Milton Keynes Council Core Strategy Examination in Public

Response of Legal & General Assurance Society Limited to the Inspector's Matters and Issues (273027)

Matter 5 - Transport
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1 Introduction

Background Context

1.1 This statement has been prepared Drivers Jonas Deloitte in conjunction with Vectos on behalf of Legal & General Assurance Society Limited (L&G) to respond to the following Matter raised by the inspector as part of the Independent Examination of the Milton Keynes Core Strategy Development Plan Document (DPD):

- Matter 5 - Transport.

1.2 L&G has also responded in separate statements to:

- Matter 2 - Development Strategy, Settlement Hierarchy; and,
- Matter 4 - Economy and Town Centres.

1.3 All responses to the Inspector’s Matters and Issues are made in the context of L&G’s asset, Midsummer Place shopping Centre, Milton Keynes (Midsummer Place).

Midsummer Place

1.4 L&G is the owner of Midsummer Place located in Central Milton Keynes. Midsummer Place forms part of the town’s main shopping area and comprises circa 40,000 sq m of retail floorspace.

1.5 L&G is a long term investor in the central area of Milton Keynes and is continually seeking to improve the existing retail offer of Midsummer Place. Discussions are also on-going with council officers on the development of further retail floorspace through an extension to Midsummer Place.

1.6 As a landowner and investor in the town centre L&G is keen to ensure that local retail policy correctly reflects national guidance which encourages development which supports the town centre first. In particular L&G seeks to ensure that retail policies recognise that Central Milton Keynes should be the focus for retail investment and that additional retail should be focused in the Primary Shopping Area in the first instance.

Previous Representations

1.7 On behalf of L&G we have submitted representations to each stage of the Core Strategy. These representations still remain valid and include:

- Issues and Options (March 2007);
- Preferred Options (November 2007);
- Pre-Submission Version (March 2010); and,
- Conformity with SEPlan (August 2011).
2 Matter 5 – Transport

273027- Legal & General Assurance Society Limited

Issue 5.1

Overall, is the Core Strategy based on a sound assessment of the transport needs of the borough and its hinterland?

In particular:

i) is there sufficient clarity about the transport implications of the Core Strategy and the post-submission proposal for a Strategic Land Allocation to the south east of the city?

2.1 No comment.

ii) how does the spatial framework and policy content of the Core Strategy relate to the local transport plan (LTP3)?

2.2 Both the Core Strategy and LTP3 are considered to be generally in accordance with the approach set out in the NPPF by ensuring that transport facilitates sustainable development and contributes towards wider objectives. There needs to be a balance in favour of sustainable transport modes to give a choice of how people can travel.

2.3 Amongst other matters development needs to accommodate goods deliveries, give priority to pedestrians and cyclists, have access to high quality public transport facilities, create safe and secure layouts to minimise conflicts between pedestrians, cyclist and traffic.

2.4 This is considered to be achieved in CS11 which presents a balanced approach to both manage and meet future transport demands. This reflects the approach that has been taken in LTP3 which provides more detail of how this will be achieved through individually identified schemes.

2.5 Future transport demand and Policy CS11 cannot be considered in isolation from other policies within the Core Strategy and must be consistent with other objectives and aspirations. For example, Policy CS7 includes a number of objectives for Central Milton Keynes (CMK) including to attract higher visitors numbers to enhance the regional status of CMK while providing more travel options for visitors and encouraging access by walking, cycling and public transport and provide more pedestrian friendly route between new and existing areas. This means that any scheme with the key objective of improving public transport provision must also be considered in terms of the impact that it has on the future performance of CMK and the impact that it would have on pedestrian friendly routes and spaces.
2.6 LTP3 includes some seven strategies for achieving the specific transport objectives for Milton Keynes, with each of these strategies then broken down into a number of specific projects and initiatives that have been developed to varying degrees. For example, in the public transport strategy the development of the “MK Star bus network” is listed as B01 and is the rolling out of the already successfully implemented new route 300 service. The provision of Park & Ride sites is B05 and it is stated in LTP3 that there would need to be extensive feasibility and design work, including widespread consultation with local communities before any sites are progressed.

2.7 At the end of Policy CS11 a number of projects are listed and it is not believed to be appropriate for these schemes to be identified at this stage as some of them have been completed or are underway and the evidence base for others is not in place. To be consistent with the guidance given in paragraph 41 of the NPPF with my emphasis in bold is:- “Local planning authorities should identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice.”

2.8 In addition, the NPPF at paragraphs 31 and 32 emphasises the importance for infrastructure in transport plans being both viable and cost-effective.

2.9 As stated above, there remains a significant amount of work to undertake to demonstrate that the provision of Park & Ride sites would be feasible and therefore there cannot be certainty that such projects can be delivered within the Plan period. Indeed some of the sites identified are outside of the borough. To address this it is considered that a minor amendment to Policy CS11 could be made to delete the specific schemes identified under “8.” and a more generic statement could be made to say “Delivery of high quality transport interchanges at identified key locations such as Milton Keynes and Bletchley railway stations.” This level of change is a minor change to make the Core Strategy sound and allow the evidence base for the Park & Ride sites to be prepared and reflected in either a Development Plan Document or Area Action Plans as appropriate or in subsequent revisions to the Core Strategy when it is reviewed.

2.10 A minor issue is that the references in the supporting text to policy CS11 need to be updated so that they refer to LTP3 and not LTP2.

Issue 5.2

Does the Core Strategy set out an integrated and achievable strategy for transport?

In particular:

i) are the priority schemes identified and are there adequate mechanisms for their implementation?

2.11 As set out above, the Core Strategy can only identify specific schemes if there is sufficient background evidence to show that they would be critical to widening transport choice. In addition to this there is a reasonable likelihood that they can be implemented within the plan period.

2.12 While not part of the statutory development plan LTP3 lists the future priorities for the provision of transport schemes. The schemes that are being implemented or are proposed for the future in the short, medium and longer term. These time periods are respectively years 1 to 4 (2011 to 2015), years 5 to 10 (2015 to 2021) and years 11 to 20 (2021 to 2031) and there is a clear implementation plan in Table 5.1 of LTP3.
2.13 Table 5.1 of LTP3 identifies the funding requirements on each of the identified schemes and potential funding sources. It provides a robust evidence that there is a reasonable prospective of the identified schemes being implemented during the period covered by the Core Strategy and beyond to 2031.

ii) is it clear how the relative priorities for car-based and other modes of transport will be reconciled?

2.14 A clear hierarchy of the approach to both managing transport demand and promoting non-car modes of transport should be given. In terms of achieving carbon reduction and managing the future demand for transport then the approach should be to firstly minimise transport demand, then promote non-vehicular modes of transport i.e. pedestrians and cyclists followed by public transport and finally cars. The final step should then be to undertake highway improvements only when strictly necessary.

2.15 Re-ordering policy CS11 would clarify this.

iii) is the aim (Vision, page 17) to reduce peak-hour commuting by car from 68% to 57% by 2026 clearly defined and achievable, and if so, is it sufficiently ambitious?

2.16 This is the only reference in the Core Strategy to this target and it is not mentioned in the transport section supporting text to Policy CS11. This target is also not reflected in LTP3. Further evidence should be provided of how the target has been identified and how it can be achieved.

2.17 The target is not considered to be unrealistic, but it should not be reliant only on public transport improvement, but the result of implementing all of the identified strategy for managing and meeting future transport demand which are identified in the Core Strategy and LTP3.

iv) is the commitment to expansion of the grid road system justified?

2.18 The transport vision can be delivered without the extension of the grid road system. Care is also needed to ensure that the expansion of the grid road system does not lead to an over provision of roads and highway capacity that encourage car usage rather than managing it and encouraging the use of other modes of transport.

v) what is the status of the park and ride proposals?

2.19 No further comments in addition to those raised in respect of Issue 5.1 (ii) above.

Issue 5.3

i) To what extent does the strategy depend on infrastructure development outside the borough and are there mechanisms in place to secure delivery?

ii) What weight should be attached to the proposed East-West rail link?

iii) What is the status of the proposal for a new junction (J13a) on the M1 motorway?

2.20 No comment on the issues raised under 5.3

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