



**PRELIMINARY HIGHWAY OBSERVATIONS FOR: 20/01656/CONS**

**DATE:** 11<sup>th</sup> February 2021

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**Outline planning application with all matters reserved except for access for a mixed use sustainable urban extension on land to the South West of Milton Keynes to provide up to 1855 mixed tenure dwellings; an employment area (B1); a neighbourhood centre including retail (A1/A2/A3/A4/A5), community (D1/D2) and residential (C3) uses; a primary school and a secondary school; a grid road reserve; multifunctional greenspace; a sustainable drainage system; and associated access, drainage and public transport infrastructure. (Buckinghamshire Council's application 15/00314/AOP).**

**Summary of advice from Transport Development Management**

No objection	<input type="checkbox"/>
No objection subject to condition(s)	<input type="checkbox"/>
Object to the Planning Application	<input checked="" type="checkbox"/>
Application needs amending and/or further information required	<input checked="" type="checkbox"/>

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**Milton Keynes Council requests that this note should be treated as a holding objection until a time that it has had the opportunity to consider new material recently submitted. Milton Keynes' concerns are outlined in the following response from our Highway department.**

Introduction

This application represents minor revisions to the previous SWMK application (AVDC reference 15/00314/OAP). The changes are related to:

- i) Alignment of the pipeline across the site.
- ii) Changes to standards for climate change mitigation.
- iii) Housing for elderly residents.

These changes are not substantial. It is relevant to note that Milton Keynes Council objected to the previous application but their views were overlooked by AVDC. It is also relevant to note that a parallel application for the previous proposal to Milton Keynes Council (reference 15/00619/FUL) for physical improvement to Bottledump Corner and a new access on to the A421 to accommodate the development of land in

Aylesbury Vale District was refused by Milton Keynes Council and is currently the subject of a planning appeal. The reason for refusal was:

“That in the opinion of the Local Planning Authority there is insufficient evidence to mitigate the harm of this development in terms of increased traffic flow and impact on the highway and grid road network with specific reference to Standing Way and Buckingham Road, thus this will be in contravention of Policies CT1 and CT2 (A1) of Plan:MK.”

## Summary

A new Transport Assessment (TA) was prepared as part of the appeal mentioned above and an identical TA accompanied this application, titled as “Updated Transport Assessment” (albeit it represents a completely new analysis and can be considered a new TA).

That new TA is now understood to have been superseded by the submission of TRN3 on 29<sup>th</sup> January 2021, as is the information submitted by the applicant / appellant in the intervening period. BC has very recently consulted MKC on TRN3 (and also on TRN2 which relates to its own highway network). MKC has commenced its own assessment of TRN3 and will respond under separate cover once it is able to do so; in the meantime, we trust that the following response is helpful.

In terms of traffic impact, which was the main concern of the Council last time around, the new TA took an entirely new approach, which is also reflected in TRN3. The previous TA relied on data from the Milton Keynes Traffic Model to test the impact within Milton Keynes but the new TA relies on a ‘count and factor’ approach. This means that new traffic surveys were done at a number of junctions early in 2020 (before the traffic conditions were affected by Covid) to give up-to-date base data. These were then growthed to 2033 using standard factoring (TEMPRO), with traffic from the development added in and junctions analysed using junction capacity models. The two key differences over the previous TA are the fact that there is no redistribution of traffic as congestion builds up (unlike when the traffic model was used) so traffic on a particular route just continues to grow. In addition, the forecast year is now 2033 not 2026, to reflect the time that has passed since the original application and the latest estimates for build out of the development. As a result of this forecast, the 2033 base network (no development) is more congested than the 2026 base in the previous TA.

Concerns have been raised with the applicant over evidence relating both to the ongoing appeal and this planning application. These discussions are ongoing and relate to matters including the Council’s serious concerns with the subsequent capacity analysis and proposed mitigation.

On the basis of the new TA, the final situation with all in place is worse than if the development doesn’t happen. This is defended in the TA on the basis:

- i) In practice there will be some redistribution of traffic on the grid road network.
- ii) The mitigation means that the situation is better than if the development came forward with no mitigation.
- iii) The residual impact is not severe as required in NPPF.

In response to these points it is considered they are not valid because:

- i) There is no analysis to show whether the spare capacity exists on alternative routes so, although this may be a possibility, it cannot be accepted at this stage.
- ii) The correct comparison is with the base situation not with the development with no mitigation.
- iii) The residual impact is considered severe as there is a significant reduction in performance even with the mitigation measures in place.

It is relevant to note that the mitigation package overall is more substantial than for the previous application, where improvements were proposed to the three main A421 roundabouts only.

### Conclusion

Based on the new TA, the development has an adverse impact on the road network in Milton Keynes which is still judged to be severe with the proposed mitigation in place. On that basis, Milton Keynes Highways would recommend that Buckinghamshire Council objects to the proposed development on traffic impact grounds.

However, it is now understood that TRN3 updates the new TA in relation to junctions within Milton Keynes. The Council therefore reserves its position on the application until such time as it has had time to fully consider it.

Stirling Maynard Transportation

for

Milton Keynes Council – Transport Development Management