Fox Land and Property

Written Submissions to the Hearing of the Independent Examinations of the Milton Keynes Core Strategy DPD

Matter 5: Transport (Policies CS11 & Table 5.7)
Introduction

These submissions have been prepared by Fox Land and Property on behalf of the Bow Brickhill Consortium.

Matter 5: Transport (Policies CS11 Tables 5.7)

5.1 Overall is the Core Strategy based on a sound assessment of the transport needs of the Borough and its hinterland? In particular:

Is their 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?

5.1.1 The Transport Assessments relied on to our knowledge all pre-date the changes now proposed by this CS being examined.\(^1\)

5.1.2 The CS does not take account of the revised LTP3 issued in April 2011 and references to it remains absent from the Councils Core Strategy (CS) Document List. There are no references to the Strategic Land Allocation (SLA) as to the sustainability or suitability of such a development. No specific Transport Impact Assessment for the new SLA configuration post the CS Submission document has been provided.

5.1.3 Without exception all the transport reports (including the Bus Strategy Consultation) refers to the expansion of the City in accordance with the emerging South East Plan where it envisages infrastructure, linkages with an expanded network of road and cycleway networks associated with an increased housing supply.

5.1.4 There is no mention of how a City expansion including the additional 2500 homes of the SLA will be connected to the Transport network.

5.1.5 Policy CS5 in respect of the SRA’s (Now SLA) merely exposes the generality of aspiration as to how the sites might integrate with the rest of the City notwithstanding the remaining fragmented nature of the allocation between the two sites. There is no understanding as to the SLA internal transport requirement and connectivity prior to assessing the wider Mk network.

\(^1\) MK Transport Strategy Review –September 2008 (MK Doc B20)
5.1.6 Item 7 of Policy CS5 states 'link to the surrounding road, redway and grid road network'. By reference to the Mk Local Transport Plan 2006-11\(^2\) what was envisaged is shown on Map 9 Milton Keynes Transport Improvement to 2016 (Reproduced as Appendix 1): The strategy relates purely to the wholesale expansion of the SE and SW Development Area where no grid network extensions are shown. We are now aware that the Church Farm part of the SLA is clearly intended to connect to H10 Bletcham Way but what type of connection is envisaged for the land adjoining the A421 remains unanswered. The grid network could still be required on land divorced from the SLA. The bus routes have not been considered for the revised SLA and only pass to the Northern tip of SR4 and a proportion of SR2. It does not capture the desired 400m walk distance from all of these development areas. (as against our proposals for Bow Brickhill)

5.1.7 Policy CS5 items 18 (Dualling of the A421) and 20 (safeguarding land for bridge with the M1 (J13a)) have to be questioned as to whether they can remain in the policy as there is uncertainty in the LTP3 document with a change in emphasis to making use of existing assets. What contribution could the SLA actually make to these City wide schemes at the same time as meeting their funding obligations via the MK Tariff or the CIL?

5.1.8 Sustainable development in this location is compromised without the whole strategy envisaged in LTP2 including the impact of the potentially undeliverable elements without the full expansion areas such as:

- The two Park and Ride Sites
- The duelling of the A421 from Junction 13
- City Street Public Transport Routes

5.1.9 As has been questioned throughout the CS process the inclusion of the SRA as the additional allocations remain unsound against other sites. There are more sustainable alternatives such as the Land to the South of the City at Bow Brickhill. The site is not reliant on the delivery of LTP2 strategy envisaged for the SE Development Area. It can also be:

- Integrated into the grid system by the extension of V11 for both road and Redway network
- Is adjacent to the existing stations of Bow Brickhill and Woburn Sands

\(^2\)Mk Document LP12:
• Is best placed to support the East West Rail Strategy
• Bus Routes can easily be routed within any development giving future patronage by residents close proximity to bus stops.

**ii) How does the spatial framework and policy content of the Core Strategy relate to the Local Transport Plan (LTP3)?**

5.1.10 The current CS does not take account of the most recent transport strategy being the LTP3. The revised concept is one of focus post the Government Spending Review 2010 by:

- ‘Making Best Use of Existing Assets’
- ‘Improved Transport Choice’
  And
- ‘Improving Promotion of Transport Choices’

5.1.11 The process that has been adopted by Milton Keynes in running two parallel Consultations in respect to Transport and the CS has confused matters as to what is the strategy during the plan period and ensuring soundness.

5.1.12 It is not until the LTP3 Appendix A that housing numbers are mentioned (p43) which envisages 43,800 dwellings as the planned growth required by the RS. This highlights one of many inconsistencies with this document. This ‘Growth’ section of the LTP3 also makes the point that ‘it is critical that the existing transport networks can support and serve these new developments.’ The question that this raises is that without the transport infrastructure mentioned for the SLA in Policy CS5 this will not be the case.

5.1.13 The LTP3 is very much an aspirational document with limited attempt as to how these initiatives will be implemented and investment secured. Within the Implementation Plan, caveats are evident as to the caution that has to be applied when considering the financial estimates. There is also an absence as to how the costs are derived and therefore no confidence to their accuracy. For example there are no stated scheme costs for the dualling of the A421.

5.1.14 Other sources did estimate the costs for the dualling from J13 to Milton Keynes as between 27 – 33.5 million. Within the Table 5.1 (p91) it is a scheme identified as

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3 Local Transport Plan 3 -2011 to 2031: ‘Focus of the Strategy’ p15
4 LTP3: Implementation Plan: Section 5; Overview (p77)
5 Appendix 2 – Extract from East of England Transport Developments
being post 5 years and will be above £5M (Red Flag). If the scheme cost was instead shown and that there is no current support for the scheme a view that funding could be available would be substantially altered.

5.1.15 In respect to the SLA this new LTP3 strategy again points towards there are better alternatives solutions to housing growth and to achieve the ambition of both more sustainable patterns of development which can utilise existing assets. The Land to the South at Bow Brickhill is more appropriate to encourage non-car modes of transport even at the base geographical view point of being in one location and fully contiguous with the City Boundary.

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?

5.2.1 It would appear many of the transport schemes that were to be implemented do not now figure in the Growth options supported by the Council including those listed in Table 1.

Table 1:

<table>
<thead>
<tr>
<th>Scheme</th>
<th>Status</th>
</tr>
</thead>
<tbody>
<tr>
<td>A421 Dualling-J13 to Fen Roundabout</td>
<td>Cancelled</td>
</tr>
<tr>
<td>J13A M1</td>
<td>Currently no prospect of coming forward</td>
</tr>
<tr>
<td>M1 Junction 13 (East) Park &amp; Ride</td>
<td>Does Not figure with the current SLA Proposals</td>
</tr>
<tr>
<td>CMK Public Transport Access Improvements⁶</td>
<td>Stalled: Funding withdrawn.</td>
</tr>
</tbody>
</table>

5.2.2 As a result of the above schemes not coming forward to achieve better connectivity for planned growth and utilising existing asset the SRA’s would not be the starting point. Under paragraph 11.5⁷ the aspirations (that are also consistent with LTP3) is providing choices away from car journeys to either public forms of transport or more preferable non vehicular movements should now be encouraged without relying on capital schemes.

⁶ Local Investment Plan 2010 Infrastructure Delivery Schedule
⁷ Cores Strategy (p66)
5.2.3 As an example of this taking a development to the South of Milton Keynes (as described in the Bow Brickhill Masterplan\(^8\)) not only provides a better platform to an expanded City but would assist in the connectivity of the existing Community of Bow Brickhill and possibly Woburn Sands. Grid Roads and Redways can be extended from the south of the City either with a standalone development at Bow Brickhill or in combination with Church Farm. Furthermore in this location as community services are seriously lacking facilities to be provided as part of the new development such as shops (currently there is no retail in Bow Brickhill), health centre and education will reduce the need to travel. Subsidised bus services could increase the patronage of public transport still further with funding support from this particular development having the added advantage of assisting rural services within the vicinity and the Objectives contained with LTP3.

5.2.4 It is difficult to decide what can be achieved until the level of investment is fixed either via the CIL or the New Home Bonus. Although the figure quoted in the LTP3 is questionable there is no commentary as to whether the funding is secured in the next 5 yrs for the £60.5M capital expenditure or indeed the current identified deficit of £26.9M can be closed (45% of Total)\(^9\)

5.2.5 Until a fixed LTP3 budget is approved (particularly through this period of austerity), the priorities should funding and the method by which schemes are implemented the delivery will remain an aspiration. The alternative approach of growth options that rely less on new capital regional schemes that can provide the required infrastructure such as the proposals from the Bow Brickhill Consortium.

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

5.2.6 There is conflict in the Policy between the recognition that the grid system evolved on the basis of car borne transport and is nationally recognised as a strong reason for the City’s success against the desire to encourage more sustainable forms of transport.

5.2.7 Vehicular movements and measures to address the increase in peak travel with the corresponding requirements to provide additional route capacity remain at the heart of the LTP’s. A bold move would be to consider new links to cut journey times for

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\(^8\) Section 5: Facilities, Section 6: Access

\(^9\) LTP3: Table 5.1: Total Costs equate to £60.5M in next 4 years with equivalent current funding deficit of £26.9M
bus priority only. Physical encouragement by making car borne journey either less attractive as far as journey times are concerned or more expensive in term of charging (such as daily car park charges) are two alternatives strategies.

5.2.8 Developments which can deliver such an approach should be encouraged such as the Bow Brickhill Proposals

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?

5.2.9 In reality this aim will remain largely aspirational unless sufficient housing is identified to maintain the growth of the city. This has been explored at length in other matters. Without such delivery peak-hour commuting will continue to grow unabated.

5.2.10 The CS also recognises the impact with the current 28,000 homes planned growth. The LTP3 states ‘at current rates of growth, there will be a 57% increase in journeys by car at peak travel times by 2031’ (p27). The chart on p25 of the Appendix A (although different) shows private vehicle trips to work represents 73% of journeys.

5.2.11 The LTP3 is a strategy document and there are no guarantees that the objectives can be achieved without funding and a political will to make unpopular decisions to reduce the reliance on the car unless more homes are planned.

5.2.12 The Bow Brickhill Masterplan is able to deliver assist in the reduction of peak hour commuting by:

- Providing more homes in the right location to give choice to those that would like to live in the Borough but cannot find a suitable place to live
- Has an excellent opportunity to achieve a model shift to public transport being in close proximity to two rail stations and the additional rail crossing to make bus journeys faster to CMK
- Has the ability to create safer walking journeys over the railway with the new bridge for both new residents and the existing community.
iv) Is the commitment to expansion of the grid road system justified?

5.2.13 There is no doubt that some form of highway connectivity will be required to provide the housing and employment growth for the City. In other matters dealt with the additional housing provision of 2,500 within the SLA is in any event insufficient to meet the required housing need and economic growth. Therefore assumptions need to test for the planned expansion to meet either the RS or SHMA supply within the Borough.

5.2.14 What has not been assessed is alternative solutions other than a grid type network and the most appropriate way of meeting the LTP3 objectives.

5.2.15 The proposals shown in the Bow Brickhill Masterplan clearly shows how neutral the development would be in a situation whether there was a commitment to the grid Road system or not.

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

5.2.16 Clearly the LTP2 strategy which was the basis of support for this consultation CS is out of date and is replaced by LTP3 (April 11) This fact alone questions the soundness of the CS.

5.2.17 The Park & Ride schemes were established in LTP2 on the basis of sufficient housing being delivered to fund such facilities and the crucial location in proximity of M1 Junction 13 reliant on the infrastructure and land assembly being provided as part of the South East Development Area. This proposal is no longer identified as part of the growth requirement.

5.2.18 In LTP3 Park & Ride has been relegated to a question of 'Park and Ride would be subject to extensive (my emphasis) design work, including widespread consultation with the local community before seeking planning permission for delivery' (Bo5 P42). An uncertain future and strategy as to quite how the authors of LTP3 (and endorsed by the Council) can claim in the Vision Statement 9 P25) 'By 2031, Milton Keynes will have the most sustainable transport system in the Country'

5.2.19 Each of the matters raised herein returns to the same question. Is the Transport strategy deliverable in the light of public finance funding restrictions without the
private sector investment which can only be unlocked with the economic growth more or less as provided for in the South East Plan and tested in LTP2.

5.2.20 As such proposals such as Bow Brickhill are even more important as they are not reliant on such matters. Yet another reason for the current supported SLA’s as not the most sustainable alternatives.

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

5.3.1 Under localism the opportunities for cross borough working is a casualty of a bottom up approach. There is little incentive for Aylesbury Vale or Central Beds to invest capital and revenue spend to support the Growth of the City. Indeed this position has already happened. The adoption of the Central Beds DPD allocations does not focus any growth on the MK Borough Boundary. Aylesbury Vale has withdrawn their CS with the intended strategy of concentrating growth on Aylesbury.

5.3.2 The only cross regional strategy remaining of any note appears to be the East West Rail Link

ii) What weight should be attached to the proposed East-West Rail Link?

5.3.3 This rail connection is an essential part of the Oxford –Cambridge Arc and appears the only surviving sustainable transport initiative between neighbouring local authorities. This has now been further reinforced by the Chancellors unequivocal support in his Autumn Statement to see the project delivered in 2017.

5.3.4 Additional private finance and patronage support is essential which is why political decision makers need to consider very carefully how they approach their policy objectives to assist this project. As such great weight should be attached to schemes that can directly impact the success of the project; none more so than Bow Brickhill.

5.3.5 Such advantages of Bow Brickhill were recognised in the Council SA on Reasonable Alternative Sites. Our submission to the SLA Consultation provided an indication of the extremely valuable support the scheme would bring be facilitating a new rail crossing. The Rail Estate Consultancy has discussed the operational benefits with both the Office of Rail Regulation and Network Rail10. With the East –West Rail route

in operation the down time of the level crossings at both Bow Brickhill and Woburn Sands will increase for at least 160 minutes per day. With the potential to remove existing uncontrolled pedestrian/ bridleway crossings the benefits are not just limited to better safety but operational improvements (greater speeds) to the route. These factors should not be overlooked and are consistent with the aims and objectives of the LTP3.

5.3.6 It is therefore essential that housing growth allocations are made with the long term objective of providing the best possible opportunity for Private sector support. By indentifying such sites as South of Milton Keynes adjacent to the East West Rail Link will only assist in the credibility and commitment for the improved rail connections that will provide a 21st Century travel solution for the City. Without such sites that could directly support with patronage from new residents before adopting Milton Keynes historic choices of peak time travel viz a viz car borne trips is exactly the Policy that should be followed in the overarching transport plans.

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

5.3.7 This new M1 junction does not appear in any of the recent strategy’s or bidding rounds. In the LTP3 Key intervention list which one assumes this must be the latest position there again is no reference and therefore appears to be a non-essential project in respect of this CS.

**TRANSPORT APPENDIX**

1. Milton Keynes Transport Improvements to 2016 –Map 9

2. Extract List of Future Highway Scheme Costs East of England 2012

3. Correspondences The Rail Estate Consultancy 7th November 2011.