Dear Sir/Madam,

RESPONSE TO THE MOBILITY STRATEGY FOR MILTON KEYNES 2018 – 2036 (LTP4) MOBILITY FOR ALL (CONSULTATION DRAFT)

Further to the several meetings culminating in our joint workshop on 11th January we are pleased to submit our comments on the draft MK Mobility Strategy Milton Keynes 2018 – 2036. We are mindful of the need to embrace the parallel proposals of Plan:MK, the MK Futures 2050 recommendations and the evolving Oxford/MK/Cambridge Corridor.

Our overall view of the strategy is that it falls short of our expectations and fails to develop a rationale and explanation or justification for proposed interventions to make our city a place we can all be comfortable and encouraged to live in. The short mobility study undertaken by Integrated Transport Planning (ITP) to support project four of MK Futures 2050 is relevant and should have been made available to inform the draft Mobility Strategy.

We are particularly disappointed that the strategy does not address the size or complexity of the issues we face nor optimises the strengths we already have. There is a concern that this strategy is lost in a plethora of ideas with insufficient clear outcomes identified. There appears to be little by way of an evidence base nor any serious scenario planning behind the proposals. We see both these areas as being key drivers of a well-constructed strategy. We also believe we need to embrace Mobility as a service (MaaS) as a positive influence within our thinking.

Building upon the outdated LTP3 plan is in our opinion not the basis for a tenable plan for the future. To term the current draft a "refresh" of this plan fails to recognise changing habits of our community and the real technological developments we currently see, nor are the proposals seen in the context of a regional plan embracing the benefits which will flow from the evolution of the Oxford/MK/Cambridge Corridor to place MK as a pivotal point within the region through which to direct travellers and consumers both in and around the city. LTP3 states that by 2031 we will have the most sustainable transport system in the country. The draft Mobility Strategy merely recognises the need to reduce transport pollution and CO_2 emissions -- is this watering down of our aspirations?

There is a need to develop the concept of First and Last Mile travel to cement in a meaningful way into a comprehensive joined up strategy.

There is insufficient reference in the draft Mobility Strategy concerning Demand Responsive Transport despite this being an important ingredient of the LTP3 strategy (Appendix F). We consider this to be a serious omission from the current draft document.

We believe the Mobility Strategy should cover a multi-faceted approach, addressing the immediate issues with clarity leading to an evolving medium and long-term vision. We see a disconnect between these features and a greater need for consistency between the short, medium and long term is required.

In many areas there are references to actions which are not supported by indicative analysis behind the thinking, this is particularly so with regard to Car Parking where little is said about how we bring about change other than the traditional response of "increase parking charges" and the discredited idea of reducing car parking spaces in residential areas.

What is the size of the problem? How does this strategy help? What are the foregone opportunity costs for the future? What movement system is appropriate for MK's unique grid system? Have Radialville and Squaresville been properly addressed? There is little to demonstrate how we will answer these key questions. We are in some doubt as to whether this is a transport strategy or a Mobility strategy, the latter being a far wider consideration of community issues.

We also believe the timing is right to consider the creation of an MK Transport Authority responsible for monitoring and evaluating change in transport technology and travel patterns, a model not dissimilar to MKDP would help create a real focus upon the importance of transport to our growth and prosperity making MK the first full MaaS city in the world combining the efforts of a plethora of commercial operators.

We have assembled a number of comments on key issues within the draft Mobility Strategy, these are attached herewith as an Appendix A and B, forming part of our submission.

The current draft Mobility Strategy falls short in a variety of areas as outlined above and lacks the real foresight the citizens of MK deserve. Both MK Business Leaders Partnership and the Fred Roche Foundation wish to be a party to a well-structured vision of the future mobility in our city and we both remain prepared to engage further with the Council before completion of the final version of the Mobility Strategy.

Yours sincerely,

DR PHILIP H SMITH MBE   STUART TURNER
CHAIR, MILTON KEYNES   FRED ROCHE FOUNDATION
BUSINESS LEADERS PARTNERSHIP

APPENDIX A.
RESPONSE TO THE MOBILITY STRATEGY FOR MILTON KEYNES 2018 – 2036 (LTP4) MOBILITY FOR ALL (CONSULTATION DRAFT)

INTRODUCTION.

This working paper records the issues that have been raised by the FRF/MKBLP Going Places Engagement work and is presented as the response to the Mobility Strategy for Milton Keynes 2018 – 2036 (LTP4) Mobility for All (Consultation Draft). The note represents a collection of thoughts and questions from a number of different sources.

The strategy document goes a long way in bringing us up to date on mobility thinking but fails to develop a rationale for a well-informed strategy or provide any explanation or justification for the proposed interventions. Twelve discussion areas have been identified: -

1. Approach/methodology/presentation.

2. The evidence base and justification for the proposed interventions.

3. Integration with other MK strategies and policies

4. Dealing with change and managing disrupters?

5. Responding to people and their needs.

6. Mobility concepts, alternative modes, movement systems

7. Public transport, and publicly accessible systems.

8. City structures - the grid, and land use patterns.

9. Alternative organisational and delivery models.

10 Costs, funding and delivery models.

11. Added value, wider benefits.

12. Environmental issues

1.0 APPROACH/METHODOLOGY/PRESENTATION.

1.1. The draft Mobility Strategy 2018 - 1036 has been presented as a review and refresh of the Local Transport Plan 3 - 2011 to 2031. The plan incorporated a Transport Vision and strategy for Milton Keynes, which was published in 2011. If this document is based on a development of LTP3 and the objectives stated at that time, this needs to be stated and established as the starting point.

There seems to be some confusion over what the strategy stands for; whether it is a refresh of the transport plan, which concerns moving people and goods around in vehicles, or a new mobility strategy, which concerns the integration of all modes, for all purposes, within the city.

1.2. The speed of innovations in mobility brings with it a raft of new acronyms and vocabulary. A *frontis* or appendix is necessary, containing a glossary of terms with a plain English explanation. See Appendix 2.

1.3. It is unclear whether the document is a strategic framework or a plan. The document is contradictory in suggesting both a definitive plan of action and a framework to guide future strategy. Given the significant rate at which technology is changing the latter is appropriate with a short time between review points.

1.4. A list of short, medium and long-term interventions is presented to support the Strategy objectives. It is unclear whether these are presented as a definite plan of action or indicative action areas that could possibly deliver the long-term aims. The strategy needs to demonstrate a greater consistency between short, medium and long-term objectives.

2.0. THE EVIDENCE BASE AND JUSTIFICATION FOR THE PROPOSED INTERVENTIONS.

2.1. The evidence base presents a lot of statistics but it is not clear how they support the interventions being proposed.

2.2 The evidence base needs to be clear on changing patterns of car ownership, and provide data with regard to changes in mode use, particularly buses.

2.3 A critical omission in the justification process is scenario testing of the proposed interventions to demonstrate how these work.

2.4 There are a wider range of options that need to be considered and assessed against different scenarios and see how they fit. For instance, CMK and the opening up of Midsummer Boulevard for electric vehicles; Last Mile thinking; support for the sporting offer' and for culture, recreation and major events.

2.5 The strategy should examine the MK Smart City work in detail and show what lessons can be applied, and learn from other programmes like the OU's 'Smart Cities in the Making: Learning from Milton Keynes'

3.0 INTEGRATION WITH OTHER MK STRATEGIES AND POLICIES

3.1. The strategy correctly recognises the need for a clear relationship with the objectives of Plan:MK, MK Futures 2050, and the CMKO growth corridor.

3.2 While the strategy advocates 'actively managing patterns of growth to make the fullest possible use of public transport' this important principle has not been developed, and the effects of the different growth strategies have not been demonstrated.

3.3 At present Plan:MK is informed by an out-dated seven-year-old transport plan. There is an opportunity for some of the findings of the Draft Mobility Strategy to be fed into Plan: MK.

3.4 The Chancellor has accepted the National Infrastructure Commission's (NIC) recommendations for the Oxford-MK-Cambridge arc. Together with the potential for greater movement north - south, the implications for development and mobility in MK are very significant. The strategy should explain how the generous movement corridors of MK's city structure have the capacity to accommodate the increase in regional mobility by its adaptability to any transport mode.

4.0. DEALING WITH CHANGE AND MANAGING DISRUPTERS

4.1. The strategy needs to demonstrate that it will be nimble enough to accommodate the rapidly advancing technologies, both hard and soft.

4.2 Regulation does not keep up with the pace of technological change. Insights and smart thinking need to be developed to circumvent inhibiting regulations.

4.3 MKC needs to work with companies to develop and deliver products that are right for the city and address the city's objectives. For instance, motor manufacturers are looking at MaaS; a common portal needs to be developed to access these services.

4.4 An idea of how the conventional approach to car parking will fit into a rapidly changing situation should be addressed.

5.0. RESPONDING TO PEOPLE AND THEIR NEEDS.

5.1. There is no analysis that addresses the users viewpoint, including specifically the young and old?

5.2 The needs of Community Transport and Age Concern should be explained.

5.3 Similarly, the strategy should show evidence of the needs of young people and specifically seek Youth Cabinet views and their future aspirations.

5.4. It is not evident that sufficient thought has been given to the Impact of rapidly changing society and values, car ownership for example.

6.0. MOBILITY CONCEPTS, MODES, MOVEMENT SYSTEMS

6.1. There is no detailed explanation of the different mobility concepts, whether transport modes or services. It seems that no analysis or comparison of the alternative movement systems has been undertaken to demonstrate how they could work for Milton Keynes, and hence their relative strengths and weaknesses. This work is necessary.

6.2. There appears to be a greater commitment being made to mass transit systems than demand-responsive systems in Section 4. Interventions to support mass transit systems are over three times greater than for demand responsive systems, but there is no evidence to support this stance.

6.3 Milton Keynes Council is promoting a mobility strategy based on a rapid mass transit system with vehicles running in high-density development corridors. Milton Keynes was designed to disperse employment sites to minimise congestion, so it is unclear how 'high-density' corridors can be created retrospectively within the existing urban area. It is not clear how a linear system will fit in with a publicly accessible system, capitalising on communication technology, flexible routing, and scheduling of small to medium sized vehicles such as a minibuses or super taxis?

6.4. The first and last mile concept is interesting but the strategy does not demonstrate how a local MK mobility strategy will relate to the regional transport strategy.

7.0. PUBLIC TRANSPORT, AND PUBLICLY ACCESSIBLE SYSTEMS.

7.1 To be successful and well used, public transport needs to be fast, frequent, reliable and convenient. The strategy needs to define how these attributes can be assured.

7.2 Provision of public transport is a binary choice, either a utility, which is paid for through general taxation, or a service paid for by the user. The best cities in the world are those where transport is a public good subsidised through taxation.

7.3 The Council should investigate the feasibility of making MK the first full MaaS city in the world, delivered by several commercial operators so the market decide what works.

7.4. In the field of public transport, regulation is not catching up with technology fast enough. The strategy should address this issue and how it relates to demand responsive transport, including some of the private on-demand models such as Uber and Lyft.

7.5 The strategy is short on measures to ensure a better bus-based system for the city. A key factor in realising the full potential of bus services is having a local regulatory authority, which can franchise services; this is prevented in MK by the Council's current constitution. The strategy should highlight this as a political issue to be addressed by the Council. The NIC report also opens new possibilities for transport regulatory powers within regions of the arc.

7.6 Other measures should be fully investigated, including more direct routes (to avoid interchange in CMK); a network of premium high frequency routes; partnerships with bus operators to ensure better alignment between investment and services; improvements such as smart cards, anti congestion measures, etc.

8.0. CITY STRUCTURES: THE GRID, AND LAND USE PATTERNS.

8.1. It does not appear that the strategy has examined alternative mobility systems and identified the most appropriate for MK's unique grid. The gridded movement layout is a legacy with immense potential and flexibility and should be the basis for formulating the mobility concepts and systems.

8.2. It is not apparent that the strategy has compared different mobility scenarios that could work for Milton Keynes and considered those that work with its unique urban form, capitalising on a dispersed, multi centred gridded city. This would suggest a move from linear to network movement systems.

We have the hard infrastructure, a network system in the form of a grid that is historically capable of accommodating these new systems, but is the understanding of this and commitment to deliver a mobility strategy that's right for Milton Keynes is not apparent.

8.3. The draft strategy does not demonstrate how the movement systems work at different spatial scales, from the local neighbourhood level to the cross-city scale to the regional context. The interface between each scale needs to be explained in the context of the city's unique urban form.

8.4 The grid system of movement corridors was developed with space for other transport modes such as trams. The strategy should reinforce this facility.

9.0. ALTERNATIVE ORGANISATIONAL AND DELIVERY MODEL.

9.1. An MK transit authority and alternative organisational and delivery model needs to be assessed.

9.2. The strategy should appraise different organisational and delivery models as one of the interventions, and, within this, both public and private models where partnership arrangements might benefit Milton Keynes.

9.3 There is currently a proposal considering a sub regional transit authority. The setting up of a MK City Transport Authority should also be on the agenda.

9.4. Consideration should be given to a body equivalent to MKDP leading an independent transit authority for MK, and bringing together local partners and stakeholders in this initiative.

10.0 COSTS, FUNDING AND DELIVERY MODELS.

10.1. No reference has been made to any basic costs of the interventions or different funding or operating models, whether in private or public ownership. It appears that an industry-driven model has been adopted without question or alternative analysis, which could undermine the credibility of the strategy.

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11.0 ADDED VALUE, WIDER BENEFITS.

11.1. There is analysis of how mobility can be utilised to build in added value. This can be looked at in several ways:
- Using mobility interventions as an enabler for social integration.
- Using mobility as a regeneration tool.
- Creating local interchanges and points of connections at local and district centres as part of the regeneration programme. Consideration should be given to the 'Points of Connection Design Study' prepared by the Parks Trust Milton Keynes in October 2009.
-To create safer and more attractive places at a neighbourhood level.
- Using mobility to support the cultural or sporting offer.

12.0 ENVIRONMENTAL ISSUES

12.1. LTP3 stated "By 2031, Milton Keynes will have the most sustainable transport system in the country." The draft Mobility Strategy has downgraded this ambition to mere recognition of the need to reduce transport pollution and CO2 emissions. The strategy should be much more ambitious considering recent advances and MK's reputation in this area.

12.2 Any solutions should deliver a healthy, liveable city with improved air quality, uncongested roads, low carbon transport and an accessible mobility network. Different options and scenarios should consider the impact of electric buses, intensive transit corridors, mass transit systems, demand responsive transport, first-last mile travel, etc.

12.3 A MK City Transport Authority could drive this agenda.

12.4 Environmental and air quality issues have been addressed but consideration should be given to application of the Air Quality Management Area (AQMA) scheme across the whole of MK?

12.5 There should be reference to "Imagine MK 2050 Strategy: A roadmap for a sustainable Milton Keynes" prepared by MKC which presents a vision for a near zero carbon city with a high quality of life for all by 2050.

SUMMARY, CONCLUSION AND NEXT STEP.

The draft Mobility Strategy could form the basis for a discussion document but can not to be considered as a mobility strategy to take forward with any confidence over the next eight years.

ST/PS - 07.01.18. Version 3.

APPENDIX B.
RESPONSE TO THE MOBILITY STRATEGY FOR MILTON KEYNES
2018 – 2036 (LTP4) MOBILITY FOR ALL (CONSULTATION DRAFT)
Terms taken from Section 5. Delivery Plan needing an explanation. (See 1.2)

- Rapid mass transport concepts (e.g. Micro Metro),
- Bus Rapid Transit or Micro-Metro.
- AVRT / Micro-Metro mass transit approaches and pilot these concepts.
- Micro-Metro concept
- Micro-Metro' rapid mass transit system.
- Rapid personal and mass transit access
- Bus priority and rapid mass transit.
- Rapid mass transit commuting options.
- Bus priority or mass transit network.
- Core routes and a mass rapid transit.
- Mass Transit System.
- Rapid mass transit, multi-modal hubs.
- Mass transit infrastructure.
- Mass transit networks.
- Rapid mass transit.
- Transit corridors.
- Local/personal transit.
- Bus priority measures. Core priority network of high frequency bus services.
- Car share/rent.
- Remote vehicle access points.
- First Last Mile Strategy. First and last mile connectivity options.
- Local transit and bike share operator.
- Demand Responsive Transport.
- Demand responsive cars, vans or buses.
- On-demand bus service.
- High frequency transit priority.
- Public transit hubs.
- 'MaaS' Mobility. (Mobility as a service).
- Ultra-low emission vehicles (ULEVs)
- Milton Keynes Go Ultra Low City scheme.
- Ultra-low emission modes (e.g. EVs)
- UK Autodrive.
- Connected vehicle.
- Autonomous Vehicles.
- Autonomous POD service and last mile mobility.
- Autonomous 'last mile' deliveries.
- MK50 Future City strategy for Smart Shared Sustainable Mobility
- MK:Smart project.
- Intelligent Transport Systems (ITS)
- Automated bus priority.
- Multi-modal smart hubs at strategic park-and- rides.