

**Matter 7: Infrastructure and Viability**

Issue 1 – Whether the overall approach to transport is justified, effective and consistent with national policy

- 1.1 No, the overall approach is not justified, effective nor consistent with national policy. Infrastructure is not sufficient to mitigate the impacts of proposed development, including from neighbouring districts; and the infrastructure proposed will not lead to the outcomes sought in LTP3 and LTP4.
- 1.2 The reference date for Plan:MK is 2031, which does not comply with the required timescale as set out in the Consortium’s response to Matter 1. The modelling, traffic and infrastructure assessments also reflect an end date of 2031, which would need to be corrected in order to properly address infrastructure requirements up to the full Plan period.
- 1.3 The impacts of Plan:MK on the road network cannot be properly understood from the studies carried out and published in the Council’s evidence base. The forecasting uses a sensible study area identified in Figure 3 of the Traffic Forecasting Report (MK/TRA/003) very similar to the functional HMA and travel to work area. Paragraph 4.5.4 states that it had been intended to input committed development in other neighbouring districts in zones around Milton Keynes within this study area, shown in Figure 8. However, this has not been carried out except for the South West Milton Keynes (SWMK) development in Aylesbury Vale. The reasons given are that there was limited data availability and different formal planning time horizons (presumably between local authorities). This is not correct.
- 1.4 The two main areas where consideration of impacts from outside of MK are most important are in Aylesbury Vale and Central Bedfordshire as it is these areas where the travel to work area for Milton Keynes predominantly extends. As set out in paragraph 4.5.3, sensibly, development at SWMK was included in the model due to its close proximity to Milton Keynes.
- 1.5 At the time of preparation of the Traffic Forecasting Report during the summer and autumn of 2017, similar work was being carried out for Central Bedfordshire. This work was being carried out by Aecom, the same consultants who carried out the traffic modelling for Milton Keynes. If ever there was a case to jointly model traffic impacts and jointly plan for infrastructure with a neighbouring authority, when both timescales and models are aligned, this is one such example. Instead, the model uses NTEM projections. These projections do not reflect the large numbers of trips from new development proposed in Central Bedfordshire within the travel to work area of Milton Keynes (for example the 5,000 homes at Marston Vale just 5km from the boundary of Milton Keynes).
- 1.6 Without the inclusions of strategic development from Central Bedfordshire, the impact on road traffic junctions and trip times cannot be properly determined and suitable infrastructure cannot therefore be proposed.
- 1.7 The Consortium has recently submitted a planning application for up to 650 homes on part of its land, just to the east of the Strategic Development Areas in Milton Keynes on the edge of the Milton Keynes administrative area adjacent to the A421. The transport assessment accompanying the application shows that some additional work can be carried out at the Kingston roundabout (which is currently nearing capacity) that would mitigate additional traffic impacts pertaining to 650 dwellings. However, this does not mean that the impacts of the proposed development of up to 5,000 homes at Marston Vale, together with the increased in-commuting to Milton Keynes, can be

accommodated by existing infrastructure without modal shift. There is no evidence that the proposed development at Marston Vale has been properly and accurately assessed, as it would need to be by way of any planning application, and so there is no certainty that appropriate highway mitigation for Marston Vale could be accommodated where required within available land.

- 1.8 That is why LTP4 proposes (p6) Park and Ride (including at Junction 13 of the M1) as part of its 'Delivery Plan' (Section 3 of the report); and was also proposed in LTP3 (2011) under policy Bo5 (p42). There is also clear Policy support for Park & Ride within Plan:MK with Policy SD17 specifically referencing Park & Ride sites for the city which '*should be fully explored and where possible provided, and efficiently and effectively linked to the city road system*'. This work should, however, have been carried out as part of the assessment of development allocations in and around Milton Keynes, and not be left as something 'to be explored, and possibly provided' as Milton Keynes and Central Bedfordshire have a strong record of non-communication in relation to these strategic planning issues.
- 1.9 Park & Ride at Junction 13 has not been agreed with Central Bedfordshire in the timescale of Plan:MK. This means that there is neither land reserved for such infrastructure, nor funding arrangements in place. Park & Ride at Junction 13 is not currently included in either Plan:MK or the Central Bedfordshire Submission Local Plan within the same timescales for the delivery of SEMK and Marston Vale (potentially amounting to 8,000 homes), nor in either of the relevant Infrastructure Delivery Plans. The requirement for Park & Ride has not therefore been safeguarded for future implementation. This lack of allocation of land for Park & Ride also fails to reflect and assist delivery of the MK Local Transport Plan.
- 1.10 As part of transitioning to a low carbon future and securing modal shift, the Plan does not sufficiently recognise the potential for increasing non-car modes. Page 2 of LTP4 states that Milton Keynes commits itself to an ambitious mode shift target, moving from a 2011 inter-borough proportion of 85/15 (between car and other modes), to 80/20 by 2030. Over a 10 year period, a shift of 5% is not, in the Consortium's view, ambitious, particularly when from 2001 to 2031 the number of journeys by car at peak travel times is predicted to increase by 57%, and yet improvements to the network can only provide for a 25% increase in capacity<sup>2</sup>.

#### Issue 2 – Infrastructure to support growth

- 1.11 As set out above, it is not possible to understand the requirements for infrastructure until modelling has properly reflected developments in Central Bedfordshire within the Milton Keynes travel to work area. The need for Park & Ride at Junction 13 (or somewhere nearby) in order to promote modal shift is a proposal in both LTP3 and LTP4, and yet no specific provision is made in either Plan:MK or the MK Local Investment Plan 2015 (MK/INF/001), or in the Central Bedfordshire Local Plan through the duty to co-operate.

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<sup>2</sup> Milton Keynes LTP3 Main Report (MK/TRA/005), p13