

**EXAMINATION OF CAMBRIDGE CITY AND SOUTH
CAMBRIDGESHIRE LOCAL PLAN
MATTER 7A – STRATEGIC TRANSPORT ISSUES
STATEMENT ON BEHALF OF BRLOG**

DRAFT FOR DISCUSSION AND COMMENT

Organisation: North of Barton Road Land Owners Group

Respondent Numbers: Cambridge City Council ID. 5336,
South Cambridgeshire District Council ID. 21302

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1. Introduction

- 1.1. This Statement has been prepared by Peter Brett Associates LLP on behalf of the North Barton Road Land Owners Group (North BRLOG) to the Local Plan Examinations for Cambridge City and South Cambridgeshire. North BRLOG comprises four landowners, as follows: Corpus Christi College, Downing College, Jesus College, and University of Cambridge. North BRLOG owns land to the North of Barton Road which is on the south western built-up edge of Cambridge. The location of the site is shown on the plan in Appendix 1 and is currently located within the Green Belt. It crosses the administrative boundary between Cambridge City and South Cambridgeshire. In September and October 2013 representations were submitted on behalf of North BRLOG to both draft Cambridge Local Plan (Draft CLP2014) and draft South Cambridgeshire Local Plan (Draft SCLP). The initial representations relating to transport were prepared by SLR.
- 1.2. There is agreement between the landowners that a co-ordinated development could be delivered with appropriate transport connections and an orbital transport route, including for walking, cycling and public transport trips, providing links between housing and employment.
- 1.3. Whilst a coordinated approach to the delivery of the three sites would be ideal, the representations also show that the development of the Land North of Barton Road site (LNOBR) has the potential to be delivered individually whilst still providing infrastructure which would support an orbital public transport route in western Cambridge.

Matter 7A

- 1.4. In summary, in relation to Matter 7A – Strategic Transport Issues the strategy for growth set out in the Plans is not evidence-based, justified, effective, or consistent with national policy, because:
 - the submitted evidence base does not provide sufficient detail on the deliverability of the current strategy and whether it can support the level of strategic growth identified to the west of Cambridge. The strategy is heavily focused towards delivering high cost, off-site infrastructure to unlock development in new settlements outside of Cambridge with little evidence of the deliverability of this infrastructure. The transport strategy appears to have been devised to attempt to respond to the Local Plan Spatial Strategy, rather than to inform it;
 - whilst the City Deal offers £100million towards the provision of infrastructure to support new developments and a preliminary prioritised list of schemes, there is still no detail on which schemes will be delivered as part of the first tranche of the City Deal funding or how they will be delivered. Therefore there is no certainty of funding or delivery of off-site infrastructure required to facilitate these major new settlements set out in the Plans such as Bourn Airfield or an expanded West Cambourne. The estimated total cost of delivering the list of prioritised schemes for tranche 1 is greater than the £100m funding which has been allocated through the City Deal. The current strategy therefore requires further funding sources to be secured to facilitate the level of growth identified in the Plans which presents a risk to delivery of this growth. Therefore, in the short term, alternative sites that are not reliant on the City Deal infrastructure should be identified to ensure that growth is not stalled.
 - the provision of new settlements in peripheral locations i.e. Bourn Airfield and West Cambourne where there is already an established high level of car use are contrary to national policy set out in the NPPF and local policy set out in Policy TI/2 of the South Cambridgeshire Local Plan which seeks to reduce the need to travel and maximise opportunities for sustainable travel;
 - our evidence suggests that more sustainable sites could be brought forward that offer a deliverable more cost-effective solution to delivering housing such as the Land North of Barton Road (LNOBR) site. For example, the most sustainable Census wards that

offer travel opportunities by a range of modes are located within the Cambridge area and its immediate periphery. By focusing growth in these locations adjacent the City boundary, an interim option is available for the delivery of housing and growth which places less reliance on City Deal funding to deliver local transport infrastructure in the short term. This would then allow the majority of the City Deal fund to focus on the delivery of the longer term strategy for new housing located in new settlements outside of Cambridge.

- 1.5. More recently, Cambridgeshire County Council have submitted a paper - 2015-20 prioritised infrastructure investment programme - to the newly formed Greater Cambridge City Deal Joint Assembly (GCCDJA), for consideration of the Tranche 1 priority schemes. These are shown in the diagram within Appendix 2.
- 1.6. Whilst it is encouraging that progress appears to be being made on the prioritisation of transport schemes, based on economic benefits, there are still a lot of un-answered questions relating to delivery, costs etc. In fact the report dated the 12th January to the GCCDJA highlights in the Executive Summary (para 7) that there is not a great deal of specific information available for the various schemes and that officers have had to estimate timescales and costs for delivery. This is not a sound evidenced based approach.
- 1.7. Overall, a more cost-effective and deliverable approach to the delivery of growth is achievable through the release of housing sites on the edge of Cambridge. In these locations, the sustainable transport infrastructure required to deliver a sustainable development will largely be paid for and delivered as part of the development and where existing travel patterns show a low use of the private car for journeys to work..

2. Matter 7A – Strategic Transport Issues

a. Are all essential transport schemes / improvements identified in the Plans and is it clear how they will be delivered?

- 2.1. As set out in paragraph 1.5, whilst the Plans (supported by the City Deal and Cambridge Transport Strategy) identify schemes required to facilitate development across the growth area, there is no evidence base to demonstrate that they are deliverable and therefore the Plans are not considered to be justified and can therefore be considered unsound.
- 2.2. Tranche 1 of the City Deal identifies £100m towards the delivery of key infrastructure, but the City Deal or the Plans do not identify the transport schemes that will benefit from the funding or how the infrastructure will be delivered. Further there is no evidence to demonstrate that the proposed strategy is sufficient to deliver the level of strategic growth identified including specific phases and triggers to facilitate development quanta. We would expect to see:
 - delivery plans and triggers for specific developments (e.g. Bourn Airfield and West Cambourne) identified in the Plans – The Economic Prioritisation of the Greater Cambridge City Deal dated 23rd December 2014, prepared by Cambridge Econometrics and SQW for Cambridgeshire County Council, and used to support the City Deal Tranche 1 prioritisation of schemes; highlights that these strategic sites are dependent upon the delivery of the A428 to M11 segregated bus route / A428 park and Ride and the Maddingley Road bus priority of which there is very little detail on the delivery;
 - identification of critical strategic infrastructure items which are required for the delivery of growth;
 - a wider strategy for prioritising the delivery of these critical off-site infrastructure requirements across the area;
 - further details of the location and deliverability of strategic Park and Ride sites at Cambourne and on Maddingley Road;
- 2.3. We also question the ability to deliver improvements to the A428 to provide the bus priority needed to deliver sustainable development in this location, as set out in full in Section 6.3 (and

para 2.2 above) of the previously submitted Transport Submission document prepared by SLR and dated September 2013.

- 2.4. The written statement prepared by Januarys on behalf of the North BRLOG and submitted for Matter 5 – Infrastructure / Monitoring / Viability highlights a shortfall in funding for this scheme (and others) which identifies the risk to delivery of the scheme and, in consequence the housing completions related to additional strategic developments in West Cambourne or at Bourn Airfield. Further, the evidence base does not satisfactorily show that the traffic impacts can be acceptably mitigated by these improvements, even if delivered.

b. Do the Plans adequately reflect the Local Transport Plan (LTP) and the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC)?

- 2.5. The Plans do not reflect wholly the sustainable transport objectives set out in the LTP and TSCSC particularly relating to:

- LTP3 Objective 5 – Meeting the challenge of climate change and enhancing the natural environment
- LTP3 Objective 4 – Managing and delivering the growth and development of sustainable communities
- LTP 3 Challenge 2 – Reducing the length of the commute and the need to travel by private car
- LTP 3 Challenge 3 – making sustainable modes of transport a viable and attractive alternative to the private car
- LTP 3 Challenge 7 – Protecting and enhancing the natural environment by minimising the environmental effects of transport.

- 2.6. The Plans fail to :

- address how an effective public transport network will be provided to the west of Cambridge to enable the level of growth identified in the Plans. Current plans appear to rely on the delivery of a segregated busway which will need to provide the necessary interchange and links to key employment areas within the City. The guided bus is not available to the west of Cambridge and the current strategy for public transport only focuses on the provision of a single radial route into Cambridge from outside the City along the A428. Whilst this provides access to employment at the West Cambridge site, seamless orbital connections and routes should be provided which link to additional employment areas to the north, north-west and south Cambridge.
- allocate suitable, deliverable and sustainable sites within the current Green Belt to the west and south-west of Cambridge, closer to the existing facilities and jobs in Cambridge (such as the LNOBR site) which offer a locations for the delivery of housing more consistent with the objectives in paragraph 2.5 above and which can deliver the public transport strategy for west Cambridge, within the short term.

c. Does the Transport evidence base comply with paragraphs 54-001-20141010 to 54-011-20141010 of Planning Practice Guidance?

- 2.7. Paragraph 54-001-20141010 requires the transport evidence base to identify opportunities for encouraging a shift towards sustainable transport usage. Whilst the current Plans identify the delivery of some housing adjacent to the built-up area of Cambridge, the strategy places heavy emphasis on the delivery of major new settlements outside Cambridge i.e. Bourn Airfield. These sites would result in increased car commuting and increased commuting distances in locations where there are no realistic alternative modes.

2.8. As identified earlier, suitable sites exist on the edge of the built up area of Cambridge (such as the LNOBR site) which offer greater opportunities to promote travel by a range of transport modes. In these locations:

- off-site transport infrastructure requirements are lower due to proximity to jobs and local facilities;
- potential for sustainable travel by a range of modes is significantly greater;
- cost-effective opportunities exist to deliver the long-term improvements in public transport connectivity to the west and south-west of Cambridge (including orbital linkages through the site) with a greater certainty of delivery and less reliance on external funding sources.

d. Will the Plans encourage the use of sustainable modes of transport?

2.9. In addressing this question, specific consideration has been given to each of the soundness criteria and whether the Plans encourage the use of sustainable modes of transport in each context.

Are the Plans consistent with National Policy?

2.10. With reference to National Policy, the Plans are not consistent with the aims and objectives of the NPPF, with particular reference to:

- Paragraph 29 – “The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel”;
- Paragraph 34 - “plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised”;
- Paragraph 35 – “Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people...”
- Paragraph 19 – ‘Planning should operate to encourage and not act as an impediment to sustainable growth.

2.11. Based on a review of 2011 Census data, the most sustainable Census wards that offer travel opportunities by a range of modes are located within the Cambridge area and its immediate periphery. Table 5.1 of the Transport Submission dated September 2013 has been extended below to show the current mode share for the Bourn Ward, which encompasses the Camborne development and Bourn Airfield.

	Barton Ward		Newnham Ward		Bourn Ward	
	No.	%	No.	%	No.	%
Car Driver	628	57%	430	23%	3,974	77%
Car Passenger	35	3%	24	1%	214	4%
Rail	48	4%	166	9%	222	4%
Bus	48	4%	61	3%	280	5%
Walk	67	6%	412	22%	293	6%
Cycle	242	22%	768	41%	122	2%
Other	26	2%	31	2%	81	2%
Total people	1,094	100%	1,892	100%	5,186	100%

- 2.12. The results clearly show the wards located adjacent the existing built up area of Cambridge (Barton and Newnham) have residents using a range of sustainable modes to travel to work with percentages of car drivers lower than 57% whereas the major developments outside Cambridge (the Bourn Ward) show high levels of car usage.
- 2.13. On this basis, it is clear that:
- opportunities to promote sustainable travel for new housing development consistent with national policy are greatest in locations adjacent the existing built-up area of Cambridge, such as the LNOBR site where established patterns of low car use already exist.
 - delivering a range of sustainable travel options is more cost-effective and viable in locations adjacent Cambridge than in locations outside Cambridge where car use is more established and a more substantial shift in mode share would be required.

Are the Plans effective?

- 2.14. As set out in paragraphs 2.1 to 2.4, whilst the Plans (supported by the City Deal and Cambridge Transport Strategy) identify schemes required to facilitate development across the growth area, there is no evidence base to demonstrate that they are deliverable within the short term.
- 2.15. Furthermore, the estimated total cost of delivering the list of prioritised infrastructure schemes for tranche 1 of the City Deal is greater than the £100m funding which has been allocated. The current strategy requires further funding sources to be secured to facilitate the level of growth identified in the Plans which presents a major risk to delivery of this growth. The effectiveness of the Plans in delivering sustainable development and the level of growth identified in the Plans is not evident.
- 2.16. Evidence is required regarding the deliverability of key infrastructure schemes identified in the Plans (and City Deal) to prioritise effectively the infrastructure schemes which offer the maximum opportunity to deliver sustainable growth within the plan period. An interim solution to deliver part of the required growth in housing and employment in the area which should be identified in the Plans is to focus growth in locations adjacent Cambridge City boundary where sustainable travel patterns are already established and infrastructure requirements are considered to be much less. This places less reliance on City Deal funding to deliver local transport infrastructure required to facilitate the growth identified in the plans, allowing the majority of the City Deal fund to be focused on the delivery of the longer term strategy for new housing located in new settlements outside Cambridge. This longer term strategy should be supported by the additional evidence-based work on deliverability set out in paragraphs 2.14 and 2.15 and currently ongoing as part of the City Deal assessment work.
- 2.17. As such it is not considered that the plans are effective for delivering the short term housing growth that is required within the plan period.

Are the Plans positively prepared?

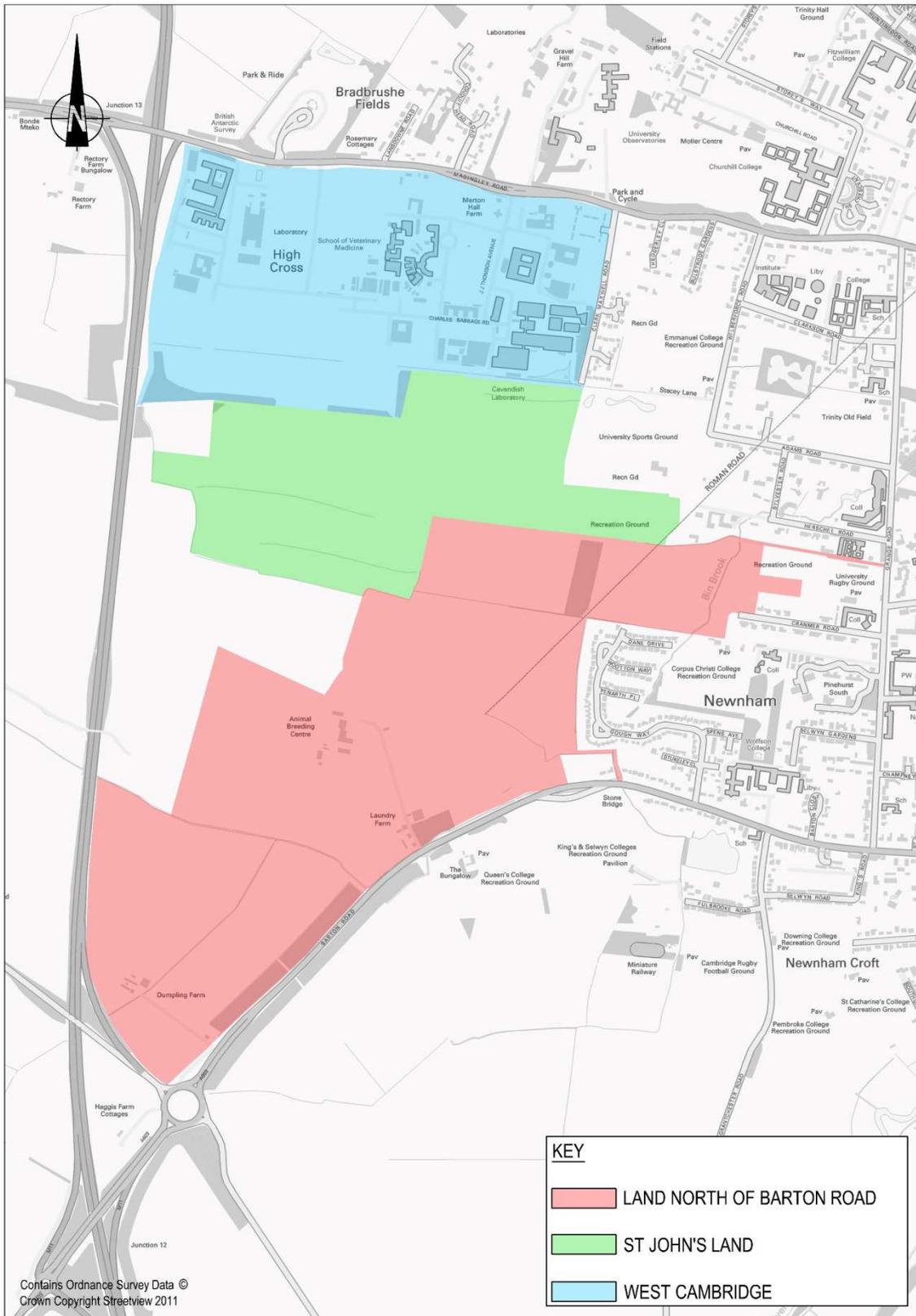
2.18. Whilst the current strategy sets out positive measures to encourage sustainable travel supported by extensive off-site transport and highways infrastructure, it appears that the transport strategy has been prepared to respond to the Local Plan Spatial Strategy rather than to inform it. Given the established sustainable travel culture which is embedded within the City of Cambridge and particularly the University and its colleges, the strategy should be more positively prepared and allocate sites adjacent the existing City boundary such as the LNOBR site in the first instance as they:

- reduce the need to travel;
- are located close to local jobs;
- require less investment in transport infrastructure to deliver access to a range of sustainable modes;
- offer the opportunity to prepare development specific transport strategies which deliver wider benefits to existing residents as well as integrate with local adjacent development sites;
- offering a realistic, alternative option for housing delivery in advance of the major settlements outside Cambridge; and
- support the aim of the City Deal to encourage a 'new wave' of the 'Cambridge Phenomenon'.

Are the Plans justified?

2.19. For all the reasons set out above, we do not consider the Plans to be justified in their approach to encouraging sustainable travel within the short term identified within the Plans period.

APPENDIX 1 – Site Location Plan



APPENDIX 2 - City Deal Tranche 1 Prioritisation Plans

