the grounds of road safety; the cumulative impacts on the local area; and the passage of HGV lorries through Newton Longville village as well as noise, pollution and the impacts on local residents.

A further comment was received dated 22/9 21 which emphasized his concerns about putting further pressure on the road network and introducing an unacceptably high risk to residents in Newton Longville. He comments on the further deterioration condition of the local road network and the public safety hazards of the transportation of high pressure gas so close to residential properties.

His final objection to the expansion of the current gas depot site relates to the proximity of the footpath NLO 18/1 and the risk to its users.

#### **Consultation Responses (Summarise)**

**The Health and Safety Executive** - is a statutory consultee under the Planning (DMPO) Order 2015 where Major Hazard Sites/Pipelines exist and confirm that the site lies within the Consultation distance of a major gas pipeline. This may restrict access if the operator has a legal interest in the pipeline and may also restrict any proposed building works. HSE advice is based on the current situation and maybe affected by the operator. The **HSE advice clearly states that they do NOT advise against this development on safety grounds**

**Environmental health** - have no objections to this application.

However, from a noise and lighting perspective, it is noted that the main noise source will be from the HGV movements delivering gas to the site. The nearest residential properties are 150m away and an increase of a maximum 20 HGV movements a day would not add significantly to the noise already experienced by these properties on a relatively busy road. Originally, the proposal included a flare stack and a propane gas tank but they have now been removed from the proposal as gas technology at the AD plants has improved sufficiently to preclude the need for either. The EH officer further considered the noise from the EWR line construction traffic would far outweigh the noise from the gas site in the next few years. Other properties are separated by the EWR line and are 225m away therefore masking any noise from the gas site.

In terms of lighting, any light spill would be contained close to the site and would be screened by some mature vegetation. The impact will not be significant.

**A further consultation occurred**, upon receipt of the air quality and noise assessments of the CNG fuelled vehicles in June 2021 and regarding noise, E.H experts advised, that despite effects possibly being reduced during Coronavirus lockdowns, the background/ ambient noise estimates were likely to be an underestimate of normal circumstances, thereby suggesting that there would be little impact even at night with windows open from the nearest receptors. They also concluded that the road traffic noise generated by the HGV movements was likely be less than the predicted effects in the submitted report and considered it to be not significant.

In terms of the air quality assessment, the conclusion was that the increase in any pollutants was less than 1% and would have negligible impact. Therefore, no further mitigation or conditions were recommended and a refusal of permission on these grounds could not be justified.

**The River Ouzel Drainage Board** - confirm that this site is outside the Boards District and they therefore have no comment to make.

**The Environment Agency** – objected originally to this application in the absence of a Flood Risk Assessment required in compliance with para 163 of the NPPF The subsequent submission in December overcame the original omissions regarding any changes in flood capacity. Their objections have been addressed by the addendums and now satisfy requirements and the objection has been withdrawn on 27/5/21 subject to the imposition of a condition.

**The River Ouzel Drainage Board** - confirm that this site is outside the Boards District and they therefore have no comment to make.

**Buckinghamshire Fire and Rescue Service** - commented that the application must give due consideration to the building Regulations section 15 (vehicular access) and Section 16 (Fire Mains

and Hydrants) and ensure adequate access for emergency vehicles along with a digital lock to the site.

**The Crime, Prevention and Design Officer** - requested that the boundary treatments and gates are increased in height from the 1.8m proposed to a height of 2.1 minimum but preferable 2.4m to match the existing boundary treatment referred to in the DAS and that plans are submitted to confirm the arrangement in accordance with the guidance.

**Milton Keynes Council** – raised an objection in November 2020 concerning the potential impact on the highway networks which stated, “At this stage, the Council has initial concerns regarding the proposal in terms of the associated impact on the local highway network. The increase in vehicle movements as a result of the proposed development could potentially be detrimental to road safety and other highway users contrary to Policy CT2 of Plan: MK (2019).

The Council also shares the views which have been raised by Bletchley and Fenny Stratford Town Council and support their observations regarding concerns around the proposed development and the impact on the wider area.

As a result of the above, Milton Keynes Council hereby issues a HOLDING OBJECTION to the application proposed until such times as further information provided in response to the queries and concerns raised by the Town Council”

In March 2021, Milton Keynes responded, “with regards to comments received relating to issues surrounding noise, pollution and public health, there have been no objections raised from the Environmental Health Officer. I am however awaiting detailed comments relating to Highway safety, traffic movements, access and vehicle routes.

On 29/3/2021 M.K Highways say; Subsequent to the previous highway comments (20/02389/CONS) a Transport Statement Addendum has been submitted. The additional information submitted does not address the issues that were raised in the previous highway comments: although these do not seem to have been passed on in full.

There is no explanation of where the renewable gas is being produced and therefore how far this material will have to travel to the site Despite the suggested environmental benefits of the scheme, the transport of this gas by road, over long distances, particularly in diesel HGVs would undermine any potential benefits,

Without understanding where the gas is produced, it is difficult to comment on whether this location is appropriate for its injection into the network. What other locations were considered and /or rejected?

The original Transport Statement suggested that vehicle movements “are expected to be around 20 deliveries a day which would result in 40 movements. However, the TS Addendum has revised that figure down to 6 deliveries, (12 movements).

The TS did not provide any detail on the routing of the HGVs to/from the site. The TS Addendum has provided a routing plan which shows that deliveries would take place via Bletchley Road or Whaddon Road.

Whilst Bletchley Road is a reasonable width at the site access, it is restricted to around 5m under the nearby railway bridge. With a height restriction of 4.2m the bridge is marked for HGVs to use the centre of the road, preventing 2 way movement

The TS Addendum includes information on Personal Injury Accidents and although it describes an incident on Whaddon Road, it does not acknowledge the collision at the Bletchley Road railway bridge. Although this was driver behaviour related it validates the concern about the road width at this location.

Tracking diagrams for HGVs using the site access have now been provided. The tracking confirms that the left turn into the site HGVs performing this manoeuvre would need to utilise both sides of Bletchley Road and both sides of the access. The tracking clearly shows that this manoeuvre would be in direct conflict with an exiting vehicle.

Vehicles turning left into the site have no visibility into the site or along the access road and the potential for conflict is high.

### Summary

No details are provided on the origin of the gas to be brought to the site. No details are provided on why this site was selected and others rejected. The potential environmental health benefits of the scheme could be undermined by long haulage distances.

Mindful of the potential conflicts at the site access and the potential for increased hazards at the Bletchley Road railway bridge, it is recommended that a formal objection is made to the application.

On 18/5/21 Milton Keynes Council responded to the re-consultation and points out that it **reiterates and maintains its previous objection**

The applicants have responded to these comments in para 7.6.

### Highways

The proposed development would use the existing access arrangements to the gas depot from Bletchley Road, which is a Classified C road with a 40mph speed limit. Highways also recognise the tightness of the local road to the north, under the railway bridge and at the crossroads in Newton Longville village and requested a Transport Statement which was subsequently forthcoming in an Addendum. Highways concluded that the roads were wide enough for HGV trucks to pass any parked vehicles but recommended a routing Plan via a s106 Legal agreement which has subsequently transpired and been further re-consulted on. Highways considered the situation carefully and were satisfied that no unacceptable impacts on Highway Safety would result, subject to the imposition of conditions, which form part of the recommendation.

The latest re-consultation received confirmation that the Highways situation proposed and the latest Traffic Management Plan were satisfactory as was the proposed management regime for the HGV drivers. Highways were also satisfied that the final arrangements would be submitted to and approved by the Council prior to the commencement of the operation, as stated in the draft Legal agreement.

## Internal consultation responses

**The Ecology Officer** - comments in March and then in August 2021 that further information is required to secure mitigation and best practice methodologies with the Preliminary Ecological Appraisal report and a biodiversity method statement (a non-licensed method statement for great crested newts) has been requested by a pre-commencement condition. These are recommended as conditions 6 and 7.

**The Protected species Officer** - considers the preliminary Ecological Appraisal submitted on 8/10/20 to be an accurate assessment of the habitats and features present on the site at the time of the survey. Further consideration needs to be given to the possibility of the existence of great crested newts, as the development will fall within 250m of ponds where they have previously been identified but notes that the habitats are of negligible suitability. A precautionary method statement will be required to highlight that best practices have been followed and any potential mitigation implemented. An appropriate condition requiring this assessment is recommended by the Protected species Officer and is included in the recommendation.

The Protected species officer further comments on minimising the light spill and potential glare by control of light direction and level particularly in areas of wildlife interest where the Council would expect surveys to identify wildlife corridors and ensure that these are protected and enhanced where possible under Local Plan Policy NE5 of the emerging VALP, which carries considerable weight.

**Buckinghamshire Climate Response Team** – commented, based on the submitted Design and Access Statement, that the scheme would use bio-methane, produced using Anaerobic digestion from locations which do not have access to the national gas grid. They also note that bio-methane will displace the equivalent amount of natural gas thereby eliminating CO2 emissions from using this non-renewable gas supply. They also note that the trucks delivering bio-methane gas from the AD plants to the gas distribution depot will be conducted using bio-methane fuelled vehicles.

The Climate Change Committee have recommended that near term policy should 'maximise bio-methane production from waste via AD for gas grid injection'

## Representations

### **Other Representations**

2 comment has been received supporting the proposal:

1353 comments have been received objecting to the proposal:

#### *Summarise comments*

- The movement of HGV trucks through Newton Longville village, Bletchley and residential streets without adequate infrastructure.
- The noise and pollution emanating from the trucks destroying the local quality of life.
- Blocking of the bridge between Bletchley and Newton Longville.

- •The transportation of flammable gas by road.
- •Fear about lack of Health and Safety measures from the new facility as well as from the traffic movements.
- •The further industrialisation of Newton Longville.
- •Facility being too close to family homes causing air pollution where there are already landfill toxins and an EWR compound and resulting in further stress.
- •Risk of a further Buncefield explosion within 200m of family homes.
- •Impact on health, quality of life, wildlife and countryside and the local flora and fauna.
- •AVDC dumping its problems on Milton Keynes
- •Disbelief of the information about use of LPG gas in vehicles and associated nitrox emissions.
- •More HGV movements through the village is unacceptable.
- •Site is too close to residential areas, playing fields, Chepstow Park, allotments, shops, a telecommunications mast, and a new railway line.
- •Increased traffic will add to already congested roads.
- •High pressure connection to natural gas mains means there is potential for undetected gas leaks.
- •Offloading of flammable gas across the road from houses creates risk.
- •Site is close to several schools, increased HGV traffic will effect children’s walking routes to school.
- •Route to site uses Buckingham and Newton road junction which is main access to St Thomas Aquinas Primary School.
- •Use of facility 24 hours a day.
- •Risk of accident leading to fire/explosion – large grass fires have occurred in adjacent fields in recent years.
- •Financial impact to house prices.
- •Landscape and visual impacts of the proposal.
- •Not clear how the proposed method of operation will work – does not consider if tankers arrive early and where they will wait.
- •Little explanation of how the ‘preferred routes’ for the tankers would be policed.
- •Environmental impact of HGVs.
- •Environmental impact of the operation as whole.
- •No evacuation process set up in the case of an emergency.

- •Not enough details on production facility locations and transport routes to be used.
- •Likelihood of gas flaring would create visual and audible disruption.
- •Small roundabouts by Tesco in Bletchley would mean the tankers will likely have to mount curbs to get round which poses a danger.
- •HGVs passing houses on Bletchley Road cause them to vibrate, potential for property damage.
- •Increased light pollution from vehicles arriving and departing and the site being lit up by floodlights 24/7.
- •Further damage to local roads from increased HGV traffic.
- •The roads leading to the site are not suitable for this proposal, there was a suggestion that a through route only accessible by authorised vehicles could be implemented through talking to FCC Environment (UK), on Guernsey Road.
- •Future expansion to the site.
- •Plans only include security fencing and not any physical barriers to protect nearby residents from blasts/shockwaves.
- •Lack of public consultation.
- •Site is too small for its intended purpose, increases likelihood of collision from manoeuvring vehicles/tankers on the site which is a massive risk with anaerobic digester effluent in the trailers.
- •Suspicion that British Gas is doing this as a cheaper alternative to creating a new gas main to supplement capacity of gas network for future housing expansion in this area.
- •Security fears that this site could become a potential target for terrorism and whether protective measures are in place.
- •Lack of benefit to the local area from the proposal.
- •Issues with Design and Access Statement
  - oApplicant describes the nearest affected property as 157 metres away from the site however HGVs will enter site just 48 metres from the next-door house.
  - •Issues with Swept analysis.
    - oModel used does not represent all HGVs.
    - oVehicles going under the EWR railway bridge - does not consider the archway or that vehicles will have to be in the middle of the road.
  - •Issues with when the transport survey was done.
    - oWhaddon Bridge was closed so higher traffic than normal on Buckingham Road.

- oEWR haul road was not in operation so all EWR traffic using Buckingham Road.
- oEWR and contractors used entrance for parking which increased the survey activity.
- oNight-time working at the time.
- oSurvey not representative of normal traffic

A further full re-consultation took place on 30<sup>th</sup> July drawing attention to the Air Quality Report, the Noise report and the Transport Management Plan. It expired on 20<sup>th</sup> August 2021. Four repeat objections was received stressing objection to the further industrialisation of Newton Longville through the proposed development and:-

- Issues with the Noise Study.
- Max noise generated not considered.
- Traffic noise levels may be for slower speeds than those suggested.
- The noise from EWR is only temporary and so should not be considered in the normal level.
- Issues with Environmental Report.
- Does not give enough details to check for calculation errors.
- Doesn't consider latest Bio-methane powered trucks research – up to 5 times more polluting than diesel

## **Appendix B: Site Location plan**

**APPENDIX B: Site Location Plan**

This page is intentionally left blank