MATTER 5: TRANSPORT

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

5.1.1 Consistent with its submission in relation to Matter 1, the Consortium maintains that the amendments to the CS that the Council introduced in late 2010 and subsequently have given rise to a lack of consistency between the aims and objectives of the document and the spatial strategy and its deliverability. As a starting point, the transport needs of the Borough and its hinterland were assessed through the RS process, with MK being considered in the context of the MK/Aylesbury Vale sub-region. A range of studies were undertaken to develop an evidence base for the sub-region’s spatial strategy that is contained in the RS (document B18). The RS process included an analysis of a number of spatial options, with the analysis being informed in part by an examination of the capacity of existing infrastructure and the need for new infrastructure. A clear and comprehensive understanding of the transport needs of the Borough and its hinterland was therefore developed through the RS process.

5.1.2 However, there has been a breakdown in the evidence-based decision-making process since late 2010, which has resulted in a substantially revised CS. In transport terms, the key aspects of this revised strategy are:
   a) the departure from a balanced approach to the delivery of housing and new jobs on a 1:1 ratio to the current strategic objective of delivery of 1.5 jobs for every new home; and
   b) the lack of a deliverability mechanism for essential transport infrastructure, particularly in the context of the fact that a reduced scale of development will inevitably result in a much lower level of funding arising from planning obligations.

5.1.3 These fundamental changes will have a compounding effect upon each other, with the growing imbalance between jobs and homes certain to increase the scale of in-commuting to MK whilst at the same time the reduced availability of financial contributions from new development will, at best, lead to the delay and more likely cancelation of delivery of new infrastructure. In contrast, the provision of additional housing to the level of market capacity assessed by the Consortium i.e. 2,650 dpha, has the potential to cut by approximately 45% the projected number of net in-commuters to Milton Keynes in 2026 whilst at the same time increasing financial contributions from planning obligations.
5.1.4 There remains broad consistency between the CS and LTP3 as to the infrastructure requirements for the Borough with the exception of M1 J13a. Where the CS is flawed however is in defining the mechanism for delivery of that infrastructure, in terms of the agent; means of delivery; and sources of funding. This is apparent in the CS at Chapter 16, which fails to provide a clear relationship between the items of infrastructure identified for delivery in paragraphs 18.2-18.4 and the parties identified as having responsibility for delivery in paragraph 16.11.

5.1.5 The lack of a robust mechanism for the delivery of new infrastructure is exemplified by the arrangements for the dualling of the A421 between MK and M1 Junction 13 and the provision of a new multi-modal hub on this section of highway. In the February 2010 version of the CS, the SESDA was identified as contributing towards the funding of these elements of infrastructure. With the SESDA having been deleted in the Revised CS, the funding burden has been transferred to the SLA in accordance with Policy CS5(18). This revised arrangement cannot be financially sustainable whereby a cost that was to be borne by 10,400 dwellings is being transferred to a development of just 3,000 dwellings.

5.1.6 We are aware that the Council has sought to assess the implications of the most recent changes to the CS by undertaking ‘A review of the Milton Keynes Transport Vision and Strategy’ (January 2012). This document is itself informed by the ‘Milton Keynes Transport Model; Traffic Forecast Report’ (Halcrow, November 2011). The TFR provides a comparative assessment of the effects on the transport network of the levels of development prescribed in the RS and that now proposed in the CS. The analysis in the TFR, Table 3.2 is that the RS (referred to as the SEP) generates consistently higher percentage increases in traffic flows than the CS. The key flaw in this analysis however is that the TFR assumes that the same infrastructure network is in place in both scenarios. The result is therefore a rather simplistic analysis that concludes that the greater levels of development, as identified in the RS, will give rise to higher traffic flows. A proper analysis of the implications of the changes in the spatial strategy in the revised CS has not therefore been undertaken and this is a key omission in the evidence base.

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?
   ii) is it clear how the relative priorities for car-based and other modes of transport will be reconciled?
   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?
   iv) Is the commitment to expansion of the grid road system justified?
v) What is the status of the park and ride proposals?

5.2.1 As commented above in relation to matter 5.1, the Consortium considers that it is a major failing of the CS that the mechanisms for delivery of priority infrastructure are not identified. The Draft Local Investment Plan moves a step towards identifying mechanisms to prioritise infrastructure delivery but this does not by itself resolve the omission in the CS.

5.2.2 In relation to Matter 5.2(ii), it is unclear how the relative priorities for car-based and other modes of transport will be reconciled. While the target modal splits are identified in the Council's document 'Transport Strategy...as Milton Keynes Grows' (July 2009), it is unclear as to how the specific modal changes and thus the reduction in peak hour commuting by car has been quantified, other than them having been identified as the level of modal shift necessary to avoid congestion within MK. Whilst reductions in car commuting could be achieved by various interventions that make non-car modes more attractive, the ability of the interventions to meet the target of 57% has not been demonstrated. The ‘Transport Strategy’ report identifies that in order to meet the required modal shift, a 5% per annum increase in public transport patronage is required each year for the next 25 years. The likelihood of achieving this level of modal shift can be assessed by comparing it with evidence from the Sustainable Travel Towns that suggests a city-wide intensive campaign to promote sustainable travel can achieve an absolute reduction in private car use of 9%.

5.2.3 Further, the aim to reduce peak hour commuting by car is not clearly supported by the modelling work undertaken for the TFR. The TFR at appendix A.2 identifies a modest reduction in the overall modal split of car use, against significant increases in local car trips demand. The modal shift identified in the TFR does not easily correspond to that quoted within the Vision of the CS.

5.2.4 In relation to Matter 5.2(iv), the CS at paragraph 2.28 identifies the grid-road system as one of the ‘defining design features’ of the city. It appears to be solely on that basis that the Council wishes to see the concept extended into the new planned areas of the city. This is an inadequate justification for such a stipulation, particularly given that the grid-road system does not lend itself to an efficient public transport network and indeed will be more likely to encourage car borne trips which will conflict with the CS modal split targets. The stipulation that the grid-road system should be extended is therefore at odds with other key transport objectives of the plan.

5.2.5 In relation to Matter 5.2(v), the CS refers to P&R and other interchange facilities being provided on the ‘edge of the city’. The evidence base for such facilities is not yet proven as LTP3 identifies that the delivery of P&R sites will be subject to extensive design and feasibility work including widespread consultation with the local community. Further, no
reference is made to how these facilities might be delivered in partnership with adjoining authorities, even though Policy CS11 recognises that P&Rs to the east and west of the city in the A421/East-West Rail corridor maybe provided ‘potentially outside MK’. This wording appears to be a legacy of the February 2010 draft CS in which the South East SDA extended into Central Beds and the P&R could have been delivered as an integrated part of that planned growth. A similar arrangement was envisaged within the South West SDA. Within the SESDA, the P&R was proposed as part of a multi-modal interchange taking advantage of the opportunity to be integrated with the rail network at M1 Junction 13. Without cross-boundary co-operation on a P&R strategy the opportunity to exploit this locational advantage will be lost (see below).

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?

5.3.1 The Consortium’s response on Matter 5.2 above identifies that the P&R sites in the A421 corridor to the east and west of MK potentially rely on the co-operation of adjoining authorities for their delivery. Similarly, the dualling of the A421 between Kingston roundabout and M1, Junction 13 has a cross-boundary component. Both the P&R to the east of MK and A421 dualling previously formed part of the comprehensive proposals for the SESDA. In order to achieve the delivery of the SESDA on a comprehensive and co-ordinated basis a Memorandum of Understanding (MoU) was agreed between MK and Central Bedfordshire Councils, which is still in place. Furthermore a corresponding allocation for the growth of Milton Keynes into Central Bedfordshire was incorporated in the Central Bedfordshire Core Strategy under Policy CS9, which was adopted in November 2009.

5.3.2 The Central Bedfordshire CS and MoU therefore continue to provide a framework for the delivery of the necessary cross-boundary infrastructure elements, albeit that the SESDA has been removed from the MK CS thereby removing the major part of the source of funding via planning obligations. It is clear from our discussions with CBC that if the MK CS does not allocate the SESDA then these mechanisms will be dismantled and the opportunity for comprehensive joint working and delivery of the SESDA and the associated cross-boundary infrastructure will be lost. This will not only undermine the delivery of the SESDA, but also delivery of the wider MK strategy given the essential requirement for A421 dualling particularly.

5.3.3 In relation to Matter 5.3(ii), following the Chancellor’s Autumn Statement in November 2011 East West Rail has the status of being included in the National Infrastructure Plan.
Government’s ‘Infrastructure Delivery Update’ (March 2012) states in relation to the rail link between Oxford and Bedford that:

‘Local authorities are currently determining the amount they can contribute to the capital cost of the proposed scheme. Meanwhile, Network Rail is developing the strategic business case.’

5.3.4 Whilst EWR is therefore a national priority scheme, the scale of the funding requirement and mechanisms for delivery are yet to be resolved. Indeed the business case relies upon the levels of planned development prescribed in the RS i.e. 70,000 new homes across the rail corridor. The reduction in planned levels of growth in the sub-region, in both Aylesbury and MK as well as in Oxfordshire, therefore significantly diminishes the business case for EWR, and makes its delivery less likely.

5.3.5 In relation to Matter 5.3(iii), M1 J13a has no status as the Highways Agency has upgraded M1 J13 as an alternative. Indeed the Highways Agency has made clear in conversations with representatives of the Consortium that it will not support any proposals for a new motorway junction at MK.