Hayfield Consortium

Response to EXAM69 and EXAM111-115

savills

Introduction

1.01 These representations are made by Savills on behalf of The Hayfield Consortium (Hayfield) who control a large area of land identified in the Local Plan as the 'Aspley Guise Triangle' – the Triangle site. The concept masterplan for the site is attached at Appendix A for reference. This appears in the vision document that has been submitted to the Council a number of times by the Consortium with earlier representations.

1.02 Hayfield has made representations at all stages of the Local Plan process, including comments on the Sustainability Appraisal (SA) at all stages of its preparation. Hayfield has also attended a number of the sessions of the examination, and provided additional written responses on Matters 1, 2, 4, 6, 13 and 14.

1.03 Despite the Inspectors' request for clarity and robustness, the SA is still unclear and inconsistent in its assessment of Hayfield's land including out-dated reference to the Expressway, which is now the subject of a review by government.

1.04 Changes have been made to the SA scoring for the Triangle site. It was previously assessed as the most sustainable site in the District, and in Area C. The changes to the SA in relation to the Triangle have not been explained or justified and appear to be a post-hoc justification for the Council's decision to allocate the Marston Vale site in Area C. The Consortium strongly objects to these unsubstantiated changes to the SA, which are not supported by the evidence base.

1.05 The Council has re-assessed vehicle movements arising from the allocations just east of M1 J13. The evidence now presented, in response to the Inspectors' concerns over mitigation of traffic impact on this junction, shows that there is no suitable mitigation scheme available.

1.06 No evidence is presented to show how cross boundary impacts have been assessed in relation to Marston Vale, nor how the site's traffic impacts compare to those of the Triangle Site. In summary, there is no justification for the allocation of Marston Vale in advance of what the former SA demonstrated to be the more sustainable option of development at Aspley Guise Triangle.

EXAM 69: Inspectors' post-hearing letter to CBC 30th September 2019

1.07 This document set out the concerns of the Inspectors regarding the soundness of the CBC Local Plan. Hayfield sets out below the key issues raised by the Inspectors of relevance to the Triangle site and the Hayfield commentary on the Local Plan.

1.08 Paragraphs 2-15 set out general concerns relating to the SA accompanying the Local Plan. This reflects concerns set out by Hayfield and others that the SA was not carried out in a way that informed decision making, but was a justification of decisions already made. Paragraph 2 identifies a key function of the SA, namely '*to make sure that proposals in the Plan are the most appropriate given the reasonable alternatives available'*. One of the key elements of Hayfield's case is that Aspley Guise Triangle is more sustainable than Marston Vale, and should therefore be brought forwards first as a more appropriate site, in accordance with paragraph 182 of the Framework. The Triangle site was assessed by the Council in its earlier SA as being

the most sustainable location for growth in the district. Nevertheless, the Council rejected the Triangle for development in the Plan period on the basis that it is located in the corridor of the Expressway (the Marston Vale site is similarly located in the 'common corridor' see plan at Appendix B).

1.09 Paragraph 14 of the Inspectors' letter states that the SA contains unsupported conclusions against the sustainability objectives of two strategic sites. Hayfield's evidence is that there remain unsupported conclusions in the SA, and there are new amendments that similarly have been made without any justification. These continued discrepancies and unjustified changes to the SA undermine the robustness and objectivity of the process referred to by the Inspectors in paragraph 13 of their letter.

1.10 Paragraphs 41 to 48 relate to the transport modelling that has been carried out in relation to Junction 13 of the M1 (M1 J13), the inconsistencies between the transport modelling carried out for the Local Plan, and the modelling prepared for the application at Marston Vale (all matters identified by Hayfield at the Examination).

1.11 Paragraphs 42 to 46 refer to the fact the highways modelling has not been completed, and needs to be carried out to inform highways mitigation measures. This fact also means that decisions on strategic allocations have not been made in light of the impacts of proposals and the potential mitigation required. The allocation of Aspley Guise Triangle is likely to have less impact on M1 J13 than Marston Vale, because the Triangle site is west of the junction, and most people in this location commute to Milton Keynes for work (both strategic options being located within the Milton Keynes Travel to Work Area). The relative merits of the two sites, their impact on the highways network, and relative levels of mitigation are still unknown (see below in relation to the Transport Paper EXAM114).

1.12 The transport modelling is of central importance to the selection of sites for development given that the Framework requires at paragraph 104 that planning policies should: -

a) …minimise the number and length of journeys needed for employment, shopping, leisure…

b) be prepared with the active involvement of local highways authorities … and neighbouring councils…

c) …

1.13 The work to inform such an assessment has not been carried out in relation to the infrastructure supporting development near to M1 J13 and the cross boundary impacts noted by Hayfield in its evidence to the Examination. In paragraph 47 the Inspectors specifically reference their reservations in relation to these cross boundary impacts that concluded only 50 vehicle movements from Marston Vale to Milton Keynes in the AM and PM peak.

1.14 Specifically, the Inspectors also required the Council to justify its suggestion that motorists would use other routes in to Milton Keynes, namely the Salford Road, instead of the A421. The analysis that supports such a contention has not been provided.

1.15 It therefore remains the case that an assessment of the relative impacts of strategic development at Marston Vale and Aspley Guise Triangle has yet to be undertaken to determine which site is best placed to minimise the number and length of journeys in accordance with the Framework.

Sustainability Appraisal EXAM105, 105A and 105B

1.16 The sustainability appraisal January 2018 (2018 SA) (document ref: CS31) identified that the Aspley Guise Triangle was more sustainable than Marston Vale. The Triangle site performed the same or better than Marston Vale in every single category except for biodiversity.

1.17 The Council confirmed in the examination hearings that the only reason that the Triangle site was not allocated was because the Oxford Cambridge Expressway might impact on the location. This conclusion is inconsistent with the evidence available on the Expressway route, with the Highways England document 'Oxford to Cambridge Expressway; the preferred corridor' (2018) showing both the Triangle site and Marston Vale within the Common corridor identified (Appendix B of this statement). Notwithstanding this, the Council concluded that the Aspley Guise Triangle should be safeguarded as a future development site rather than allocated for development within the Local Plan. Hayfield has consistently maintained an objection to the process that led to this conclusion and the conclusion itself. Instead the Aspley Guise Triangle should, as the more sustainable location, be developed in advance of Marston Vale. The key advantages of the Triangle site in transport terms alone is that it would deliver a Park and Ride / rapid transit hub at M1 J13 that would enable modal shift, creating an immediate transport benefit for all traffic approaching Milton Keynes from the key A421/A428 corridor from the south east.

1.18 The original assessments of the two sites are shown below from Table 8.6 of the 2018 SA (ref: CS31). This assessment was carefully considered through a series of meetings with the Council during August to October in 2017. During these meetings the Consortium presented information on the constraints and opportunities of the site, including green infrastructure, ecology, transport and movement (amongst other issues).

Proposed Housing Allocations: Summary																	
Site Allocation	**SA Objectives**																**Total**
	1	**2**		**3**	**4**		**5**		**6**	**7**	**8**	**9**	**10**	**11**		**12**	**13**	**14**	
	Housing	Communities – Green Belt; identity		Services & Facilities	Employment		Health & Equality		Highways & Air Quality	Sustainable Transport	Energy & Climate Change	Water Resources & Quality	Flood Risk	Soil		Biodiversity & Geodiversity	Landscape	Historic Environment	
Aspley Guise Triangle 3500 homes	++	0	+	++	++	+	0	++	0	++	+	0	0	- -	0	0	+	0	
Marston Vale 5000 homes, 40 ha of employment land	++	0	-	++	++	+	0	++	-	++	+	0	0	- -	0	+	+	-	

1.19 These ratings followed an initial assessment which had scored the Triangle site slightly lower, carried out in June 2017 (ref: CS30). Appendix IX of the Regulation 18 consultation (ref: CS30) identifies that the initial appraisal was high level, and notes on pages 17 and 18 that the comments received by Hayfield (for example on highways, health, air quality, sustainable transport, and employment) all informed an update to the SA.

1.20 The Triangle site was therefore subject to considerable scrutiny. The Marston Vale site went through a similar process, with the Council undertaking a series of meetings with the promoter of the site

1.21 Given the process that was undertaken to prepare the 2018 SA, it is extremely unusual and unexplained that the results of the SA have now changed to such a significant degree. The table below shows the 'before and after' versions of the SA for the Triangle site (Aspley Guise).

Proposed Housing Allocations: Summary																		
Site Allocation	**SA Objectives**																	**Total**
	1	**2**		**3**	**4**		**5**		**6**	**7**	**8**	**9**	**10**	**11**		**12**	**13**	**14**	
	Housing	Communities – Green Belt; identity		Services & Facilities	Employment (support and town centres)		Health & Equality		Highways & Air Quality	Sustainable Transport	Energy & Climate Change	Water Resources & Quality	Flood Risk	Soil		Biodiversity & Geodiversity	Landscape	Historic Environment	
Aspley Guise ASSESSMENT 2018	++	0	+	++	++	+	0	++	0	++	+	0	0	- -	0	+	+	0	
Aspley Guise ASSESSMENT 2020	++	0	- ?	++	0	+	0	++	0	++	+	0	0	- -	0	-?	+	-	

1.22 We set out below an analysis of the changes made to the Triangle site for this latest version of the SA.

Communities

1.23 This score has changed from '+' in 2018 to '-?' in the new document. The new assessment states at 4.57 that the Triangle site may have a negative effect on settlement identity because the rail line might cause severance between the new development and existing settlements i.e. Aspley Guise. Table 3.3 sets out that a '-' score is given when '*Development at the site option is likely to contribute towards coalescence and/or erode settlement identity*' (p18 of EXAM115). The village of Aspley Guise to the south is separated from the Triangle site by the railway line. A green gap has intentionally been planned along the southern edge of the Triangle site to maintain separation between the proposed development and Aspley Guise village (a response to comments raised

during public consultation that the settlement of Aspley Guise should retain a separate identity. There is no intention to integrate development at the Triangle site with Aspley Guise village, nor do the residents of Aspley Guise want this. This was previously recognised as a positive benefit of the proposals in accordance with the adopted objectives as set out above.

1.24 The '+' score was established in the SA 2018, where at paragraph 8.54 the Council noted:

> *For the second element of the SA Objective No 2 relating to settlement identity, the SA changed from minor negative to minor positive for Aspley Guise Triangle as masterplanning for the site proposes separation and no coalescence.*

1.25 The masterplan has not changed since this assessment was carried out. It is unclear, then, why the Council has now changed the assessment to '-?'.

Employment

1.26 The rating for employment has changed from '++' to '0'. At paragraph 4.66 the Council states that '*For the seven remaining sites no employment land is expected to be provided as part of the development*.' This includes the Triangle site. The Hayfield Consortium has discussed the site with the Council and provided copies of the vision document. The vision document clearly sets out a schedule on page 28 that shows the site is proposed to deliver over 6ha of employment. The revisions to the assessment are therefore incorrect.

1.27 It is unclear why the Council has assessed the site as if it is not bringing forward any employment, when its previous assessment correctly recognised that this would be delivered on the Triangle site.

Biodiversity

1.28 There is a clear contradiction in the new SA between the way in which Marston Vale is appraised and the way in which other sites (including the Triangle site) is appraised. The Marston Vale site contains a County Wildlife Site (CWS) and is near to SSSIs. Paragraph 4.88 assesses that Marston Vale has potential to improve nearby SSSI's through creating connections. This judgement is not applied to other sites that are close to SSSI's or CWS. For example, the Triangle site, which contains no ecology sites but is close to a CWS, is assessed by the Council as having negative effects. The Consortium's vision document submitted to the Council explains that green buffers are to be created around the CWS, which is retained in a large area of green space (p13, 22 and 27 of the vision document), with plenty of opportunities for enhancement. This was discussed with the Council during a meeting about Green Infrastructure opportunities at the site in 2017, just before the site was proposed to be allocated in the Local Plan. The Aspley Guise Triangle Landscape Sensitivity Study January 2007 (EXAM68) highlights the '*area of wet pasture opportunity to conserve, enhance and extend*' the CWS (Figure 5.3) in this same part of the Triangle site, as identified in the masterplan in the vision document.

1.29 The previous SA (AV_14 of the March 2017 Appendices to the July 2017 SA) concluded that '*Overall there is the potential for long-term minor positive effects*' in relation to biodiversity. No reasons are given for the change in the previous assessment that now determines that the Triangle site will have negative effects on biodiversity objectives. The revised assessment is much less detailed, and no longer refers to the range of opportunities for biodiversity improvement previously identified in accordance with the aims of the Central Bedfordshire Nature Conservation Strategy and the Central Bedfordshire Environmental Framework.

Historic Environment

1.30 The original 2018 assessment for the Triangle site noted that the broad location is located in close proximity to Listed Buildings in Aspley Guise and Wavendon, as well as conservation areas in Aspley Guise and Husborne Crawley. The vision document shows that Hayfield's masterplan does not locate any development near to designated heritage assets and indeed retains a green buffer to the settlement as referred to above. The conclusion of the 2018 SA was that mitigation would '*ensure that development does not lead to any significant effects on the settings of the Listed buildings and the Conservation Areas, with neutral effects …*'

1.31 Nothing has changed since this assessment was carried out and it is therefore unclear why, after its initial careful consideration of this objective, the Council now changes its assessment to '-' without any supporting evidence or explanation.

Conclusions of SA (EXAM115)

1.32 The 2020 SA concludes at paragraph 4.99 that the most significant positive effects are associated with the Marston Vale site, with 5 significant positive effects.

1.33 Paragraph 4.99 goes on to explain that there are only two potential significant negative effects associated with Marston Vale, and it therefore performs best. The Inspectors will note that whilst the Council has downgraded a number of the assessment outcomes for the Triangle site, it previously also recorded 5 significant positive effects.

1.34 Correspondingly, the Triangle site only has one predicted significant negative effect, compared to the two significant negative effects of Marston Vale.

Supplementary SA Findings Stage 2 – Residential site options

1.35 Chapter 5 of the SA highlights two of the flaws that have been evident in the SA work carried out to date in relation to the Triangle site. These relate to the way that the Expressway has been dealt with and its impact on a number of sites in the District; and the co-ordination of infrastructure between Central Bedfordshire and Milton Keynes.

1.36 Table 5.3 of the SA (EXAM115) sets out the alternative sites considered for housing, and Table 5.4 sets out the 'distribution types'. Marston Vale is identified as a development that is: -

- A new settlement of village scale;
- Growth around strategic roads;
- Growth around a sustainable transport hub.

1.37 EXAM113 confirms at paragraph 3.3.20 that growth around strategic roads is one of the poorest performing options; growth around sustainable transport hubs is expected to have the most significant positive effects; and village scale growth falls somewhere between the two. The sustainable transport hub presumably refers to the Millbrook rail station near to Marston Moretaine.

1.38 The Aspley Guise Triangle growth typology is referred to as: -

- Growth around strategic roads;
- Urban extensions of 1,500 to 4,000 homes.

1.39 The SA should identify the Triangle site as a settlement based on growth around a transport hub. This categorisation is based on the ability of the site to link to both Ridgmont and Aspley Guise rail stations as well as the ability to facilitate delivery of the proposed Park and Ride / rapid transit hub just west of M1 J13 (which is located on land within the Consortium's control).

1.40 Area C and in particular the Triangle site and Marston Vale are both located within the Milton Keynes TTWA within which the principal commuter flows are towards Milton Keynes. In this context, the Triangle site would deliver a key transport hub benefit in the form of the Park and Ride at M1 J13, which is identified in the Local Transport Plan (Milton Keynes LTP3) (extract at Appendix C) and referenced as a specific potential location in the 'medium' term.

1.41 Milton Keynes LTP4 (Mobility for all 2018) (extract at Appendix D) has a delivery plan (Chapter 3) that also refers to delivery of Park and Ride at Junction 13 '*to support longer distance trips from outside Milton Keynes*' (p6). These essential parts of the transport infrastructure network have been raised many times by Hayfield with both Councils, who still fail to adopt a co-ordinated approach to the issue. The provision of Park and Ride and the modal shift it would facilitate on the edge of Milton Keynes is one of the key elements in reducing transport emissions in the region and the move towards a carbon zero network. Despite its strategic importance, this planned transport infrastructure is given no consideration at all in the Central Bedfordshire Sustainability Appraisal. It is a clear failure that this opportunity has not been discussed between the Councils; and a failure of the SA to ignore the proposed Park and Ride in its assessment.

1.42 In addition, the Triangle site represents an extension of the urban area of Milton Keynes to which it would be physically attached at its north-western edge, in the vicinity of Eagle Farm. EXAM113 sets out that urban extensions of the scale of the Triangle site are expected to have the most significant positive effects, as is growth around transport hubs. In other words, if the Council's assessment had correctly concluded that the Triangle site is proposed as growth around a transport hub, it would also have concluded that in relation to

these categories, the Triangle site is more sustainable than Marston Vale given that it represents two of the most sustainable growth typologies.

Area C: East West section

1.43 Paragraph 5.49 reviews the comparison of sites in Area C, including the Triangle site and Marston Vale. Using the previous SA findings, Table 5.7 would have identified that the Triangle site is the most sustainable in this area. The Council did not carry out this direct comparison in its previous work. The comparison has now been carried out, but inexplicable changes have been made to the assessment of the Triangle site (as set out above), which change the relative rankings compared to other sites.

1.44 The table now shows that Marston Vale has five objectives where it is likely to deliver significant positive effects, whereas the Triangle site has four. Previously, the Triangle site was considered to have five objectives where significant positive effects would have been delivered. One of these relates to employment. Employment is still proposed by the Consortium at Aspley Guise, but the previous significant benefits are no longer identified by the Council. Instead the Council assesses the Triangle site (incorrectly) as if it will not deliver any employment. Paragraph 5.52 of the summary confirms this assessment and lack of inclusion of employment at the Triangle site.

1.45 Notwithstanding the changes in the SA, the Triangle site is still assessed as having less significant detrimental impacts on the sustainability objectives than Marston Vale.

1.46 In relation to the Expressway, the SA advises in the green summary box on p59 that the Triangle site '*was prevented from being allocated due to it being within the potential alignment for the Expressway*'. It is unclear if the assessment still considers this to be the case. The Marston Gate and Marston Vale sites are also within the Expressway corridor (to the extent that this is now considered relevant), but are allocated in the Local Plan. The Council is therefore inconsistent in its approach to the Expressway. The Council states as an explanation for this inconsistency that it was '*aware the route* [of the Expressway] *would connect at J13…*' but presents no evidence of this, nor was it confirmed by Highways England during the Examination sessions. Hayfield has subsequently requested any evidence that the Council has in relation to the proposed alignment of the Expressway and how it impacts the Triangle site but not on other allocated sites. No information has been forthcoming. The only evidence relating to the Expressway that is available is the preferred corridor, referred to and identified in the Hayfield evidence for Matter 1 (see also plan extract in Appendix B).

1.47 The SA seems to have failed to update the text in the green box relating to the Triangle site. It still refers to the Expressway, and the (historic) fact that the previous SA determined that the site '*should only be considered once strategic decisions around infrastructure in the Oxford-Cambridge Arc were further down the line*.' The government identified in March 2020 that it was no longer directly pursuing the Expressway in relation to the Oxford Cambridge Arc. The present statement on the Government's web site for the Oxford to Cambridge Expressway states:

> *We are now pausing further development of the Oxford to Cambridge expressway project while we undertake further work on other potential road projects that could support the Government's ambition for the Oxford-Cambridge Arc, and benefit people who live and work there.* (https://highwaysengland.co.uk/oxford-to-cambridge-expressway-home/)

1.48 Similar wording is set out in Part 2 of the Road Investment Strategy 2, 2020-2025 (RIS 2) published in March 2020 at p117. At this moment in time the Expressway therefore has no status in the Local Plan process

1.49 A recent appeal ref: APP/Y04535/W/17/3169314, called in by the Secretary of State, highlights the government's approach to development that might impact the (now mothballed) Expressway.

1.50 Paragraph 12.72 of the appeal states: -

> *It is conceivable that the route of the Oxford to Cambridge Expressway could travel through or near to the appeal site based on the preferred option of Highways England and the various constraints within the Woburn Sands area. However, there has yet to be a formal announcement on the next stage of this road project or further public consultation on specific options or routes. Plan:MK addresses the Expressway in relation to the South East Milton Keynes extension in terms of the timing of any planning permission but does not preclude development in specific locations as the details and future of the project are still yet* [sic] *unclear. The main parties agree that the proposal does not conflict with the development plan insofar as the Expressway is concerned and so does not warrant refusal of the proposal on this matter*

1.51 The Council previously identified that the Expressway was the only reason why the Triangle site was not allocated and instead proposed for future development. It is unclear if this remains the Council's reasoning and, if so, on what evidence base it relies for this position.

1.52 Para 5.53 of the SA states that the Council considers Marston Vale to be the most sustainable site. The documentation indicates that this conclusion is based on the tables and assessments in the SA. As set out above, these are fatally flawed in that they contain both inexplicable and unsubstantiated changes to the 2018 that have the effect of downgrading the assessment of the Triangle site. In addition, the assessment overlooks some key benefits that the Triangle site would deliver, including public transport infrastructure, that would not only improve the sustainability of the site but also serve a wider strategic function in reducing the carbon-intensive nature of travel into and around Milton Keynes.

1.53 The Inspectors pointed out at paragraph 81 of their letter to CBC of 30 September 2019 (EXAM69) that: -

1. The SA has not adequately demonstrated that the spatial distribution of housing and employment is the most appropriate strategy given the reasonable alternatives; and
2. Rectifying the inconsistencies will be a difficult task that needs to be carried out with an open mind.

1.54 The Hayfield Consortium agree and support both points. None of the work that the Council has subsequently undertaken has altered this position; if anything the reliability and accuracy of the SA documentation has diminished meaning that the SA is of even lesser value as a guide to decision making. The lack of any justification for changes to the SA that now support an allocated site at Marston Vale, when previously it did not, serves to demonstrate that the SA is less objective and less robust than before. Hayfield maintain that the SA has not been reviewed with an open mind in the way that the Inspectors required.

Summary of Changes to the SA Findings

1.55 Chapter 6 of the SA provides the summary of changes to the findings.

1.56 The Inspectors' letter required that the Council re-assess the sites with an open mind, because parts of the assessment were clearly inconsistent.

1.57 Paragraph 6.7 of the SA suggests that entirely new appraisal work has been undertaken and presented in the report in relation to some of the residential site options. We note in our comments above that there have been a number of changes to assessment scores, but no explanation in the SA. Paragraph 6.8 advises that the changes made are set out in that chapter. Paragraphs 6.13 to 6.16 are the four paragraphs that seek to explain the multiple changes made to all of the site appraisals in the SA.

1.58 Paragraph 6.16 is the only paragraph of the document where changes to the assessment of the Triangle site are set out. It states that, along with a number of other sites, '*The SA findings for those site options are therefore largely unchanged from the Regulation 18 SA Report; however, a small number of changes have been made to ensure consistency and to ensure that the appraisal is robust*'. This explanation is not sufficient to explain the changes that now result in the Council finding Marston Vale more sustainable than the Triangle site, when the previous SA found that the reverse was the case.

1.59 Hayfield's concerns with the SA are: -

- Lack of consistent approach in rating sites against SA objectives;
- Lack of consistent approach in assessing the Triangle site, with changes made to previous assessment scores lacking any justification or evidence;
- Incorrect information used in relation to the employment provision at the Triangle site, which is proposed in this location in conjunction with a mixed use scheme (not as the Council suggest, just housing);
- Lack of consideration of the proposed transport hub at M1 J13 proposed to be delivered within the Triangle site in accordance with a number of transport objectives but ignored in the SA;
- Inconsistent approach in the way that sites have been treated that were previously in the Expressway Corridor, and this approach still referred to in the SA;

1.60 The SA draws an incorrect conclusion at paragraph 5.53 that Marston Vale is the most sustainable site in Area C. This conclusion is not justified by the evidence provided. The way that unjustified, and un-evidenced changes have been made leads Hayfield to conclude that the changes now made to the SA are a post-hoc justification for the allocation of Marston Vale, when the Triangle site is actually a more sustainable location for growth as the 2018 SA demonstrated.

Housing Technical Paper EXAM113

4.01 Paragraph 3.2.3 of EXAM113 expresses the Council's clear view that it is not its own assessment that is flawed, it is the way that the assessment has been presented. What it seeks to do to rectify this situation is to present the evidence in a different way. This is not the correct process. The Council is indicating in this paragraph, that the process it originally followed did not flow from 'Sustainability Appraisal to allocation of sites'. This cannot be the process that was followed because the Council now admits that the evidence was not presented in a way that justified its own conclusions. However, those conclusions should have been drawn from the Council's own evidence in the first place. Had the evidence informed the decision making process, the Council would have made different decisions.

4.02 Instead of reviewing this decision making process 'with an open mind' the Council has sought to justify on a post hoc basis the allocations contained in the draft Plan. Paragraph 3.2.3 advises that the Council has allocated the correct sites (contrary to the Inspectors' initial conclusions), and it will now present the evidence to show that this is the case.

4.03 Paragraph 3.3.20 notes that the large scale of growth associated with Options 2 and 6 are expected to have the most significant positive effects. Of the growth options identified for Area C in Table 5.3 of EXAM115, the Triangle site is the only site where growth is associated with either Option 2 or 6.

4.04 Paragraph 3.3.20 explains how the Council determined where housing needs should be met. It confirms the best performing options in relation to growth typologies listed in the SA. Unfortunately, although the Triangle site is the only site representing the two most sustainable typologies for growth i.e. an urban extension and around a transport hub, it is not identified as such. The Council's assessment is incorrect as set out above in paragraphs 1.42. This is an omission in the early part of the SA that feeds into later assessments relating to the overall sustainability of the Triangle site.

4.05 To summarise: the Triangle site is the only location in Area C that is identified as either Option 2 or Option 6 (the two most sustainable typologies), and is also a location that provides growth around a transport hub. It performs best of all options when compared with other growth locations in Area C.

4.06 Section 3.4 of the Housing Technical Paper relates to Marston Vale New Villages, and assumes the site's allocation. Hayfield's submissions to the SA identify the flaws leading to the incorrect allocation of Marston Vale New Village and not the Triangle site.

4.07 The comments above in relation to paragraph 3.3.20 of EXAM113 refer equally to paragraphs 3.4.9 of the evidence confirming the incorrect way that the sites in Area C have been assessed.

4.08 The conclusions at paragraph 3.4.11 of EXAM113 are examined in relation to paragraphs 5.45 to 5.53 of the SA above. The amendments to the SA that now show Marston Vale to be more sustainable than the Triangle site are not justified by any evidence.

4.09 The Local Plan is contrary to NPPF paragraph 182 as it does not allocate the most appropriate sites for development.

4.10 Modifications should be made as previously proposed by Hayfield, in order to allocate for mixed-use development the Triangle site within this Local Plan.

Transport Technical Paper EXAM114

4.11 The Transport Technical Paper (TTP), states, at paragraph 1.2.1 that '*there have been two stages to the technical evidence prepared on transport matters for the Local Plan prior to the Examination hearing sessions, and a further series of junction modelling post the hearings*'.

4.12 The next paragraph goes on to state that the first stage was strategic modelling '*which provided a high-level cumulative assessment of road network performance (at peak times) and highlighted those 'hotspot' locations where congestion levels and junction delays as a result of the proposed local plan growth had impacts on the highway network. As well as early consideration of the impact of the overall growth strategy, the work then considered the strategic housing and employment, and small to medium site allocations'*. That is the work referred to earlier in these representations as being found deficient, both by Inspectors and a raft of representations made at the time of Examination Hearings, in terms of the conclusions it drew on the likely impact of planned growth within the period of the plan, specifically in respect of M1 J13.

4.13 The TTP then describes the second stage of work which was '*the preparation of a Mitigation Feasibility Study (EXAM 7S). This built on previous work by developing and testing the viability of potential mitigation design options at seven identified sites on the Strategic Road Network (SRN). These seven sites were agreed with Highways England (HE) as the key 'hotspots' for mitigation prior to commencing work. This study outlined baseline and future junction performance; identified and tested potential scheme options to mitigate the impact of Local Plan growth (2035); and selected a preferred viable mitigation, based on the information available. Local junction modelling has been used to compare the future operational performance of the potential mitigation schemes and the key outcomes of this are reported'*. However, the Inspectors were entirely clear within their EXAM69 document, which took account of all of the work undertaken in stage 1 and 2, that the work provided was insufficient in determining whether the Regulation 22 CBC LP was sound. That Hayfield expressed in its earlier representations and its objection to the planning application for Marston Vale.

4.14 The Council confirms at paragraph 1.2.4 that M1 J13 '*was not included within the hotspot locations mitigation work as it was decided due to the complicated layout of this junction that a micro- simulation model would be built by Highways England to understand how the junction operated and what mitigations might improve its operation sufficiently to accommodate the Local Plan growth'*. This confirms that the required level of assessment had not been undertaken at the time of the Examination and the Inspectors did not have before them any robust analysis of the impact of planned growth at Marston Vale on M1 J13 and how this impact could be mitigated.

4.15 Despite the clear case that insufficient information was provided to the Examination, both originally and through updated submissions during the Examination period, prior to the issue of EXAM69, Section 2.2. of the transport technical paper still maintains that both HE and the Council agreed that sufficient modelling had been undertaken i.e. this latest paper seeks to justify the Council's original position despite the insufficiency of the evidence base.

4.16 Notwithstanding this, the TTP states that the Council has worked with HE to undertake more detailed modelling of M1 J13 to appraise a set of potentially deliverable mitigation scenarios. Five mitigation scenarios have been considered in the TTP (A-E) and key conclusions on these five scenarios are set out at paragraph 2.2.7 with greater detail in EXAM114C Mitigation Options Report.

4.17 The TTP does not provide the detailed outputs of the model and the specific impacts of the proposed mitigation interventions in terms of delay, queueing and capacity in figures so it is very difficult to gauge the actual results of work undertaken. The Mitigation Options Report (EXAM114C) does not provide this information in detail either.

4.18 The TTP states at paragraph 2.2.8 that two mitigation scenarios (B and C) have been identified '*which will offer additional capacity without causing further congestion at other locations on the junction*'. However, it goes on to state that two arms of the junction (the M1 southbound on-slip and the Bedford Road/ Salford Road) '*are constrained due to traffic not being able to exit the junction on to the Salford Road and the M1 south bound on-slip*'.

4.19 The report states that the M1 southbound on slip and Bedford Road/ Salford Road junction '*are close to capacity and cannot cater for the additional traffic released by the interventions*' i.e. the mitigation solution causes issues on other arms of the junction, which strongly indicates that it is not a workable mitigation solution at all.

4.20 Scenario C proposes widening of the approach from the southbound bridge which improves operation of the southbound roundabout, however, in summary of the mitigation options the report states at paragraph 2.2.8 '*the outcomes of the initial options modelled have shown that Scenarios B and C offer additional capacity without causing further congestion at other locations on the junction. The modelling has also shown that the junction is constrained due to traffic not being able to exit the junction on to the Salford Road and the M1 south bound on-slip*'. No solution to this issue is offered yet the report immediately continues that '*this modelling work indicates that these two scenarios can deliver additional capacity sufficient to mitigate the impact of Local Plan growth*'.

4.21 The full Mitigation Options Report at EXAM114C states that '*it should be noted that this report documents an early stage high level traffic modelling study, of possible options, no preferred options have been identified at this stage and no conclusions are reached within the note regarding which options could result in the best outcome on the network. Furthermore, no work has been undertaken to confirm their feasibility, safety, option cost, viability or cost benefits*'. Thus, if the mitigation modelling undertaken still has not appropriately considered a viable, costed and deliverable solution for satisfactory operation of M1 J13 it cannot be concluded that planned growth can be accommodated to an acceptable degree in this location and the Inspectors' concerns raised in EXAM69 have not be answered.

4.22 It is unclear how this can be an acceptable 'final' position in responding to the Inspectors' concerns, and Hayfield's concerns that mitigation of planned growth within the Regulation 22 CBC LP has not been properly assessed. It seems to show the optimum solution to mitigate the impact of planned growth is a £4-£5m (paragraph 2.2.10) scheme, but which nevertheless fails to address capacity issues on two arms of the junction.

4.23 Section 2.3 of the TTP responds to the Inspectors' concerns in EXAM69 regarding the distribution of traffic at M1 J13 and specifically on the A421, arising from planned growth and particularly relevant to the appropriate assessment of SA2 (and SE2 within the Plan).

4.24 The report draws on the fact that paragraph 47 of EXAM69 refers to '*50 vehicle movements*' in the AM and PM peak and makes the point that 'ED C24-C28 are to 'PCUs', rather than vehicles, and so it is helpful to clarify this distinction. A 'PCU' - passenger car unit – is the standard method of replicating different types of vehicles in transport models. For example, a 5-seater car would be replicated as 1 PCU, whereas a bus may be replicated as 2.5 PCUs, and a motorcycle as 0.4 PCUs. Our original representations referred to the 50 PCUs claim that was identified as a gross underestimation of likely traffic growth in this location. That point still remains.

4.25 Regardless of whether it is 50 vehicle movements or 50 PCUs, the report ignores the key issue which is that gross underestimation of the likely level of additional trips associated with planned growth to the east of the M1. This was a key area of Hayfield's objection to the Marston Valley planning application and part of its previous representations to the LP Examination.

4.26 The report seeks to clarify (and further justify the original modelling exercise) by confirming that the 50 PCU figure quoted was the change in demand in that location arising from growth and not the trip generation of the development. That may be the case, yet the point remains that the modelling presented initially significantly underestimated the change in demand flow during the peak hours at this junction, particularly given the proximity to M1 J13 of SA2 and SE2, which deliver a significant amount of residential and employment growth. A change in demand of just 50 PCUs arising from the quantum of planned growth is unrealistic.

4.27 The TPP notes that the timing of this additional modelling is fortunate in that there are now live planning applications for both SA2 and SE2. The report states that the impact of SA2 on the A421 and at M1 J13 is now better understood (and is notably much higher than considered in the evidence base supporting the Local Plan) and that the impact of SE2 has been found, as part of the planning application process, to have impacts on the wider highway network towards M1, A421, A507 and A4012.

4.28 The relevance in respect of the Inspectors' concerns is that, whilst new information is now available, CBC made its decisions on the selection of sites for development based on erroneous information and so that site selection process is therefore flawed.

4.29 The TPP is not clear in terms of the actual impact of the Marston Vale development /Local Plan growth scenarios and does not provide the 'with' and 'without' development scenarios. In fact, EXAM114B Traffic Forecast Report states that it seeks to review operation of the junctions in the future year with planned LP growth in 2025 and 2035, but goes on to state that growth has been taken from the CBLTM which was developed in 2016. This raises a question over whether growth assumptions have been updated at all following new information that has been forthcoming in planning applications.

4.30 The Hayfield objection to the Marston Valley planning application, dated March 2019, raised concern over the low trip rates that had been applied to the scheme within the Transport Assessment. The trip rates applied are significantly lower than those adopted within the Hayfield Park Village (HPV) application (made on part of the Aspley Guise Triangle site) to a degree of some 30-35%. Considering that the trip rates adopted within the HPV application were agreed with Central Bedfordshire Council, Milton Keynes Council and Highways England this is surprising, and it is difficult to understand why trip rates that differ so greatly could be acceptable.

4.31 There is no clarity in the information supplied regarding the trip rates which have been used to consider growth associated with Marston Vale (or any other allocations). If the assessment is based on the low trip rates set out within the Transport Assessment for the Marston Valley application, it is likely to under report the impact of the scheme by up to one third.

4.32 The Local Model Validation Report (EXAM114A) and the Traffic Forecast Report (EXAM114B) both state that modelling work reported within those two documents was undertaken between February and June 2019, prior to the Inspectors' EXAM69 letter, and prior to the LP Examination Hearings being completed. Only EXAM114C, the Mitigation Options Report is stated to report work recently undertaken in February to April 2020. The LMVR nor the Traffic Forecast Report can have informed the selection of sites, or responded to the Inspectors' comments raised during the Examination process.

4.33 The LMVR (EXAM114A) notes that the models may not be fully WebTag compliant due to the base data applied which is a hybrid of ANPR data, MTC data and data extracted from the Marston Valley TA and the Hayfield Park Villages TA (dated 2013). Discrepancies between the data sets are noted throughout yet CBC still conclude the model is still considered fit for purpose.

4.34 The TPP at paragraph 2.3.9 states that the A421 link (towards Milton Keynes) will attract circa 1,000 PCUs in the peak hours in each direction, increasing to up to 1,400 PCUs. This suggests that the Local Plan growth scenario will generate an additional 400 PCUs in the peak hours in each direction (i.e. 800 PCUs two-way). These figures still appear low given the scale of the allocation at Marston Vale proposed and our concern regarding underreporting of the impact of Marston Vale set out above still remains.

4.35 Further, the report states (paragraph 2.3.11) that the Marston Valley site will generate a demand on the A421 (towards Milton Keynes) of up to 262 PCUs in the peak hours. Assessing this number against the total trip generation (from the TA) this equates to some 7% (total proposed two-way traffic of 3,880) of traffic routing towards Milton Keynes. This figure, as previously reviewed, seems low. In contrast, the distribution agreed

with CBC, MKC and Highways England as part of the HPV application was closer to 57-65% reflecting the fact that Milton Keynes is a key employment destination. A figure of just 7% is questionable and is likely to vastly underreport the impact of Marston Vale (and planned LP growth generally) in this location.

4.36 The Marston Valley development has also indicated and tested mitigation proposals that are able to *'…offset the impacts of their additional traffic at M1 Junction 13*'. Notwithstanding that we consider the distribution of vehicles through this junction to be un-justifiably low, the report does not state what these improvements are and how they might be delivered.

4.37 Hayfield considered that the Plan was premature at the time of the Regulation 22 submission in April 2019. Through thorough Examination of the Plan the Inspectors' determined in EXAM69 that insufficient technical information had been provided to demonstrate planned growth can be accommodated on the strategic and primary road network. EXAM69 was specific in seeking further clarity on this matter. However, some 8 months following the Inspectors' request the information that is forthcoming is nothing more than a high level review of options which concludes no real solution for this critical junction on the Strategic Road Network and no solution that has been considered in terms of viability or deliverability. Instead of developing appropriate highway modelling to assess the impact of potential growth and inform decisions on strategic allocations, the Council are instead seeking to retro fit inadequate evidence to justify decisions that have already been made prior to full consideration of the evidence

4.38 In reviewing the very limited information presented in the TTP and its supporting appendices, two key issues remain:

1) effective mitigation against the impact of planned growth at M1 J13 has not been identified; and

2) there remains no robust evidence base to demonstrate that the Regulation 22 CBC LP can be found sound in transport terms since the requirements of the Framework, to objectively assess growth and cross border impacts, have not been met.

Appendices

Appendix A
Hayfield / Aspley Guise Triangle Development Framework

KEY

- Site boundary
- Access and road network
- Existing development
- Milton Keynes Strategic Land Allocations (SLA)
- Existing planting
- Existing hedgerow
- Pedestrian and cycle network
- Sustrans route 51
- Residential development
- Local centre
- Park and ride
- Proposed planting
- Proposed bund
- Public open space
- Lower school
- All-through school
- Employment
- Bedford Milton Keynes Waterway
- Potential attenuation features

Hayfield Park Villages

on behalf of The Hayfield Consortium

\\Oxford03\urban design\URBAN DESIGN\UD Projects\SEMK\Graphics\G 140929 sketches 100 CC.indd. 09/03/18.

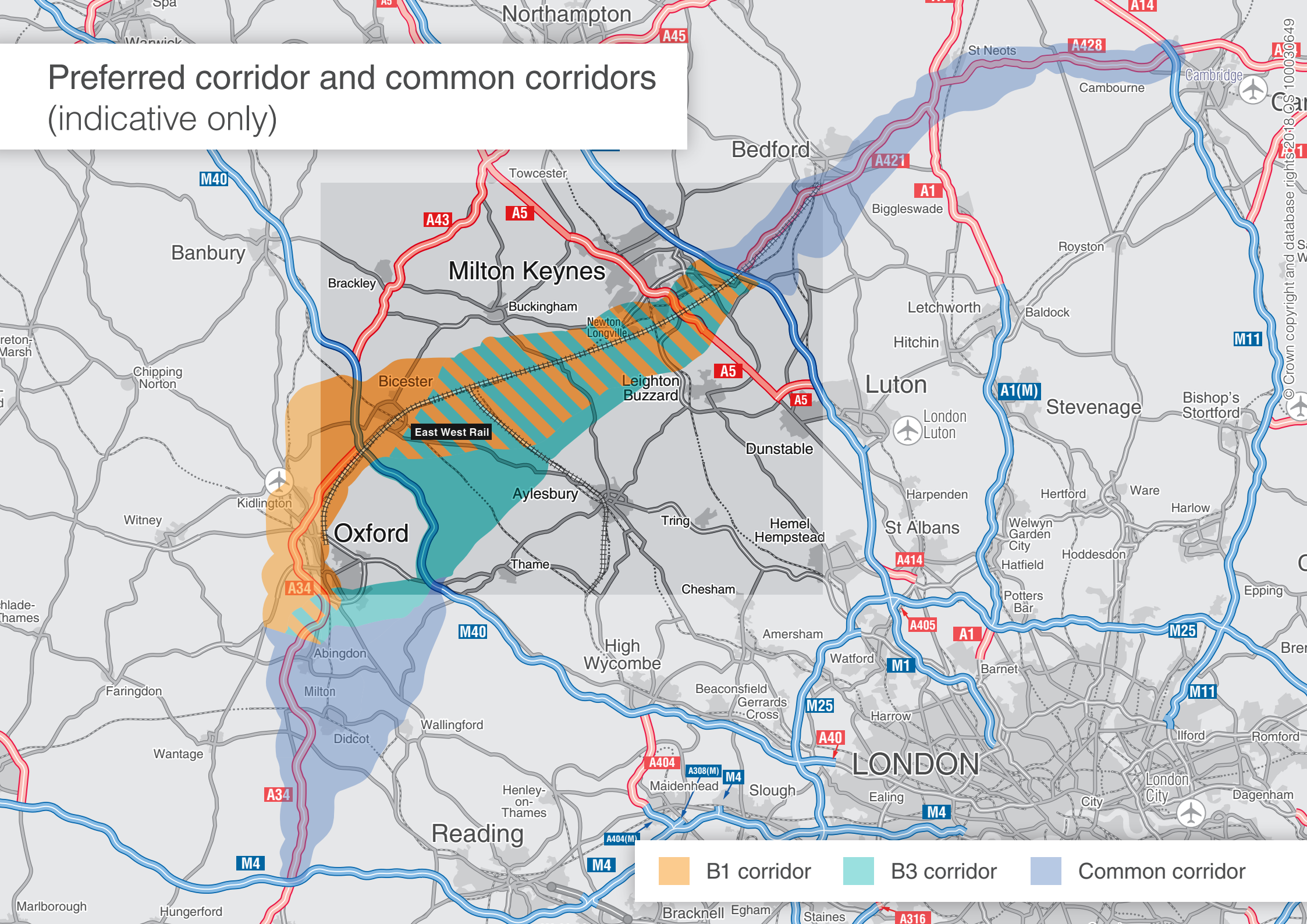
N

drawing no.	SK129	drawing	Hayfield Village Illustrative Framework
rev	-		
scale	NTS	job no.	OXPL27927
drawn by	CS	date	20 November 2017
checked by	-		

savills

Appendix B
Expressway Preferred and Common Corridor

Preferred corridor and common corridors
(indicative only)



Appendix C
Extract from Milton Keynes LTP3

Transport Department

MILTON KEYNES COUNCIL

A Transport Vision and Strategy for Milton Keynes

Local Transport Plan 3 - 2011 to 2031

www.milton-keynes.gov.uk/transport-strategy

April 2011

Bus, Interchange and Future Modes of Transit

City Centre and Central Milton Keynes

The city will be served by a high capacity, fast and frequent bus network, 'MK Star', along main arterial corridors and other key corridors serving Central Milton Keynes, the hospital and other key destinations. The network will also serve Park & Ride sites strategically located on the edge of the city and at key highway junctions; and feeder routes, including semi-flexible 'dial-a-ride' style services, will serve stops and stations within the city including the hospital and district centres. As demand grows from improved service provision, promotion and population and employment growth, the feasibility of rapid transit will increase. Long term interventions provide for this future.

The need to interchange will be minimised, and where interchange is necessary, the quality of facilities and information will be enhanced. Interchange improvements will include improved bus interchange in Central Milton Keynes; superior Real Time Passenger Information provision; improved timetabling and ticketing, including a single smartcard system for all public transport modes; and improved routes to stops and stations. Extended operating hours and weekend and public holiday services will support shift workers and the night time economy.

In Central Milton Keynes, existing and new modes of public transport will be embraced so that the need for travel by private car can be reduced further and public transport will better serve multi-destination journeys.

Delivery Date - Short Term

Bo1 'MK Star' bus network

The centrepiece of the Milton Keynes bus network will be the 'MK Star'. The network will build on the recent success of increasing patronage along core routes through increased investment and promotion (e.g. the 300 service).

Routing: MK Star will be a high frequency network of bus routes operating along arterial corridors and other corridors of high demand, providing excellent network coverage across the city. These through services will link the older towns, rail stations, Western and Eastern Expansion Areas, Central Milton Keynes, the hospital, and other key destinations and local centres (see Figure 4.1). The network can and will be readily expanded.

Frequency: Six buses per hour minimum frequencies will operate during peak periods, with a minimum of three buses per hour between peaks. Operating hours will be extended to support the buoyant night time economy of Milton Keynes, as well as people working early morning, evening and night time hours, as well as at weekends and on public holidays. A minimum of two buses per hour will operate at these times, with one bus per hour during night times.

Operation: It is envisaged that the 'MK Star' will be a largely commercial operation and initial subsidy and prioritised council investment will be used to help determine the more detailed design of the network and kick-start its operation, and promotion of the flagship network. The council will seek to pilot longer operating hour services initially on particular routes rather than across the whole network. The network will

be served by improved rural services (see Bo9), feeder services from rural and urban areas alike (see Bo2 and Bo8), and Park & Ride sites on the edge of the network (see Bo5).

Bo2 Semi-flexible, 'dial-a-ride' style bus services covering city estates

The majority of local authorities are facing cuts to subsidised bus services, with some local authorities contemplating the removal of subsidised services altogether. In Milton Keynes, the council is committed to subsidising non-commercial services, but acknowledges that some services may be more efficiently run using smaller vehicles such as mini-buses and taxi buses with semi-flexible routing to maximise demand. Within and between the city estates, fixed route services and semi-flexible, 'dial-a-ride' style services will feed the network for those able and wanting to transfer onto the high frequency network at improved interchange points, as well as providing increased accessibility for residents to Central Milton Keynes, the hospital and other key services, if by less direct routes.

Smaller vehicles will operate the services, and the council will seek to deliver services in partnership with private and voluntary sector partners', and making best use of existing drivers and accessible vehicles. The technology will be in place to provide the efficient booking system, Real Time Passenger Information, and other coordinating Intelligent Transport Systems.

Bo3 Bus 'hopper' service for Central Milton Keynes

The hopper service will serve key destinations including Milton Keynes Central Rail Station, the Hub, thecentre:mk, Xscape, and the Theatre District. One possible route will be from MK Central Rail Station, Silbury Boulevard, Marlborough Gate, Midsummer Boulevard, Lower Ninth Street, Avebury Boulevard and back to MK Central Rail Station. A nominal charge will be used, with a desire to provide a free service if funded by local business benefiting from the service.

Bo4 Improved interchange facilities

Existing interchange facilities are poor at Milton Keynes Central Rail Station, Bletchley rail and bus stations, Wolverton rail station, in Central Milton Keynes, and at Milton Keynes General Hospital. Funding has been secured to provide a new building at Wolverton rail station (seeking opportunities to improve access to platforms), and plans for the redevelopment of Station Square in front of Milton Keynes Central will also be delivered pending planning permission and securing funding from relevant partners. Bletchley rail and bus stations also need upgrading. The main exit of the rail station faces away from the town centre; facilities, information and signage are poor; and buses do not serve the main forecourt of the rail station. The bus station provides a poor urban environment for encouraging bus travel; physical access from bus bays onto and off buses is poor; and information provision and other facilities are also poor. Milton Keynes Council has integrated the findings and recommendations of the Transport Vision and Strategy within the Bletchley Transport Strategy. Central Milton Keynes and Milton Keynes General Hospital both lack operational bus interchanges (excluding Milton Keynes Central Rail Station).

Infrastructure will include improved urban realm and accessibility improvements, increased levels of cycle parking and possible cycle hire facilities; revised levels of ranking space and collection and drop off spaces for taxis and private hire vehicles; additional and improved bus stands where appropriate; infrastructure for hybrid and electric vehicle charging; and additional services for passengers and local residents, workers and visitors such as shops, refreshments, and lavatories. Information will also be improved at interchanges and bus stops with both print material as well as digital information such as RTPI provision.

In development plans, land for future interchange facilities and depot facilities should be defined and defended.

Delivery Date - Medium Term

Bo5 Park & Ride

The network will be served by Park & Ride sites on the edge of the city and in close proximity to the strategic highway network to allow commuters and other journey purposes to transfer to bus. The delivery of Park & Ride would be subject to extensive feasibility and design work, including widespread consultation with the local community before seeking planning permission for delivery. Possible locations include M1 Junction 13, A5 junction with A4146, A421 junction with B4034, stadium:mk or the Nation Bowl Milton Keynes, and A5 near Stony Stratford.

Bo6 Bus priority

In general, the free flowing grid road network negates the need for bus priority lanes in the city. As levels of congestion increase, bus priority to maintain journey times and improve reliability may be necessary at congested junctions and along congested links at peak times if the 'MK Star' network is to provide a real and attractive transport choice. This will be done with minimal disruption to motorists. This could include Automatic Vehicle Detection, bus gates, and bus lanes that provide additional capacity, rather than removing capacity away from motorists. It will remain an option for these lanes to also provide additional capacity for High Occupancy Vehicles (HOVs) to promote car sharing further.

Delivery Date – Long Term

Bo7 Rapid Transit

A rapid transit system is a high frequency and high capacity form of public transport, typically segregated from the highway network. As the demand for travel increases across the public transport network, particularly on the 'MK Star' network, it may become feasible to replace buses with a more advanced form of innovative transit. Without further feasibility analysis, it is not possible to determine what form the transit should take (e.g. segregated or guided bus, tram, or personal rapid transit or 'pods').

Appendix D
Extract from Milton Keynes LTP4

Transport Services

milton keynes council

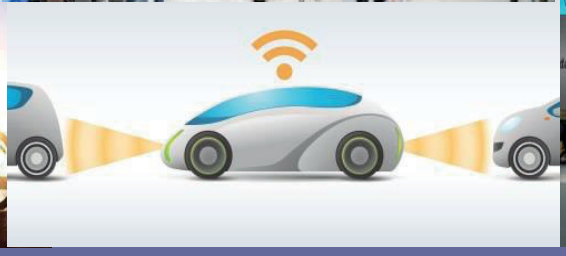
Mobility Strategy for Milton Keynes 2018-2036 (LTP4)

Mobility for All

March 2018






www.milton-keynes.gov.uk/transport-policy

Parking supply: Work with retail, business and developers to provide adequate car park capacity at point of need for key event driven locations (such as retail, leisure, business sector) to meet the growth needs of these sectors, including where possible, creation of a better balance between parking supply and land use (for example different multi-storey or build-over parking solutions).	Short
Review parking: Identify and respond to changes required in parking supply through a consideration of factors such as the expected increase in visitor numbers and dwell time targeted for CMK, additional residential, retail, leisure and office developments likely to generate journeys and changes in transport methods. Benchmark CMK's parking provision and parking costs compared to our "competitors", including similar urban centres and comparable major retail/leisure destinations around the UK. In the medium term where there is oversupply consider converting conventional spaces to electric vehicle charging spaces and bicycle parking or converting space to alternative uses where possible.	Short Medium
Improve public realm and wayfinding: Encourage more walking through improved public realm and wayfinding signage. Education and awareness raising programme, and development of partnerships to provide opportunities for walking and to create a walking culture.	Short
Road Safety: Support delivery of new measures that undergo a Road Safety Audit with a targeted programme of education, training and promotion	Short
Support Safe Urban Driving courses: support Safe Urban Driving courses throughout Milton Keynes to improve HGV driver performance. This will help to raise awareness of the presence of vulnerable road users and help prevent collisions.	Short

Improving our public transport

	Completion Term
Provide new park and ride sites: in the short term carry out feasibility work to assess potential for short term park & ride projects. In the long term work with neighbouring authorities to implement new park and ride sites where there is a high trip demand to the city centre from the north (eg.A5 and A509 / M1 J14), south (eg.A4126), west (eg.A421) and east(eg.J13) of CMK to support longer distance trips from outside Milton Keynes.	Short Long
Premium Bus Route Network: Identify a core priority network of high frequency bus services that operate from early in the morning until late in the evening linking areas of high-demand. We will work in partnership with commercial providers to deliver these, aiming for levels of quality and journey times comparable to that of other modes. This may require physical road improvements and links to bus priority within an Urban Traffic Control System and in the longer term be converted to Bus Rapid Transit or Micro-Metro.	Short
Expand our existing local bus network and introduce bus priority lanes: review the current bus network within Milton Keynes and expand to include bus priority lanes along key access routes to the city centre including use by multi occupancy vehicles (MOVs), powered two wheelers (PTW) and other sustainable modes in support of our mode-shift target where appropriate.	Medium

Shuttle bus service to retail core at weekends: Consider free or discounted shuttle bus service to retail centre and rail station in CMK on weekends. Using park and ride service based on the development of out of town park & ride locations that intersect with known high volume commuter routes.	Short
Ensure schools, higher education, GP & Hospital services and key employment locations are accessible by sustainable transport: Review access to schools, higher education and key employment locations by sustainable transport and consult with site owners to determine whether current services are adequate.	Short
Demand Responsive Transport: Trials to be undertaken to prepare for medium term city wide solutions, potentially incorporating council funded community transport, home to school travel and other subsidised routes. Explore opportunities to use this model to improve accessibility in rural areas, not currently well served by public transport.	Short
Milton Keynes Micro Metro: Milton Keynes is served by six rail stations – improve the connectivity as a 'Micro-metro' rapid mass transit system, particularly in relation to development to the south of the city including investment in station hubs for multi-modal travel behaviour to be expanded.	Medium
Quality Transport Partnership: Re-establish a Milton Keynes Quality Bus Partnership as the principle forum to encourage and facilitate strategic partnership with bus operators to deliver a high quality high frequency bus service which leads to an increase bus patronage and a sustainable, commercial operated network wherever achievable.	Short
Optimise public transport / mass transit access in new development areas: Ensure new development areas have capacity for rapid personal and mass transit access including priority routes on main and local roads along with high quality and well sign-posted walking connections to mass transit boarding points and good quality facilities.	Medium