LAND AT BUCKINGHAM ROAD, TATTENHOE ROUNDABOUT, STANDING WAY TO BOTTLEDUMP ROUNDABOUT MILTON KEYNES

APPEAL BY SOUTH WEST MILTON KEYNES CONSORTIUM

PINS REF: APP/Y0435/W/20/3252528

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SHORT OPENING ON BEHALF OF NEWTON LONGVILLE

PARISH COUNCIL AND WEST BLETCHLEY COUNCIL

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1. Newton Longville Parish and West Bletchley Council join with Milton Keynes Council in requesting the Inspector to dismiss this appeal. So strongly do the Councils feel about this matter that they have gone to the trouble and expense of securing themselves Rule 6 status in the inquiry and instructing not only counsel and solicitors but a professional expert as well to bear out their case that the development the subject of this appeal should be refused planning permission on the grounds specified by Milton Keynes Council.
2. The course to reach this point has been far from smooth. The first round of the inquiry was deferred after all parties had already produced their evidence. Because the detail of the appeal proposal has been changed, all parties have had to address those changes by way of a complete resubmission of their evidence.
3. That would be a remarkable enough state of affairs in any planning appeal. But given that what this inquiry is concerned with is the proposals for accessing a site which has been under active consideration since January 2015, the fact that it has taken so long for its promoters to decide on the detail for appropriate access and mitigation is truly staggering.
4. The remarkable nature of this situation takes on a whole new dimension in that Buckinghamshire Council, the host authority for the larger part of the proposals for “South West Milton Keynes”, still has not reached the point where they are content to approve them, see para. 7.3 of Ms Bailey’s proof of evidence, CD 21A: “BC’s position on the appeal at present is that they are not yet able to confirm that they are satisfied that the appeal scheme is acceptable in planning terms such that planning permission should be granted”.
5. In any event, the position of Milton Keynes Council, the local planning authority for the appeal proposals, in common with Newton Longville and West Bletchley Councils, is that the Inspector can have no confidence that the significant access issues which have been identified by them have been resolved.
6. As set out in the expert evidence of Mr Burbridge on behalf of the Councils, he raises the significant concern that the assessment provided by the appellant fails to assess the impact of the traffic that will re-route on the highway network because of the increased local congestion as a result of the proposed development. As he points out, the appellant has failed to provide any micro simulation model (or any alternative modelling) which would assess the impact of re-routeing traffic but simply assumes that that traffic will be redistribute on the highway network with no severe impact.
7. Mr Burbridge maintains that the appellant’s/WSP’s own work clearly demonstrates a severe impact on the network on the basis of the modelling presented to the inquiry. As he says, the current proposed mitigation cannot be relied upon since in many instances the geometric parameters suggested in the modelling would not be deliverable on site at the detailed design stage because they fail to accord with DMRB CD116, CD116 “Geometric design of roundabouts”, CD 13N, which he says should be considered to be the appropriate standard in accordance with national practice for the affected junctions on the A421 and the site access on Buckingham Road.
8. While these matters of detail will be considered further in the programmed round table sessions, Mr Burbridge points out in particular that the site access roundabout on Buckingham Road has been incorrectly modelled so that the resultant impact of the development has been underestimated and that entry widths have been modelled at the site access which simply would not be deliverable at the detailed design stage.
9. Where Tattenhoe Roundabout is concerned, Mr Burbridge has identified that the Linsig modelled has been undertaken incorrectly with inappropriate link lengths and queue de-sliver values. Even aside from these errors, he points out that WSP’s own work still shows issues that queue lengths will extend to the point that they themselves will block the exits.
10. Mr Burbridge raises detailed concerns about other off-site junctions in relation to the modelling parameters and the acceptability of the suggested geometry at detailed design including at junctions 6, 15, 16 and 17.
11. He makes the point that it seems that the modelling undertaken has led the junction designs without due regard to or consideration of appropriate design standards. As a result, therefore, the impact of the appeal proposals has been underestimated when judged against the correct design standards in DMRB CD116, CD13N. Although in any event, he maintains, WSP’s own modelling shows that the network is significantly over capacity and that the impact of the development at various of the junctions should be considered “severe”.
12. Mr Burbridge raises yet further underlying issues with WSP’s TRN3 which call into question the credibility of the modelling undertaken and assumed traffic flows. In particular he questions detailed matters including the internalisation factor for secondary school trips, the modal share reduction factor and significant departures from standards in the Road Safety Audit.
13. Mr Burbridge’s opinion aligns closely with that of Mr McKechnie for Milton Keynes Council – albeit that they reached their similar expert conclusions quite independently of each other and on the basis of the same technical material. This is a matter to which the Inspector will be invited in due course to attribute considerable weight.
14. At variance with the opinions of Mr Burbridge and Mr McKechnie are those of Mr Paddle and Mr Bedingfield, for the appellant and Buckinghamshire Council respectively. But their opinions are undermined by the failings of assessment identified by Mr Burbridge and Mr McKechnie.
15. Both Mr Paddle and Mr Bedingfield have put in rebuttal proofs but the concerns identified by the experts opposing the development remain. This will be the subject of evidence and argument in due course.
16. Moreover, Mr Bedingfield is in the curious position of having accepted the appropriateness of the appeal proposals despite the failings of them identified by Messrs Burbridge and McKechnie and despite his own authority still not having yet decided that the balance of the development in his authority administrative area is acceptable in principle. This will be a matter to be explored in cross-examination.
17. But the position of Newton Longville Parish Council and West Bletchley Council remains, on the basis of Mr Burbridge’s evidence that the appellant’s assessment of the appeal proposals fails fully to address and mitigate their impact on the highway network which will suffer severe impact both at individual junctions and cumulatively across the network as a network as a whole.
18. As Mr Burbridge says, many of the mitigation proposals are not deliverable and therefore the modelling fails to present the real impact of development traffic. Redistribution of traffic is predicted by WSP at congested junctions, but no modelling has been undertaken to bear this out. This leads him respectfully to request that the appeal proposals be dismissed as being contrary to both local and national transport policy.
19. In due course, therefore, Newton Longville Parish Council and West Bletchley Council will be making the same request.

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