MILTON KEYNES FORUM

The Civic Society For Milton Keynes

MOBILITY STRATEGY FOR MILTON KEYNES 2018 – 2036 (LTP4)

Mobility For All

A Response to Milton Keynes Council's Consultation Draft

February 2018

1. Milton Keynes is at a critical point in its life. New development has now breached the original boundary of the Designated Area of the New Town and two further unconnected but inter-related initiatives (the MK Futures Commission report "Making a Great City Greater" and the National Infrastructure Commission's "Partnering For Prosperity" about the Cambridge-MK-Oxford Arc) are now propelling the city towards the prospect of even more extensive growth.

2. The original Plan for Milton Keynes proposed a polycentric city linked by a network of grid roads that promised easy movement coupled with a high level of connectivity. Whilst this has been successful for those with ready access to cars, it has been an increasing point of concern that such a road network mitigates against the network of an efficient public transport network, which is better suited to a radial approach focussed upon a city centre.

3. Whilst we welcome the Mobility Strategy we do not think that it recognises and reflects upon the constraints, challenges and opportunities in a sufficiently considered and dynamic manner. The blunt reality is that, despite policies in MK's previous LTP plans, the proportion of the population travelling by bus within MK has actually reduced. We are unconvinced that there is anything within the Strategy that will achieve a substantial increase in the proportion of movements to be made by public transport.

4. The conundrum that is faced within Milton Keynes is that the speed and efficiency of movement by car throughout the urban area is such that it would require a very considerable decline in journey times and a massive improvement in the speed, frequency and reliability of public transport services to bring about a significant shift towards use of the latter.

5. There is no recognition of this dilemma within the Strategy which, in a nutshell, may be expressed through the simple question "What level of peak hour delay will motorists tolerate to achieve a quicker bus service?" We would argue that this vital question has to be addressed as a fundamental part of any future strategy.

6. We are concerned that, overall, there is too little detail within the Strategy about how outcomes are to be achieved. We hope that a more comprehensive implementation plan (which will also be subject to public consultation) will be produced in due course.

7. Fundamentally, there is no indication within the Strategy about what constitutes "peak congestion" ie the state at which congestion on the grid roads becomes unacceptable to the residents. We note, with some amusement (Table 2, p18) that a 13% increase in journey time per mile in the morning peak is considered to be "progress" which, we would argue, is anything but. We are concerned that, whilst it is possible to increase the efficiency of the MK grid with roundabout improvements and the use of dualling reservations, the gridroad system has a finite capacity beyond which, instead of becoming something that attracts people to the city, it becomes a deterrent and a disincentive. We need to understand at what level this occurs because it will affect the growth of the city in both absolute and geographical terms and its attractiveness to business and investment. We therefore need fully to appreciate the extent to which roundabouts and grid roads can be upgraded to accommodate more traffic; the associated benefits and costs and the impact that this could have upon the future development of Milton Keynes: such information should be an integral part of a Mobility Strategy, particularly given the peculiar demands upon Milton Keynes at

the present time.

8.   We feel that a major weakness of the Strategy is that it does not address the wider MK travel to work area. We feel that there is the need for more and better data about traffic entering the city, particularly during peak travel times, and where it comes from. It would be especially useful to know the places of origin and numbers of those who enter the city and commute to London as this could help in the planning of Park and Ride sites which could, in turn, lessen the parking pressure in CMK.

9.   There is no mention within the Strategy about the scale and use of Taxis and Private Hire vehicles which, we feel, is an increasingly important part of transport provision and provides an alternative form of transport, especially for those who have no car of their own. This is a rapidly changing sector and empirical evidence suggests that such usage will only grow rather than decline in the future. It is perfectly conceivable that something akin to the original MKDC Dial-A-Bus Ride could appear before too long. Ride sharing can be particularly economic compared with conventional public transport and taxis and such vehicles respond well to the polycentric form of the city layout, where only one quarter of the employment is in the city centre. The growth of such services could impact upon the Council's spatial strategies because they would call into question the need for higher housing densities to support public transport.   Furthermore, private hire use, coupled with driverless hire cars, could reduce the demand for city centre parking.

10.   It is a truism that all meetings about CMK, no matter what the precise subject matter, sooner or later evolve into a discussion about parking. This is a ridiculous state of affairs for a city centre with so many spaces. We therefore think that it is important to attempt to put this to bed, once and for all, with a dynamic and wide-ranging review into the whole subject. For example, we feel that there may be merit in reverting to a three tier tariff of short, medium and long stay to replace the current two tier system, with its wide disparities between charging rates. This should be linked with a review of the gridsquares adjacent to CMK to ascertain the level of overspill parking that is occurring in these areas.

11.   Although initial incentives for Electric Vehicles (EV) are to be welcomed as a means to reducing local air pollution and marginal overall reductions in contributions to climate change gases, a time will come when the percentage of cars that are fully EV is so large that free parking incentives will need to be withdrawn. We suggest that the trajectory for this needs to be set out in advance, otherwise its continuance could have the perverse incentive of encouraging car use rather than public transport. The Strategy should also details of how the Council will ensure that people who do not have a personal parking space are able to charge their vehicles at home at night using off-peak electricity.

12.   We also think that it is important to gather data about how children get to school. Parental Choice in education has had a negative impact upon traffic flows around the city, which is particularly noticeable around schools themselves and either ends of the school days. If we understood how children and their parents moved around the city then we would be able to plan better incentives to both increase fitness and alternative modes of transport (with cycling being the most obvious). Do we know, for example, how many secondary school children walk, use bikes or public transport? One of our members recently visited MK Academy and noticed only five bicycles in the bike racks, which is a terrible indictment for a

secondary school.   A "Cycling To School" target should form part of the strategy

13. There is scant mention of the need to reduce notable Peak Hour congestion points, eg the A5 roundabouts, the area around Bow Brickhill and the road between Newport Pagnell and Olney.

14. We are concerned that there is little mention on the Strategy about the impact that East-West rail could have upon Milton Keynes. For example, what level of services can be expected once it is in full operation between Oxford and Cambridge? Importantly, it would seem to be obvious that direct services between either ends may not always call at Milton Keynes Central because of the increased journey time that would result which, in turn, could impact upon Bletchley Station. There is no mention either of the need to protect from development the "Bletchley Chord" which is essential to run direct trains from MK Central to Bedford and beyond.

15. There is an apparent lack of synergy between the Mobility Strategy and the Council's "Strategy For First Mile Last Mile Travel" that it submitted to the National Infrastructure Commission as part of the latter's Cambridge-MK-Oxford Arc work eg the latter refers to mass transit systems being developed along identified routes (eg Winslow and the Eastern Expansion Area) in the period 2025-2031 whereas the former is more vague and relates only to connections to railway stations.

16. There is no indication about how and where the M1 would be crossed to connect development east of the motorway with the city. This is important to ensure that land is protected from development.

17. There is no indication about how development of land outside the Borough area will impact upon the mobility within Milton Keynes. Will the Council be insisting upon a high level of connectivity – subways, Redways etc to match the rest of the city? A map to show these expansion areas would be very helpful.

18. There is no mention within the Strategy about the potential of dualling grid roads, eg H4 west of V8, to reduce congestion or of use of grid-road reservations to enhance public transport by creating fast bus-only routes.

19. We note the various comments and proposals about the Redways, which are, in general, an underused asset of Milton Keynes. We are concerned about the lack of maintenance, for which there is no excuse – the Redways should be seen as an integral part of MK's movement network and should be maintained to the same standard as grid roads and not seen as a soft option if funds are tight. There should be a Council-wide commitment to ensure that this happens.

20. We are concerned that paragraph 3.2.6 "Active Travel" makes a number of inaccurate statements about the Redways, which seem to be repeats of subjective opinions about matters such as safety without substantive evidence to back them up and we have listed our concerns below. Evidence should be provided for such statements or they should be deleted.

21.   It is important to understand that cyclists do not restrict themselves to the Redways alone – there are many leisure routes that can function as an integral part of the cycling movement network eg along the Grand Union Canal and through the Linear Parks. We therefore think it imperative that any review of the Redways should be accompanied by a separate study that considers the movement of cyclists across the city as a whole, not just along the Redways *per se*. This is something of great interest to our members and we would ask that we be involved in any review, meetings etc please.

22.   There is no mention of the feasibility of rail-borne logistics. The upgrade of the Oxford-Cambridge rail line offers an increased opportunity for the use of freight on the rail network and we need to understand whether sites alongside the line eg in Caldecotte are suitable for such a purpose. If so, these need to be reserved in spatial plans such as Plan:MK.

23.   We would like to propose five particular initiatives that should form part of the Strategy:
      a.   A re-examination of the functionality of Station Square. It is clear that the revamp a number of years ago has not been a complete success. MK Forum made clear at the time that Station Square could not provide the necessary capacity for access by private car and Private Hire vehicles, and so it has proved. We feel that more expansive thinking is necessary with a view to using the service road at the back of the building for cars and private hire vehicles with passengers accessing the concourse via lifts and escalators. This would leave Station Square free for public transport, taxis and deliveries. This is a recap of a proposal that we first made to the Council around 2008.
      b.   The proposed Redway upgrade should incorporate a route numbering system to aid wayfinding.
      c.   There should be bus priority measures at roundabouts during peak hours, which would require part-time signals and bus only lanes.
      d.   The Council should confirm that it will provide underpasses as necessary, consistent with the usual MK provision regarding intervening distances etc, to connect the Western Expansion Area to the rest of Milton Keynes across V4 and H4.
      e.   A central public transport spine along the entire length of Midsummer Boulevard will be an essential component of the movement network with the growth of the city. The Strategy should recognise this and make a specific commitment that, when the detailed plans for the redevelopment of intu are announced, the Council will serve notice that it wishes to operate an emission free public transport system through the covered concourse area. This will ensure that money is spent in the most efficient manner and that the redesign properly reflects the demands if the detailed transport infrastructure, such as kerbs, crossing points etc.

24.   Turning to the Draft Strategy, we have the following particular comments upon the text:
      a.   **1.2 Context: Connected**: Add, as a final paragraph "*The city's polycentric model means that (uniquely in Great Britain) uses are spread across a grid. It is important that this Strategy understands, respects and reinforces this approach and does not necessarily seek to impose solutions that, while they may work in conventional cities, might not necessarily be appropriate for Milton Keynes*".
      b.   **1.2 Context: Growth**: Add, at end of second sentence: "*The report Partnering For Prosperity by the National Infrastructure Commission posits growth beyond this to a potential figure of 500,000*".

c. **2.2 Progress on Interventions: Cycling, Walking and Smarter Choices**: It is worth exploring whether scooting would be an appropriate mode of travel to school for young children who did not wish to use cycles.
The text refers to Fig 7 as showing the network of cross-city Redway routes but it actually consists of a photo of a typical Redway rather than routes.

d. **3.2.2 Travel Patterns**: We think that it is important that the levels of car ownership are put into a proper context. For example, whilst car ownership levels in MK are high, this is also true for the south-east as a whole when compared to the rest of the country. The RAC Foundation has applied 2011 Census Data to show that, of the 348 local authority areas in England and Wales, Milton Keynes is ranked 206 below places such as Bedford, Cheltenham, Swindon, Stockport, Colchester, Woking and Ashford[1].

e. **3.2.5 Redway Network**: Insert, as a final paragraph: "*The Redway network will be treated as an integral part of the city's movement systems and will be maintained to the same standards as the grid roads*".

f. **3.2.6 Active Travel**: it is inaccurate to say that the Redways were designed "*primarily as Leisure routes*". Delete the opening sentence of second paragraph and replace with the following wording (from "The Milton Keynes Planning Manual") "*The Redway system is an effective coherent network of routes separate from the city road system providing an attractive, safe, direct and convenient access for pedestrians and cyclists at a local, district and city scale. The system as a whole forms a comprehensive network for cyclists which includes, in some areas, local roads, footpaths and leisure routes* ".

g. **5.2 Support Growth and Provide Mobility for All**: Add i) "*Redways: Undertake a full upgrade of the Redway system to provide a cohesive and well signed network and ensure that it is properly maintained to the same standards as the rest of the city's movement network*"; ii) "*Work with schools to identify the potential for pupils to make journeys to school by walking, scooting or cycles. Establish appropriate targets against which the success of such measures can be assessed*".

h. **5.3 Provide An Efficient Network: Management of Car Parking Stock**: The reduction of parking spaces in CMK will be a contentious issue and, if it does prove appropriate, it is not the purpose of this document to propose alternative land uses and, in any event, the comment about conversion to "public realm" is irrelevant given that such spaces are already "public realm". The final two sentences of this paragraph should be deleted.

i. **5.5 Protect Transport Users and the Environment**: Add "***Electric Vehicles***: *Introduce a requirement for all new housing developments to have sufficient charging points for electric vehicle to accommodate residents who do not have their own on-plot parking spaces*".

j. **Appendix B Glossary** Add "*that are distinguished by their red tarmacadam surfaces*" to the definition of "Redway network" or, alternatively, use the definition referred to in 25(f) above..

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[1] https://www.racfoundation.org/assets/rac_foundation/content/downloadables/car%20ownership%20rates%20by%20local%20authority%20-%20december%202012.pdf