

LOCAL PLAN 2035 – REPOSE OF MILTON ERNEST PARISH COUNCIL

Milton Ernest Parish Council recognises the need for more homes to be provided within the Borough. We acknowledge the challenges that presents, and the potential benefits a significant new settlement might bring as part of the solution. We supported Twinwoods settlement with its consequential bypass for the village.

We object to the proposed new settlement development at Sharnbrook (Colworth Garden Village) as it has no credible solution to the increased traffic it will bring to Milton Ernest. We are very concerned that the impact on the village of Milton Ernest has been given virtually no consideration. No consideration of the environmental impact. No consideration of the ecological impact. No consideration of the noise impact. No consideration of the separation impact. No consideration of traffic queue lengths, capacity or safety issues.

Frankly, this is a disgrace.

Milton Ernest is the only village that sits astride the major access road. The additional traffic will have a major effect on the life of the community. We have considered SYSTRA's A6 corridor study, which we believe to have over-optimistic assumptions regarding the amount by which additional traffic will be reduced – details are given below.

In addition, there is no mention of the development consequences within the village as a result of not choosing the Twinwoods option. These are:

- The Borough's preferred site for the housing allocation is site 518, which could provide up to 50 houses. It sits on the A6 and will generate peak-time turning movements. Whilst these will be small in overall terms, they will have a disproportionate impact on delays and queue lengths; and
- The Twinwoods site is now likely to be subject to more intense marketing to make better use of the facility within the current consent envelope. This will result in more traffic using Thurleigh Road and more turning movements.

The provision of a new railway station as part of the Colworth development is a positive investment that will support non-car journeys. However, the impact on reducing peak-time A6 traffic should not be overestimated. The highest level of traffic through the village is between 07.30 and 09.00. However, the present station car park is full by around 07.30, which means that station bound traffic is going through Milton Ernest by 7.00 or before. This indicates that only a small proportion of peak-time traffic through the village is related to rail journeys.

In view of the above we would ask that the Bedford Borough Council does the following:

- 1) Undertakes a sensitivity analysis on the four key assumptions set in para 2.2.10 of the SYSTRA report (that is, considering the best and worst outcomes);
- 2) Undertakes an evaluation of benefit cost ratio of a bypass using the Department for Transport's standard web-TAG process (this will put a cost on noise impacts, environmental impacts, ecological impacts, social impacts, capacity of the non-dualled A6 and queue lengths), taking account of:
 - the sensitivity analysis; and
 - the additional turning movements within the village as a result of site 518 and Twinwoods.
- 3) Proposes adequate community mitigation measures.

Comments on the SYSTRA Development Option Assessment: A6 Corridor

Before commenting in detail two general points need to be made:

- 1) The assessment was carried out in April 2017 and although it evaluates various scenarios around the three major development options being considered at the time, it does not specifically look at the, currently preferred, Colworth Garden Village option; and
- 2) Although paragraph 1.2.1 says that '*the study area for this assessment is broadly shown in Figure 1. It extends between the A6 / Mill Road / Thurleigh Road roundabout in the north and the A6 / Manton Lane / A5141 roundabout in the south*' figure 1 actually shows the study area as being between Milton Ernest and Bedford – that is, the A6 between the Sharnbrook roundabout and through Milton Ernest has not been included. As a result, the report gives virtually no information regarding the impact through our village.

We note that TRICs and TEMPro are industry norms for calculating traffic generation and background growth. However, we are interested that a strategic Saturn model is being used as the calculations are junction related, which would seem more appropriate for localised software such as Arcady or Picady.

We would be grateful for more information on the Saturn model, specifically: what routes it covers, whether it is multi-model, when it was last updated, what degree of validation it has achieved and whether it meets the DfT's requirements as set out in the web-TAG methodology.

The report says that the 2035 reference scenario predicts a 30% to 40% general increase in traffic but as a result of four key assumptions it will be reduced to an increase of just 5%. That is quite some claim.

The assumptions in the SYSTRA report are as follows;

- *Increase in the amount of development internalisation – overall up to approximately 45% of all employment and residential trips on average and 95% of education based trips generated in the AM peak hour, will be internal to the new settlement sites.*
- *Redistribution of traffic to/from Bedford Town Centre – up to 55% of all incoming employment traffic and 60% of outgoing residential traffic in the AM peak hour is distributed away from Bedford and the Town Centre, as a result of employment allocation and growth areas within the region.*
- *Increase in uptake of sustainable travel mode from 10% to 30% – reducing the amount of development traffic from the sites due to the uptake of sustainable travel modes as a result of sustainable travel interventions (Personal Travel Planning (PTP), Mobility as a Service (MaaS) etc.).*
- *Reduction in background traffic growth – on the basis that the new settlements will comprise the majority of the housing and employment development in the borough, there will be no other material background traffic growth on the local road network.*

Our comments on those assumptions are set out below. We have taken into account the analysis of the 2011 census, as given in Bedford.communityinsight.org, as being the best information on employment and movement patterns.

Internalisation of trips: whilst we recognise that the Colworth Science Park already provides employment, and has the potential to provide more, the projection of 45% of all employment being internal appears very high. The census results show that 70% of the population of

Sharnbrook is economically active. The population is 2,000 with 900 households, which equates to 1.5 jobs per house.

There are 2,500 houses proposed in phase 1, which at the current rate would mean 3,750 jobs. The report is suggesting that nearly 1,700 would be provided internally to development. That seems highly unlikely as the current employment for Unilever at the Colworth site is just 600.

The report also suggests that 95% of education-based trips will be internal to the site. This may be true as a general norm but appears high when taking into account the Harpur Trust schools and the further education colleges in Bedford.

Trip redistribution: the report suggests that 55% of traffic will be diverted from Bedford because of 'employment redistribution around the region'. In effect this is saying that around half of jobs in Bedford will disappear.

Apart from being very concerning, it is difficult to see how it is rooted in fact. The 2011 census shows 24% employed in the public sector, 13% in accommodation and food and 9% in retail. That's 46% of jobs that are location-based and unlikely to move.

Whilst we recognise that new jobs will be created around the region, we hope the implication of a stagnating Bedford does not become a reality.

Increase in sustainable travel modes: travel planning as a tool has been available for over 10 years, but its impact has been most successful in urban areas where there are plentiful alternatives such as frequent buses or trams, good cycling facilities and effective car share schemes. We would be very interested to know what examples there are of isolated rural communities achieving anything like the 30% of sustainable travel predicted. Currently 72% of work journeys from Sharnbrook are by car or motorcycle.

In terms of rail, the report estimates that between 5% and 8% of residents of Bedford Borough could choose to use a new station at Sharnbrook. However, there are still a range of uncertainties including capacity and frequency of any new service.

Reduction in background traffic growth: we acknowledge that adding the projected traffic generation to the TEMPro general background growth would result in a degree of double counting. However, we question whether there would 'be no other material background growth'. Apart from 200 or so houses that may be built in the local villages there will be normal background growth to the north of Sharnbrook that will access jobs and services in Bedford and beyond, and so use the A6. Further strain will be also put on the system by new developments planned off the A6 Clapham Road roundabout.

Mitigation measures: the report sets out in paragraph 6.1.7 a number of demand management and capacity enhancing mitigation measures. We would comment as follows:

- The North Bedford Triangle movements (to replace trips to Bedford) is no longer relevant as there is just one preferred development site;
- We agree that a new station at Sharnbrook is essential, but currently there are a significant number of uncertainties;
- A park and ride (with, as suggested, bus lanes) would provide the potential for reducing car traffic. However, if it is located to the south of Milton Ernest, that will do nothing for vehicles coming through the village, and if it is located to the north it would not be possible to provide a bus lane;
- The strategic east-west links, including east-west rail would still require southerly travel from Sharnbrook;

- The report suggests that improvements to other local authority areas will require east-west demand (to reduce travel to Bedford) and whilst this could happen there is no certainty that it will (actually it is quite possible that the reverse will happen) – in any event this would present other challenges to the local road network;
- A school transport co-ordinator is an excellent idea but we wonder if it is so easy to do why it has not already happened;
- We would certainly support a Manton Lane area travel plan but, again, wonder why it is not already in place; and
- The level of capacity improvements proposed militates against the idea that the amount of increased traffic generated would be very limited. The suggestion of a flyover at the Sharnbrook roundabout indicates high level of vehicles usage.

Summary

In summary, we are extremely disappointed that the impact on Milton Ernest has not been considered. We believe that should Colworth Garden Village be developed the increase in traffic, noise, pollution and disruption will be especially significant and can only be relieved by the construction of a bypass.

The SYSTRA traffic analysis is based on over-optimistic assumptions about traffic reduction measures and policies. Whilst we recognise that they will have some effect, an evaluation needs to be undertaken around the lower end of the predictions.

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