Appeal Statement

South Caldecotte Development Proposal: The development of the site for employment uses, comprising of warehousing and distribution (Class B8) floorspace (Including mezzanine floors) with ancillary B1a office space, general industrial (Class B2) floorspace (Including mezzanine floors) with ancillary B1a office space, a small standalone office (Class B1) and small café (Class A3) to serve the development; car and HGV parking areas, with earthworks, drainage and attenuation features and other associated infrastructure, a new primary access off Brickhill Street, alterations to Brickhill Street and provision of Grid Road reserve to Brickhill Street.

Planning Application: **19/01818/OUT**
Appeal Reference – **APP/Y0435/W/20/3251121**

Highways England
Woodlands
Bedford
MK41 7LW

5 June 2020

Introduction

1. This Appeal Statement has been prepared by Highways England in response to a large employment planning application in Milton Keynes, locally know as South Caldecotte. The Appeal Statement sets out how Highways England have reviewed the planning application, and our interactions with the applicant and the planning authority, Milton Keynes Council.

2. Highways England is responsible for the operation, maintenance and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the location impacted by South Caldecotte development proposal we have responsibility for the M1 and A5, part of the SRN.

3. This statement covers the following elements:

   - Development sites details and impact on the SRN
   - Interactions between HE and the applicant, Hampton Brook
   - Interactions between HE and Milton Keynes Council
   - Review of SRN related transport matters
   - Outstanding transport assessment and design reviews
   - Conclusion

Development site details and impact on the SRN

4. The outline planning application (MK/01818/OUT) proposes that the site will encompass up to 241,540 sqm (2,600,000sqft) of B1(c), B2, and B8 land uses. The site includes storage, warehouses, distribution and light industrial and ancillary offices.

5. The development site is located to the west of V10 Brickhill Street in South Caldecotte, Milton Keynes and is proposed to be allocated under policy SD14 of Plan MK (March 2019) for a mixed employment development of B2/B8 uses.

6. Highways England major concerns with the proposed development was its impact on the A5 and connections with the local road network at the A5/Redmoor junction and the Kelly's Kitchen roundabout (A5 SB/A4146/Watling Street/A5 NB/Brickhill Street). The A5/Redmoor junction concerns have been appeased leaving the Kelly's Kitchen Roundabout as the focus for much of the review undertaken with regards to this planning application.

7. Figure 1 below shows the location of the proposed development site and its relationship to the Kelly's Kitchen Roundabout (A5/A4146/Watling Street/ Brickhill Street).

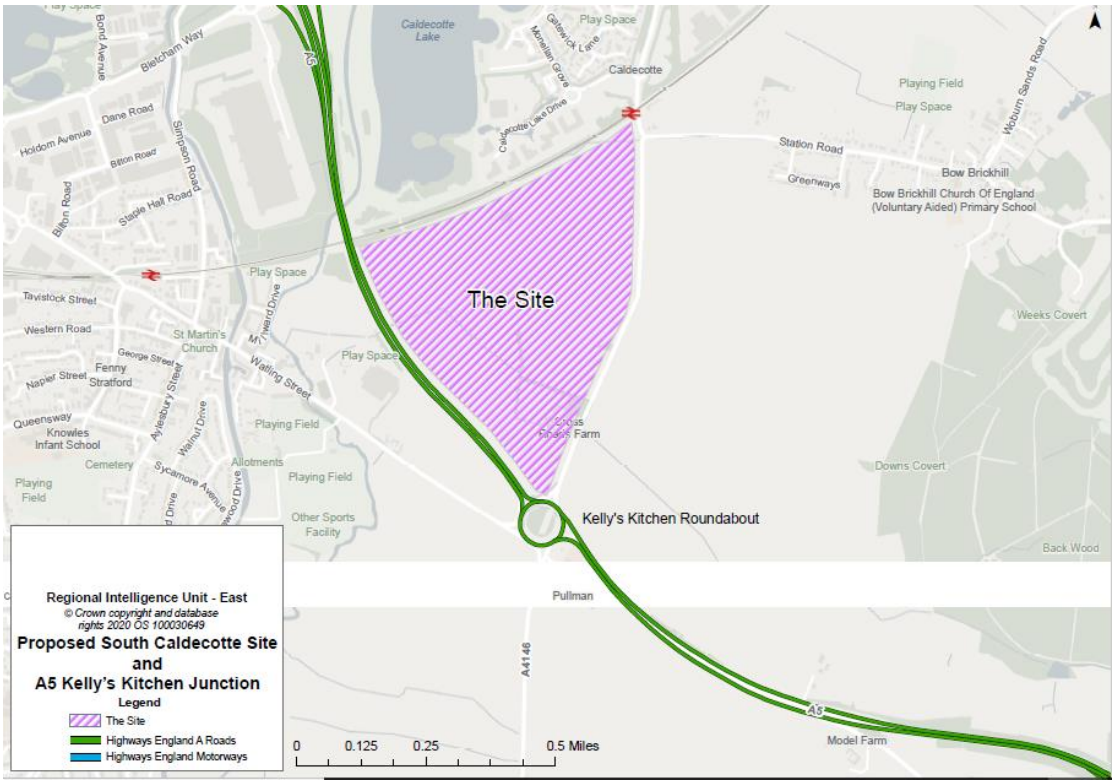

Figure 1: Proposed Site Location and A5 Kelly's Kitchen Junction

8. The proposed development site is accessed from V10 Brickhill Street that leads to the Kelly's Kitchen Roundabout which intercepts journeys from the A5, A4146 and Watling Street. The A5 is single carriageways in this direction, routes south east towards Luton and the M1 J11A. Northwest the A5 links to the Midlands via Towcester and Lutterworth.

9. The A4146 routes south towards Leighton Buzzard and Watling Street routes northwest through Bletchley and Milton Keynes. Hence the Kelly Kitchen Roundabout is an important interchange for many journeys.

10. The development site has three possible routes to reach the M1. M1 J14 is located approximately 13.2 km to the north of the site and could be reached in around 12-15 minutes via the A5 /Redmoor Roundabout. M1 J13 is located to the east of the site, approximately 10.6 km, with a journey time of 10-20 minutes via the V10 Brickhill Street / A4146 / A421. M1 J11A (new junction) is located to the southeast, approximately 19 km and could be reached in around 14-22 minutes via the A5 towards Luton.

11. Currently, all roads leading to/from Kelly's Kitchen Roundabout are experiencing delays during both AM and PM peaks. The A5 is a popular route for both private and commercial vehicle users' usage wishing to travel south on the M1.

12. Figure 2 below shows the Road Traffic Collision incidents during last five years (2015-2019), and indicates that the roundabout has a number of slight accidents, many of these relating to poor driver behaviour.

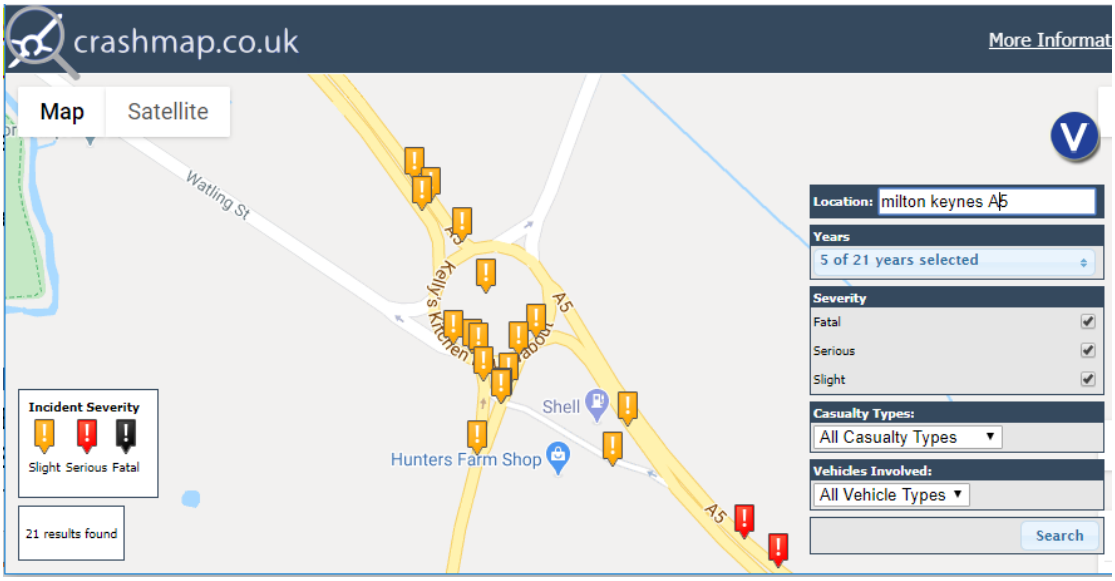

Figure 2: Road Traffic Collision between 2015-2019

Interaction with applicant, Hampton Brook

13. Highways England have had ongoing discussion regarding this site since November 2018. The pre- app materials reviewed have covered the draft Transport Assessment, and initial review of the VISSIM model for Kelly's Kitchen Roundabout.

14. Following submission of the planning application we have reviewed the TA, and further versions of the VISSIM model together with a possible mitigation scheme for the Kelly's Kitchen Roundabout.

15. Hampton Brook had made us aware that they intended to appeal the Council non-approval of this application, and have recently asked that we enter into a Statements of Common Ground with them.

Interaction with Milton Keynes Council

16. Milton Keynes Council initially consulted Highways England on this application on the 30 October 2019, three months after the planning application had been validated on 17 July 2019. The Council further failed to inform us in a timely manner of this appeal, doing so on the 28th May 2020 in an email from the Planning Officer.

Review of SRN related Transport Matters

Transport Assessment (TA)

17. Highways England have undertaken a number of reviews of information relating to this application, these reviews have been carried out by AECOM and form a series of technical notes. Executive summaries of the technical notes are in Appendix 1 with the full technical notes available on Milton Keynes Council's website.

18. The revised TA was reviewed, and we are satisfied that this document gave an acceptable representation of the proposed developments impacts (Technical Note 08). The TA showed the proposed development was expected to generate approximately 428 and 327 vehicular traffic during the morning and evening peak hours respectively. These figures are made up of 86 and 84 HGV vehicles during the respective peak hours on the highway network.

19. Trip distribution diagrams below (Figure 3 and 4) taken from the TA show the predicated traffic to and from the proposed development site that will route through Kelly's Kitchen Roundabout. During AM and PM peaks, a total of 1,118 and 820 vehicles are moving towards the V10 Brickhill street respectively.

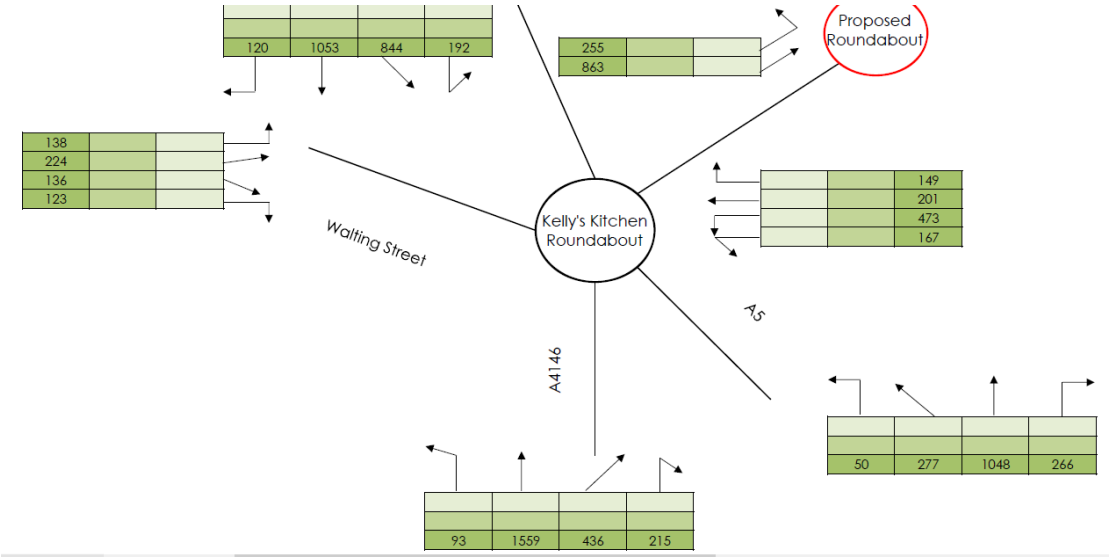

Figure 3: 2023 Baseline +Committed +Proposed Development Traffic AM 800-900 hrs

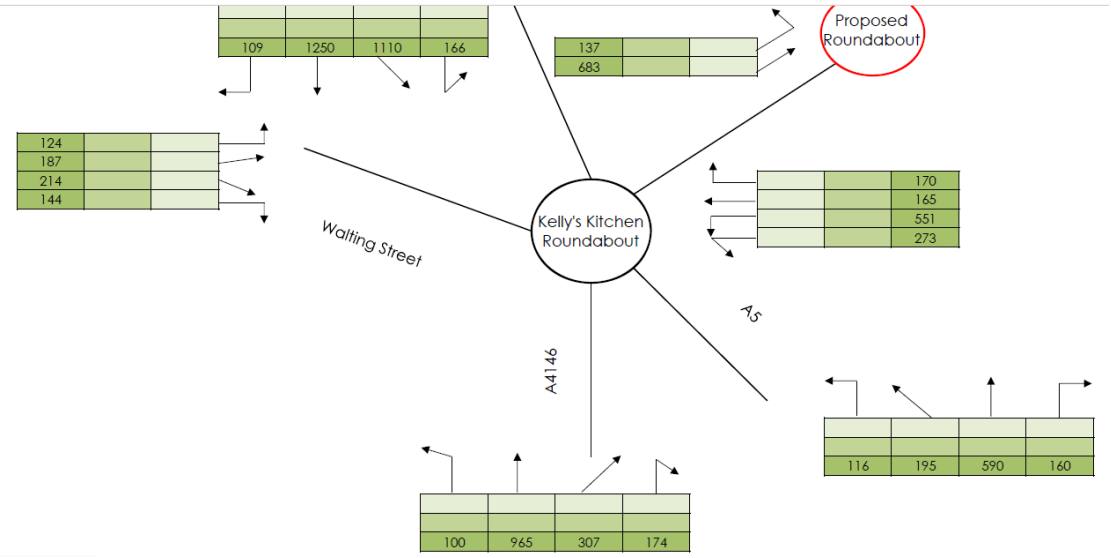

Figure 4: 2023 Baseline +Committed + Proposed Development Traffic PM 1700-1800 hrs

Kelly's Kitchen VISSIM model

20. Highways England have also reviewed various modifications of this model over the past couple of months and are content that the Base model is acceptable.

However, the Forecast model still has some coding issues that are currently being addressed.

Outstanding Transport Assessment Work

21. Highways England and the applicant are continuing to work through the VISSIM model issues, and once these are resolved a mitigation for this application can be modelled to demonstrate that the highway network can safety accommodate traffic from the development.

22. The mitigation scheme currenting proposed is a further refinement of the Eaton Ley residential development proposals mitigation scheme, that was granted planning permission in June 2017.

23. The proposed mitigation will require design checking for compliance with Design Manual for Roads and Bridges (DMRB) standards and providing this is acceptable the applicant will be able to undertake a Stage 1 Safety Audit of the scheme.

24. Highways England will at this point be in a position to recommend the application is approved subject to conditions relating to delivery of the mitigation scheme at Kelly's Kitchen Roundabout and a further condition covering the need for a construction management plan.

25. Highways England currently envisage that the mitigation scheme planning condition would be a Grampian condition requiring the Eaton Leys improvement scheme at Kelly's Kitchen to be delivered before this development could proceed.

Conclusion

26. Highways England in its role as highway authority for the SRN appreciates that its network is needed to support economic growth, and as such is generally positive towards development, providing that the impacts of growth can be safety accommodated. Hence, when we are consulted on a planning application it takes time to assess that the network has capacity to accommodate the development proposed and that that can be done without causing/or adding to safety issues.

27. It is therefore unfortunate that the planning authority were slow in consulting on this application as the time lost would have helped with the many technical reviews that have been needed in relation to this application.

28. Highways England have had on going communication with the applicant of this site over the last couple of years both pre-app and at the planning application stage. The technical work required to support this application is ongoing and it is hoped that this will be completed prior to the Inquiry.

29. Planning conditions relating to delivery of the mitigation for this development have still to agreed and again it would be imagined that these would be agreed prior to the Inquiry.

Appendix 1 - Executive summaries of AECOM Technical Notes (post planning application submission)

Technical Note 06 – Dated 24 January 2020: Transport Assessment Review

Following the review AECOM make the following recommendations:

Recommendations regarded as critical to the acceptability of this planning application:

1. A capacity assessment should be undertaken at the A5 Redmoor junction (para 2.5).
2. Once VISSIM modelling issues are resolved (see TN07), revised model outputs should be provided within the TA for review by AECOM (para 2.9).

Recommendations regarded as important but not critical to the acceptability of this planning application:

3. As there is predicted to be a material increase in trip numbers as a result of the proposed development at Redmoor roundabout, PIC analysis should be undertaken at this junction (para 3.7).
4. Further details of the bus provision proposals are provided to enable AECOM to determine whether they are likely to result in a shift away from private car use (para 3.8).

Technical Note 07 – Dated 24 January 2020: Base VISSIM Model

Following the review AECOM make the following recommendations:

A **SIGNIFICANT** issue in the forecast scenarios has been identified during the model review:

- The submitted model fails to replicate the results contained in the accompanying report for 5 of the 6 scenarios in the AM peak models.

The following issues have been found to be **MEDIUM** level:

- Incorrectly modelled lane allocation on different approaches to, and within Kelly's Kitchen roundabout;
- Prohibited lane changes are made by vehicles on the A5 approaches to the junction;
- Priority rules are incorrectly coded resulting in traffic not realistically blocking the lanes while queuing;
- Unrealistic signal operation at Kelly's Kitchen roundabout leading to excessive queuing within the junction, resulting in conflict points being blocked and inefficient synchronisation of signal timings;
- The report does not include an analysis of network performance results for all scenarios tested; and
- The report should include an analysis of latent demand in all scenarios when assessing the impact of the development.

Technical Note 08 – Dated 20 March 2020: Revised Transport Assessment

Following the review AECOM make the following recommendations:

Recommendations regarded as critical to the acceptability of this planning application:
None

Recommendations regarded as important but not critical to the acceptability of this planning *application:*
None

Technical Note 09 – Dated 20 March 2020: Audit Forecast VISSIM Model

Following the review AECOM make the following recommendations:
Two **SIGNIFICANT** issues in the forecast scenarios has been identified during the model review:

- Excessive queuing has been observed inside the roundabout, resulting in an unrealistic operation.
- The Do Something scenarios use signal controllers different to those of the Do Minimum scenarios, preventing a like for like comparison of the mitigation proposals.

Technical Note 10 – Dated 24 April 2020: Audit of Revised Forecast VISSIM Model

Following the review AECOM make the following recommendations:

The modelling results show that, while journey times on Brickhill Street northbound and the A5 southbound improve significantly with the proposed mitigations, the impact of the development on journey times along the A4146 and the A5 northbound is not mitigated.
However, overall network performance results show that with mitigation, average delay across the network is reduced in the Do-Something scenario, compared to the Reference Case. Delays at the junction remains at similar levels to the Reference Case in the AM peak hour, and are significantly reduced in the PM peak hour.
It is likely that further signal optimisation would allow more even distribution of the benefits observed on the A5 southbound among other arms of the junction, providing a better distribution of benefits on all approaches.
Observations of the model operation indicate that in the 2023 Do-Something scenario the queuing on the A5 south approach is significantly longer than the Reference Case scenario, which AECOM considers equates to a severe impact that can be attributed to the proposed development.
From HE's perspective, AECOM recommend that further measures are sought to ensure that the impact of the proposed development on the A5 northbound approach is not considered severe. This could potentially be demonstrated through the optimisation of signal timings (this should be consistent and applied in all scenarios) that protects the operation of the A5 approaches and ensures that the impact of the South Caldecotte development on these arms is not severe.