

Central Bedfordshire Local Plan

Consultation on additional examination evidence:

Exam 111 – Statement of Common Ground between HE and CBC

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Exam 114 – Transport Technical Paper

1.0 Introductory Statement

- 1.1. This representation is submitted on behalf of O&H Properties Ltd, owner and promoter of the Marston Vale New Villages proposed for allocation under Policy SA2 of the Central Bedfordshire Council Local Plan (CBCLP).
- 1.2. O&H wishes to make a number of points to supplement its representations made to the Draft Plan at Regulation 18 stage consultation (July – August 2017), Pre-Submission Version at Regulation 19 stage consultation (January – February 2018) of the CBCLP as well as at the Examination in Public (EiP) Hearing Sessions (July – August 2019).

2.0 Representation

- 2.1 O&H considers that the interlinked nature of EXAM111 and EXAM114 warrants a single comprehensive representation. O&H respectfully requests the comments outlined in this representation are considered for both EXAM111 and EXAM114.

EXAM111

- 2.2 O&H welcomes and supports the Council's collaborative efforts with Highways England (HE) as reported within the Statement of Common Ground (SoCG). O&H are of the view that the SoCG acts as a useful update for participants to summarise progress in the interim period following the previous hearing sessions. Therefore, O&H supports EXAM111 and considers it to be a positive addition to the CBCLP evidence base.

EXAM114

- 2.3 O&H welcomes and supports the Council's substantial efforts to undertake additional modelling to support the Local Plan. It should be noted that the additional work undertaken by CBC is both substantial and at a level of detail beyond that generally expected in the context of demonstrating the deliverability and viability of a Local Plan.

M1 Junction 13

- 2.4 O&H supports the Council's efforts to respond to the Inspectors' previous concerns¹, particularly with respect to paragraph 46 of EXAM69. O&H agrees with the Council's assertion that the additional Junction 13 modelling was not necessary to reach a substantiated conclusion on the soundness of the Plan but nevertheless welcomes the opportunity to provide additional input to further reinforce the evidence base in this regard.
- 2.5 O&H notes the M1 J13 modelling work undertaken by AECOM on behalf of the Council and supports the conclusions reached. Nevertheless, O&H wishes to reserve the opportunity to provide detailed comments as part of any discussion on the modelling work at any future EiP hearings.
- 2.6 O&H note the 'scenarios' presented for M1 J13 but wish to offer no detailed commentary on each individual scenario at this stage. O&H reserve the right to add further commentary on this at a later stage if necessary.

¹ As raised in examination document EXAM69.

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- 2.7 A number of 'scenarios' have been tested which include potential mitigation schemes for M1 J13. O&H supports the mitigation schemes tested for M1 J13 and considers that this represents confirmation that there is a feasible and viable solution for this junction capable of mitigating the Local Plan growth.
- 2.8 The further work undertaken by CBC as set out in EXAM 114 and the SoCG between CBC and HE demonstrates that there is a very clear agreed position between the Council and HE that there are no significant outstanding issues regarding the Marston Vale New Villages allocation and its potential impact on M1 J13. O&H supports this conclusion and confirms that this correlates with the outcomes of the Marston Valley Transport Assessment (MVTA) submitted in support of the outline planning application (CB/18/01969/OUT).
- 2.9 It should be noted that the details of the specific mitigation schemes tested by HE / CBC are not identical to the M1 J13 mitigation schemes tested within the Marston Valley Transport Assessment (MVTA). However, O&H can confirm that these differences are not substantive in terms of securing effective mitigation, and simply reinforce the position in respect of the local plan that there are a number of robust and feasible technical solutions agreed between the parties which (a) can mitigate the impacts of development at M1 J13 and (b) which are affordable and can be delivered without hindering the viability of the local plan allocations.
- 2.10 In the context of the above, it should be reiterated that it is not unusual for modelling undertaken for local plan purposes and that undertaken in support of an outline planning application for a specific development proposal to differ. Importantly, the MVTA and any subsequent outline planning permission will ensure that appropriate mitigation is secured to address the impacts of the development, in the knowledge and context of the evidence base and work undertaken for the local plan.
- 2.11 We consider that EXAM114 answers concerns presented at paragraph 46 of EXAM69 and can now allow the Inspectors to move towards reaching a robust, substantiated conclusion on the soundness of the Plan.

Viability – M1 J13 & the Marston Vale New Villages Allocation

- 2.12 O&H wishes to reaffirm the comments made at paragraph 2.2.10 of EXAM114 and that the costs quoted in the Strategic Transport Modelling and reconfirmed within EXAM114 remain viable.
- 2.13 On the basis of the evidence now provided, we consider that the Inspectors can be reassured that:
- (a) numerous potential mitigation schemes exist for M1 J13 which do not compromise the viability of the proposed Marston Vale New Villages allocation; and
 - (b) as the precise configuration and detail of any future mitigation scheme for M1 J13 can be agreed at the appropriate time in the context of specific planning applications, such matters of detail should not be a reason to delay the CBCLP EiP any further.

Strategic Model Flow Outputs – A421 to Milton Keynes

- 2.14 O&H welcomes the Council's clarification on this matter and considers that it was an issue raised as a result of the way the information was originally presented rather than a substantive issue with the original modelling itself.
- 2.15 The number of PCU trips towards Milton Keynes and the Marston Vale New Villages allocation was queried during the Local Plan EiP hearings. The Council, in EXAM114, have clarified this query at paragraphs 2.3.2 – 2.3.14. The Council have confirmed that the quoted figure (50 PCUs) does not represent the trip generation from the Marston Gate and Marston Vale but rather, it suggests the volume of trips across the entire CBLTM model that may not be able to reach this link because they are constrained from doing so elsewhere in the model.
- 2.16 O&H supports the conclusions reached by the Council in EXAM114 with respect to cross-boundary vehicle movements via the A421 to Milton Keynes.
- 2.17 Notwithstanding the above, O&H wishes to express that the work undertaken as part of EXAM114 goes beyond what is normally expected of the plan-making process and should be considered in this context. As part of the determination of the MV Outline Planning Application and securing a robust permission, any detailed technical matters should be captured and addressed through due process now that it has been demonstrated a mitigation solution is achievable and viable for local plan purposes, and any such issues should not be seen as a reason to delay the CBCLP EiP any further.
- 2.18 EXAM114 responds to the question in paragraph 47 of EXAM 69 and should allow the CBCLP EiP to positively continue.

Summary

- 2.19 In short, O&H is of the view that EXAM114 responds positively to the Inspectors' previous concerns and considers that sufficient clarity has been provided, at this stage, to allow the CBCLP EiP to be concluded in this respect.