Comments on Milton Keynes East Strategic Urban Extension 21/00999/OUTEIS

From MK Green Party

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Introduction

While we are opposed in principle to the expansion of MK onto greenfield sites around urban MK, we accept that MKE is in Plan MK and so cannot be objected to on that basis.

This outline application is premature because this it is only for part of the MKE SUE. **It should be deferred** until there are outline apps for all parts of the SUE and then they should all be considered together. This app is dependent upon the other apps, especially for transport, traffic and access, so cannot stand on its own. This app is hybrid, some parts are outline and some are full. It is not clear which parts are which. Some roads and redways appear to be outline only whereas others appear to be full. Some of the plans have been revised recently giving little time for comments to be made on them.

We also have **objections** to the provision of highways, Redways and bus and MRT facilities, see below.

Highways

We are generally opposed in principle to “rolling out the grid” into expansion areas but this site could be an exception because of local constraints such as A422, A509 and M1. The main road network in MK is designed on a grid system. The road network within MKE is also designed on a grid system. However the link between these two grid networks, across the M1, is not aligned with a grid network. This makes no sense. The connection between the two grid networks should itself be a grid network.

M1 Crossing

At the proposed dive-under Y junction on the V11 near Carleton Gate there will be no access for traffic from east to west or vice versa. Consequently all east-west traffic traffic on the H4 alignment will have to use Willen Rd and the Bloor district distributor road. Neither of these roads is a grid road. The Bloor district distributor road is not suitable for the amount of through traffic that it will have to handle, especially with houses fronting on to it. The junction of Willen Rd and the Bloor district distributor road will be a T-junction. This will be a cause of delays and congestion, with or without signals, because of the amount of traffic turning at the junction.

The proposed V11 bridge over the M1 will lead to more traffic using the already busy Pineham roundabout and the H5 which is heavily congested at peak times.

We also have concerns about how traffic on the southbound V11 underpass will merge with the traffic on the dual carriageway from MKE. If the inside lane of the dual carriageway becomes a bus/MRT lane then merging traffic will have to cross that lane. How will that happen?

Alternative proposal

Instead of extending V11 on a new bridge over the M1 extend H4 Danstead Way on a new bridge over the M1 to London Rd (V12). H4 from V11 to V12 and V12 (London Rd) from H4 to H3 (A422) would be dual carriageways. Other sections would be single carriageways. This would be instead of the V11 extension and new M1 crossing proposed in the DF. The H4 bridge over the M1 would be less expensive than the proposed V11 bridge because it would be at a right angle to M1 whereas the proposed V11 bridge would be skewed. Skew bridges cost more.

This H4 extension could be by a new 4 lane bridge from Tongwell roundabout on the same alignment as existing H4 and a new roundabout on the east side, Caldecote rdbt, where a diverted Willen Road would meet it. The existing Willen Road bridge over the M1 could become just a Redway bridge or could also accommodate a northbound-only single carriageway road. This new M1 bridge might need extra lanes for MRT. The plan below shows how this could be done.

The proposed Willen Link roundabout could then be replaced with a local road underpass and a left in/left out (LILO) junction on each side of the grid road, as is found in other parts of the MK grid road network.

North-south traffic would use existing V11 (possibly dualled) to Tongwell rdbt, H4 extension across the M1 to new Caldecote rdbt, new link to Willen Rd and then Willen Rd. This would be similar to the layout of the H8 and V8 where they briefly run together between Marina and Netherfield rdbts.

The proposed V11 bridge was part of the HIF bid. This was based on work by the developers and was not subject to public scrutiny prior to submission to DfT. The principle of a H4 extension over M1 has not been assessed by either the council, DfT or the developers. It would be very unwise to approve the current application until such an assessment has been made.

Signs would direct A422/A509 Bedford/Olney to CMK traffic away from M1 J14. Cars from Bedford and Olney directions towards CMK would be directed to use V12 (old London Rd) and extended H4, to reduce pressure on J14.

Other roads

There should be a link from new eastern perimeter road (V13) to North Crawley Rd. This might be bike and bus-only or could also allow other vehicles.

Alternatively the junction between the eastern perimeter road and the A422 could be moved about 300m north to where North Crawley Rd crosses A422. Instead of an at grade roundabout it could become a grade separated junction. This would increase the capacity of the road and reduce delays. The existing North Crawley Rd bridge would become the Southern side of a new roundabout above the A422. A new bridge just to the north would become the northern side of a new roundabout with U shape links at each end to create an oval roundabout, a similar shape to the J14 over the M1. The eastern perimeter road would join this new roundabout at its south east corner. There would be north-facing on and off ramps down to A422. South-facing on and off ramps would not be necessary because Tickford and Fenny Lodge roundabouts are nearby and can be accessed via North Crawley Rd. Constructing this new roundabout above the A422 would be far less intrusive than constructing a new roundabout at grade. This new roundabout would also be the access to a P&R site for cars from the A422/A509.

If the proposed V11 extension across the M1 is to be built the junction of Carleton Gate with the V11 could be a left in/left out (LILO) junction with access from Carleton Gate to the northbound lane of existing V11 only. This would reduce the pressure on the northern exit via Millington Gate and enable access into the estate from the south for Willen residents.

The new road proposed to serve the housing and employment areas in the south east of the site could be extended to Cranfield. This would significantly reduce the volume of traffic passing through Moulsoe village. A Redway alongside such a road would provide a more level journey to Cranfield for cyclists, avoiding the hill that Moulsoe sits on.

The speed limit on grid roads should be reduced to 50 mph. As well as improving road safety and reducing CO2 emissions it would make it easier for buses to pull out of side roads and bus stop lay-bys - it is much easier for a bus to join a stream of traffic travelling at 50mph than one travelling at 70mph - and easier for buses to cross traffic when turning right into or out of estates. The original Plan for MK produced by the MK Development Corporation in 1970 specified a 40mph speed limit for grid roads, fig 103 on page 287, so a speed limit reduction would be moving closer to the original design for MK.

Make other roads safer by introducing 20mph speed limits in the new residential areas and possibly also in the employment areas.

Pedestrianised areas and streets should be encouraged.

There should be reduced parking standards near local/district centres.

Some housing to be car-free for non-car-owners, enforced by covenant. The provision of car parking spaces takes up land which could be better used for more housing or more green space.

There should be Electric Car charge points in new housing and at local centres.

There should be a Car share scheme for MK East residents.

Mass Rapid Transit

We welcome the proposal to serve MKE with MRT, buses and DRT. However the proposed design does not work for MRT. It is not compatible with MK2050 or the SPD.

The Primary streets within MKE proposed to be served by Mass Rapid Transit are not suitable for Mass Transit or Rapid Transit and so definitely not suitable for Mass Rapid Transit. The Primary streets are too narrow (no segregation), too twisty and too slow for MRT.

MK2050 specifies that MRT should be capable of carrying 100+ passengers, that's the “mass transit” bit. The illustrations show a 3 section articulated vehicle. Such a long vehicle could not easily operate on the narrow and twisty primary streets as shown in DAS Ch 5. MASTERPLAN FRAMEWORK and Ch 6 ILLUSTRATIVE MASTERPLAN.

The Primary streets are proposed to have 20mph speed limit. If MRT is confined to 20mph it will hardly qualify as “rapid transit”. It is acceptable to have short low speed sections of MRT in the vicinity of local centres and MRT stops but not long low speed sections as proposed.

The Primary streets are proposed to be single carriageway roads. So MRT would have to share road space with other traffic giving the potential for that other traffic to delay the MRT services.

The design of the Primary streets could work for conventional buses but not for MRT. The design needs to be changed so that it can accommodate MRT in the future.

This is MK2050 description of MRT network:

"A Mass Rapid Transit network
The original 1970 Plan for Milton Keynes created our grid road network with the flexibility and space for a fixed-track public transport system. Through our long-term planning we can now deliver a modern version of this in the form of a Mass Rapid Transit (MRT) network. This would be a public transport system with frequent services to and from our key destinations, capable of carrying many passengers at times of peak demand with competitive ticket prices.
New electric-powered vehicles, similar to a tram in functionality and quality, can run on road surfaces rather than expensive, fixed rail infrastructure, and in future will be driverless. To be attractive, journey times must be reliable, so our MRT vehicles cannot be caught up in traffic. The generous space built into our grid corridors means we can create lanes alongside or within the existing carriageway (for example, by using one of the lanes of a dual carriageway). The illustrations in **Figure Five** and **Figure Six** show examples of how that could work. Dedicated routes for MRT will also be created to link with new or existing settlements nearby. In some places, our MRT vehicles might run within traffic for short distances with measures that ensure they are given priority. Using the flexibility built into our design, initial modelling has shown that about 90% of our network could be on segregated routes."

What is proposed in the DAS is clearly not compatible with the MK2050 specification or with the Milton Keynes East Strategic Urban Extension Development Framework Supplementary Planning Document (SPD). The SPD in Fig 4.2a specifies that the MRT will run on grid roads and segregated routes, not on residential roads.

Community Hub multi-modal transport interchange

The Community Hub MRT stop is shown as only being on the route from Newport Pagnell/P&R. The route from Cranfield joins the route from Newport Pagnell just to the west of the Community Hub MRT stop and so the route from Cranfield would not serve the Community Hub stop. That makes no sense. All MRT services passing through MKE should serve the Community Hub MRT stop, whether originating/terminating in Newport Pagnell/P&R or Cranfield. The design needs to be altered to enable that to happen.

Buses

More journeys must be made by public transport. This should be encouraged by providing better facilities for buses and Mass Rapid Transit (MRT). This can take the form of higher quality vehicles, higher quality bus stops and ensuring that buses or MRT do not get held up in congestion so that they can run fast and be punctual.

The bus services that will be introduced to serve MK East should not just be from CMK to MK East. They should go on to Newport Pagnell. This will make the local link between MK East and Newport Pagnell and also provide a more frequent service between CMK and Newport Pagnell. There should be bus services to other key locations in MK, not just to CMK. These should include Newport Pagnell, Coachway, Kingston and the Hospital.

How will the bus services be funded? The long build period will mean that subsidy will be required for a longer than the normal 5-7 years, requiring more subsidy in total. Where will this subsidy come from?

The 400m circles in the diagram on p143 of the DAS give a misleading impression of the coverage of the bus services. DfT recommendations and MK Council policy is that there should be a maximum 400m walking distance between each home and the nearest bus stop. Note this is “walking distance”, not “as crow flies” which is what the 400m circles show. Consequently the true coverage, housing within 400m walking distance of a bus stop, is considerably less than that shown in the diagram.

The Principle Bus Route (PBR), as shown in the diagram on p143 of the DAS, only has one bus stop in the 3km between H5 and Community Hub. It should have more bus stops. There could be a pair of bus stops on V11 just before the proposed new bridge over M1, to serve Willen, and another pair of bus stops on PBR just before the proposed new roundabout that gives access to Bloor Homes area, to serve adjacent planned residential or employment areas.

X5 is a Regional express service. This doesn’t serve every local stop that it passes, only major interchanges. So it won’t serve the bus stops on southern part of London Rd shown in the diagram on p143 of the DAS. No other service is shown as running on that section so there may well be bus stops but they won’t be served by any buses. The housing on the west side of London Rd will be more than 400m walking distance from bus stops on the Primary St. Consequently some of the housing in that part of the development won’t be served by bus. More local bus routes should be created so that all parts of the development, including London Rd, do have a bus service.

The Northern section of the Primary street is not suitable for X5 Regional express service for much same reasons as it is not suitable for MRT.

Roads that will be used by MRT/buses should be built early so that services can run from first occupation.

A condition of planning permission should be that the local bus services that serve MK East are operated with electric buses.

We are puzzled by the use of the term “demand responsive rapid transit system” on DAS p59. “A series of characterful neighbourhoods with density and mixed uses in the right places to support a demand responsive rapid transit system with direct connections to Milton Keynes.” We are familiar with MRT and DRT but this is a new one on us. What does it mean?

Some of the documents refer to a Public Transport strategy as being in preparation in 2019. We have not been able to find it amongst the plethora of documents. Does it exist? Is it available?

Walking/Cycling and Redways

More journeys must be made by walking and cycling. This should be encouraged by providing better facilities for those modes.

There must be permeability for pedestrians and cyclists. It was there many decades ago in the design of, for example, West Bletchley and Lakes Estate, but not in more recent developments of last 30 years, eg Monkston and Middleton.

The design of housing estates should be more permeable for pedestrians and cyclists with, for example, footpaths linking the closed ends of cul de sacs so that people can walk or cycle more directly without having to make large detours from the "crow-flies" route.

There should also be frequent pedestrian/cycle links from the streets within a grid square to the Redways alongside the surrounding grid roads and the bus stops on the grid roads.

We welcome commitment that all homes to be within 12 min walk of a school. This commitment should be extended to include a convenience food shop or Community hub as well as a school.

There should be grade separated Redway crossings every 500m or less on M1 and A422. These should not be left for Bloor Homes to provide. Most of the users will be going to or from St James development so St James should provide most of the infrastructure, including grade separated Redway crossings. Excuses about the difficulties over land ownership are not sufficient reason to fail to provide adequate crossings. The crossings are essential. So if St James cannot provide them then the development should not take place.

There should be a Redway across the M1 to the south of J14 to link the southern part of MKE to the rest of MK. The A509 at J14 is not safe for cyclists and has no footpath for pedestrians. The SPD has such a link but the Masterplan does not. It should do so. On the west side it could link into the existing Redway network at Coachway. On the MKE side it could follow the same corridor as the watercourse running between warehouses to the Primary street and across the Primary street to serve the housing in the SE corner of the development.

The Redway crossings of A422 near Tickford and Marsh End roundabouts **must** be grade separated. At grade crossings would be dangerous and would cause delays to traffic on A422.

We regard the provision of a grade separated crossing at Marsh End roundabout as more important than the Redway bridge over A422 proposed roughly mid way between Tickford and Marsh End roundabouts because it would be used by more pedestrians and cyclists. We would wish to see the existing PROW across A422 roughly mid way between Tickford

and Marsh End roundabouts retained. If only one grade separated crossing can be afforded in that area then it should be at Marsh End roundabout with a traffic light controlled at grade crossing at the mid point rather than the other way round. This would probably require a 50mph speed limit on that section.

The Redway crossing of A422 near Tickford roundabout must be grade separated. This can be done by creating a Redway alongside the river Ouzel under the existing A422 bridge. Issues about land ownership must be resolved to enable this to happen.

The ramps to the Redway bridge over A422 near Howard Way and to the Redway underpass under V11 are shown as concertina or folded ramps. These are difficult for cyclists and wheelchair users. They are not consistent with the council policy to encourage more journeys by bike. These, and all concertina or folded Redway ramps in MKE, should be replaced by either straight ramps or wide radius curve ramps. Where space is restricted these might be a spiral design.

The Redway that was planned, but never built, from Coachway to Pineham roundabout, under A509 and then along the north side of Portway, should be built together with an underpass of V11 just north of Pineham roundabout.

These new Redways provide a connection between CMK and the southern part of MKE. Although these Redways are mainly outside the MKE site they are to serve residents and employees of MKE and so should be provided by St James.

The design of housing estates should be more permeable for pedestrians and cyclists with, for example, footpaths linking the closed ends of cul de sacs so that people can walk or cycle more directly without having to make large detours from the "crow-flies" route.

There should also be frequent pedestrian/cycle links from the streets within a grid square to the Redways alongside the surrounding grid roads and the bus stops on the grid roads.

There should be a link from new eastern grid road to North Crawley Rd. This might be bike and bus-only or could also allow other vehicles.

Rail

Parts of the Environmental Statement Chapter D: Transport are a work of fantasy. For example Table D4.4 claims that Woburn Sands, as of Feb 2021, has 4 trains per hour (tph) to Ridgmont, Stewartby, Bedford and 2 tph to Bletchley. There has never been more than 1 train per hour on this Marston Vale service and since trains run between Bletchley and Bedford it is hard to see how they can have different levels of service. When the centre section of East West Rail is completed, possibly around 2030, then Woburn Sands may get 4 trains per hour but it doesn’t have them in 2021.

It should also be noted that during Spring of 2021, including February, most “trains” on Marston Vale line were actually rail replacement buses due to crew shortages caused by the Covid pandemic.

Fortunately Woburn Sands station is a long way from MKE so this is of little relevance to MKE but it illustrates the nonsense that is used to pad out planning application supporting documents.

Car parking

Car parking in residential areas should be designed so that it can be repurposed when it is no longer needed for storing cars. If MK is to achieve the council's goal of carbon neutrality by 2030 and becoming the Greenest city in the world then its citizens will travel very differently to the way that people have travelled since the inception of the new town in 1967. People will own far fewer cars and so less space will be required to park them in, both "at home" and at work, shops, etc. The surplus car parking spaces should be designed so that they are capable of being turned into cycle storage, gardens, allotments, small parks or play areas or having more housing built on them.

Car parking in non-residential areas should be designed so that it can be repurposed when it is no longer needed for storing cars. This might be more employment buildings or leisure facilities.

Green spaces

All mature trees should be retained. More trees should be planted as part of the development. Most existing hedges should be retained and joined together with new planting to act as wildlife corridors.

There should be a requirement to plant lots of street trees. These provide shading and cooling in housing areas, increasing comfort and reducing energy consumption.

The green buffer along part of the eastern edge near Moulsoe should be extended all the way up to North Crawley Rd.

The Ouzel floodplain should remain as natural as possible but with increased tree planting

Ends