



Representations on Behalf of Prologis UK Ltd

**Central Bedfordshire Local Plan
Examination: Additional
Consultation on Examination
Documents (EXAM 114)**



1. BACKGROUND

- 1.1. On behalf of Prologis UK Ltd, this representation note has been prepared in response to EXAM 114 and accompanies Lichfields' letter 15572/01/HS/SF/ dated August 2020. This note responds to how the content of EXAM 114 evidences the draft [Policy SE2](#) and provides further relevant information in the consideration of the SE2 allocation.
- 1.2. EXAM 114 and its appendices A-C detail and comment upon the forecast cumulative traffic impacts arising from development proposed under draft Policies SE2 'M1 Junction 13 – Marston Gate Expansion' and SA2 'Marston Vale New Villages'.
- 1.3. The sites shown under these draft allocations are currently the subject of live planning applications. From a transportation perspective, they very usefully include detailed Transport Assessments which assess the effects of the allocated development on the highway network. In the case of Marston Gate Expansion, the assessments and proposed mitigation strategy has been worked and collaborated upon over the course of the last two years culminating in agreement with both Highways England (HE) and Central Bedfordshire Council (CBC). As stated by both HE and CBC in [EXAM 114](#), this level of assessment is beyond that which is required at the plan making stage. Given the above, we contend that this provides a solid platform from which to base our comments on EXAM 114.

2. MITIGATING THE IMPACTS FROM DEVELOPMENT

- 2.1. Over the course of the last two years, an understanding of the issues at M1 J13 has been gained and shared between the parties to the application on SE2. The parties agreed that the Bedford Road/Salford Road traffic signals, M1 J13 northbound off-slip and southbound overbridge are experiencing stress at certain points during the day. This is attested within EXAM 114B stating that the M1 J13 is at capacity currently. Moreover, it has been accepted that the assets within the control of HE and CBC should be treated jointly and severally due to their proximity and likelihood to impact on one another from both a capacity and safety perspective.
- 2.2. Given the above, the timing of development and the implementation of, and appropriateness of, their mitigation is therefore central to the consideration of draft allocations SE2 and SA2.

- 2.3. The timeframes associated with delivery of these developments are set out in the submitted Transport Assessments (application reference CB/18/04600/OUT WSP report 70047734-001 Rev 2 dated 05/03/2019 and application reference CB/18/01969/OUT Peter Brett Associates report 27467 Rev 3 dated 18/05/2018 respectively). Subject to adoption and application outcome, the timescales associated with these developments are:
- Short-term (<5 years): Marston Gate Expansion (2024: 16.6Ha Use Class B8 (full occupation)) and Marston Vale (2024: circa 1,150 dwellings at an assumed linear rate)
 - Medium-term (6-10 years): Marston Vale (2026: 1,600 dwellings)
 - Long-term (>10 years): Marston Vale (2039: 5,000 dwellings + Use Classes A, B, C and D (full occupation))
- 2.4. At full occupation within five years, Policy SE2's proposed B8 employment use is forecast to generate 516 and 265 two-way vehicle trips during the AM and PM peak hours respectively. Policy SA2's expected trip generation in the same year is forecast to be 832 and 843 two-way vehicle trips in the AM and PM peak hours respectively without Travel Plan measures introduced (PBA Transport Assessment Chapter 8). At full occupation in 2039, the trip generation is 4,694 and 5,000 two-way trips respectively once more without Travel Plan measures introduced (PBA Transport Assessment Chapter 10).
- 2.5. In respect of SE2's impact on M1 J13, two schemes mitigating these impacts have been developed and agreed with HE and CBC and are described below:

Bedford Road / Salford Road Traffic Signals

- An additional right-turn lane will be provided from Bedford Road (south) to A507 Salford Road (east), which will double the current level of right turn capacity and improve the performance and throughput of the junction overall. The improvements will serve to prevent queues from extending back to the northern dumbbell roundabout and prevent blockages from developing on the circulatory carriageway. The nearside right-turn lane at the junction will be continued to form a 'free flow' left-turn lane at the roundabout with the existing Prologis Park Marston Gate Distribution Centre as shown on drawing reference 243/P/001 Rev G included at Appendix A. The estimated cost of these works is £2.5M.

NB: *Peter Brett Associates MV Transport Assessment Appendix Q reference 27467 Rev 2 dated 18/04/2018 identifies a similar arrangement for this junction in mitigation of SA2.*

M1 Junction 13

- As shown on drawing reference 243/P/040 Rev D (Appendix A), signage and lane ordering to improve navigation through the M1 J13 intersection space improving both highway safety and overall capacity due to the inherently better efficiency. The estimated cost of these works is £0.5M.
- 2.6. The mitigation set out above responds directly and positively to Bullet 3 of the draft Policy SE2 outlined in the [Central Bedfordshire Pre-submission Local Plan](#).
- 2.7. These works are forecast to achieve more than simply offsetting the impacts from the development of SE2 for its intended uses. This is especially important when reading EXAM 114B that holds that M1 J13 cannot accommodate the planned level of growth within the plan period without improvement over and above the M1 J13 – 16 Smart Motorway All Lane Running (SMALR) and A421 dualling works south west of the junction to Eagle Farm roundabout both in progress currently.
- 2.8. In addition to fully mitigating the development of land allocated under SE2, the capacity ‘buffer’ created will support an element of the trips generated by the first phase of development under draft Policy SA2, e.g. the construction traffic expected in the temporary situation. In any event, the development of SE2 for its intended uses with appropriate, timely mitigation will have wider positive effects for the area in respect of transport.

3. EXAM 114 ASSESSMENT & COMMENTARY

- 3.1. In preparing EXAM 114, AECOM on behalf of HE developed and appraised five ‘high level’ options (Packages A - E) to mitigate the identified growth and restore capacity M1 J13 where possible.
- 3.2. Paragraph 2.2.10 of EXAM 114 states that the current preference is a combination of Package B (signalise the M1 southbound off-slip approach to the northern dumbbell roundabout, add a flared lane and signalise the circulatory link) and Package C (widen the southbound overbridge at the approach to the southern roundabout).
- 3.3. In its assessment, AECOM undertook study of ‘Do-Minimum’ and ‘Do-Something’ scenarios for forecast design horizons of 2025 and 2035. This should provide a robust platform given the likely short to medium-term transport effects of the Covid-19 pandemic. Traffic volumes have already reduced significantly and evidence from the years following the economic recession of 2008 clearly demonstrated that background traffic volumes can take up to 8 years to return to an established baseline position.

- 3.4. We are supportive of the work undertaken by AECOM to date and the broad conclusions drawn within EXAM 114 particularly in respect of a solution being possible at M1 J13. However, we do believe that the results and thinking do not fully articulate the potential benefits that are achievable if both allocations are confirmed and implemented with suitable, fair levels of mitigation. Notwithstanding this, we believe that this evidence base is sound in relation to the progression of the Local Plan.
- 3.5. Beyond the initial 5 year short-term phase described previously, EXAM 114 (and Peter Brett Associates MV Transport Assessment Appendix Q) established that the strategic road network will require additional mitigation to be delivered at an appropriate point during the Local Plan period to accommodate the trips forecast to be generated by allocated residential sites emerging at that time such as the medium to long-term phases of proposals being brought forward in accordance with draft Policy SA2.
- 3.6. It is our opinion that the EXAM 114 promoted Package B will result a betterment to the operational performance of M1 J13 and is appropriate to mitigate the impact arising from the medium to long-term Local Plan development. This improvement has the potential to deliver greater benefits if combined with the two schemes outlined above that are necessary to mitigate the intended use under draft Policy SE2.
- 3.7. We agree that Package C will result in a betterment to M1 J13 and should be considered in mitigation of the medium to long-term impact of Local Plan development. It will result in the creation of additional lane capacity on the overbridge approach to the southern roundabout. Again, this improvement has the potential to deliver greater benefits if developed in conjunction with the two necessary schemes promoted as part of the MGE site planning application.
- 3.8. It has been estimated that the combined cost of Packages B and C is in the region of £5M with an obligation to fund these works associated with the future delivery a development being brought forward in accordance with draft Policy SA2, as described in Paragraph 2.2.10 of [EXAM 114](#). It is considered that this represents a fair and reasonable approach in view of the fact that these mitigation works are intended to offset the impact of medium to long-term Local Plan development. Moreover, the balance of trip generation from each site suggests the same.
- 3.9. The development being brought forward in accordance with draft Policy SE2 has already successfully demonstrated and agreed an effective package of mitigation measures that will be worth approximately £3M. They will achieve a position of better than nil-detriment compared to the baseline position ensuring the impact of short-term Local Plan development can be fully mitigated.

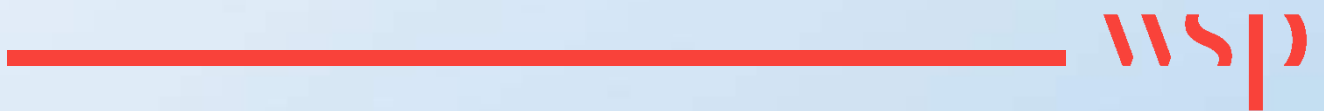
- 3.10. One of the principal benefits to the Local Authority of granting allocation status to both sites will, therefore, be delivery of important infrastructure upgrades from private sector funding which will be worth approximately £8M (combined) to the District. The strategic allocation of these sites will present a unique opportunity to bring forward further development across the District, whilst enabling significant infrastructure upgrades with only a limited impact upon the public purse. This approach is confirmed in the [Infrastructure Delivery Programme](#).
- 3.11. The necessary measures included as part of the MGE application will also result in optimal benefits being realised in relation to the delivery of HE's preferred combination of Packages B and C. Should the necessary measures not be provided as part of the SE2 allocation, these schemes will still be required but as a burden on another development or the public purse. In respect of the former, it is possible that viability might become an issue for a single site.
- 3.12. EXAM 114 does not expressly discuss the positive impact that the agreed SE2 necessary works will have prior to the ultimate delivery of the preferred options presented within the 'Do Something' scenario. These however have been both demonstrated and agreed to improve M1 J13.
- 3.13. The combined benefits of granting allocation status to both sites should not be underestimated. The submitted Transport Assessment has demonstrated that a development being brought forward in accordance with draft Policy SE2 can be fully accommodated and can mitigate the impact of its own development trips without being reliant upon other development in the area. The short-term necessary measures promoted within the MGE application will also be beneficial in facilitating the initial phases of a development being brought forward in accordance with draft Policy SA2 (including the ability to support trips generated by construction traffic).
- 3.14. The benefit of the strategic allocation of these sites is even greater when the potential to create synergies between necessary employment and residential uses is considered (with appropriate phasing proposed to ensure that jobs are created first and then homes following soon after to support the needs of future employees). This will present a unique opportunity to achieve truly sustainable development, which serves the needs of residents and employees within Central Bedfordshire and aims to reduce demand for longer distance commuter trips by providing homes and employment prospects adjacent to each other within the District. This approach is underlined by the further mitigation proposed as part of SE2 that links Ridgmont station to Marston Gate and improves cycling facilities along Station Road whilst managing the level crossing.

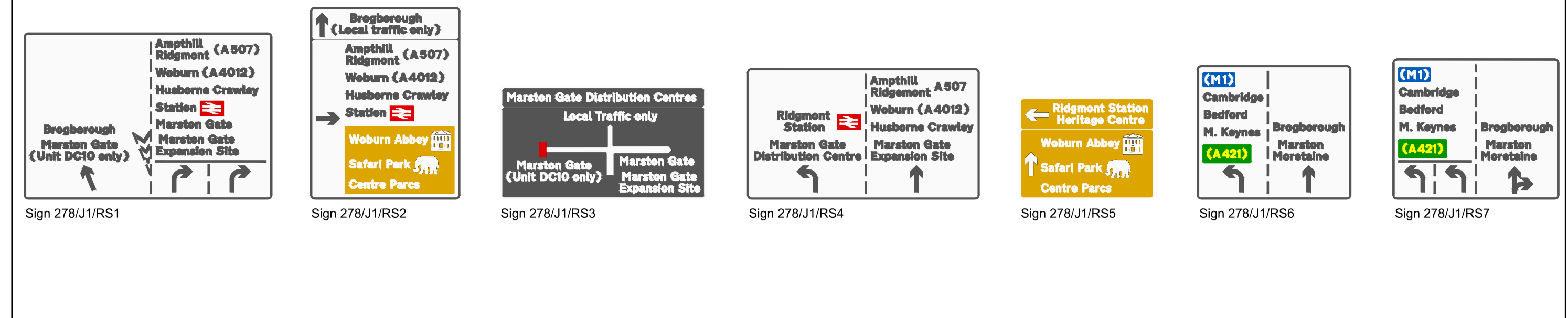
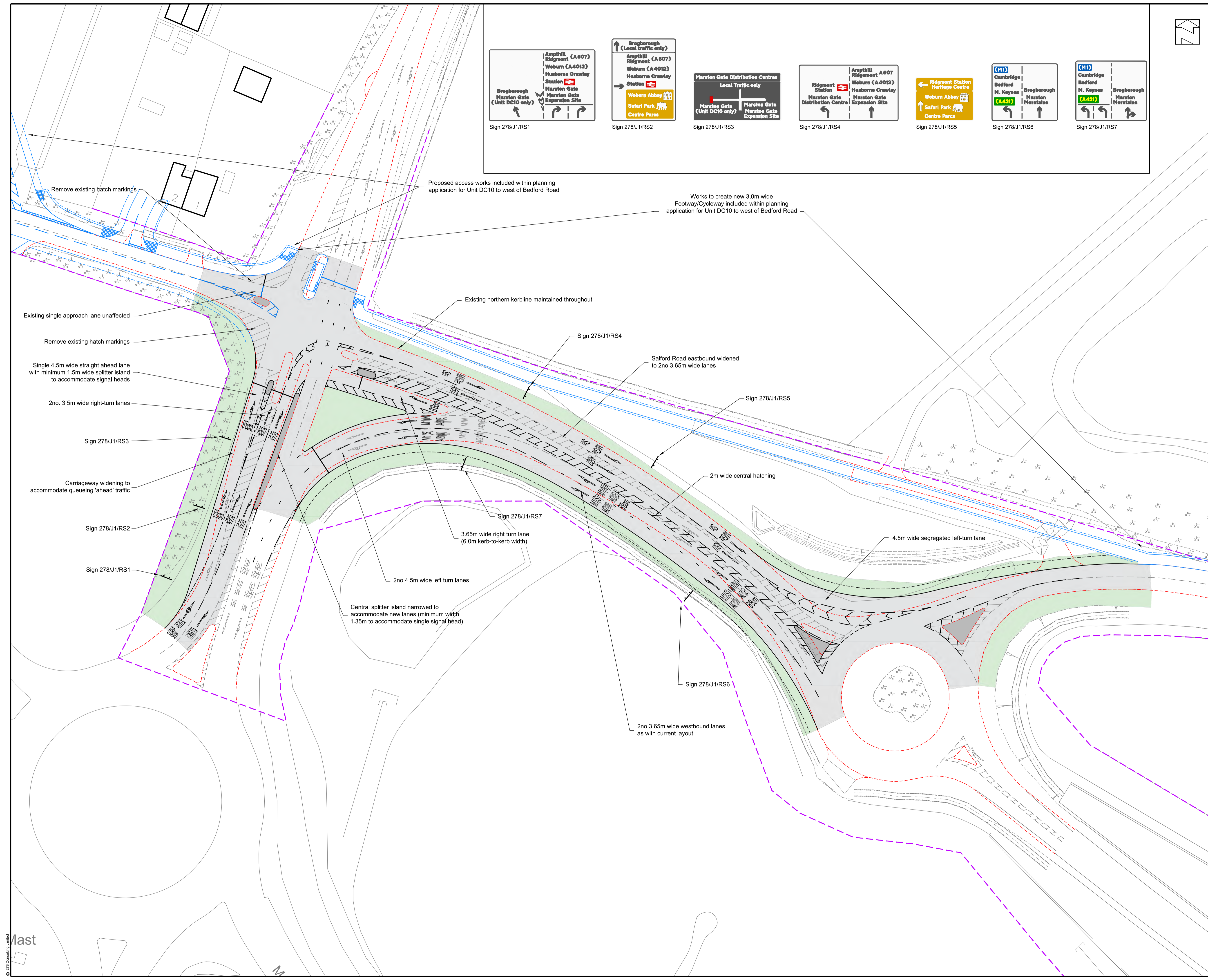
4. CLOSING COMMENTS

- 4.1. WSP is supportive of the work undertaken by AECOM to date and the broad conclusions drawn within EXAM 114.
- 4.2. With the planning application for development at Marston Gate Expansion submitted, substantive and agreed traffic modelling work has already taken place that provides a level of certainty often not available at this stage. The application proposals are accompanied by a package of highway improvements that will positively impact upon both the capacity and safety of M1 J13 and the A507/Bedford Road junction noting that improvements to the latter junction will have positive repercussions on the motorway junction's overbridge and slip roads. This package of work has been agreed with both HE and CBC and it is accepted that with its implementation there will be a net improvement to highway conditions.
- 4.3. The delivery of these highway benefits is dependent upon development at the allocated Marston Gate Expansion site coming forward. It is estimated that the total costs for these works is in the region of £3M and Prologis are fully committed to the implementation of these works prior to occupation of the site.
- 4.4. It is also noted that the highway modelling work undertaken has demonstrated that these works will be required, regardless of the development of Marston Gate Expansion site to enable the future efficient functioning of the two junctions. In the event of the site not being allocated in the Local Plan and therefore not progressed, there will be an obligation upon other parties to implement these works (or a package of similar improvements) at their cost. Equally, other development proposals in the area will be obliged to initially deliver improvements similar to that proposed to protect the efficient operation of the junctions, before any consideration is given to additional traffic flows associated with their own development proposals and additional works required to mitigate that increase.

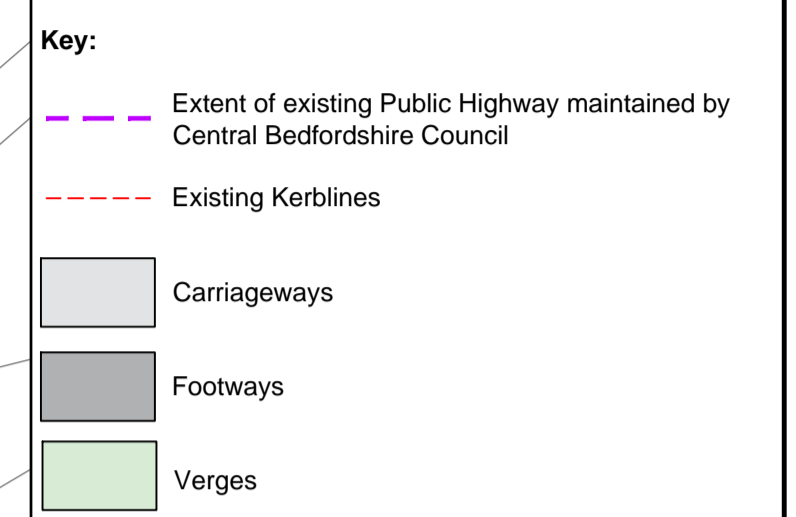
Appendix A

DRAWINGS





Notes:
 1. The layout details illustrated herein are subject to full 3D alignment and constructional design.
 2. For details of junction capacity assessments refer to the Transport Assessment prepared by WSP.



For Planning Purposes Only

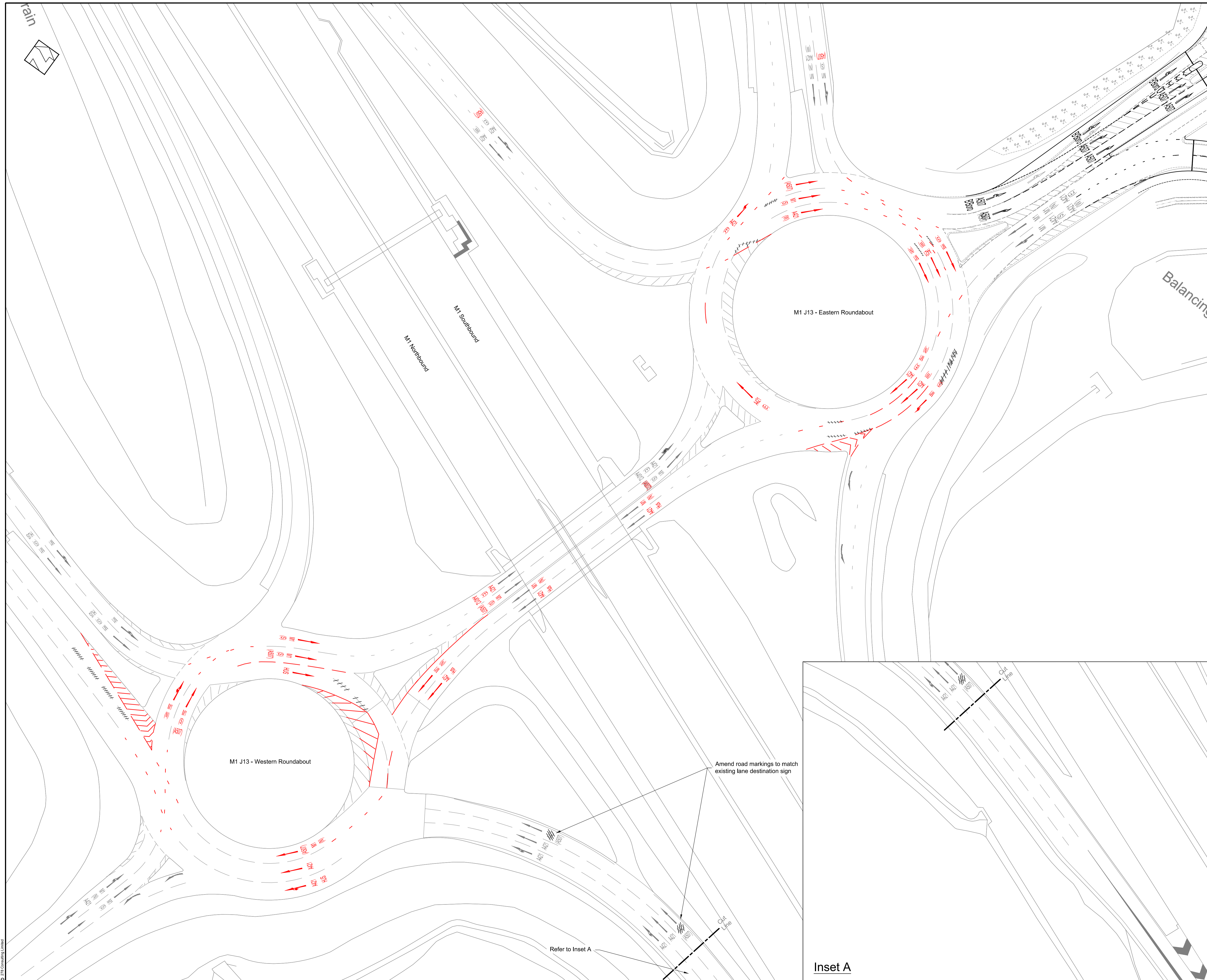
Rev	Description	Date
G	Drawing title updated and 'For Planning Purposes' added	02/11/18
F	Notes updated. Footway/Cycleway works along north side of Salford Road 'moved' to DC10 planning application. New roadsign RS5 added and all signs renumbered.	18/10/18
E	Further minor amendments to road markings in response to Stage 1 RSA.	11/06/18
D	Amendments made as part of Designer's Response to 1RSA. Lane markings and roadsigns added. Roadmarkings at Bedford Road right-turn amended. Notes updated.	01/06/18
C	Nearside kerline on Bedford Road northbound approach to signals realigned. Key Added.	06/03/18
B	Footway/Cycleway works on Station Road moved to Drg 243/P/023	25/01/18
A	Layout of northbound approach to signals amended. Cycleway details added.	14/12/17

Client:

Project:
Marston Gate Expansion Off-Site Highway Works

Title:
Bedford Road/Salford Road Improvements General Arrangement

Drg Size: A1	Scale: 1:500	Date: 08/12/2017
Drawing No: 243/P/001	Rev: G	



- Notes:**
1. Details of existing road markings are approximate only having been derived from Google imagery.
 2. Details of proposed additional road markings are indicative only and subject to further discussions and approvals from the relevant highway authorities.

- Key:**
- Existing Road Markings
 - Proposed Additional Road Marking
 - Existing Road Markings to be Removed

For Planning Purposes Only

Rev	Description	Date
D	Revisions to M1 N/bound diverge slip 'tiger-tail' roadmarkings removed. Width of lanes forming A421 w/bound exit from southern roundabout increased to 10m. Markings around overbridge entry onto southern roundabout updated.	01/04/19
C	Drawing title updated and 'For Planning Purposes' added	02/11/18
B	Amendment to NB Diverge slip lane markings	25/09/18
A	Lane designations on N/B diverge slip and around southern roundabout updated.	19/09/18

Client:

Project:
**Marston Gate Expansion
 Off-Site Highway Works**

Title:
**Review of Potential M1 J13
 Safety Improvement Works**

Drg Size: A1	Scale: 1:500	Date: 14/09/2018
Drawing No: 243/P/040	Rev: D	



Inset A



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