Milton Keynes Core Strategy Examination

Hearing Statement : Matter 5 - Transport

Gallagher Estates

Respondent Ref : 273046

May 2012
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Introduction

Issue 5.1
‘Is the Core Strategy based on a sound assessment of the transport needs of the Borough and its hinterland?
In Particular i) is there sufficient clarity about the transport implications of the Core Strategy and the post-submission proposal for a Strategic Land Allocation to the south east of the city?
ii) How does the spatial framework and policy content of the Core Strategy relate to the local transport plan (LTP3)?’

Issue 5.2
‘Does the Core Strategy set out an integrated and achievable strategy for transport?
In particular, i) are the priority schemes identified and are there adequate mechanisms for their implementation?
ii) is it clear how the relative priorities for car-based and other modes of transport will be reconciled?
iii) Is the aim (Vision, page 17) to reduce peak-hour commuting by car from 68% to 57% by 2026 clearly defined and achievable, and if so, is it sufficiently ambitious?
iv) Is the commitment to expansion of the grid road system justified?
v) What is the status of the park and ride proposals?’

Issue 5.3
i) To what extent does the strategy depend on infrastructure development outside the Borough and are the mechanisms in place to secure delivery?
ii) What weight should be attached to the proposed East-West rail link?
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Appendices

Appendix 1 – Highways Agency Correspondence relating to M1 J13a.

Appendix 2 – Further information in response to Matter 5.2(v) relating to the Park and Ride proposals.


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Response to Matter 5 - Transport

Introduction

Gallaghers welcome the opportunity to provide responses to the questions raised by the Inspector in relation to Matter 5 Transport. Gallaghers are supportive of the work undertaken by Milton Keynes Council (MKC) in deriving the transport needs for the Core Strategy (CS), and the aims of the Transport Policies which have guided that work. There are however a number of detailed issues/themes which are not only the subject of specific questions but which also inter relate to wider questions. The detailed matters can be summarised as

- the commitment to expansion of the grid road system? (Matter 2(iv))
- the status of the park and ride proposals (Matter 2(v))
- the status of the proposal for a new junction (J13a) on the M1 motorway? (Matter 3(iii))

Related to Matter 2(v) is MKC’s proposal for a Lorry Park within the Strategic Land Allocation (SLA) which appears within the Lorry Management Strategy of October 2009 (included at Appendix 3). Whilst the CS does not highlight a specific need for Lorry Parks it is considered important that the issue is dealt with at this stage. This is primarily dealt with under matter 2(v).

The responses to the individual questions follow the theme of the four detailed issues listed above where appropriate. Full responses to the specific questions which relating to them are also provided in relation to the relevant detail Matter.

Issue 5.1

‘Is the Core Strategy based on a sound assessment of the transport needs of the Borough and its hinterland?’

5.1.1 Gallaghers are supportive of the work undertaken by MKC in developing the new Milton Keynes Transport Model (MKTM). MKC has constructed a ‘Saturn’ model of Milton Keynes, to predict the traffic impacts of future developments. This model was validated to represent the existing road network in 2009. This model has also been used to forecast traffic flows in 2026 using the methodologies set out in the report entitled “MKTM Traffic Forecast Report” (Document B143).

5.1.2 The model provides a readily agreeable source of data regarding the existing traffic in Milton Keynes, the increase in traffic due to committed development, proposed development allocations and proposed supporting transport infrastructure. This is being used as part of the evidence base for the CS, and we consider that this provides a sound assessment tool to confirm the transport needs of the CS.

5.1.3 While the MKTM is comprehensive in it’s inclusion of CS Allocations and the Transport Infrastructure to support it, it does however lack an appropriate level of detail in respect to a number of key issues :-
a) The MKTM does not include highways internal to new developments and can not therefore provide evidence to confirm the need to extend the grid road network into new developments in relation to highway capacity.

b) The assumptions in the model relating to the Park and Ride strategy are arbitrary and not based on sound evidence.

c) MKC have also recently indicated a requirement for a Lorry Park within the Strategic Reserve Area (SRA). There is little evidence supporting the need for or location of Lorry Parks.

d) The MKTM does not include a new J13a on the M1 or an overbridge across the M1. The model however, adequately demonstrates that the CS would be successful without either, in that no traffic issues are forecast to arise in their absence.

5.1.4 In summary, the CS is generally based on a sound assessment of the transport needs of the Borough with a few detailed exceptions.

In Particular

i) is there sufficient clarity about the transport implications of the Core Strategy and the post-submission proposal for a Strategic Land Allocation to the south east of the city?

5.1.5 The MKTM gives clear transport impact data in terms of the traffic increases likely to arise as a result of the CS proposals. The development allocations within the SLA are included in the 2026 “Reference Case” version of the model. The model confirms that the highway network would operate satisfactorily with the SLA development in place and supported by the transport strategies and infrastructure, as identified within the CS.

5.1.6 Whilst it is considered that there is sufficient clarity about the transport implications of the CS, there is insufficient clarity about certain detailed aspects of the transport measures put forward to support, these are as follows:-

a) The need to extend the Grid Road system into the development areas for the purpose of providing highway capacity is unclear as the internal development roads are not included in the MKTM.

b) Section 5.5 of the MKTM Traffic Forecast Report (Document B143) states that the MKTM includes a preliminary estimate only of the benefits likely to be achieved from a Park and Ride site on the A421 to the South East of Milton Keynes Centre.

c) The transport implications of a Lorry Park within the SRA have not been assessed as part of the work undertaken to inform the CS.

ii) How does the spatial framework and policy content of the Core Strategy relate to the local transport plan (LTP3)?

5.1.7 Point 7 of CS 11 (and CS 5) refers to both the dualling of the A421 and a new M1 J13a and that these should be delivered in step with housing and employment growth. LTP3 does not include proposals relating to a new J13a. As discussed in response to question 3(iii) below, there is no requirement for
a new M1 J13a and the CS does not therefore relate to the LTP3 in this respect.

5.1.8 Both the CS and LTP3 identify the need for feasibility and design work in deciding the optimum locations and details of Park and Ride sites serving Milton Keynes. Both documents recognise that it is too early to allocate sites for these uses as other locations may provide enhanced benefits.
Issue 5.2

‘Does the Core Strategy set out an integrated and achievable strategy for transport?’

5.2.1 Gallaghers consider that the integrated transport strategy set out in the CS is achievable, however certain elements have not been justified by robust evidence which demonstrates that they are needed to mitigate the anticipated impact of development, both for the development of the SLA and the overall spatial strategy. For example, the Park and Ride site which is proposed on the A421 to the South East of Milton Keynes Centre could operate satisfactorily in any one of a number of locations and further work is needed to ensure that any benefits of the overall Park and Ride strategy are maximised.

5.2.2 The requirement for a new M1 J13a is one part of the strategy for transport which would not be achievable. Not only is this unlikely to be supported by the Highways Agency (HA) but the Agency have also stated in CS Consultation Responses (included at Appendix 1) that the inclusion of the policy objective of a new J13a casts considerable doubt on the deliverability of the infrastructure strategy due to the likely cost.

In particular, i) are the priority schemes identified and are there adequate mechanisms for their implementation?

5.2.3 The LTP3 (Document LP17) includes a list of key transport interventions which include both policies and schemes. Section 5 of LTP3 sets out the Implementation Plan which includes indicative costs, timescales and funding sources. Whilst the LTP3 recognises that further work on prioritisation of schemes will be required, this will be dependant on the need to deliver transport interventions in step with housing and employment growth.

5.2.4 The Milton Keynes Tariff will be central to the implementation of the key interventions and it is understood that MKC have also indicated a commitment to a Community Infrastructure Levy from 2013/14.

ii) is it clear how the relative priorities for car-based and other modes of transport will be reconciled?

5.2.5 Of the eight measures listed under CS 11, 6 relate to a change in favour of sustainable transport over car-based travel. Points 1 (Grid Roads) and 7 (maximising highway capacity, J13a and A421 dualling) appear to conflict with this change in some respects. Maximising highway capacity and improving access to the Motorway network would encourage increased car use thereby undermining the potential for a shift towards more sustainable modes.

5.2.6 It is recognised that there will always be a need to cater for car-based travel but the transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel (Paragraph 29 of the NPPF (Document NP16)). Measures associated with car-based travel should therefore follow rather than lead the transport policy and further clarity on how/when such measures would be triggered would be beneficial.
iii) Is the aim (Vision, page 17) to reduce peak-hour commuting by car from 68% to 57% by 2026 clearly defined and achievable, and if so, is it sufficiently ambitious?

5.2.7 The target of 57% car-based commuting by 2026 appears to be sufficiently ambitious but clearly needs to be supported by a change of balance in favour of well planned and evidence based sustainable transport interventions rather than investment in facilities for car based travel.

iv) Is the commitment to expansion of the grid road system justified?

5.2.8 The grid road system as defined in LTP3 includes facilities for both sustainable and car-based modes. There is clear justification for expanding the sustainable transport aspects of the grid road network but expansion of the car-based modes should be dependant on demonstrable need rather than being a policy commitment. Dual carriageways for example should only be provided where the capacity of single carriageways is exceeded. The traffic flows forecast by the MKTM 2026 Reference Case model at the access points into the Strategic Reserve Area are well within the capacity of single carriageway roads and it is clear that dual carriageways would not be required.

5.2.9 Milton Keynes Partnership undertook an analysis of the Strengths, Weaknesses, Opportunities and Threats (SWOT) of the Growth Strategy for Milton Keynes in 2006. (Reference Appendix 9 of “The New Plan for Milton Keynes” (Document B18)). In relation to the Grid Road Network the analysis concluded that

“Grid road pattern leads to inflexibility in design of development and inefficient use of land”.

5.2.10 The Milton Keynes Bus Strategy (Document B68) also points out certain conflicts between the Grid Road system and the provision of Bus Services. Paragraph 2.34 of the Strategy states:

“The principal highway network, the grid roads, is generally remote from the residential areas. In most cases, the residential streets within the grid squares were not designed for buses but these roads have to be used in order to bring bus services close to the population. This makes it difficult to provide fast, frequent and attractive services with stops often poorly related to housing and employment and journey times cannot compete with those by car. In addition, the bus stops along the grid roads are often poorly overlooked making them feel less safe”.

5.2.11 Grid Roads also make it difficult to promote pedestrian permeability due to the perceived barrier presented by high speed of traffic and the wide carriageway.

5.2.12 Paragraph 6.5 of the strategy continues:-

Adopting a “grid-roads” policy at this stage is not something that the bus operators’ support and it could not be imposed on them within the current legislative framework. Such a policy would also reduce the overall accessibility of the bus network.”
5.2.13 Milton Keynes Council are developing a Master Plan for the SLA and have indicated that two grid road corridors are to be retained through the development on a North-South Axis from the two primary access points. Neither grid road corridor would link to the Grid Road Network and the value of isolated/unconnected grid road sections is questionable.

5.2.14 In summary, there may be a need to revisit the definition, character and transport provision of the Grid Road system to ensure that it remains current to Transport Policy direction. This is the subject of discussions between Gallagher Estates and MKC as part of the Wavendon Masterplan work.

v) What is the status of the park and ride proposals?'

5.2.15 Gallaghers support the over riding principal of Park and Ride in that it will reduce congestion and aid accessibility within Milton Keynes but for a P&R strategy to be successful it needs to be evidence based, well planned, well located and viable.

5.2.16 Point 8 of CS 11 includes the policy requirement for a Park and Ride site at M1 Junction 13/A421 (East) connected to the East - West rail link which would potentially be outside Milton Keynes. Point 6 of CS 5 places this Park and Ride within the SLA. MKC’s view is that the Park and Ride site should be located on the Eagle Farm North site within the SLA. The proposal is not however supported by an evidence base either in terms of size or location.

5.2.17 Appendix 1 provides further information in respect of the MKC's Park and Ride Proposals.

5.2.18 MKC have also indicated a requirement for a lorry park on the EFN site. This is set out in the Lorry Management Strategy (Appendix 3). It is unclear what the purpose or intended use of this of this facility would be. Lorry parking facilities already exist for M1 traffic and again, a lorry park at EFN would primarily intercept A421 traffic. It is not considered that sufficient business would be generated to make such a facility viable.

5.2.19 Appendix 1 also provides further information in respect of the MKC’s proposals for a Lorry Park on the Eagle Farm North site.

5.2.20 In summary, the proposals for Park and Ride sites to support the Core Strategy have no current status in that an adequate evidence to inform the size and location of sites has yet to be developed. The overall principal of a Park and Ride Strategy as part of an overall Transport Strategy for MK is however supported.

5.2.21 MKC’s proposal for a Lorry Park on Eagle Farm North is not supported.
**Issue 5.3**

i) To what extent does the strategy depend on infrastructure development outside the Borough and are the mechanisms in place to secure delivery?

5.3.1 The dualling of the A421 between Eagle Farm Roundabout and M1 J13 as referred to in CS 11 point 7, would depend on infrastructure development outside the Borough. An appropriately located Park and Ride facility, in line with CS11 point 8, for example, could lessen or remove the need for dualling of the A421.

ii) What weight should be attached to the proposed East-West rail link?

5.3.2 CS 11 point 8 refers to a Park and Ride site on the proposed East-West rail link. Rail services already exist on part of the East-West rail link route serving Bletchley and Bedford. The proposed East-West rail link project would further enhance sustainable travel opportunities, such as an appropriately located park and ride facility, by providing a wider choice of rail served destinations.

iii) What is the status of the proposal for a new junction (J13a) on the M1 motorway?

5.3.3 The HA have previously provided Consultation Responses in relation to the CS. A Technical Note prepared by their transport Consultants AECOM is included in Appendix 1. The technical note formed the basis of the Agency’s consultation response. It is stated in the Technical note that “a new junction on the M1 would clearly be at odds with the transport policies of central government and is likely to be resisted by the HA” (Halcrow emphasis).

5.3.4 DfT Circular 02/2007 “Planning and The Strategic Road Network” (included in Appendix 4) sets out how the HA on behalf of the Secretary of State participates in the planning process. Paragraph 40 of that Circular states “There is a general presumption that there will be no additional accesses to motorways (Halcrow emphasis) and other routes of strategic national importance, other than the provision of service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges”.

5.3.5 The HA also pointed out in CS Consultation Responses that Paragraph 3.101 of Milton Keynes Council’s LTP2 (Document LP12) states "Initial appraisal work already undertaken has ruled out inclusion of a new Junction 13A, between Juctions 13 and 14" and considered the reference to J13a in the CS to be misleading.

5.3.6 The concept of a new M1 J13a appears in the London to South Midlands Multi Modal Study (LSMMMS) (September 2002) (Extracts included in Appendix 5). This study was undertaken to identify a strategy for delivering the growth then planned. The main emphasis of the strategy was to assess and appraise the need for new infrastructure and the study made recommendations for both rail and highway infrastructure. Pages 132 and 133 of the study are relevant to M1 J13a which is discussed primarily in the context of east - west movement along the A421/A428 Corridor.
5.3.7 The study highlighted two issues,

- Firstly that significant east-west movement on the A421 was forecast which would not require access to the M1 and that an over bridge should be provided such that A421 traffic did not interfere with M1 traffic at J13.
- Secondly, that improvements to the A421 immediately east of the M1 would require new M1 Junction 13 arrangements to be in place.

5.3.8 The study considered a new J13a as one option to resolve these issues. The other option consisted of improvements to J13 which incorporated an overbridge for A421 traffic. The latter option was recommended as part of the LSMMMS strategy. Those improvements have now been completed and any need for a J13a is clearly now obsolete.

5.3.9 The status of the proposal for a new junction (J13a) on the M1 motorway is therefore clear in that it was at one time considered as part of one possible strategy for accommodating growth in the London to South Midlands region. The recent completion of the A421 dualling to the East of the M1 and the improvement of J13 incorporating an overbridge for A421 traffic is a clear and significant commitment to the alternative strategy of which J13a does not form a part.

5.3.10 The new overbridge provides enhanced capacity for traffic across the M1 and therefore replaces the need for additional M1 crossing points. It is therefore demonstrated that there is no basis for a new junction 13a or a new overbridge to be retained within the MK CS as a policy requirement.

5.3.11 We understand that this position is the subject of common ground shared by Milton Keynes Council and the Agency.
Appendix 1
Background

This note has been produced in response to the production of the latest version of the Milton Keynes Core Strategy Pre-Submission document published in February 2010.

The Agency has engaged with Milton Keynes Council over the past two years regarding development of the MK Core Strategy and reviewing the use of the MK Multi Modal Model (MKMMM) to support the CS evidence base. Over this period, the Agency has stressed the importance of developing and articulating the transport evidence base that will underpin the Core Strategy.

The Agency has previously commented upon a number of documents relating to the transport evidence base used in the Core Strategy as well as the previous version of the Pre-Submission Document. The main conclusions of these reviews are set out below:

- **Core Strategy: Pre Submission Document (September 2009):** The Agency expressed support for many of the principles of the Strategy in seeking to reduce the need to travel and reliance on the private car, encouraging more sustainable travel opportunities and the application of smarter choices measures such as Travel Plans alongside new developments. It was highlighted that the approach to transport policy in the Core Strategy should be underpinned by a robust transport evidence base and to respond to the transport objectives for the area. The potential cumulative transport impacts of development should be fully considered and the transport policy framework to address future challenges and to deliver desired outcomes.

  The Agency concluded that it is not currently evident that the transport policy approach provides a sufficient framework to guide the delivery of transport interventions and influence and manage future travel demands in a manner that will deliver transport objectives for the area, including safeguarding the future operation of the SRN.

- **Transport Strategy Note (updated Annex to a 2008 MK Cabinet Report):** The Agency acknowledged that whilst this document provided a general view of the direction of the transport strategy in MK, it required more clarity in terms of the measures to be delivered to support the CS. It was noted that the forthcoming CS should clearly set out the transport strategy in policy terms as well as detailing the transport measures in the Infrastructure Delivery Plan. Likewise, the recent requirement in PPS12 for Core Strategies to incorporate infrastructure planning and to consider both the appropriateness of infrastructure schemes and their deliverability was also stressed in the Agency's response.

- **Milton Keynes Core Strategy Options – Transport Modelling:** This report provided an overview of the potential transport impacts of additional development tests in MK; however the Agency noted that it was limited in both its scope and detail. It was acknowledged that whilst both of these documents represented a welcome step forward in terms of considering a sustainable transport strategy, they did not give the Agency sufficient confidence or clarity in terms of the transport evidence base for the CS.
Taking the above points into consideration, the primary concern of the Agency was that the transport strategy for Milton Keynes (MK) appeared to perpetuate the dominance of the car and that the Core Strategy should seek to consider and set out a more sustainable approach (based on the emerging TaSTS/DaSTS process).

The following comments form a suggested basis for the Agency’s response to the Core Strategy Pre-Submission Version, February 2010 taking into account these previous consultation responses and a review of the revised document.

**Proposed Response**

The Agency seeks closer integration of land use and transport and therefore welcomes the opportunity to comment on the Core Strategy Draft Submission document. In making this response, we have drawn on Government policy guidance with respect to transport, particularly the Department for Transport’s Circular 02/07: Planning and the Strategic Road Network and its Guidance on Transport Assessment.

The following comments on the Pre-Submission document for the Core Strategy are also framed with particular regard to Planning Policy Statement 12 and Delivering a Sustainable Transport System published by the DfT in November 2008.

In accordance with these documents, we expect the Core Strategy to be supported by an appropriate transport evidence base that sets out current problems in the area and demonstrates that the preferred land use and transport proposals in the Core Strategy will deliver desired outcomes in terms of key transport objectives, including safeguarding the operation of the Strategic Road Network (SRN).

We also look to the Strategy to be effective and therefore to demonstrate in a Delivery Plan how the transport measures necessary to support growth in the area will be delivered, the agencies that will be responsible for this and the anticipated public and private sector funding requirements, including a mechanism for developer contributions where appropriate.

The Agency particularly needs to be satisfied that any proposed development in the area takes account of the potential impacts on the SRN. In this respect the Agency’s specific interest relates to the M1 between J13 and J15, and the A5 which provide links to the rest of the region and further afield. To this end the Agency is seeking that development proposals are consistent with sustainable principles and are supported by appropriate transport policies and measures that will minimise future traffic growth and encourage sustainable travel modes.

**Strategic Road Network Context**

The strategic capacity of the M1 and the A5 is demonstrated by their level of ‘stress’, which relates to the daily flow divided by daily capacity on each route. This capacity is calculated by the maximum sustainable traffic flow in the peak hour. Where roads are congested for longer than the peak periods, it results in ‘stress’ levels which are more than 100%.

The Strategic Road Network (SRN) in the Milton Keynes area comprises the M1 between J13 and J15, and the A5. The current and future anticipated stress levels of the SRN in the area are set out below (Highways Agency East Midlands Regional Network Report 2010):
It can be seen that the M1 in particular, is under considerable stress which will is anticipated to increase over the Plan period. It should be notes that the government is rolling out a programme of “Managed Motorways”, including Hard Shoulder Running (HSR) and over the next ten to fifteen years it is planned to implement a scheme for HSR on the M1 between Junctions 13-19. This will help to reduce the pressure on the M1 as indicated in the above table.

The A5 south of MK is also under pressure. However, these assessments do not take into consideration future junction performance which needs to be considered at the local level as part of the evidence base for the Core Strategy. In particular, we anticipate the A5 junctions will come under increasing pressure as a result of development in the area.

The level of pressure on the SRN highlights the need for the MK Core Strategy to focus on policies and measures that will minimise future growth in traffic and manage growth in a manner that helps to safeguard the future operation of the SRN. The progression of the proposals within the Core Strategy should therefore be viewed within this context.

The Storey of the Place

The introduction to the Core Strategy and sections leading up to the Vision for Milton Keynes contain a mixture of messages regarding the historical strengths of Milton Keynes, an apparent need to maintain these into the future to ensure continued growth and prosperity but at the same time encouraging change in transport behaviour. Retaining ease of movement across the City suggests perpetuating a situation of car dependency across the area leading to high growth in traffic while discouraging more sustainable modes of travel and the effectiveness of proposed measures to enhance these modes.

The dominant role of the Grid Road system and roundabouts is given a significant degree of recognition in contributing to the success of Milton Keynes. The need for change is however recognised within the document. Paragraphs 2.8 to 2.14 present an informative picture of the transport problems facing Milton Keynes. Traffic growth is predicted to rise by 57% but the grid road system can only accommodate 25% of growth. This sets the scene for the introduction of changes in the way people travel and the need to influence travel demand by car and manage traffic access to the highway network.

The reference in paragraph 2.9 to the grid road system as being a constraint to public transport provision is perhaps indicative of some of the conflicts that are presented within the document in terms of the transport strategy that will form part of the Spatial Strategy.

![Table](image-url)
Vision

The Spatial Vision of Milton Keynes is presented as a 14 item list of aspiration statements the achievement of which is the objective of the strategy.

The Agency welcomes the reference to developing sustainable transport as part of the Vision for the Milton Keynes area, and embedding principles to ensure that new development is accessible by alternatives to the car.

The Agency recognises the aspiration of the authority to develop Milton Keynes to ‘eco-town’ standards as part of the growth agenda for the region (point 4). This provides a focus for enhanced sustainable transport networks within Milton Keynes and to destinations further afield. To support this approach, the creation of new employment, shopping, leisure and educational facilities needs to be accompanied by high quality networks for pedestrians, cyclists and public transport users, providing attractive alternatives to the private car. This approach is fully supported by the Agency.

The Agency is pleased to see that new retail provision up to 2026 will be located in accessible locations, as this type of land use is a significant trip generator and has the potential to impact on the Strategic Road Network. Making central Milton Keynes the primary focus of shopping activity should assist in reducing the need to travel, by maximising accessibility to key facilities by alternatives to the car, particularly public transport.

The Agency welcomes the recognition of the role of transport in tackling climate change. Transport is a significant contributor to climate change and this has been reflected in Delivering a Sustainable Transport System (DaSTS) produced by the Department for Transport in November 2008. This challenge should be reflected in the policies approach contained in the Core Strategy, for example by giving priority to the provision of more sustainable forms of travel such as public transport use, walking, cycling, and by influencing and managing the demand for travel in a way that reduces unnecessary car use.

The Agency is therefore pleased to see emphasis being placed on improving public transport. The pursuit of these policies will reduce the reliance on the private car in the city and assist in reducing future pressures on the local and strategic road network. Active support for low carbon forms of public transport will also assist in promoting public transport use whilst also contributing towards tackling climate change.

The Agency is encouraged to see that the road network in the new development areas will include provision for direct public transport routes as well as emphasising the need to make walking and cycling convenient for residents. The Strategic Development Areas to the south-east and south-west of the city offer the chance to provide high quality sustainable transport links to the existing urban area and the Agency is therefore pleased to see emphasis being placed on the requirements of non car users.

Whilst there is recognition of the need to change travel characteristics, point 5 gives the impression that future transport needs will be accommodated by building new roads rather than looking at more innovative ways to reduce traffic growth and getting better value from transport funding opportunities. Point 9 refers to the City’s iconic grid road system as something that needs to be preserved and point 11 refers to a new J13a on the M1. In relation to the latter point, a new junction on the M1 would clearly be at odds with the transport policies of central government and is likely to be resisted by the Highways Agency.
In summary, the vision contains much that the Agency is supportive of in terms of changing travel characteristics and managing the need to travel. Such an approach would ensure that maximum efficiency was gained for all highway users, well into the future. This support is however tempered by the contradictory statements and aspirations which suggest a continuation and provision for existing travel patterns and perpetuation of a heavy dependency on the car. The strategy aspiration for a new junction on the motorway simply to support local development and without a clear demonstration of strategic need or possible adverse impacts on a nationally important route detracts from the credibility of the document.

Strategic Objectives

Of the 16 strategic objectives contained within the Core Strategy, those of particular relevance to the Agency are addressed below:

- **Objective 9: Managing increased travel demands through.**

  The Agency supports the approach taken to manage the number of trips on the highway network through a range of measures. Improvements to, and continued investment in, the public transport network will play a key part in achieving a mode shift to sustainable travel, coupled with enhancing pedestrian and cycling infrastructure. The expansion of the Redway network will offer the opportunity to reduce the reliance on the private car and raise the priority of non-motorised users.

  The reference to the utilisation of Integrated Demand Management measures is also welcomed. The Strategy should seek to clearly set out what this will entail in terms of policy and initiatives to be delivered on the ground.

- **Objective 10: Mitigate the Borough’s impact on climate change.**

  The Agency welcomes the inclusion of an objective to tackle climate change, however this needs to reflect the role that transport plays in this process. The promotion of sustainable forms of travel will contribute towards reducing the reliance on the private car and thus reduce the \(\text{CO}_2\) emissions across the city.

- **Objective 16: Ensure the infrastructure necessary to support growth is identified.**

  In relation to this objective, the Agency would wish to see that growth in the area is supported by appropriate measures and infrastructure which reduces car dependency and mitigates the impacts of development on the highway network. The increase in demand to travel as a result of new development will have impacts on the SRN and it is not evident what these could be and whether they can be fully addressed. However, the commitment for this to be fully considered as development comes forward in partnership with the Highways agency is welcome.

It is apparent that the objectives of the Core Strategy are in line with national guidance in seeking to promote sustainable travel and minimise the impact of growth on the transport network. However, it is important that the objectives are underpinned by evidence that these principles can be translated into actual measures on the ground and that the Strategy has the ability to secure such improvements to transport provision in a timely manner as development comes forward.
A number of the policies contained within the Development Strategy will influence future travel in the area and therefore have implications for the strategic road network, and these are discussed below.

- **Policy CS1 – Milton Keynes Development Strategy**

The Agency welcomes the approach to focus development in the existing urban area of Milton Keynes as this should assist in reducing the need to travel, by maximising accessibility to local services by alternatives to the car, particularly public transport, walking and cycling. In addition, building at higher densities could have similar benefits and help support the viability of existing public transport services and secure improvements in their operation, which could benefit both existing and new residents.

This approach could, however, place greater pressure on corridors which are already subject to high levels of congestion. Consideration will therefore need to be given to securing contributions from developers towards mitigation measures which should include improvements to sustainable travel options where these could reduce pressures.

In relation to the allocation of a Strategic Development Area to the south east of the city, the Agency supports the principle of locating new development adjacent to the principle urban area of Milton Keynes. The site should benefit from good accessibility by sustainable travel modes and relate well to existing service provision and employment opportunities. However, development adjoining to the urban area *per se* does not necessarily equate to sustainable growth and measures should be taken to ensure integration with and enhancement of local sustainable transport networks.

- **Policy CS2 – Housing Land Supply**

When considering the housing land required in Milton Keynes, it is important to recognise the key link between housing density and the potential impact on the highway network. High-density developments will need to be supported by robust and sustainable transport provision to ensure that the number of private vehicle trips is minimised. However they also provide the opportunity to support the viability of new and existing public transport services and therefore the potential to build at higher densities along public transport corridors should be explored as a means of further reducing reliance on the private car.

Policies in the Core Strategy should also emphasise the importance of good design in reducing car dependency and associated congestion and pollution. Where possible sites should be located in accessible locations and provide good links to external transport networks. Internally, developments should be designed so as to reduce journey lengths so that walking and cycling provide viable alternatives to the car.

According to Table 5.2, a significant proportion of the RSS housing allocation has already been identified. 4,800 units remain to be allocated in the South East SDA and 1,151 remain to be allocated in the rural site allocations SPD. The Strategic reserve areas add a further 2,500 units to be allocated between Wavendon and M1 J13. The number of houses in this location could however be increased further as it is anticipated that the Central Bedfordshire Core Strategy will include an allocation in the adjacent area.

- **Policy CS3 – Employment Land Supply**

According to Table 5.2, a significant proportion of the RSS housing allocation has already been identified. 4,800 units remain to be allocated in the South East SDA and 1,151 remain to be allocated in the rural site allocations SPD. The Strategic reserve areas add a further 2,500 units to be allocated between Wavendon and M1 J13. The number of houses in this location could however be increased further as it is anticipated that the Central Bedfordshire Core Strategy will include an allocation in the adjacent area.
The Agency broadly supports the designation of land for employment provision through the Core Strategy to the extent that it is consistent with employment demand arising from housing growth within the area as this will help increasing the self containment of Milton Keynes, whilst reducing the need for out commuting or increased in-commuting. Employment allocations should also be easily accessible by sustainable transport options, minimise reliance on the car and exploit opportunities for the distributions of goods by rail where feasible and appropriate.

In addition, prior to the occupation of any new employment site, the Agency would encourage the authority to secure the adoption of a Travel Plan by the occupier to imbed sustainable travel patterns from the outset, thereby reducing car dependency and pressure on the highway network.

Employment land is to be allocated in the ratio of 1.5 jobs per new home. Measures will be investigated to accelerate either house building or job creation programmes to ensure that growth in housing and employment progress at the same rate. From Table 5.3 however, it is apparent that in the South East SDA, new employment will not reach the 1.5 jobs per home target. Out commuting could increase as a result.

- **Policies CS5 / CS6 – South East / South West Strategic Development Areas**

The concept of sustainable urban extensions to the south east and south west of Milton Keynes is supported in principle. It is anticipated that the developments will be of a sufficient scale to support the provision of local services and employment opportunities which should assist in reduce the need to travel. They are also of sufficient scale to support enhanced public transport, cycling and walking networks that can be integrated into existing networks.

The Strategy indicates that the urban extensions will contain local highway infrastructure and public transport links to nearby centres, together with a new park and ride site in relation to development as part of the South West SDA. In this respect the Agency would encourage an approach which prioritises public transport, walking and cycle access throughout the sites, and with surrounding centres.

The Agency does not anticipate that the South West Development Area on its own will have a significant adverse impact on the SRN. However, even with the provision of enhanced sustainable transport networks, the development areas together with other locations for across the area will produce cumulative impacts on the SRN. It is not clear how significant these may be, what mitigation measures will be required in response and whether the policies in the Core Strategy adequately address this aspect.

The commitment given to future joint working (including with the Highways Agency) to investigate and address transport issues associated with the development areas is welcome. It would be helpful if the policies relating to development areas specifically referred to the need to consider and address the impacts of each development area within the wider context of the cumulative impacts of development across Milton Keynes with the aim of safeguarding the future operation of the SRN.

There are 14 principals that direct the development of the SDA’s Principal 14 refers to an updated Tariff and Framework Agreement for the provision of infrastructure. No indication is given regarding the magnitude of the updated Tariff. The policy does however list the infrastructure that the South East SDA will provide, including the dualling of the A421, a multi modal transport hub with connections to park and ride, a lorry park linked to the M1 and contributions to east – west rail. The new MK model will be used to assess the transport implications of the development proposals. The
Mechanisms for delivering the infrastructure are discussed briefly in 6.11. Infrastructure is to be delivered through S106 agreements which require the payment of contributions based on an agreed formula. MKC would then take on the delivery of the infrastructure using pooled contributions. In order to ensure that development is adequately controlled, the HA have in the past, used Grampian planning conditions. The use of such conditions is not mentioned in the Strategy however.

Policy CS6 relates to the South West SDA even though it is outside Milton Keynes Councils administrative boundary. The policy refers to further work that needs to be done to assess the traffic impact of the development. Delivery mechanisms are not discussed in the policy.

Area Based Supporting Policies

With regard to the Area Based Supporting Policies, the Agency would wish to highlight the following comments in relation to the development focus on Central Milton Keynes:

- Policy CS7 – Central Milton Keynes

  Retaining Central Milton Keynes as the focus for retail and commercial development within the city is supported by the Agency on the basis that it is the most sustainable location for such provision as it is at the heart of the public transport network for the area.

  The proposed improvements to walking and cycling access and public transport provision are also welcomed. However reference to recognising 'the influence of the car in the design and layout of the area' is ambiguous and could be clarified to place greater emphasis on the need to prioritise access by sustainable modes of travel as opposed to catering for car based trips to the centre. In addition, central Milton Keynes is a major destination within the area and the approach to the provision and management of long-stay parking will affect the future level of car commuting to the centre and therefore form part of a wider approach to influencing and managing travel demand. It would be helpful if the approach to this aspect could be clarified.

  Car parking in Central Milton Keynes is mentioned in para 7.8. but is not referred to in the Central Milton Keynes policy (CS7). Reference is made to a well-managed supply of parking and the impression is given that the availability of parking is seen as an attractor of investment and so will be maintained at levels similar to that which exists today.

Topic Based Supporting Policies

In terms of the topic based policies contained within the Core Strategy, a number are of relevance to the strategic road network and are addressed below:

- Policy CS11 – A well-connected Milton Keynes

  Section 11 details a topic based policy on transport. The document refers to the convenience of car travel around the city as something that attracts and retains business. It also recognises however that growth is putting considerable pressure on the grid road network and to tackle this, the document acknowledges a need to introduce changes to the way people travel. To facilitate this, reference is made to improvements included in the 2008 Bus Strategy. The provision of public transport to new development presents a number of conflicts within the document. Para 11.5 states...
that “the design of new development areas will increase local access to the bus and redway networks”. It has already been recognised earlier in the document however that the grid road network, the extension of which forms part of the vision for Milton Keynes (spatial vision, point 9, p22), makes it difficult to provide fast, frequent and attractive bus services (Para 2.9). The concept of City Streets, as detailed in the Bus Strategy is aimed at resolving this conflict.

Reference is again made to the need for a new J13a on the M1 which would improve access to and from the motorway. This junction forms part of policy CS5 suggesting that it is required in order to maximise the capacity of the Boroughs highway network. The impression is also given that the arrangements to deliver this junction are included in the LTP2. Para 3.101 of the LTP2 states however that “Initial appraisal work already undertaken has ruled out inclusion of a new Junction 13A, between Junctions 13 and 14”. The reference in the Core Strategy is therefore misleading.

However, the Agency is supportive of the principles set out in the policy for a well-connected Milton Keynes, by seeking to increase the provision of public transport services and improve facilities for walking and cycling. The aim of creating a core public transport network within Milton Keynes is particularly welcomed as this has the potential to increase modal share and minimise the growth of vehicle trips on the network. Given the fact that urban extensions are required to the existing conurbation, public transport should be viewed as a key component to delivering growth in a sustainable way, and in reducing reliance on the car.

The delivery of a “well connected Milton Keynes” may need to rely partly on influencing and managing travel demand and, although this is referred to, it is not fully addressed in the policy. For example, the management of parking provision and promotion of travel planning will form a key element of any attempts to encourage more sustainable travel patterns. The Agency would welcome greater emphasis on the need to influence and manage travel demand.

It is important that the transport policy approach is appropriate and therefore underpinned by a robust evidence base. It is not evident that Policy CS11 is adequate to address future transport pressures that will arise across the area or that it will enable delivery of the transport objectives for the area. The Agency is keen have further engagement with the Council on this aspect, particularly in light of the potential for growth to impact upon the SRN.

- **Policy CS22 – Delivering Infrastructure**

Section 16 describes the delivery of infrastructure and the MK Tariff which is encompassed in Policy CS22. It recognises that the delivery of necessary infrastructure often in advance of new development is crucial to achieving attractive and sustainable places where people will want to live. Para 16.4 recognises that the Tariff will not meet the full cost of the infrastructure required to support growth and government funding will be needed to fill funding gaps. A new tariff agreement is to be developed to deliver the infrastructure necessary to support the South East SDA. The transport infrastructure requirements are not as yet confirmed however but will be developed prior to commencement of development (Para 16.5).

Policy CS22 states that :-

- New development that generates a demand for infrastructure will only be permitted if the necessary on and off-site infrastructure required to support and mitigate the impact of that development is either:
  - already in place, or
there is a reliable mechanism in place to ensure that it will be delivered in the right place at
the right time, to the required minimum high standards demanded by this Council and its
partners.

It is encouraging that the authority is seeking to secure developer contributions to help supplement
public sector funding so that necessary infrastructure to support growth can be delivered. This is of
particular relevance to the delivery of necessary transport infrastructure, including necessary
measures on the Strategic Road Network. The Policy is not clear on the potential amount of
infrastructure that may need to be funded through developer contributions and further thought could
be given to this aspect. In addition, clarification could be provided in terms of when development
may proceed in relation to funding being provided or mitigating measures being implemented. A
costed programme of measures to be supported through a Tariff approach will need to be identified
through an appropriate transport evidence base.

Should the “reliable mechanism” referred to in the policy be dependant on government funding, then
it follows that in order to comply with the policy, this funding will need to have been secured before
new development can be permitted. Whilst this is absolutely the right approach, the funding
requirements for the CSS are not yet known and particularly given the current economic climate,
government funding can not be relied upon to make a strategy sound. There is no evidence to
suggest that the CSS as set out in the document in terms of aspiration housing and employment
targets can be achieved within the means available. The earlier policy objective of a new J13a also
casts considerable doubt on the deliverability of the infrastructure strategy that is to be pursued.

Evidence Base

The previous comments made by the Agency in relation to the emerging strategic plans for the area
have consistently indicated the need for a robust evidence base which would demonstrate the need for
transport measures to support the Core Strategy, deliverability of these measures and an appropriate
policy framework.

The Agency has concerns regarding the scope of the transport evidence base which has been produced
by the authority to support the Strategy. It is recognised that significant work has been done in this area
but the Agency would like to see supporting evidence for the proposed transport policy framework with
regard to:

• Future levels of trip making in the area and overall transport impacts of growth;
• Potential outcomes of different transport strategies/interventions;
• Extent to which transport policies and measures will deliver required outcomes;
• Consistency of Core Strategy transport policies and proposals with RSS transport objectives;
• Balance between highway measures, sustainable measures and measures to influence travel
demand and manage traffic access to strategic routes;
• Deliverability of proposed transport measures, and
• Extent of reliance on developer contributions.

It is possible that these considerations may arise at the EiP for the core Strategy and the Agency would
welcome the opportunity to discuss these aspects further with the Authority.

Summary
The Agency welcomes the opportunity to comment on the Milton Keynes Core Strategy and is keen to maintain a close working relationship with the authority as the Strategy progresses. The Agency fully endorses many of the principles of the Strategy in seeking to reduce the need to travel and reliance on the private car, encouraging more sustainable travel opportunities and the application of smarter choices measures such as Travel Plans alongside new developments.

However, the Agency is concerned that there is an apparent dichotomy that runs throughout the document. References to the “Iconic” grid road system being a contributory factor in the success of Milton Keynes do not fully recognise that transport policy has changed. The grid road system can continue to play its part in supporting the future success of an expanding Milton Keynes but its role will need to be a supporting one rather than a lead. References to new motorway junctions also reflect historical “predict and provide” policies rather than the policies of an innovative city with innovative transport policies.

The means to provide new transport infrastructure are limited and investment value needs to be maximised by providing benefit to all highway users. The cost of a new motorway junction alone would outstrip the funding opportunity presented by the development included within the strategy. Government funding for such a project is highly unlikely to be successful as it would be contrary to transport policy and would detract from possible funding opportunities for sustainable transport intervention.

The Agency expects the approach to transport policy in the Core Strategy to be underpinned by a robust transport evidence base and to respond to the transport objectives for the area. There is a need for the potential cumulative transport impacts of development to be fully understood and it is not clear that the transport policy framework will deliver desired outcomes. It is therefore not evident that the transport policy approach provides a sufficient framework to guide the delivery of transport interventions and influence and manage future travel demands in a manner that will deliver transport objectives for the area, including safeguarding the future operation of the SRN.

The Agency is keen to continue its engagement with the Council to discuss the transport policy approach being taken forward in the core Strategy.
Appendix 2
v) What is the status of the park and ride proposals?

1. Gallaghers support the over riding principal of Park and Ride in that it will reduce congestion and aid accessibility within Milton Keynes but for a P&R strategy to be successful it needs to be evidence based, well planned, well located and viable.

2. Point 8 of CS 11 includes the policy requirement for a Park and Ride site at M1 Junction 13 /A421 (East) connected to the East - West rail link which would potentially be outside Milton Keynes. Point 6 of CS 5 places this Park and Ride within the SLA. MKC’s view is that the Park and Ride site should be located on the Eagle Farm North site within the SLA. The proposal is not however supported by an evidence base either in terms of size or location.

3. Various documents refer to the need for Park and Ride. In particular, MKC’s LTP3 includes Park and Ride in the transit strategy “on the edge of the city and in close proximity to the strategic highway network”. LTP3 goes on to note that specific sites (apart from the Coachway site at M1 J14; refer to Paragraph 5.28 of the Milton Keynes Bus Strategy 2008) are yet to be identified and are “subject to extensive feasibility and design work, including widespread consultation with the local community before seeking planning permission for delivery”. However, it is not clear from the evidence currently available that the Park and Ride Strategy has been adequately progressed to a stage where specific site locations can be allocated.

4. In relation to MKC’s aspiration for a Park and Ride site on EFN, it is considered that the site would have a number of disadvantages. These are linked to catchment overlap with the existing site at Coachway, which is compounded by longer journey times to CMK from EFN and potentially expensive new bus service requirements.

5. The catchment area of a site at EFN includes traffic from Bedford on the A421 and from M1 J13. However, the clear opportunity to use the Coachway site at M1 J14 would only add 6-8 minutes travelling time by car, and with a quicker bus link, the overall journey time is likely to be quicker using the Coachway Park & Ride site for all potential EFN users, and M1 traffic in particular.

6. If the need for a Park and Ride site on the A421 could be demonstrated, a site closer to M1 J13 than EFN and having a dedicated bus service would offer a more logical option for potential users.
7. In addition, a site closer to M1 J13 than EFN and linked with East-West rail would (ultimately) also offer the selling point of access to the wider rail network as well as Central Milton Keynes, and be a true multi-modal transport hub (similar to the access that the Coachway offers to long-distance coach services at present).

8. A site closer to M1 J13 than EFN, may reduce traffic flows on the A421 further lessening the need for dualling.

Lorry Park

9. MKC have also indicated a requirement for a lorry park on the EFN site. This is set out in the “Lorry Management Strategy” of October 2009. It is unclear what the purpose or intended use of this of this facility would be. Lorry parking facilities already exist for M1 traffic and again, a lorry park at EFN would primarily intercept A421 traffic. It is not considered that sufficient business would be generated to make such a facility viable.

10. The first Paragraph of Section 8.1 of the Lorry Management Strategy states "there **MAY** (Halcrow emphasis) be a need to provide a new lorry park in the City, particularly to reduce the problem of lorry parking in residential areas". The report then goes on to say (para 8.3) "There is however currently little evidence...to suggest that there is a problem with large lorries parking in residential areas". It is not therefore clear that there is a problem to resolve due to the lack of a conclusive evidence base.

11. However, in order to resolve the issue, section 8.4 of the Lorry Management Strategy includes a number of proposals which are to be considered. In terms of the SRA two are relevant :-

1) Planning Applications for Industrial/commercial uses should include adequate Lorry Parking facilities to accommodate the demand generated by that use.

2) A site within the SRA should be considered for a 200 space fully serviced "Lorry Park" facility.

12. Assuming that 1) is satisfied through the planning process then 2) would be to cater for “Transient Parking” only, ie for short duration or overnight stays away from Goods Vehicle Operating Centres.

13. Surveys referred to in 8.3 of the Strategy indicate a demand in 2008 in the Kingston/Brincklow area of 89 lorries, with some of that number appropriately
catered for by marked lorry parking bays. It is not clear how that local demand translates into the need for a 200 space fully serviced “Lorry Park” facility within the SRA.

14. Developments within the SRA will include adequate Lorry Parking facilities to accommodate their own demand in line with Parking Standards and any additional lorry parking would only have a benefit in terms of resolving existing issue which there is no evidence to justify.

15. The strategy clearly advocates a financially viable fully serviced operation including fuel sales, spares sales, maintenance facilities, lorry washing facilities, toilet block, shower facilities and with meals available. Much of what is listed in the lorry park specification is already available at other locations in the vicinity, including the M1 Services and the “M1 Milton Keynes Truck Stop” at J13.

16. The Department for Transports Lorry Parking Baseline Report of November 2009 (included at Appendix X) also suggests that lorry park utilisation along the M1 corridor is much lower than along other strategic roads, with only 50% night time utilisation and 35% day time utilisation.

17. With a low level of demand and competing facilities already in existence, the viability of such a facility is highly questionable.

18. Looking at examples of similar sized facilities elsewhere in the country and the land available on the Eagle Farm North site, it is likely that such a facility as that proposed by MKC would occupy around 25% of the developable land. Should this land be allocated for this use, it is highly unlikely that the land would be developed. Tariff contributions from more appropriate development would therefore be lost.

19. The location proposed by MKC also presents a number of issues in Planning terms. The Lorry Park would effectively become the gateway to Milton Keynes and would be located in close proximity to the residential area development of Eagle Farm South. Neither of these issues could be said to be desirable. It is likely that any Lorry Park Facility would be 24hr operation. DfT Circular 01/2008 – “Policy On Service Areas And Other Roadside Facilities On Motorways And All-Purpose Trunk Roads In England” requires that where truckstops are to be signed from the Motorway network they should be available for 24 hours per day. The proposed residential development on Eagle Farm South would be sensitive to noise, air quality, light spillage, fuel spillage, fumes, etc, associated with the continuous operation of the facility.
20. No evidence has been provided on the traffic implications for a Lorry Park at Eagle Farm North. It is likely that a Lorry Park would attract significant flows of inbound HGV’s in the PM peak. HGV traffic from M1 J13 would have priority over eastbound A421 traffic from Milton Keynes and this may result in delay congestion on the A421.

21. In summary, there is no evidence to support the allocation of a Lorry Park facility within the SRA.
Appendix 3
Lorry Management Strategy

October 2009
This document has been prepared by
Milton Keynes Council

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1. Introduction

Delivery of freight is an integral part of modern life. Freight is essential to industry and commerce and if we are to enjoy the quality of life we expect we must accept that such freight deliveries are not only necessary but essential.

Currently well over 60% of freight is carried by road and even freight carried by rail will generally require a journey by road in order complete its journey to the final destination. Much effort is put into increasing the amount of rail freight, but even a doubling of the amount of rail freight will not significantly reduce lorry traffic.

Every property will at some point in time require access for lorries for delivery, removal or building purposes. Refuse and recycling vehicles and fire engines are also large vehicles which need access.

Within Milton Keynes, extensive ongoing development in order to deliver the growth agenda is attracting many lorry movements - these movements also need to be accommodated on the network.

The lorry is therefore a fact of life, and we must live with it.

Clearly however, the lorry can have a detrimental impact upon our environment and quality of life and therefore alongside making very necessary provisions for the lorry it is also important to be able to minimise the possible detrimental impact that lorries can sometimes have.

Many of our roads were not built for modern lorries and as such, they may often create a variety of issues for local communities and other road users and we frequently receive requests for measures to be taken that will reduce the adverse effects of lorries travelling on roads and delivering to locations in both urban and rural areas.

In addition, there is also a need to effectively manage both final destination deliveries and also provide lorry parking and rest facilities.

This strategy seeks to set out the issues involved in managing lorries on our roads and identify actions that can be taken to minimise their impact.
2. Existing Strategic and Policy Background

The Milton Keynes Local Plan and the Local Transport Plan establish the principles for the adoption of a road hierarchy for different transport uses. This underpins the development of a Lorry Route Network within Milton Keynes.

The Council’s Local Transport Plan is centred on four national priorities, these being:

- Improving Road Safety,
- Reducing Congestion,
- Improving Accessibility; and
- Improving Air Quality.

All four of these are critical when considering lorry movements on our road network in Milton Keynes.

In addition the Local Plan identifies the need for additional lorry parking facilities to be provided in order to deal with the increasing number of lorries parking on our roads.

Finally, both the Council’s Air Quality Management Strategy and Traffic Management Plan place responsibility upon the Council for locally managing air quality and congestion on our roads.
3. The Impact of Lorries

3.1 What is a Lorry?

The definition of “What is a lorry?” often causes some confusion – lorries may be rigid or articulated and come in a variety of sizes.

For the purposes of our lorry management strategy, lorries are subdivided into two types, defined by the maximum gross weight of the vehicle (which is the combined weight of the vehicles and its maximum permitted payload). They are:

- Those over 7.5 Tonnes - vehicles must display red and yellow rear reflective markings, and,
- Those over 18 Tonnes (up to a maximum of 44 Tonnes) – vehicles will have a minimum of 3 axles.

These distinctions are made in several aspects of legislation, particularly in respect of weight restrictions.

The impact that lorries can have on both the urban and rural road network and environment falls generally into three categories, an assessment of which can be used to assess the suitability of routes for lorries. These are:-

- Environmental Impact
- Hazards
- Nuisance and Congestion

3.2 Environmental Impact

Environmental impact can be observed in two ways, either by physical measurable characteristics or by people’s perception.

Issues of concern are generally:

**Noise Levels**

Lorry noise is one of the major concerns for people in their houses or on the street. A common complaint is that the tranquil rural environment is being disturbed by lorry traffic.

The current permitted noise emission levels are still quite loud. Lorry noise is affected by traffic speed and is made worse when vehicles have to stop and start. In addition, uneven road surfaces and manhole covers within the road can result in additional vibration and noise.

Other than for new road construction or highway improvement there is no formal acceptable noise threshold limit for roads, however clearly heavy lorry flows could well result in noise levels that may be deemed intrusive and inappropriate.

Under the Land Compensation Act and Noise Insulation Regulations of 1975, where a new road is being provided, or an existing road improved, mitigation action is required where
the noise levels exceed 68dB (and are predicted to rise by 1dB). This legislation is enforced by central government agencies.

Mitigation measures such as acoustic fencing or bunding should be considered at the design stage.

As a standard low noise surfacing is being used when ever roads are resurfaced in Milton Keynes.

In many areas specific night-time curfews are in place on deliveries to Supermarkets to minimise disruption and noise. This is dealt with in more detail in Section 7.

**Vibration**

Vibration is frequently a concern due to its nuisance effect and the perception that it causes structural damage, particularly to older and historic buildings.

Extensive research from within the industry on a range of building types has not shown any clear link between exposure to traffic vibration and structural defects.

Generally speaking observed damage to buildings can be attributed to site factors other than the exposure to traffic.

**Air Pollution**

Within Milton Keynes the areas of poorest air quality are located in some of the heaviest HGV flow corridors. Regular monitoring of the two main pollutants associated with traffic emissions, particles (PM$_{10}$) and nitrogen dioxide (NO$_2$) has been undertaken since 1998 by the Environmental Heath Division.

The council has a duty to review and assess local air quality, a function known as Local Air Quality Management (LAQM). Where prescribed air quality levels are likely to be exceeded the council must designate the area as an Air Quality Management Area (AQMA). In order to tackle the air pollution and bring about improvements, an Air Quality Action Plan is drawn up following public consultation.

There is currently one AQMA located in Olney. There are no other AQMA’s within Milton Keynes even though the M1 motorway runs through Newport Pagnell and has a high flow of lorries and other vehicles. The concentrations of NO$_2$ usually reduce rapidly with distance from the road and emissions rapidly disperse to levels below the levels at the measurement locations (usually in residential areas).

The nitrogen dioxide concentration can be elevated in older towns subjected to high traffic flows through narrow streets. The concentration exceeds the prescribed level along Bridge Street and the High Street South in Olney. An AQMA was designated on 1st December 2008. Houses are very close to the road and the dispersion and dilution of pollutants is reduced because of the enclosed nature of the road known as the “street canyon” effect.

The prescribed level for particles (PM$_{10}$) is not exceeded at all locations throughout the council area.

Whilst there are significant moves from within the industry to develop and encourage cleaner lorries, there is no doubt that lorries do contribute heavily to air pollution and visible smoke and dust - this is of concern in both urban and rural areas. Further advances
by the industry will seek to continually improve this and the use of “greener” fuels is being actively promoted.

Within MK the areas of poorest air quality are located in some of the heaviest HGV flow corridors. Regular monitoring of Oxides of nitrogen and particulates is undertaken and the following areas have been highlighted as being just below the permitted acceptable threshold levels:

- M1 - Junction 14,
- M1 - through Newport Pagnell, and,
- Olney High Street South (tunnel effect of buildings contributes).

Any sites which exceed the threshold levels may require the designation of an Air Quality Management Area which will require an action plan to be implemented to enhance air quality.

### 3.3 Hazards

Concerns regarding hazards fall into 5 main categories

- Personal Injury Collisions
- Speed of Lorries
- Impact damage to Buildings & Structures
- ‘Weight’ damage to the highway
- Overloading and insecure Loads

**Personal Injury Collisions**

Generally speaking collisions involving lorries are infrequent and per mile travelled have the lowest collision rate.
However the size and often speed of such vehicles does lead to a greater perception of
danger and vulnerable roads users may be particularly at risk from lorries. Extra care
should be taken by vulnerable road users when crossing roads or being passed by large
lorries and lorry drivers should take care when passing such road users.

Table 1 shows, for the past 5 years, data for collisions on roads within Milton Keynes
involving lorries by road classification.

**Table 1 : Personal Injury Collisions involving Lorries on all Roads within MK**

<table>
<thead>
<tr>
<th>Road Class</th>
<th>2003</th>
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<th>2005</th>
<th>2006</th>
<th>2007</th>
</tr>
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<td>38</td>
<td>42</td>
<td>38</td>
</tr>
<tr>
<td>A class</td>
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<td>55</td>
<td>40</td>
<td>39</td>
<td>23</td>
</tr>
<tr>
<td>B class</td>
<td>9</td>
<td>4</td>
<td>6</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>C class(inc. some grid roads)</td>
<td>27</td>
<td>20</td>
<td>32</td>
<td>29</td>
<td>25</td>
</tr>
<tr>
<td>Unclassified</td>
<td>11</td>
<td>11</td>
<td>15</td>
<td>10</td>
<td>12</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>106</strong></td>
<td><strong>118</strong></td>
<td><strong>131</strong></td>
<td><strong>122</strong></td>
<td><strong>105</strong></td>
</tr>
</tbody>
</table>

Personal injury collisions involving lorries have remained reasonably static over the past 5
years with peak being experienced in 2005. The classification of road which these are
occurring on does however vary.

Clearly factors such as the traffic flows, the volume of lorries on the roads and the length
of road of that classification play an important part and the fact that both “B” Class and
Unclassified roads show low incidents of collisions is reflective of this.

Higher levels on Motorways, A Class roads and C Class roads (which include the
remainder of the grid road network not classified as A or B Class) are reflective of the
greater volumes of lorries using them

Table 2 below provides an analysis of the number of goods vehicle casualties by severity
which shows a comparison with the national picture

**Table 2 : Lorry Casualties by Severity on all roads within MK**

<table>
<thead>
<tr>
<th>Severity</th>
<th>2003</th>
<th>2004</th>
<th>2005</th>
<th>2006</th>
<th>2007</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fatal</td>
<td>0</td>
<td>1</td>
<td>4</td>
<td>1 (91)</td>
<td>1 (110)</td>
</tr>
<tr>
<td>Serious</td>
<td>3</td>
<td>3</td>
<td>5</td>
<td>7 (856)</td>
<td>7 (747)</td>
</tr>
<tr>
<td>KSI</td>
<td>3</td>
<td>4</td>
<td>9</td>
<td>8 (947)</td>
<td>8 (857)</td>
</tr>
<tr>
<td>Slight</td>
<td>50</td>
<td>36</td>
<td>49</td>
<td>47 (7497)</td>
<td>43 (6959)</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>53</strong></td>
<td><strong>40</strong></td>
<td><strong>58</strong></td>
<td><strong>55 (8444)</strong></td>
<td><strong>51 (7816)</strong></td>
</tr>
</tbody>
</table>

The national figures for 2006 and 2007 (shown in brackets in Table 2) show a 7%
reduction in total collisions, this equates with the local reduction over the same period.
Nationally, Killed or Seriously Injured (KSI’s) have reduced by 10%, however, within MK
this figure has remained static.

A comparison of the casualties per million HGV kilometres (km) would provide a more
accurate position as to how MK roads are performing when compared to the national
picture.
Traffic flow estimates for MK suggest an HGV flow figure of 129.8 million HGV km per year on our roads giving figures of 0.06 KSI’s per million HGV km and 0.42 casualties per Million HGV km.

It has not been possible to obtain comparative national data however this is still attempting to be sourced.

All locations demonstrating high numbers of collisions are analysed and if lorry collisions are a key factor this fact will be taken into account when identifying potential solutions

**Speed of Lorries**
The Highway Code details the maximum speed for vehicles of different types. In the absence of any lower restriction set by the highway authority, the maximum speeds that lorries are permitted to travel at are detailed below:

- **Maximum Gross Weight not exceeding 7.5Tonnes**
  - Single Carriageways not subject to a lower limit = 50mph
  - Dual Carriageways not subject to a lower limit = 60mph

- **Maximum Gross Weight exceeding 7.5Tonnes**
  - Single Carriageways not subject to a lower limit = 40mph
  - Dual Carriageways not subject to a lower limit = 50mph

All goods vehicles over 3.5Tonnes are required by legislation to have speed limiters set at 56mph.

If there is evidence of speeding lorry traffic this can be dealt with through the Council’s speed management strategy and policies.

Slow moving lorries can also lead to problems as this may lead to driver frustration in vehicles which are following.

**Impact Damage to Buildings and Structures**
Although rarely occurring, quite rightly so, incidents of lorries colliding with buildings or highways structures cause great concern.

Within MK there are very few reported impacts to bridges by lorries. Figures are not available for impact or damage to buildings however there have been very few known incidents in recent years.

Low bridges are required to have adequate warning signs in advance to minimise potential collisions.

**‘Weight’ damage to the Highway.**
Recent “scanner” surveys covering the whole of the Council’s highway network have identified the roads with the weakest carriageway construction. Clearly, roads which are used by lorries suffer a greater load impact and it is important that such roads are adequately maintained.

Whilst this is a key concern for the local authority, often the public’s perception is that the issues are not as severe as the more visible damage caused to footpaths and verges.
which have been subject to over-running by lorries. These are potentially dangerous to pedestrians and can cause extensive and costly damage to underground services.

**Overloading and insecure loads**
Lorries that are suspected by the Police as being overloaded are able to be taken to the Vehicle and Operator Services Agency (VOSA) managed weighbridge at J14. VOSA do undertaken regular checks on roads within MK in conjunction with the Police. Insecure loads can create problems (particularly on high speed roads) and Thames Valley Police traffic patrols are particularly careful to ensure that lorries are loaded properly and securely.

### 3.4 Nuisance, Obstruction and Congestion

Due to their size, lorries often contribute to vehicle congestion on our roads, particularly when delivering and when roads are narrow and heavily trafficked. For some, the mere large physical presence of lorries creates a significant safety concern and often a nuisance factor.

**Visual Obstruction and Intrusion**
In some places the quality of the built or natural environment is such that lorries are seen as a blight on the scenery or urban environment.

In rural areas on narrow lanes and through villages the issues created by rat running vehicles seeking to avoid congestion on more appropriate routes are compounded and are seen to contribute to the reduction of hedgerows, verges and walls and may cause damage to tree canopies. In some areas with particularly large lorry flows, there are concerns that difficulties in pedestrian movements across roads may contribute to community severance.

Parked lorries often obscure light from windows and obstruct views. In some instances continued parking of large vehicles where there are no appropriate facilities can generate unsightly litter and other antisocial behaviour activities which can create health risks.

**Congestion and Accessibility**
In many town centres and rural villages, congested or narrow roads mean that lorries, if accessing or parked to deliver or load can create considerable congestion problems on the road. Alternatively lorries often park on or partly on the footpath in order to keep traffic flows moving - this in itself however creates obstruction problems for pedestrians and other users of the pavements and is likely to result in damage to the footpath and underground services.

In many cases delivery or service yards have been provided however they are often inaccessible to lorries due to the presence of parked cars.
4. The Lorry Route Network

4.1 Development of the Lorry Route Network (LRN)

Lorry traffic within Milton Keynes is likely to be of two distinct types:

- Lorries travelling through Milton Keynes, and,

- Lorries with either an origin or destination within Milton Keynes.

Due to its location, Milton Keynes is likely to have a high proportion of both as it is positioned on the strategic national road network and also functions as a distribution centre for a large number of major national freight companies as well as a local service centre.

The Council’s adopted Local Plan clearly establishes a road hierarchy the purpose of which is to aid the management of traffic within and through the Council area. This is supported in Council’s Local Transport Plan.

In order to make the most efficient use of the network users need to be directed onto the most appropriate parts of the network for their journey. The road network has therefore been divided into four different categories each with differing characteristics:

- **Primary Distributors** – The main routes for through traffic allowing traffic to take a direct and efficient route through the area – these include all A Class roads and the Highways Agency Trunk Road network (The M1 and A5),

- **District Distributors** – These roads carry some through traffic but mainly traffic whose origin or destination is within the Borough. These include most grid roads (other than those designated as Primary Distributors) and B class roads. In CMK the “Gates” are classified as District Distributors,

- **Local Distributors** – These provide access to grid squares and other settlements, and,

- **Access Roads** – These give direct access to buildings.

The road network associated with the older towns in the Borough do not always easily fit within the District and Local Distributor definitions.

The Primary Distributor road network through Milton Keynes (made up of Motorway and “A” class roads forms the strategic lorry route network for those vehicles travelling *through* Milton Keynes.
There are however a number of major lorry trip attractors and generators within Milton Keynes (and within close proximity in neighbouring Local Authorities). These are made up of major industrial and commercial centres, major retail areas, major landfill and mineral extraction sites.

Ongoing large scale expansion sites on the north, east and western flanks have commercial and retail sites associated with them and as such will attract lorry movements in the future which need to be accommodated in the local road network. They are also likely to attract large volumes of localised construction traffic during their development.

Residential properties, small local centres and small industrial premises will also generate a small number of lorry movements; however these are not considered to be significant lorry trip attractors or generators due to the relatively small numbers involved.

In order for lorry traffic to adequately serve the various major attractors and generators it is necessary to develop a lorry route network using district distributor roads.

Figure 1 shows the location of all the identified major lorry trip attractors and generators within Milton Keynes and an associated network of routes made up of Motorway, “A” Class, “B” class roads and the remaining MK Grid Road network which together directly serve virtually all of the attractors or generators.

Where there is a more satisfactory alternative route nearby, some of the poorer quality routes (where the road layout or environment may not be conducive to lorry travel) have been omitted. These include:

- B565 Olney to Lavendon,
- B5388 Olney to Yardley Hastings,
- B4034 Buckingham Road Bletchley, and,
- A5130 Northfield Roundabout to Woburn Sands.

This forms the preferred Lorry Route Network (LRN) for Milton Keynes dealing with not only through trips but also trips to and from destinations within Milton Keynes.

4.2 The “Abnormal Loads” Route Network

Abnormal loads are loads that are wider, taller or heavier than the normal maximum allowed on the roads of the UK. If the load can be split, it must be, but if the load is a single indivisible load, then there is a legal provision for the load to travel subject to notification of the route and in many cases, with an escort.

Abnormal loads may have to be routed on alternative routes through Milton Keynes in order to avoid certain structures or physical restrictions. A long established network of routes exists and is constantly updated when road improvements take place or new problems are detected.

4.3 Publicising the Network

The LRN should be adequately signed and publicised to encourage its use. It is however recognised that lorry drivers may well divert from this route in order to take short cuts or avoid congestion and where this results in environmental or other concerns such
movements need to be minimised and any restrictions in place will also be signed in accordance with regulations and well publicised.

In order to encourage lorries to use the most appropriate routes on the network the requirement for additional signing will be assessed and where necessary, provided.

Specific lorry route signs will be used in order to provide additional guidance to drivers on routes to locations on the network in order to minimise rat running through residential urban and rural areas.

Information relating to the LRN should be made widely available to operators through a variety of media. This is discussed in more detail in Section 9.
5. Managing the Impact of Lorry Traffic on the LRN

Generally speaking, those roads which make up the LRN do so because they are of a high standard and the concerns identified in section 3 are unlikely to have any great impact. Routes should not have any features likely to restrict access such as low bridges or weight restrictions.

There are however some roads and settlements on the LRN in both urban and rural areas where there may be some direct impact associated with passing lorry traffic. These are identified in Table 3.

**Table 3 : MK settlements on the LRN potentially subject to direct Impact**

<table>
<thead>
<tr>
<th>Route</th>
<th>Settlements</th>
</tr>
</thead>
<tbody>
<tr>
<td>A428</td>
<td>Lavendon, Cold Brayfield.</td>
</tr>
<tr>
<td>A509</td>
<td>Olney and Emberton &amp; Warrington.</td>
</tr>
<tr>
<td>A422</td>
<td>Chicheley</td>
</tr>
<tr>
<td>B526</td>
<td>Newport Pagnell, Gayhurst, Lathbury &amp; Stoke Goldington</td>
</tr>
<tr>
<td>B4034</td>
<td>West Bletchley</td>
</tr>
</tbody>
</table>

A regular programme of traffic and air quality monitoring will be undertaken at locations within these settlements in order to assess any detrimental impacts which may be attributed to the fact that they are located on the LRN. Action may be necessary to mitigate the impact of lorries travelling through these areas.

5.1 Restriction of Lorry Movement

In normal cases, measures to restrict lorries from using roads on the LRN will not be proposed or supported. However where UK and European air quality objectives are exceeded measures to restrict lorries from using the LRN will be considered when all other options have been discounted.

5.2 Casualty Reduction Measures

All roads undergo an annual casualty analysis, if casualty sites requiring action are identified on the LRN (whether involving lorries or not), any measures implemented should, as far as is possible, be complimentary to the lorry use of the road.

5.3 Speed Management

Speed management measures will be implemented in accordance with our Speed Management Strategy and policies, regardless of whether the road is on the LRN or not.

5.4 Traffic Calming

If it becomes necessary to implement traffic calming measures on part of the LRN, for either speed or casualty reduction purposes, traffic calming will need to be designed with lorry traffic in mind. Traffic may be required to slow however measures resulting in an increase in pollution due to continued stopping and starting will not be promoted.
Speed cushions are likely to be utilised more than full width humps which can generate excessive noise however where there is demand for pedestrian facilities, flat topped humps and tables may still be used.

5.5 Accessibility

It is important to ensure that pedestrian and cycle accessibility and safety is not compromised on the LRN. Priority should be given to the provision of such facilities where none currently exist. Facilities for other road users may be able to be enhanced through traffic engineering techniques.

5.6 Congestion Relief

It is essential that traffic delays are actively minimised on the LRN, not only to ensure the network is effective in delivering its objectives, but also to minimise the negative environmental impacts associated with particularly slow moving lorries.

Where congestion is occurring on the LRN, priority should be given to the introduction of effective congestion relief measures.

5.7 Air Quality

Should regular air quality review and assessments indicate that the prescribed air quality levels are likely to be exceeded, the area may be designated as an Air Quality Management Area (AQMA) as is the case of Bridge Street and High Street South in Olney.

Further monitoring can be undertaken using mobile air quality monitoring stations and an Air Quality Action Plan put in place to reduce pollution. Such proposals will ideally need to accommodate lorry movements on the LRN, however ultimately it may become necessary to consider alternative routing for lorries if it is not possible to improve air quality below objective levels through other measures proposed within an AQMA action plan.
6. Managing the Impact of Lorry Traffic off the LRN

6.1 Restriction of Lorry Movement

If a road not on the LRN is being used by lorries as a “through route”, then a Traffic Regulation Order (TRO) prohibiting this use will be considered.

It is however important to stress that lorry restrictions will not necessarily be automatically applied to every road that is not on the LRN. It is a costly process generating much street clutter in additional signage, requires regular enforcement to ensure effectiveness and often has uncertain benefit.

There can often be a significant number of lorries which need access to serve residential urban and rural areas. If lorries are seen in such areas it is often assumed they are rat-running, this may not however be the case.

It is not the function of TRO’s to bring about changes in land use by denying access by Lorries to existing business premises. Orders proposed for such purposes will not be progressed.

Ongoing surveys have been undertaken at a number of locations of different road classification on and off the LRN. These identify levels of both general and lorry traffic. It is therefore possible to determine the average flow expected on differing road types.

Table 4: Threshold Values for Various Road Classifications

<table>
<thead>
<tr>
<th>Road Type</th>
<th>DfT Hourly Flows (1 way)</th>
<th>Traffic Flow Threshold Values (Observed Mean 2 way Survey Results)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Total Flow</td>
</tr>
<tr>
<td>URBAN</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Local Distributor</td>
<td>1,140 -1,860</td>
<td>4,826</td>
</tr>
<tr>
<td>Access Road</td>
<td>750 - 1,320</td>
<td>862</td>
</tr>
<tr>
<td>RURAL</td>
<td></td>
<td></td>
</tr>
<tr>
<td>s/c A class &amp; Grid</td>
<td></td>
<td>12,490</td>
</tr>
<tr>
<td>d/c A class &amp; grid</td>
<td>3,350 - 4,000</td>
<td>-</td>
</tr>
<tr>
<td>B Class</td>
<td>5,229</td>
<td>73</td>
</tr>
<tr>
<td>C Class</td>
<td>3,498</td>
<td>59</td>
</tr>
<tr>
<td>Un classified</td>
<td>1,266</td>
<td>30</td>
</tr>
</tbody>
</table>

NOTE: The data will be annually updated using most recent count data and sites.

For roads not on the LRN, if two of the three relevant average flow threshold figures contained in table 3 are exceeded, consideration will be given to promoting and implementing restrictions upon lorry movement on these roads.

6.2 Types of Lorry Restriction

Restrictions on large vehicles may be implemented on the basis of weight or physical dimensions. Restrictions can be based on environmental considerations (such as where European and UK air quality standard objectives are not met) in which case they will often
be area wide, or on physical constraints, such as a low or weak bridge or a physical
narrowing.

Area wide restrictions will have exemptions for access, permitting those vehicles that have
business at an address within the area to enter it to complete their business. Physical
restrictions generally do not have exemptions for access as they are based on the fact that
passage for restricted vehicles is not possible or dangerous.

**Weight Restrictions**

Weight restrictions are based on the maximum gross weight of a vehicle. They can only be
set at 7.5T or 18T.

Lorry restrictions will invariably need to contain an exemption for access to premises inside
the restricted area and therefore some legal lorry movement will occur even if the
restriction is complied with fully. There is no size limitation on goods to be collected or
delivered to qualify for an exemption. Where the restriction applies to a structure, there is
generally no exemption.

Obviously the larger the restricted area the more “legal” movements will be permitted and
the enforcement task of Thames Valley Police becomes more onerous. In addition it is
difficult to communicate to drivers the extent of the large area restrictions often resulting in
drivers unknowingly contravening a restriction.

The most effective restriction is one that covers a short length of road only as this will have
very few exemptions. Environmental weight restrictions apply to goods vehicles only, they
do not apply to buses or coaches.

**Height Restrictions**

Height restrictions are only used when there is a structure over the road that cannot be
removed, such as a bridge. Most bridges have advisory (triangular) signs warning of the
low clearance. Some have regulatory signs indicating a legal restriction backing up the
physical restriction. Legal restrictions may also apply to the approach to the
structure, particularly if turning a large vehicle at the structure itself is
hazardous.

Height restrictions are always set at the maximum safe height, never
higher. Drivers should be aware that the height of a bridge above the road
might be different on the far side of the bridge. A vehicle that can get
under one side of the bridge might not be able to pass under the whole
structure. Arch bridges pose a particular problem in that the
clearance is obviously dependent on the line of approach. Regulatory signs will not be appropriate and signs advising high
vehicles to use the centre of the road, with corresponding advice for vehicles in the
opposite direction may be considered.
Width Restrictions
Like height restrictions, width restrictions should only be used where available road width is physically restricted to less than the width of a heavy vehicle.

Critical locations will normally be at corners or on bends. At these locations, it is not the absolute width of a vehicle that is the problem. The width that a vehicle requires when turning will be considerably more than the width of the vehicle itself and will depend on many things, particularly the vehicle’s length.

There are many locations where a width restriction designed to prohibit a particular size of vehicle would have to be set so low that very many smaller vehicles that have no problem at the location would also be restricted (for example camper vans and large transits). This may mean that the restriction would have very many unwanted side effects. There are often calls for the width restrictions to be supported by physical restrictions set up earlier on the route to render the restriction self enforcing.

Length Restrictions.
As well as weight height and width, it is possible to restrict vehicles on the basis of length. There are however unlikely to be many locations where the length of the vehicle is the single critical dimension. If the problem is a combination of length and width, maximum gross weight restrictions are considered the best option.

6.3 Casualty Reduction Measures
All roads undergo an annual casualty analysis. For casualty reduction sites identified on roads off of the LRN, measures may be implemented that are inconvenient for large vehicles although safe operation of refuse and fire service vehicles will always have to be incorporated in any scheme.

6.4 Speed Management
Speed management measures will be implemented in accordance with our Speed management strategy and policies, regardless of whether the road is on the LRN or not.

6.5 Traffic Calming
If traffic calming is proposed on a road not on the LRN, the full range of traffic calming measures available may be considered as appropriate. Measures may be implemented that are inconvenient for large vehicles although safe operation of refuse and fire service vehicles will always have to be incorporated in any scheme.

6.6 Accessibility
It is important to ensure that pedestrian and cycle accessibility and safety is not compromised on any routes whether on or off the LRN. However as previously indicated those routes on the LRN may be weighted more highly when prioritising requests.

6.7 Congestion Relief
It is important to ensure that potential congestion is minimised on any routes whether on or off the LRN. However as previously indicated those routes on the LRN may be weighted more highly when prioritising requests.
Congestion resulting from lorries parking and delivering will however be considered individually and measures set out in Section 7 will be considered.

6.8 Air Quality

As with lorry traffic on the LRN, if regular air quality review and assessments indicate that prescribed air quality levels are likely to be exceeded, the area may be designated as an Air Quality Management Area (AQMA). In areas that are not on the LRN the Air Quality Action Plan may require measures that directly impact upon lorry movements.

6.9 Assessment of Route Suitability off the LRN

There will of course be a need for lorries to use roads not on the network, primarily for delivering and accessing local facilities and services in town centres, residential and rural areas.

In such instances, where there are a number of potential routes available for lorries, route assessments will be undertaken in order to identify the most suitable route to serve these areas. These may be designated and signed as the most appropriate route. Table 2 shows the factors which are considered to be critical to the route assessment:
7. Managing Lorry Deliveries

At the start and end of all lorry journeys there will be a need to load or unload – depending upon the location and circumstances, this will have a variety of impacts.

On industrial estates and retail parks there should be sufficient provision made on-site for deliveries, however early arrivals do need to be catered for as many companies will not allow drivers to enter the premises until their allocated time slot. If this occurs regularly resulting in either safety or congestion issues then measures identified in Section 8.0 on Lorry Parking Facilities will need to be employed.

Provision may be made at some locations for 24/7 deliveries, however the planning process must clearly be able to respond to any concerns regarding noise and inconvenience which this may cause and such operations should not be permitted in areas where such issues are likely to cause concern.

In vibrant town centre “high street” areas there are competing requirements of providing an efficient delivery service whilst maintaining and further enhancing the environment of town centres. There can be no ‘one size fits all’ solution for such “high street” dilemmas, however a best fit solution should be sought in order to minimise the time goods vehicles spend delivering to such locations. The Lorry Route Network Maps contain detailed preferred access arrangements into Town Centre areas which will be signed accordingly

Safety, air quality, accessibility and congestion concerns are paramount and the potentially detrimental impact of loading or unloading can be minimised by considering use of the following:

- Use of dedicated servicing areas away from the highway,
- Provision of dedicated loading bays for dual use (i.e. loading bays during the day and general parking in the evenings and weekends),
- Enforceable loading restrictions,
- Restrictions upon delivery time (i.e. avoiding night time, peak traffic times and if appropriate, school drop off and pick up times),and,
- Development of signed appropriate routes.

Local centre shops in residential areas often have deliveries made by large vehicles and this may create minor congestion and disruption issues within the residential area. In addition this may result in safety concerns and damage to verges and footways. Plus early morning or late night deliveries can cause concerns and should be avoided. However if such facilities are to be provided then local residents must accept some degree of disruption, however minimal.

Concerns should initially be raised with the local shop and hauliers to ascertain if alternative arrangements can be made such as changes to routing, size of vehicles or delivery times. Future proposed developments must be designed to cater for such movements.
Many supermarkets do have night-time delivery curfews imposed by the planning authority in order to minimise overnight noise. Whilst on the face of it delivery curfews may seem beneficial, a 2002 survey by the 10 biggest retailers found that if half its curfews were lifted they would be able to reduce their fleets by 630 vehicles (10%). Distance travelled would fall by 63 million miles, saving 36 million litres of fuel and reducing CO2 emissions by 96,000 tonnes.

There is clearly a balance to be achieved between environmental impacts on individual communities and the wider perspective. The Freight industry has however recently drawn up a “good neighbour” code of practice aimed at ensuring that night time deliveries are as quiet as possible. In conjunction with the FTA and RHA this should be rolled out across MK.

In rural areas deliveries to local village shops and other attractors is necessary and as such restrictions imposed would need to provide exemptions for access.

In all areas, local contact with the companies concerned, business associations and town centre managers should be the first step in trying to resolve local issues through voluntary means.

Lorry loading and delivery requirements must be given very careful consideration in planning stages of any new development or highways improvement scheme to ensure that facilities are acceptable and functional whilst minimising the detrimental impact on accessibility, air quality, safety, congestion and the environment.
8. Lorry Parking Facilities

8.1 Local Plan Policy

The Milton Keynes Local Plan (section 7.54 on) indicates that:

“there may be a need to provide a new lorry park in the City, particularly to reduce the problem of lorry parking in residential areas. Other policies require the retention or replacement of lorry park facilities in areas affected by new development proposals at Fen Farm in the Eastern Expansion Area”

Any new lorry park facility will need to satisfy the general design policies in this plan and also be in a suitable location to minimise its potential environmental effects.

POLICY T16 states:

- Site shall not be in the open countryside as defined in Policy S9
- The site must be well related to the Primary Distributor Road network
- Any ancillary uses are closely related to the main use of the site as a lorry park – such as petrol filling station, refreshments, motel and vehicle repairs
- Proposals should not have a significant adverse effect on the amenity of nearby residential areas.”

8.2 Requirement for lorry parking

Over recent years, lorry driver rest facilities and lorry parking have become increasingly prominent issues facing the Council.

Areas for goods vehicles to stop and park when away from the operating centre do play a vital role for freight operators to enable their drivers to refresh themselves and maintain their vehicles. Driver rest facilities and lorry parking provide an important support service to road freight, particularly for freight companies based outside the area.

Lorry drivers are required to take both daily driving breaks and overnight rest by the European Union Driver Hours Directive 3820/85. In addition to the health, safety and welfare of drivers, inadequate lorry parking provision can have an adverse impact upon other road users, and poor security can put cargo at risk.

There is no doubt that well designed and strategically located lorry parks can play a significant role in reducing the mileage run by visiting lorries, promoting driver well-being, helping with efficient deliveries and minimising disruption to communities.

It is preferable for lorries to be parked at a managed, secure site that offers safe entry and egress and encourages lorries to park in a formal and well designed location, rather than parked in roadside lay-bys or on or adjacent to minor roads in industrial estates where the vehicle itself may cause disturbance to residents (including any noise from refrigeration units). Such facilities should also provide drivers with food and proper rest facilities which help compliance with drivers’ hour’s regulations, and also contribute towards road safety.
Within Milton Keynes there are essentially three types of lorry parking requirement:

**Goods Vehicle Operating Centres**
The Traffic Commissioners require that all Goods Vehicle Operators are normally required to park their vehicles at their registered Goods Vehicle Operating Centre (GVOC). This may be a private facility owned by the company however many local businesses in Milton Keynes and some national distributors currently use “Fen Farm” as their registered GVOC. This has a capacity of some 350 lorry parking spaces and some 400 vehicles are currently registered.

Generally speaking GVOC do not cater for transient vehicles although the “Fen Farm” facility does operate as both a GVOC and to a lesser extent as a transient lorry park.

The Fen Farm lorry park facility is shortly to be redeveloped and those vehicles using the site as their registered GVOC would not be permitted to park on the highway as doing so would be in contravention of their Operators Licence and the Traffic Commissioners are able to take enforcement action.

**Early Arrival Parking**
Frequently lorries arrive at their destination prior to the designated delivery “slot” and in many cases due to insufficient on site parking on site or local site management procedures are required to park on the highway.

**Transient Parking**
Facilities are required for statutory breaks during lorry trips, these may be for short durations or for overnight stays. There is now a tendency for some of these stays to be lengthy with some drivers being reported to be parked for up 10 days before making their return pick up and journey home.

**8.3 Current Parking Facilities**
There are currently within Milton Keynes very few designated facilities for off street lorry parking these are shown in Table 5.

**Table 5 : Current Off street lorry parking (excluding private GVOC)**

<table>
<thead>
<tr>
<th>Site</th>
<th>Capacity</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fen Farm</td>
<td>350</td>
<td>Primarily used as a GVOC</td>
</tr>
<tr>
<td>Water Eaton Road</td>
<td>12</td>
<td>Poor location, not promoted</td>
</tr>
<tr>
<td>M1 N Pagnell Services</td>
<td>Unknown</td>
<td>Charges in operation</td>
</tr>
<tr>
<td>M1 J13</td>
<td>Unknown</td>
<td>Charges in operation</td>
</tr>
<tr>
<td>North Crawley Road</td>
<td>0</td>
<td>CLOSED in 2005</td>
</tr>
</tbody>
</table>

Much of the lorry parking currently occurs on industrial estates and in lay-bys adjacent to the grid roads. There is however currently little evidence (either anecdotal or qualitative) to suggest that there is a problem with large lorries parking in residential areas or within MKC operated car parks.

Surveys undertaken overnight in lay-bys and industrial estates during February 2008 indicate the following demand for overnight parking.
Table 6: Summary of Night-time Lorry Parking Surveys

<table>
<thead>
<tr>
<th>Type</th>
<th>2003</th>
<th>2008</th>
<th>% Change</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rigid</td>
<td>18</td>
<td>14</td>
<td>-22%</td>
</tr>
<tr>
<td>Artic</td>
<td>99</td>
<td>116</td>
<td>+17%</td>
</tr>
<tr>
<td>Cab only</td>
<td>13</td>
<td>7</td>
<td>-46%</td>
</tr>
<tr>
<td>Trailer Only</td>
<td>15</td>
<td>34</td>
<td>+126%</td>
</tr>
<tr>
<td>Total</td>
<td>149</td>
<td>171</td>
<td>+15%</td>
</tr>
</tbody>
</table>

Over the 5 year interim period there has been an increase in the overall number of lorries parked by 15% (22). In many locations the volume is similar or has declined however there has been a significant increase in lorry parking in the Kingston/Brinklow areas where the number has increased from 40 to 89. This is probably as a result of the provision of marked lorry parking bays in the Kingston area.

8.4 Lorry Parking Issues

In the absence of a designated off street facility, use is being made of fairly remote wide roads on industrial estates and lay-by’s such as those in Kingston and Brinklow.

This has, in the past led to congestion problems and safety concerns and schemes have previously been implemented to attempt to manage this parking by providing advisory on-street lorry parking bays. These are now being backed up with restrictions in areas where parking would lead to safety or congestion concerns.

Whilst parking on industrial estates and in lay-by’s may be appropriate for short stay Transient Parking and Early Arrival Parking it is not a suitable solution for parking for longer stay and overnight stops as there are a number of deficiencies:

- Some sites may be adjacent to busy roads and safety may be compromised.
- There are limited or no facilities available leading to health and litter issues
- There can be associated safety and traffic congestion, access obstruction and consequent safety problems
- In some circumstances it does lead to related anti social behaviour activities

It is clear that further increases in demand for lorry parking will create further pressures on the highway, such as those indicated above.

The following proposals should therefore be considered:

- Enforcement agencies should be encouraged, through working with local Neighbourhood Action Groups (NAG’s), to undertake effective enforcement of vehicles parked inappropriately or away from their operating centre.
- Within the planning process sufficient land should be provided in all industrial and commercial units for the anticipated lorry parking requirements - this should include the needs for operators to provide GVOC.
In addition, industrial estates should provide an area of spare land available for overflow lorry parking to ensure that vehicles are not parked on the highway.

Where lorry parking does result in safety concerns or congestion problems continued use should be made of short stay time-limited lorry parking bays or lay-by’s backed by parking restrictions in inappropriate areas. Where short stay parking is encouraged then facilities for litter disposal should be provided.

In accordance with Local Plan Policies a location in the vicinity for the Eastern Expansion area should be considered as a lorry park as this will have good transport links with both the A421 and the M1 and is in or adjacent to the current Eastern expansion area and would be available to be “designed in”. Potential suitable sites are the strategic reserve sites at Eagle Farm, Glebe Farm and Church Farm (during the current economic down turn it may be that there are current development sites which may be made available on a temporary basis).

The Council would not seek to manage or operate a lorry parking facility and would seek expressions of interest from operating companies to develop and manage the facility possibly in conjunction with development on the site.

Whilst the DfT’s publication “The Local Authority Freight Management Guide” suggests that three levels of parking facility are able to be provided, the basic provision is not dissimilar to that which is currently available in Milton Keynes (i.e. roadside with little or no facilities) which is deemed unsatisfactory as a long term solution

Therefore the suggested functional specification for the site should be as follows:

- Lorry Park with at least 200 spaces for transient users (based on recent lorry parking survey results - it may be that the site in addition offers an Operating Centre Facility)
- Secure (CCTV and/or security patrols)
- Well Lit
- Lorry Washing Facilities
- Lorry Maintenance facilities
- Spares and Fuel available
- Toilet Block and Shower Facilities
- Reasonable prices
- Reasonable quality Meals/snacks available
- Well promoted and signed.

It is imperative that the cost for using such facilities is reasonable a concern is that even with such provision drivers would seek to park in other areas. Therefore, once such provision is made it will be necessary to implement a programme of restrictions to ensure that overnight lorry parking in unsuitable locations is minimised.

In order to encourage private sector investment it is essential that an area be identified within the Local Plan or Local Development Framework as being suitable for lorry parking
and driver rest areas. However, the means of financing and managing the lorry park need to be deliverable and this may require a named operator.
9. Communications and Information.

If the delivery of this strategy is to be successful then it is essential that actions are communicated to all stakeholders appropriately.

It is essential that the agreed LRN, lorry restrictions and provision of lorry parking facilities and agreed access routes to commercial centres is publicised as widely as possible this will be undertaken through a variety of media including:

- Direct consultation with the Freight Transport Association and the Road Haulage Association,
- Maps (in various languages) should be available to lorry drivers distributed through local companies showing the designated route,
- Included on Information Boards at rest stops and Lay-bys,
- Made available to all map producers,
- Made available to Satellite Navigation Companies via their trading associations,
- Available on the MKC Website, and,
- Incorporated into emerging Intelligent Transport Systems Strategy.

In addition, it is important that the LRN itself together with key destinations and parking areas are adequately signed so that drivers are aware of the appropriate routes and facilities, however, consideration will be given to the environmental impact of such signing.

Where destinations are off the LRN, appropriate routes will be signed.

Any lorry restrictions implemented will be appropriately signed and information will be included alongside the general publicity regarding lorry routes.
10. Partnership Working

In order to ensure that lorries are able to use our road network safely and efficiently it is essential that we work in partnership with stakeholder groups on a number of levels.

- With hauliers and the representative associations (the Freight Transport Association and Road Haulage Association) to ascertain needs for appropriate routing, lorry parking and rest stops,

- With neighbouring local authorities to ensure consistency in the LRN and particularly dealing with cross boundary issues associated with appropriate routing off the LRN,

- With individual business, business associations and city centre managers to ensure that their servicing and delivery needs are met in the most appropriate way and that any issue arising are able to be resolved,

- With the wider local community and environmental groups to ensure that concerns regarding lorry routing and parking are heard and where possible acted upon,

- With Thames Valley Police who will be responsible for enforcing any restrictions implemented,

- With Developers and the Planning Department to maximise opportunities for enhancing facilities available for lorries and lorry drivers, and,

- With SATNAV operators to ensure as far as is possible that correct information regarding the LRN and any restrictions in place is conveyed to drivers via SATNAV’s.

- Arising from the consultation on this strategy a formal Freight Partnership should be established in order to provide a forum for industry and the Council to work together to:

  - Formalise the development of the freight strategy work,
  - Oversee the delivery of Freight Strategy Action Plan,
  - Reduce the adverse effects of freight on the environment and implementing economical, safe, efficient and community friendly freight transport, and,
  - Encourage best practice.
### 11. Proposed Lorry Management Strategy Delivery Plan and Financial Assessment

<table>
<thead>
<tr>
<th>Ref</th>
<th>Action</th>
<th>Who</th>
<th>08/0910</th>
<th>09/10</th>
<th>10/11</th>
<th>11/12</th>
<th>12/13</th>
<th>Capital Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Establish a formal Freight Partnership to monitor the implementation of the strategy and action plan.</td>
<td>MKC</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>2</td>
<td>Agree the LRN</td>
<td>FP</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>3</td>
<td>Consider actions and priorities for proposals to mitigate impact on and off the LRN</td>
<td>FP</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>4</td>
<td>Implement a Rolling Programme of restrictions where appropriate</td>
<td>MKC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>£20,000 pa</td>
</tr>
<tr>
<td>5</td>
<td>Sign the LRN appropriately</td>
<td>MKC</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td>£20,000 pa</td>
</tr>
<tr>
<td>6</td>
<td>Production of Lorry Route Maps</td>
<td>FP</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td>£10,000 pa</td>
</tr>
<tr>
<td>7</td>
<td>Production and Implementation of Lorry Route information Boards</td>
<td>FP</td>
<td></td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td>£20,000 pa</td>
</tr>
<tr>
<td>8</td>
<td>Place/update Lorry Route info on MKC website</td>
<td>MKC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>£5,000 pa</td>
</tr>
<tr>
<td>9</td>
<td>Liaison with SATNAV operators to ensure correct information is conveyed to lorry drivers via SATNAV’s</td>
<td>MKC</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>10</td>
<td>Integration with Intelligent Transport Systems Strategy development</td>
<td>MKC</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>11</td>
<td>Monitor traffic and air quality at sites regularly on and off LRN</td>
<td>MKC</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>12</td>
<td>Review management of Lorry Deliveries</td>
<td>FP</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>13</td>
<td>Liaise with planning regarding parking facilities for developers</td>
<td>MKC</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
<tr>
<td>14</td>
<td>Identify site for lorry park and prepare detailed brief</td>
<td>FP</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td>Nil</td>
</tr>
</tbody>
</table>

**Total Estimated Capital Cost per Year (£’000)**

<table>
<thead>
<tr>
<th></th>
<th>08/0910</th>
<th>09/10</th>
<th>10/11</th>
<th>11/12</th>
<th>12/13</th>
</tr>
</thead>
<tbody>
<tr>
<td>Capital Cost</td>
<td>35</td>
<td>45</td>
<td>75</td>
<td>45</td>
<td>35</td>
</tr>
</tbody>
</table>

*FP – Freight Partnership
MKC – Milton Keynes Council*
Milton Keynes Council
Traffic Management
Civic Offices
1 Saxon Gate East
Central Milton Keynes
MK9 3EJ

Tel: 01908 252531
Fax: 01908 254212
Email: traffic.management@milton-keynes.gov.uk
Web: www.milton-keynes.gov.uk/transport
Appendix 4
PLANNING AND THE STRATEGIC ROAD NETWORK

INTRODUCTION

1. This circular explains how the Highways Agency (the Agency), on behalf of the Secretary of State for Transport, will participate in all stages of the planning process with Government Offices, regional and local planning authorities, local highway/transport authorities, public transport providers and developers to ensure national and regional aims and objectives can be aligned and met. This circular:

   • sets out how the Highways Agency will take part in the development of Regional Spatial Strategies (RSSs) and Local Development Frameworks (LDFs) from the earliest stages;

   • encourages the Agency and Regional Planning Bodies (RPBs) and Local Planning Authorities (LPAs) to work together to ensure effective participation in the preparation of regional and local sustainable development policy;

   • sets out how the Agency will deal with planning applications.

2. It replaces the guidance in Circular 04/2001, Control of Development affecting Trunk Roads and Agreements with Developers under Section 278 of The Highways Act 1980 in relation to the control of development affecting strategic roads. Guidance on agreements with developers under s. 278 of the Highways Act can be found in Guidance on Agreements with the Secretary of State for Transport under the Highways Act 1980.

3. This circular is applicable to the whole strategic road network in England, including those roads managed by the Design, Build, Finance and Operate (DBFO) companies.

4. The efficient movement of people and goods on the strategic road network has a key part to play in supporting the economy. The Agency, on behalf of the Secretary of State for Transport, is responsible for managing and operating a safe and efficient strategic road network in England. Amongst its activities, the Agency is responsible for
considering the potential impact on the network of proposals for new developments. Part of this remit is to enable the network to support the economic viability and sustainable growth of regions.

5. In carrying out this role, the Agency will work co-operatively within the framework of the Government’s policies for planning, growth areas, regeneration, integrated transport and sustainability. Spatial planning has a key role to play in delivering all these policies. The Agency will engage proactively with Government Offices, regional and local planning authorities, local highway/transport authorities, public transport providers and developers to help achieve Government aims and objectives.

Policy background

6. The Government’s policies for growth and regeneration depend on creating employment opportunities and encouraging the development of sustainable communities, including new housing developments, through the planning system. Most of these objectives and policies are delivered by encouraging the use and sustainable development of land, through the granting of planning permission. Regional and local planning authorities are required, under the RSS and LDF, to set out realistic objectives and policies for regional, sub-regional and local sustainable development. RSSs and most LDDs, under the LDF, are subject to mandatory sustainability appraisals, covering the full range of social, environmental and economic effects.

7. The successful delivery of growth and regeneration objectives in any development plan relies on the provision of infrastructure to ensure the foundations for successful developments. This provision needs to be planned on the basis of informed knowledge of what is likely to be practicable and affordable. This means that infrastructure providers, including the Agency, need to be involved in developing the plans that their infrastructure will support. The Agency is a key delivery partner in achieving the outcomes set out in the RSS and LDF. Involving the Agency early in the RSS and LDF process will improve the prospects of delivering realistic objectives and policies. The risk in not involving the Agency in developing policy frameworks is that, further down the line, specific planning proposals may emerge which the strategic road network is unable to support and may therefore be refused planning permission.

8. It is Government transport policy, wherever possible, to look for alternatives to building new roads, by reducing the impact of road users on each other and the environment, improving road performance through better network management and making smarter journey choices easier. Any strategic road capacity constraint on sustainable economic development should be identified at the RSS stage. Where appropriate, measures to overcome such constraints should be promoted through the Regional Transport Strategy (RTS), although the presumption should be to give preference, where possible, to solutions other than the provision of new road capacity.

Regional Spatial Strategies

9. RPBs (in London, the Mayor) are responsible for the revision, implementation and monitoring of the RSS (in London a Spatial Development Strategy).¹ The RSS, which includes an integrated RTS, sets out the broad development strategy for a region for a

¹ Where the term ‘Regional Spatial Strategy’ (RSS) is used throughout this document, it should be read as referring, as well, to the Spatial Development Strategy in London.
15–20-year period. It includes strategic policies and proposals, including infrastructure proposals and management polices, governing the future distribution of regionally or sub-regionally significant activities and development. The RSS is part of the broader suite of tools for the delivery of the Government’s policies for regeneration, growth and sustainable communities.

10. The process for the production of RSSs is set out in Planning Policy Statement 11: Regional Spatial Strategies (PPS11). This part of the circular sets out the role of the Agency in regional planning and describes how it will contribute to the processes for developing the RSS.

The Agency’s role in developing Regional Spatial Strategies

11. Whilst not a statutory consultee in the RSS process, the Agency will participate actively to help to produce a coherent strategy, allowing regional and local developments which are in accordance with the RSS to be taken forward with greater certainty.

12. The Agency contributes to the revision of the RSS, including the integrated RTS, by advising on the ability of the strategic road network to support proposed land-use policies and proposals. This includes evaluating the impact of strategies on roads performance and also takes into account safety and environmental considerations. In preparing the RSS, the RPB should actively engage the Agency, in order to ensure it has the Agency’s input.

13. The Agency will:

   • work with the RPB to contribute to the production of a deliverable RSS. This engagement should occur at an early stage, and continue throughout the RSS revision cycle;

   • help to develop options and proposals in the draft RSS and to work out the capability of the strategic road network to support broader policy aims;

   • provide advice and support for technical aspects of the strategies, such as traffic forecasting on the strategic road network or demand management; and

   • provide advice, in broad terms, on the possible costs of options and proposals.

14. In assessing the interaction of the RSS proposals with the strategic road network, attention should be paid to the advice set out in Chapter 5 of the Guidance on Transport Assessment (published by the Department for Transport and the Department for Communities and Local Government). ²

15. The Government’s programme of investment in the strategic road network in the regions will be informed by realistic programmes and priorities proposed in the RSS (with its integrated RTS), which the Government expect to be aligned with priorities included in other regional strategies, for example the Regional Economic Strategy.

16. The Agency will advise on the balance of risk to existing and future economic activity created by traffic congestion on the strategic road network. Under certain circumstances, RSSs (as approved and issued by the Secretary of State for Communities and Local Government) may include planning proposals which might increase traffic demands on the affected network above levels that would assure the efficient flow of traffic. In such circumstances, the RSS would need to make clear that development would be subject to mitigation measures agreed by the Agency being put in place to minimise the consequences on the strategic road network. Further information on this principle can be found in paragraphs 36–37 below.

17. The Agency will continue to treat safety on the network as a paramount concern.

LOCAL DEVELOPMENT FRAMEWORKS

18. The LDF sets out, in a portfolio, the Local Development Documents (LDDs) that collectively deliver the spatial planning strategy for an LPA’s area. These documents should generally conform with the strategies and policies set out in the RSS and describe in greater detail the spatial options in the locality covered by the Development Plan. The LDDs give greater certainty to developers over the nature and location of opportunities. Developers can expect that proposals made in accordance with the Development Plan will, in most cases, be granted approval, unless material considerations indicate otherwise.


The Agency’s role in the preparation of Local Development Frameworks

20. The Agency is a named consultee in the process for producing LDFs, including Local Development Documents (LDDs). LPAs should ensure that the Agency is involved from the pre-production stage of the LDDs and throughout the preparation process. This is consistent with PPS12 guidance, which provides for LPAs to engage at an early stage with stakeholders. It would be contrary to the aim of the current planning system to involve the Agency only at the late stage of statutory consultation. Involving the Agency in the plan preparation process will help to ensure the development of sustainable and coherent proposals. Failure to involve the Agency in developing LDD proposals runs the risk that plans will not sustainable and may not be capable of being supported by the strategic road network.

21. The Agency will offer advice and technical support that will guide the scale and location of proposals in relation to the strategic road network. The Agency will also provide guidance, for incorporation in the plan, on the scale and nature of improvements to the strategic road network and demand management measures – see paragraph 33 – (where such improvements and measures are required) that will be considered in order to facilitate development. This guidance will be relevant to both public and private sector investment decisions. It will remain important for the LPA to ensure that its proposals are evidence-based and deliverable. In assessing the interaction of the LDD proposals with the strategic road network, attention should be paid to the advice set out in Chapter 5 of the Guidance on Transport Assessment.
22. Where the Agency considers that a proposal in an LDD may not be deliverable, for example because it would require improvements to the strategic network that are not practicable or which may be unaffordable, it will provide a full and reasoned case to the relevant planning authority. The Agency would then work with other stakeholders to help ensure that deliverable LDDs can be prepared. When the Agency is considering new proposals or advising on their revision, its foremost concern will be safety on the strategic road network.

23. The Agency cannot be expected to cater for unconstrained traffic generated by new development proposals. Such growth would be unsustainable and would restrict opportunities for future development where available capacity is limited. Development should be promoted at sustainable locations, and the Agency will expect to see demand management measures incorporated in development proposals (see paragraph 33). The Agency will seek to engage with LPAs and Local Highway Authorities in order to integrate demand management between the strategic and local road networks and the development site itself.

THE AGENCY AND PLANNING APPLICATIONS

24. LPAs are responsible for determining planning applications. LPAs consider each planning application on its merits and reach a decision based on whether it accords with the relevant development plan, unless material considerations indicate otherwise. Where applications do not meet these requirements, they may be refused.

25. Article 10 of the Town and Country Planning (General Development Procedure) Order 1995 (the GDPO) sets out the circumstances in which the LPAs are required to consult the Secretary of State, and Article 15 of the GDPO sets out the circumstances in which the LPAs are required to notify the Secretary of State of applications for planning permission for development affecting certain highways. Article 14 of the GDPO empowers the Secretary of State to give a direction restricting the grant of planning permission by the LPA for a particular proposed development. When notified of, or consulted on, an application for planning permission, the Agency, on behalf of the Secretary of State, may take one of the following courses of action:

- offer no objection;
- recommend that planning permission should either be refused, or granted only subject to conditions;
- direct conditions to be attached to any planning permission which may be granted (the effect of which will, most commonly, be to require the developer to deliver the mitigation measures on the strategic road network necessary to cater safely and efficiently for anticipated traffic levels and/or to phase the delivery of the development); or
- direct that planning permission not be granted (either indefinitely or for a specified period).

26. The Agency will work with developers to secure delivery of their proposals in such a way that they minimise any additional burden on other users of the strategic road network. Development should normally be in line with policies and proposals already set out in the Development Plan. Where development proposals are fully consistent with the
adopted Development Plan, the Agency would not expect to have to engage in the full assessment process, provided there had been no material changes after LDD adoption. In such circumstances, considerations would normally be limited to the agreement of detailed access arrangements (including mitigation measures) rather than the principle of the development itself.

DEALING WITH TRAFFIC GENERATION FROM DEVELOPMENT PROPOSALS

27. In general terms, Government policy is no longer to attempt to cater for unrestrained road traffic growth. In working with developers, the Agency will expect to see proposals that include ways to reduce the traffic impact of the development. Developers can no longer expect that all the traffic they might produce will be allowed without restraint. This would lead to ever-increasing congestion, which poses a threat to economic growth and the environment. While the Agency will work with relevant stakeholders and developers in order to promote development, it will need to take into account the impact that such growth will have on the ability of the strategic road network to function effectively.

28. There will be cases where new capacity and/or other improvements are required, and these will be considered on an individual basis and, where appropriate, incorporated into the Agency’s forward programme of works (which is assessed on affordability and priority). Improvements required to mitigate the impact of traffic generated by developments will also need to address any existing issues at that location, unless the Agency already has a firm commitment to do so.

29. In many locations there are constraints on what the environment and society can tolerate in terms of the infrastructure requirements to cater for traffic growth, as well as the environmental impact of that traffic. This applies to the traffic generated by developments as well as general traffic growth.

30. The ability of road links and junctions to deal with traffic flow also imposes constraints. In terms of link capacity, the circumstances in which the Government would consider providing more than dual four-lane carriageways will be extremely rare. Additional junction capacity will be constrained by the availability of land and, in particular, the scale of grade separated junctions that may be required to deal with large turning movements. Any additional capacity provided at a specific junction or on a specific link must be compatible with the overall route standard.

31. PPG13 states that, where developments will have significant transport implications, Transport Assessments should be prepared and submitted alongside the relevant applications. Guidance on this is contained in the Guidance on Transport Assessment. Where development is likely to have a material impact on the strategic road network, it will be important to engage with the Agency at an early stage. The coverage and detail of the Transport Assessment needs to be agreed with the Agency, and should reflect the scale of development and the extent of the transport implications of the proposal. Where this is not the case, the Agency will be unable to agree with development proposals.

32. In dealing with proposals for new developments, the Agency will take into account the wider impact of the associated traffic on other proposals affecting the strategic road network. This will be particularly important where proposals for development are in
areas covered by different LPAs or RPBs, and the Agency will advise on matters that impact across administrative boundaries. The Agency will seek to promote co-ordination of development proposals to secure effective outcomes in the broader context for both developments and the operation of the strategic road network.

**Demand management**

33. Demand management covers the range of techniques used to reduce traffic generation. Having regard to the guidance set out in PPG13, paragraph 89, developers, working in partnership with local authorities (where appropriate), must submit plans for the implementation and maintenance of measures that will minimise the traffic generated by their development. This is likely to be through travel plans. These will include, but will not be limited to, measures to manage car use, particularly by single occupants. Examples of such techniques may include tailored provision of public transport, car sharing/pooling, parking control, and the encouragement of cycling and walking.

**The use of available capacity**

34. The theoretical capacity of roads on the strategic network is calculated using standards set out in the Agency’s *Design Manual for Roads and Bridges*. Developers must consult with the Agency very early in the planning process to ascertain the effective actual operational capacity of an adjacent strategic road (including its junctions) and, where appropriate, the extent that this can be increased within environmental and affordability constraints. It should be noted that the actual operational capacity could be significantly lower than the theoretical capacity for a number of reasons.

35. This must be compared with the overall forecast demand (existing demand, plus traffic likely to be generated by existing commitments to developments, the additional traffic generated by the development and modelled background growth), normally for a period of ten years after the date of registration of a planning application for the development, supported by an acceptable Transport Assessment (TA) carried out in accordance with the *Guidance on Transport Assessment* or on a basis otherwise agreed with the Agency. This period is referred to in this circular as the ‘Review Period’.

36. Where the overall forecast demand throughout the Review Period does not exceed the operating capacity, developments will normally be allowed to go ahead without the need for improvements to the network, (subject to the considerations in paragraph 51 about multiple development proposals). However, developers will still be expected to manage down the traffic impact of their developments.

37. Where the provision of extra capacity is needed to provide for overall forecast demand throughout the Review Period (outside of the Agency’s forward programme of works), capacity improvements may be agreed, subject to environmental and deliverability considerations. These improvements will normally be provided, at the expense of the developer, via the provisions of a section 278 agreement, to ensure that local conditions on the strategic road network will be no worse throughout the Review Period with the development than if it had not taken place.

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3 The length of the Review Period, at the discretion of the Secretary of State for Transport, can be amended for individual cases, where there is a wider political and economic imperative or, for example, where proposals will take a long time to develop fully. This would only be in exceptional circumstances.
38. Where extra capacity is needed to allow the full development to proceed, but cannot be provided under the terms of paragraph 33, the Secretary of State may direct that planning permission not be granted (subject to the principle set out at paragraph 16). However, sustainable development, delivered through access control and demand management techniques, may be allowed to proceed, provided that such measures ensure that agreed capacity levels are not breached. Agreement with the local highway authority will also be required in these circumstances. Issues relating to the delivery of such developments should be addressed at the RSS/LDF stage.

39. LPAs will need to ensure that, where appropriate, travel demand management measures such as travel plans, public transport initiatives and parking restraint are secured by planning conditions or planning obligations. LPAs are encouraged to liaise with the Agency as to the content of planning obligations.

**Capacity enhancements and access to the network**

40. There is a general presumption that there will be no capacity enhancements on routes of strategic national importance purely to accommodate new developments (and these would be subject to environmental and deliverability considerations). Capacity enhancements should be identified in the RSS and would not normally be considered as a fresh proposal at the planning application stage. Additional capacity may be considered in the context of the Agency’s forward programme of works. It can only be justified by balancing the needs of motorists and other road users with wider concerns regarding the impact on the environment and the local/regional community.

41. There is a general presumption that there will be no additional accesses to motorways and other routes of strategic national importance, other than the provision of service areas, facilities for the travelling public, maintenance compounds and, exceptionally, other major transport interchanges. Access from other types of development to motorways and other routes of strategic national importance will be limited to existing junctions with all-purpose roads. Modifications to existing junctions will be carried out only where traffic flows and safety will not be adversely affected. Connections to slip roads and/or connector roads will not be permitted.

42. The Agency will adopt a graduated and less restrictive approach to accesses on the remainder of the strategic road network, but there will still be a presumption in favour of using existing accesses and junctions. Any additional junctions or increased junction capacity should be identified in the LDD and/or RTS and will be considered within the context of the Agency’s forward programme of works.

43. Regardless of the status of the road, developers will be required to ensure that their proposals comply in all respects with design standards and other requirements. Where there would be physical changes to the network, schemes must be submitted to road safety and non-motorised user audit procedures. The Design Manual for Roads and Bridges sets out details of the Secretary of State’s requirements for access design and audit. If necessary, further advice is available from the Agency. The Secretary of State may direct that planning permission not be granted for any planning application which fails to meet these requirements or which, for any other reason, raises significant safety concerns.

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4 The graduated and less restrictive approach to existing and new accesses depends on the standard and status of a given route. Safety and the free flow of traffic will continue to be the Agency's primary concern when making considerations.
44. The Agency should be consulted on any development proposals where a new access onto a local road is required, which in turn feeds a strategic road and has the potential for a material effect.

45. LPAs will need to consult the Agency over any development which may affect the users of a strategic road, even though it may not lead to an increase in traffic. Examples of such development would include earth mounds, wind farms and golf courses. The Agency should also be consulted on applications for signs or advertisements visible from the strategic road network.

**PROCESS FOR SECURING AGREEMENTS**

46. Where the assessed traffic flows exceed the capacity of the strategic road(s) concerned at any time within the Review Period, or where safety would be compromised or statutory environmental standards breached, the Secretary of State may direct that a condition be attached to any planning permission granted. Where it is not possible to identify reasonably practicable highway works or demand management techniques capable of safely and efficiently accommodating the assessed future traffic flows and providing an acceptable standard of service to strategic road users, the Secretary of State may issue a direction not to grant planning permission. Where a direction is issued that planning permission not be granted, the Agency will negotiate with the developer to ascertain what could be deliverable.

47. The effect of the condition will be to specify the demand management or improvement measures required, either to manage or to accommodate this traffic, ensuring the safety of all road users, including pedestrians and cyclists and safeguarding the environment. It is the responsibility of the promoter of development to identify and submit the measures required to the satisfaction of the LPA and the Agency. When taking decisions, the Secretary of State will take account of the latest Guidance on Transport Assessment.

48. The normal means for developers to redeem the condition will be through schemes negotiated with developers and secured through the use of planning obligations or highways agreements.

49. Planning obligations are agreements between local planning authorities and developers under section 106 of the Town and Country Planning Act 1990, through which the developer can provide measures to address planning issues arising from their development, including mitigating its impacts on the local community. Guidance on the use of s.106 agreements is set out in the Office of the Deputy Prime Minister Circular 05/2005, Planning Obligations. As s.106 does not extend to Government departments, the Agency cannot be party to such agreements.

50. Highways agreements between developers and highway authorities are made under section 278 of the Highways Act 1980. In the case of the Agency they provide a means through which the developer can pay for measures to mitigate the impact of the development on the strategic road network. Where improvements are required both on the strategic and the local road networks, there may be opportunities for joint

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5 As substituted by s12 of the Planning and Compensation Act 1991.
agreements between the Secretary of State and the local highway authority. The process for securing these agreements is set out in Guidance on Agreements with the Secretary of State for Transport under section 278 of the Highways Act 1980.

51. Where multiple development proposals may have a significant impact on the strategic road network, proportional investment may be required in the necessary improvements to the network. In such circumstances, it may be beneficial for a ‘ringmaster’ to act as a broker for the public sector and developers to invest in improvements to the network. The ringmaster is an organisation or public body that will co-ordinate investment commitments for a particular development or series of developments. It will be responsible for ensuring that developers’ contributions allow the infrastructure to be secured in a fair and equitable way. The Agency will not act as a ringmaster, but will work with the designated ringmaster to facilitate the delivery of appropriate schemes.

52. Any works, and/or any demand management measures, carried out by the Agency as part of the developer’s mitigation measures have to be capable of dealing with the development’s forecast increase in traffic over the course of the Review Period. In addition to securing whatever highway works are needed under these arrangements, developers will normally be required to pay a commuted sum for their future maintenance.

ENVIRONMENTAL IMPACTS OF DEVELOPMENTS

53. The Agency will seek to ensure that the mitigation of the environmental impact of highway works resulting from a new development is in line with current guidance.

54. Highway construction works and development traffic may be assessed as likely to cause an impact on the environment in breach of statutory limits. When such a breach is thought likely to occur on the strategic road network, it is the Secretary of State’s responsibility to take measures to avoid the breach in statutory limits. In appropriate circumstances this may include directing that planning permission not be granted.

55. Promoters of development which would cause a predicted breach of environmental standards through the creation of additional traffic on the strategic road network must develop proposals to mitigate the environmental impact of the development. Environmental Impact Assessments (EIAs) may be required where there could be effects on the environment, under either the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 or Highways (Assessment of Environmental Effects) Regulations 1999.

56. Where the predicted breach occurs outside the highway boundary (for example noise levels at new housing located near to a trunk road), the mitigation measures are likely to be located outside the highway boundary. The Agency is under no obligation to allow developers’ mitigation measures to be constructed within the highway boundary.

57. The developer will ensure that sufficient environmental information is provided at all stages of the planning process to satisfy authorities that those environmental impacts have been comprehensively considered and that measures have been included within the proposals that mitigate these impacts as fully as possible, within the bounds of practicability.
# GLOSSARY

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>DBFO</td>
<td>Design, Build, Finance and Operate</td>
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<tr>
<td>DCLG</td>
<td>Department for Communities and Local Government</td>
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<td>DfT</td>
<td>Department for Transport</td>
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<td>DPD</td>
<td>Development Plan Document</td>
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<td>EIA</td>
<td>Environmental Impact Assessment</td>
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<td>HA</td>
<td>Highways Agency</td>
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<td>LDD</td>
<td>Local Development Document</td>
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<td>LDF</td>
<td>Local Development Framework</td>
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<td>LHA</td>
<td>Local Highway Authority</td>
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<td>LPA</td>
<td>Local Planning Authority</td>
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<td>LTA</td>
<td>Local Transport Authority</td>
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<td>LTP</td>
<td>Local Transport Plan</td>
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<tr>
<td>RPB</td>
<td>Regional Planning Body</td>
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<tr>
<td>ODPM</td>
<td>Office of the Deputy Prime Minister</td>
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<td>PPG13</td>
<td>Planning Policy Guidance Note 13: Transport</td>
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<td>PPS11</td>
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<td>RSS</td>
<td>Regional Spatial Strategy</td>
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<td>RTS</td>
<td>Regional Transport Strategy</td>
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<td>SDS</td>
<td>Spatial Development Strategy</td>
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<td>SPD</td>
<td>Supplementary Planning Document</td>
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<td>TA</td>
<td>Transport Assessment</td>
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Appendix 5
CHUMMS and endorsed by the Regional Planning Body and confirmed by the Secretary of State. However, further work is underway to finalise the required standard of the scheme and, for the sake of consistency, any decision on A14 west of Huntingdon must await this resolution.

In principle, however, the following points can be made:

- the standard of the route should be dual 3-lane throughout;
- the incorporation of hard shoulders would be beneficial, both from the point of view of maintenance and consistency of standard with the M6.

The timing of improvements to the A14 depends on the timing of the M1Junction 19 improvements and the Cambridge to Huntingdon improvements. Ideally, the improvements to the A14 west of Huntingdon would be in a similar timescale. However, resource planning work by the Study Team and by the Highways Agency indicates that this may be difficult to achieve. Consequently, it is recommended that the western section of the A14 is improved as soon as possible after the 10-Year Plan period. Earlier problems on the section of A14 around Kettering will need to be addressed through short term measures such as low cost junction improvements and ramp metering.

In addition to the proposal west of Huntingdon, the analysis highlighted a short section of A14 east of Cambridge Northern Bypass which required improvement to overcome congestion. This section, between B1047 (Horningsea) and A11 would create a consistent dual 3-lane standard between M1 and A11.

**A421/A428**

Analysis has demonstrated that, in part as a result of increasing congestion on the M25, but also as a result of increased development and stronger east-west economic linkages, the A421/A428 corridor will become progressively more important through time for long-distance, east-west movements.

This longer-distance role, when considered in tandem with the increasing levels of congestion, both east and west of the M1, highlighted the need for improvements in this corridor. The conclusion from this testing work was that provision east of the M1, as far as the M11, should be at a consistent dual 2-lane standard. West of the M1, environmental constraints limited the options available for providing additional capacity. The operational testing work and environmental assessments confirmed that the existing A421 should continue to serve its current function with respect to through movements. This would require some dualling of the A421 west of M1 Junction 13 from the junction to the existing section of dual carriageway. In the longer term, further treatment of the many roundabout junctions on the existing A421 through Milton Keynes may be required to accommodate the higher volumes of traffic.

The dualling of the A421, both east and west of M1 Junction 13, as well as widening of the M1 immediately south of Junction 13, will create further pressures at the junction, which is already over capacity at peak periods. Analysis of movements at this junction highlighted the significant east-west movement on the A421, which does not
require access to the M1. Work by the HA’s framework consultants identified the possibility of removing this traffic from the M1 junction by providing a new over-bridge to the north of the junction. This can be achieved without the need for a new Junction 13A, which had been suggested as an alternative, and the improvements to Junction 13 are therefore recommended as part of the strategy.

The timing of scheme construction in this corridor would see improvements being made first to the section of A421 immediately east of the M1. These improvements would also require the new M1 Junction 13 arrangements to be in place at an early stage, since the widening of M1 to this point would also be planned in the first few years of the strategy implementation.

Work on the eastern end of the corridor, the A428 east of A1, would probably take place just beyond the 10-Year Plan period. However, in order to demonstrate the contribution of the full corridor improvements, it has been assumed for appraisal purposes only that the entire upgrading of A421/A428 between M1 and M11 would take place during the 10-Year Plan period.

Finally, it is assumed that A421 improvements west of the M1 would take place beyond the 10-Year Plan.

**A505**

The other major east-west corridor considered for further capacity improvements was the A505. Select link analysis showed that whilst this corridor does accommodate some long distance movement, the majority of movements are bounded by the M1 and M11. In other words, they are predominantly sub-regional and local in nature.

The starting point for testing work was the assumption that the M1 would be improved to dual 4-lane standard and that Dunstable Northern and Luton Northern Bypasses would be constructed to dual 2-lane standard. The Reference Case network also assumed a Baldock Bypass.

Testing was of an incremental nature, first to the west of the M1, connecting A418 to A5; second, a Hitchin bypass and, third, a Letchworth bypass. The effect of all these proposals was to provide improved operating conditions on the route but, crucially, they did not change the function of the corridor in terms of long-distance movements.

If, however, improvements were made to the east of Baldock, on the A507 connecting to Bishops Stortford and Stansted Airport, then this would dramatically change the function of the corridor by attracting much longer distance traffic and effectively creating a new strategic east-west route between the M1 and M11. This route would relieve the M25 to some extent and begin to create a new strategic ‘outer-orbital’ route through an environmentally sensitive area.

The conclusion of this testing work confirmed the Dunstable and Luton Northern Bypasses as dual 2-lane standard. Construction of the Hitchin and Letchworth Bypasses, however, was dependent upon the view taken by Hertfordshire County Council, but did not have a material impact on the scale of strategic long-distance movements and is, therefore, not an issue for this Study. There was a strong view,