



PARISH/TOWN COUNCIL COMMENTS ON PLANNING APPLICATION:-

15/00314/AOP - NEWTON LONGVILLE

Email: parishclerk@whaddonbuckspsc.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. LINDAY Date: 11/9/20
CLERK - PO WHADDON PARISH COUNCIL

WHADDON PARISH COUNCIL

11th September 2020

Reply to; Suzanne Lindsey
Clerk to Whaddon Parish Council
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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-modelling (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 TjB 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.