

Cambridge City and South Cambridgeshire Local Plan Examinations Matters and Issues Statement

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Matter 7 A - Strategic Transport Issues (Wednesday 18 February 2015)

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

1.1 The Plans do not identify all essential transport schemes/improvements and provide no clarity on how they will be delivered because:

- 1 Essential transport schemes/improvements are only identified in the Infrastructure Delivery Plan and not the Plans themselves.
- 2 There is no clarity on how they will be funded and the timescales for delivery in the Plans.

Identification of Essential Transport Schemes/Improvements in the Plans

1.2 Chapter 10 of the SCLP and Section 9 of the CCLP deal with the issue of providing the infrastructure (including transport) to support development. The only specific transport scheme policy in the SCLP is Policy TI/1: Chesterton Rail Station and Interchange which is not referred to in the IDS Update. Similarly, the CCLP only identifies a single specific scheme, namely an 'indicative alignment of the Chisholm Trail under Policy 80'. This is despite the IDS Update identifying some 72 schemes including some 31 major schemes (>£2million) at an estimated total cost of £750million¹.

¹ IDS Update 2013 Appendices B to D (RD/T/020)

- 1.3 SCLP Section 3 and CCLP Chapter 3 both refer to various transport schemes/improvements in the site specific policies. However for example in both Policies SS/5:Waterbeach New Town and Policy SS/6 New Village at Bourn Airfield in the SCLP, the transport schemes are listed to be addressed as issues and requirements through a future AAP that will establish a policy framework for the site. Furthermore the Policies Maps do not identify the transport schemes referred to. The Plans therefore do not identify essential transport schemes/improvements as described in the IDS² and IDS Update³ discussed during the Matter 5 session.
- 1.4 Both Plans make reference to the IDS. However it is clear that significant transport schemes/improvements that are essential to support development proposed are not embedded in the Plans through specific policies such as protected lines/areas etc. This is not surprising, as the Councils were clearly not in a position to include such schemes in the Plans at the time they were prepared as the necessary transport evidence base had not been collected⁴. This point is expanded further in the answer to question iii). The IDS Update 2013 states that ‘critical’ infrastructure requirements are based upon ‘initial’ views with the final view on what constitutes critical infrastructure to be taken by each council respectively. This is clear evidence that the Plans do not clearly identify ‘essential’ elements of transport schemes/improvements as a decision has yet to be taken and, furthermore, these ‘initial’ views are not supported by a robust transport evidence base. Further evidence of a lack of decisions on transport schemes taken by the Councils can be found in Agenda Item 7 of South Cambridgeshire District Council’s Cabinet meeting held on 16 October 2014⁵.
- 1.5 A decision on what constitutes critical infrastructure is fundamental to the soundness of the Plans. Paragraph 018 of the Local Plans section of the PPG⁶ provides advice on how to show that a Local Plan is capable of being delivered including provision for infrastructure. The guidance states that “*key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself and that the detail concerning planned infrastructure provision can be set out in a supporting document such as an infrastructure delivery programme*”.

Funding and Timescales for Delivery

- 1.6 The PPG⁷ on Local Plans states ‘*The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and*

² IDS 2012, para 9.2.6 (RD/T/010)

³ IDS Update 2013 Appendices B to D (RD/T/020)

⁴ CEG Matter 5 Statement

⁵ South Cambridgeshire District Council Cabinet 16 October 2014 Cabinet Meeting Agenda, pg 39 (Annex 1 to RD/CEG/010)

⁶ PPG – reference ID: 12-018-20140306 (RD/NP/020)

⁷ PPG (RD/NP/020) – reference ID: 12-018-20140306 (RD/NP/020)

provide it, and how it relates to the anticipated rate and phasing of development'. The IDS Update (2013)⁸ clearly shows, at the time the Plans were finalised and submitted for examination, no decision had been taken on 'critical' transport infrastructure.

- 1.7 The Plans do not include a trajectory for at least the first five years showing what transport infrastructure is required and who is going to fund it and provide it. For reasons relating to funding timescale uncertainties discussed during the Matter 5 session⁹, there is a high degree of uncertainty over which transport schemes are to be delivered over at least the first five years of the Plans and, hence, support development as proposed.¹⁰
- 1.8 An example of the lack of clarity on funding and timescales for delivery can be found in the initial list of schemes identified to be funded through the Tranche 1 (2015-2020) City Deal funding. Table 1 – City Deal programme and shortlisted schemes¹¹ - identifies an initial list of some 14 schemes at a total estimated cost of £193.9million. The Tranche 1 funding is £100million and, therefore, it is clear this list will need narrowing down further to reflect the budgetary constraints. This is further clear evidence of no decisions being taken on the prioritisation of schemes and explains why it has not been possible to include schemes in the Plans contrary to PPG advice.
- 1.9 In conclusion, the Local Plans do not identify the essential transport schemes/improvements and it is not clear how this essential infrastructure will be delivered. This flaw in the Plans is rooted in the absence of a proportionate effective evidence base prepared in a positive manner at the right time in the plan making process. Any sound plans for Cambridge and South Cambridgeshire must identify essential transport schemes in the Cambridge Area, including locations on the edge of the City. These locations do not rely on the A14, A428 and A10 schemes. This will increase the certainty of delivery of development.
- 1.10 This matters because we believe that if the costs, risks and uncertainty of the major infrastructure programmes are properly articulated then it would enable a more effective and objectively assessed appraisal of the development strategy and distribution in the context of the development sequence stated in the Plans. This would again ensure that development opportunities on the edge of Cambridge are recognised for their relative low cost, high value contribution to the local sustainable transport network, that directly accords with the principles of sustainable development as set out in the NPPF.

⁸ IDS Update 2013, para 4.3.1 pg 16 (RD/T/020)

⁹ CEG Matter 5 Statement, para 2.3

¹⁰ Major Transport Scheme Programme including housing trajectory (RD/CEG/020)

¹¹ South Cambridgeshire District Council Cabinet 16 October 2014 Cabinet Meeting Agenda, pg 39 (Annex 1 to RD/CEG/010)

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

2.1 The Plans do not adequately reflect the LTP and the TSCSC because:

- 1 The spatial pattern of development will not promote sustainable trip patterns necessary to meet the LTP Targets and Objectives or the TSCSC Policies.
- 2 The significant highway infrastructure upon which the Plans are dependent will promote unsustainable trip patterns contrary to LTP Targets and Objectives and the TSCSC Policies.

2.2 Figure 2.1 of the LTP3 provides a summary of how the LTP3 will contribute to meeting the five LTP3 Objectives. In order to illustrate how the Plans reflect the LTP objectives, Figure 2.1 is replicated at Appendix 1 with a third column added commenting on the impact of the Plans against these objectives. Where appropriate, in Appendix 1, reference is made to the relevant evidence base in either the Plans or representations.

2.3 In summary, the spatial pattern of development proposed will not contribute to the LTP3 objectives for the following reasons:

	LTP3 Objective	Impact of Local Plans
1	Enabling people to thrive, achieve their potential and improve their quality of life.	The new settlement strategy will not offer the opportunity to residents to travel to key service and job locations by active modes and hence improve their quality of life ¹² .
2	Supporting and protecting vulnerable people.	The poor accessibility of the New Settlement Strategy to key services in the Cambridge Urban Area will not support and protect vulnerable people ¹³ .
3	Managing and delivering the growth and development of sustainable communities.	The new settlement strategy adjacent to major dual carriageways will encourage the development of unsustainable communities, as the evidence at Cambourne clearly illustrates ¹⁴ .

¹² CEG Transport Evidence Base, September 2013, figures 9 to 11, pg's 46 to 48

¹³ CEG Transport Evidence Base, September 2013, para 3.7 to 3.12, pg's 13 to 15

¹⁴ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – 'Lessons from Cambourne Review

4	Promoting improved skill levels and economic prosperity across the county, helping people into jobs and encouraging enterprise.	The new settlement spatial strategy will make it more costly and difficult for people to access jobs in The Cambridge Urban area ¹⁵ . Evidence from existing travel patterns ¹⁶ demonstrates locating development beyond the Green Belt will reduce the number of people travelling into the City and the workforce available to support economic growth compared with accommodating an increased population within and on the edge of the City.
5	Meeting the challenges of climate change and enhancing the natural environment.	The Plans including major highway/transport infrastructure schemes will deliver unsustainable trip patterns by encouraging the use of the private car. The significant transport infrastructure will significantly impact upon the natural environment. These impacts have not been assessed through the Plan preparation ¹⁷ .

2.4 The Plans rely on the Transport Strategy for Cambridge and South Cambridgeshire as an evidence base to identify the essential elements of transport infrastructure needed to deliver development as proposed. This Strategy was published in July 2013 for consultation and CEG representation¹⁸ identified that the DTS did not align with the Local Plan: Patterns of Development and there was a significant lack of robust evidence in relation to transport infrastructure costs and deliverability.

2.5 The misalignment of the TSCSC with the Local Plan Spatial Strategy can be highlighted by the fact that the Strategy sets out a target to stabilise car trips¹⁹. To achieve that target, the proportion of car trips in South Cambridgeshire must fall from 60.2% (current) to 47% (2031) of the forecast growth in trips. Such a target can only realistically be achieved by focussing a greater proportion of development in Cambridge and Cambridge fringe locations, where sustainable mode share is significantly higher, trip lengths are shorter and the prospect of capturing trips on foot, by bike and public transport are realistic and achievable. This strategy is supported in technical modelling work undertaken by WSP/Cambridgeshire County Council in March 2013 comparing the travel behaviour of residents in 'Fringe', 'Outer Fringe' and 'Rural

¹⁵ CEG Transport Evidence Base, September 2013, Appendix A(ii)- Accession Mapping Public Transport

¹⁶ CEG Transport Evidence Base, September 2013, Appendix A(iii)- 'Analysis of CSRM 2031 Projections for Fringe Sites and Rural Settlements', Section 3.6, para 3.6.1 to 3.6.4

¹⁷ PPG Paragraph 010 Reference ID 54-010-20141010 – Last sentence of 1st paragraph(RD/NP/020)

¹⁸ CEG Matter 5 Statement, Appendix 1 & 2

¹⁹ TSCSC (RD/T/120) 'Traffic Growth and the impact of new development' pg 2-3

Settlements'. The technical modelling evidence is summarised in Tables 3 and 4²⁰. A similar level of detailed modelling has not been carried out to test the impact and effectiveness of the transport infrastructure identified.

2.6 There is no proportionate technical evidence in the emerging Transport Strategies that demonstrates that these schemes deliver the necessary sustainable transport outcomes or indeed that they can be delivered in the timescales needed to deliver the housing trajectories²¹.

2.7 In order to identify whether the Plans adequately reflect the TSCSC, a review of the twenty one TSCSC policies against the Plans has been carried out and this is attached at Appendix 2. In summary, the outcome of this is similar to the LTP review and shows that the Plans will not deliver development that accords with the TSCSC policies.

3.0 **iii. Does the Transport evidence base, including, comply with paragraphs 54-001-20141010 to 54-011-20141010 of Planning Practice Guidance?**

3.1 A detailed audit of the Plans' transport evidence base against PPG is attached at Appendix 3. In summary, the transport evidence base does not comply with Planning Practice Guidance for the following reasons:

- 1 There is no proportionate technical evidence in the emerging Transport Strategies that demonstrates that these schemes deliver the necessary sustainable transport outcomes or indeed that they can be delivered in the timescales needed to deliver the housing trajectories.
- 2 The chronology of the CSRMM modelling runs has led to fundamental failings in the plan preparation. The chronology clearly demonstrates that it has not been possible for the transport evidence that has been prepared to be used to objectively assess and inform the transport infrastructure requirements in the preparation of the Local Plans²².
- 3 The transport evidence baseline analysis does not take into account the unsustainable transport impact of previous new settlement strategies such as Cambourne²³.
- 4 The CSRMM Modelling Report identifies that road space is freed up by developing in more sustainable locations but that the benefit is eroded as suppressed demand returns²⁴. These findings warranted further investigation of measures that would address the issue referred to as 'back-filling' rather than relying on historical travel patterns. PPG clearly states that care needs to be taken when considering using any model

²⁰ CEG Transport Evidence Base, September 2013, Tables 3 & 4 pg 15

²¹ Major Transport Scheme Programme including housing trajectory (RD/CEG/020)

²² CEG Matter 5 Statement, para 1.2

²³ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – 'Lessons from Cambourne Review

²⁴ CSRMM Modelling Report, July 2013 (RD/strat/160) Section 2.1, 2nd para, 2nd bullet point

that it takes into account of the need to address historical travel patterns not necessarily reinforce them.²⁵ This has led to an unsound evidence base.

- 5 The major transport schemes modelled in the Phase 3 CSRM test do not correspond with those identified in the IDS update as being necessary and critical. A summary list of the IDS Update schemes against those tested in the CSRM Phase 3²⁶ runs illustrating this point is attached at Appendix 4.
- 6 The impact of the identified significant transport infrastructure in terms of environmental impact and scheme value for money has not been tested²⁷.

3.2 PPG states '*A robust evidence base will enable an assessment of the transport impacts of both existing development as well as that proposed, and can inform sustainable approaches to transport at plan making level. This will include consideration of viability and deliverability*²⁸. In summary, the transport evidence does not fulfil this purpose.

4.0 **iv. Will the Plans encourage the use of sustainable modes of transport?**

4.1 No, the plans do not encourage the use of sustainable modes of transport, and, when compared to reasonable alternatives, will result in:

- Increased trip distances to work, school and other key services
- Increased use of, and reliance upon, the car for local journeys
- Increases in transport emissions, including carbon and other greenhouse gases
- worsening levels of accessibility for those without access to a car

CEG's 'Transport Evidence Base'²⁹ sets out in detail the reasons for this response. The following summarises the key issues:

The plans will increase travel distances and car use, compared to reasonable alternatives

4.2 The Plans will increase travel distances by placing homes and jobs (and other essential services) far apart from one another. Travel distance is a key determinant of travel choice. Longer distance journeys are unable to be carried out by active travel modes (walk, bike), and are less easily met by other

²⁵ PPG Paragraph 010 Reference ID 54-007-20141010 – 4th sub para (RD/NP/020)

²⁶ CSRM Modelling Report, July 2013 (RD/strat/160) Appendix B, Table B1 and Figure B1

²⁷ NPPG (RD/NP/020) – reference ID: 54-010-20141010

²⁸ NPPG (RD/NP/020) – reference ID: 54-002-20141010

²⁹ CEG Transport Evidence Base, September 2013

sustainable travel modes (bus, car share). The result of the plan will be more, and longer, car journeys across the plan area and reduced trips to the City, undermining economic growth³⁰. This is highlighted in the accessibility analysis of the plan area³¹. The Councils' modelling evidence also emphasises the significant increased travel distance and dependency on the car³².

4.3 To exacerbate this problem, the Plans place the majority of new housing 5-10 miles north and west of Cambridge, with the focus for new job growth to the south of Cambridge. The only viable way of making these journeys will be by car, with the environmental impact made worse by the fact that these journeys will have to pass through already heavily congested parts of the road network, with no reasonable prospect of mitigation measures³³. The Councils' own modelling evidence base demonstrates that the Plans are advocating more and longer journeys by car, when compared to a reasonable alternatives³⁴.

Mode Share of Trips by Origin (as at 2031)

Origin of Trip	All Day Trips			AM (0700-1000) Origins			
	Car	Public Tspt	Active Travel	Car	Public Tspt	Active Travel	All Sust Tspt
Cambridge Fringe Development (incl. South Cambridge)	43%	5%	42%	33%	7%	60%	67%
Outer Fringe Development (incl. Waterbeach)	71%	4%	25%	61%	7%	31%	38%
Rural Settlement (incl. Cambourne, Northstowe, Longstanton)	71%	6%	23%	66%	10%	25%	35%

4.4 Our investigation into travel patterns has re-enforced the enormity in difference of travel behaviour between Cambridge Fringe locations and Satellite locations, as summarised in the following table³⁵

³⁰ CEG Transport Evidence Base, September 2013, Appendix A(iii)- 'Analysis of CSRM 2031 Projections for Fringe Sites and Rural Settlements', Section 3.6, para 3.6.1 to 3.6.4

³¹ CEG Transport Evidence Base, September 2013, Accessibility analysis in Chapter 3 para 3.7-3.9, and travel distance analyses in para 3.20 – 3.22

³² CEG Transport Evidence Base, September 2013, Appendix A(iii) 'Analysis of CSRM 2031 Transport Modelling Projections for Fringe Sites and Rural Sites'

³³ Transport Evidence Base, September 2013, para 3.18 to 3.19 and Figure 1

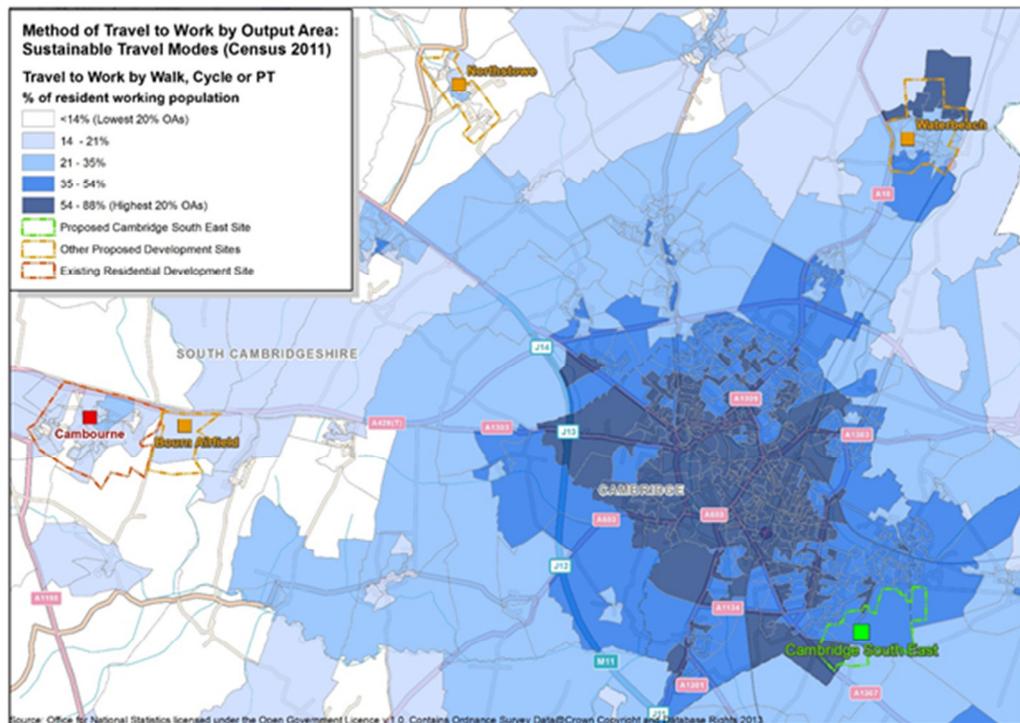
³⁴ CEG Transport Evidence Base, September 2013, Chapter 3 paras 3.10-3.12, Table 3&Table 4, pg 15 and full analysis in Appendix A(iii)

³⁵ CEG Transport Evidence Base, September 2013, Table 1, Pg 12

Location	Work from home	Public Tspt	Car use	Active Travel	Motorcycle / Other
Queen Edith's ward (adjacent to SE Cambridge)	8%	12%	34%	45%	1%
Bourn (adjacent to Cambourne / Bourn West)	7%	9%	76%	7%	1%
Cambridge (control site)	6%	12%	35%	46%	1%

4.5 Travel patterns are particularly marked when examining 'active travel' opportunity, as shown on the following diagram³⁶. It is clear that Cambridge has a truly unique cycling culture that will be eroded if dispersed settlement patterns are promoted before all opportunities to expand the Cambridge urban area are explored.

Spatial distribution of people that currently walk, cycle and catch public transport to work across the plan areas



The plans will increase travel distances and car use, compared to reasonable alternatives

4.6 The locations proposed for new settlement areas have proven themselves historically to be unsustainable in transport terms. Cambridge and South Cambridgeshire had a unique opportunity to learn from the failed lessons of

³⁶ CEG Transport Evidence Base, September 2013, Figure ES2 in the Executive Summary

Cambourne, but have chosen to ignore these important lessons, and have continued to promote a dispersed pattern of development. The recent independent review of Cambourne³⁷, clearly identified that it is in every way an unsustainable development (as reflected in the views of those living and working in Cambourne, and the supporting data sets). The 2011 Census identified that 76% of people from Cambourne travel to work in a car, compared to just 34% in Queen Edith’s ward immediately adjacent to the CEG promoted proposed South East Cambridge development area.

% of population using car as the main mode of transport for the commute (Census, 2011)

Cambourne	Queen Edith’s	South Cambridgeshire	England
76%	34%	64%	57%

4.7 Additionally, our review identified the measures used to promote existing development sites across the plan area exacerbate this issue, with Cambridge housing sites focussing on connections by walk, cycle and public transport but sites being marketed in Cambourne aggressively advertising themselves as ‘easy access by car’³⁸. This demonstrates the Councils’ policy of attempting to mitigate impact through softer travel planning measures is simply not effective in places such as Cambourne, where travel choice is limited by geographic location.

Conclusion

4.8 The above has summarised why the plans will not encourage the use of sustainable transport, and in particular why they fail the essential NPPF test (para. 182) of whether they are *‘the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence’*.

³⁷ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – Lessons from Cambourne Review

³⁸ CEG Transport Evidence Base, September 2013, Table 5 and para 3.13 to 3.14

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Appendix 1

Appendix 1

Figure 2.1. Summary of the Impact of the Plans on Local Transport Plan (LTP) Objectives

	LTP3 Objective	Examples of LTP3 contribution	Impact of Plans – BGH/ITP Commentary
1.	Enabling people to thrive, achieve their potential and improve their quality of life.	<ul style="list-style-type: none"> • Provide a transport network that is efficient and effective • Provide good accessibility to services and for businesses • Influence planning decisions to incorporate green spaces that are pleasant for pedestrians and cyclists 	<ul style="list-style-type: none"> • The Plans rely upon the delivery of major transport infrastructure that has not been proven to be efficient or effective and deliverable in a timely manner.¹ • The New Settlement Strategy locations do not provide good accessibility to key services and businesses in the Cambridge Urban Area.²
2.	Supporting and protecting vulnerable people.	<ul style="list-style-type: none"> • Develop district based transport strategies for East Cambridgeshire, Fenland and Huntingdonshire • Support Community Transport schemes • Implement road safety initiatives to reduce road traffic accidents • Provide easily accessible information on transport and travel options • Work with partners to understand the most appropriate methods of service delivery 	<ul style="list-style-type: none"> • The poor accessibility of the New Settlement Strategy to key services in the Cambridge Urban Area will not support and protect vulnerable people³. • The reliance on private car use of the New Settlement Strategy could lead to an increased risk of a need to implement road safety initiatives on rural roads.⁴

¹ IDS Update 2013 Appendices B to D (RD/T/020)

² CEG Transport Evidence Base, September 2013, figures 8 to 11, pg's 46 to 48

³ CEG Transport Evidence Base, September 2013, Para 3.7 to 3.12, pg's 13 to 15

⁴ CEG Transport Evidence Base, September 2013, Appendix A(iii), Analysis of CSRM 2031 Projections for Fringe Sites and Rural Settlements , Table 3.1 pg 4

	LTP3 Objective	Examples of LTP3 contribution	Impact of Plans – BGH/ITP Commentary
3.	Managing and delivering the growth and development of sustainable communities.	<ul style="list-style-type: none"> • Discourage use of cars where alternatives exist and encourage use of sustainable means of transport such as walking, cycling and public transport • Facilitate active travel with investment in footpaths and cycle ways • Implement road safety initiatives to reduce road traffic accidents • Influence planning decisions to co-locate housing with jobs and services to reduce the need to travel • Influence the design of new developments to promote road safety and encourage travel by foot and bicycle • Implement travel plans and other smarter choices measures such as car clubs and car sharing 	<ul style="list-style-type: none"> • The New Settlement Strategy locations adjacent to rural high speed dual carriageways will encourage use of cars as car travel will be more attractive than alternative modes of transport.⁵ • Due to the distances between the proposed new settlements and the Cambridge Urban Area, the Plans will not facilitate significant active travel even with investment in footpaths and cycleways.⁶ • Evidence at Cambourne shows that travel plans and other smarter choice measures at similar locations are not effective.⁷
4.	Promoting improved skill levels and economic prosperity across the county, helping people into jobs and encouraging enterprise.	<ul style="list-style-type: none"> • Develop district-based transport strategies for East Cambridgeshire, Huntingdonshire and Fenland • Implement the district based strategies and the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) • Improve accessibility to education and jobs • Provide a transport network that is efficient 	<ul style="list-style-type: none"> • Locating future residents in new settlements away from Cambridge will not improve accessibility to education and jobs⁸ • Evidence from existing travel patterns⁹ demonstrates locating development beyond the Green Belt will reduce the number of people travelling into the City and the workforce available to support economic

⁵ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – ‘Lessons from Cambourne Review

⁶ CEG Transport Evidence Base, September 2013, figures 9 to 11, pg’s 46 to 48

⁷ CEG Transport Evidence Base, September 2013, Appendix E- Comparative Analysis of existing travel plans, Table 1 pg 8

⁸ CEG Transport Evidence Base, September 2013, Appendix A(ii)- Accession Mapping Public Transport

⁹ CEG Transport Evidence Base, September 2013, Appendix A(iii) ‘Analysis of CSRM 2031 Projections for Fringe Sites and Rural Settlements’, Section 3.6, Para 3.6.1 to 3.6.4

	LTP3 Objective	Examples of LTP3 contribution	Impact of Plans – BGH/ITP Commentary
		<p>and effective</p> <ul style="list-style-type: none"> • Influence national decisions on the strategic road and rail network to ensure Cambridgeshire is an attractive and buoyant location for business 	<p>growth compared with accommodating an increased population within and on the edge of the city.</p> <ul style="list-style-type: none"> • The Plans have not demonstrated that they can provide a transport network that is efficient and effective in a timely manner.
5.	Meeting the challenges of climate change and enhancing the natural environment.	<ul style="list-style-type: none"> • Consider new, and expand existing, quality bus partnerships to ensure that public transport operators use increasingly 'clean' fleets • Monitor air quality and implement Air Quality Action Plans • Develop Noise Action Plans • Actions to address traffic growth, particularly car use • Future proof our maintenance programme and scheme appraisal processes against the effects of climate change • Encourage behavioural change away from single occupancy car use • Minimise the impacts of transport on the natural environment, heritage and landscape and seek solutions that deliver long – term environmental benefits. 	<ul style="list-style-type: none"> • The Plans' significant transport infrastructure costs will limit the opportunity for funding of quality bus partnerships.¹⁰ • The New Settlement Strategy adjacent to dual carriageways will encourage use of the private car and increase CO₂ emissions and other emissions.¹¹ • The new settlement strategy will increase the rates of traffic growth.¹² • The substantial costs to construct the infrastructure will increase pressures on maintenance programme budgets.¹³ • The New Settlement Strategy will not encourage a behavioural change from car use, and will foster a greater reliance on the use of the car, when compared to reasonable alternatives.¹⁴ • The impacts of the transport infrastructure will have a significant negative impact on the natural environment, heritage and landscape

¹⁰ IDS Update 2013 Appendices B to D (RD/T/020)

¹¹ CEG Transport Evidence Base, September 2013, Appendix (iv) Assessment of Alternative Sites Travel Distances (by road) and/emission levels

¹² CEG Transport Evidence Base, September 2013, Appendix A(iii), Analysis of CSRM 2031 Projections for Fringe Sites and Rural Settlements , Table 3.1 pg 4

¹³ IDS Update 2013 Appendices B to D (RD/T/020)

¹⁴ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – 'Lessons from Cambourne Review, Key Conclusions Pg 5 of 6

	LTP3 Objective	Examples of LTP3 contribution	Impact of Plans – BGH/ITP Commentary
			that has not been tested in any detail through the Plan preparation. ¹⁵

¹⁵ PPG Paragraph 010 Reference ID 54-010-20141010 – Last sentence of 1st paragraph (RD/NP/020)

Appendix 2

Appendix 2

Consolidated list of Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) transport policies

Impact of CCC and SDDC Local Plans

	BGH/ITP Commentary
Policy TSCSC 1: The strategy approach	
<p>The transport network will support economic growth, mitigate the transport impacts of the growth agenda and help protect the area's distinctive character and environment.</p> <p>To achieve this, sustainable transport capacity will be provided in and around the city between key employment areas, and to where people live and access services. The sustainable transport network will strengthen the economic hubs and the high tech clusters in and around the city by making movement between them straightforward and convenient.</p> <p>The backbone of the strategy will be a high quality passenger transport network of bus, guided bus and rail services, fed and complemented by comprehensive pedestrian and cycle networks. Highways capacity enhancements will ensure that traffic can move efficiently in appropriate locations without interfering with passenger transport corridors.</p>	<ul style="list-style-type: none"> • The Local Plan transport evidence base does not accord with PPG guidance and therefore it does not adequately demonstrate that the transport impacts of the growth agenda are mitigated and thus protect the area's distinctive character and environment¹. • The sustainable transport capacity created will not be used effectively as the New Settlement Strategy set out in the Local Plans offers limited opportunities to utilise this infrastructure². The backbone of the strategy also includes significant highway capacity enhancements³ such as A14, A10 and A428 that will encourage the use of the private car and limit the effectiveness and benefits of the passenger transport network proposals⁴.

¹ Appendix 3 of CEG Matter 7 Matters and Issues Statement

² CEG Transport Evidence Base, September 2013, Para 3.7 to 3.12, pg's 13 to 15

³ TSCSC – High Level Programme pg 4-31 to pg 4-32, figure 4.12.(RD/T/120)

⁴ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – 'Lessons from Cambourne Review'

	BGH/ITP Commentary
Policy TSCSC 2: Catering for travel demand in Cambridge	
<p>For more travel demand to be accommodated on the constrained transport network of Cambridge:</p> <ul style="list-style-type: none"> • More people will walk, cycle and use passenger transport services for journeys into, out of and within the city. • More people will car share. • Pedestrians, cyclists and buses will be prioritised for trips across the city. General vehicular traffic will not be prohibited and accessibility will be maintained, but a car journey may be longer and more time consuming than at present for many trips. • General traffic levels will remain at current levels. 	<ul style="list-style-type: none"> • The New Settlement Strategy set out in the Local Plans will not facilitate walking and cycling into and out of the city due to the distances involved⁵. • The location of the new settlements is more likely to increase traffic levels as car use will be higher⁶.

⁵ CEG Transport Evidence Base, September 2013, figures 9 to 11, pg's 46 to 48

⁶ CEG Transport Evidence Base, September 2013, Tables 3 & 4 pg 15

	BGH/ITP Commentary
Policy TSCSC 3: Catering for travel demand in South Cambridgeshire	
<p>For additional travel demand to be accommodated on the constrained transport network of South Cambridgeshire and into Cambridge and surrounding towns:</p> <ul style="list-style-type: none"> • Passenger transport services on main radial corridors will be used for part or all of more trips to Cambridge and to other key destinations. • More people will walk and cycle to access these services. • More people will car share. • More locally led transport solutions will provide passenger transport options in more remote areas that cannot viably be served by conventional bus services. 	<ul style="list-style-type: none"> • The proposed new settlements set out in the Local Plans are not within reasonable walking and cycling distances of the Cambridge Urban Area⁷ • Evidence from existing travel patterns⁸ demonstrates locating development beyond the Green Belt will reduce the number of people travelling into the City and the workforce available to support economic growth compared with accommodating an increased population within and on the edge of the city.⁹ • The high cost of the transport infrastructure that the plan relies upon^{10,11} will mean there is greater burden on the public purse¹² with an increased risk that locally led transport solutions in more remote areas cannot be funded
Policy TSCSC 4: National networks: trunk roads, motorways and rail	
<p>For these routes to play their part in catering for the travel demand of Cambridge and South Cambridgeshire:</p> <ul style="list-style-type: none"> • Improvements driven by the national agenda must take account of local circumstances, local opportunities and local impacts. 	<ul style="list-style-type: none"> • The New Settlement Strategy set out in the Local Plans encourages use of the trunk road network and the use of the private car.¹³

⁷ CEG Transport Evidence Base, September 2013, Tables 3 & 4, pg 15

⁸ CEG Transport Evidence Base, September 2013, Appendix A(iii) 'Analysis of CSRM 2031 Projections for Fringe Sites and Rural Settlements', Section 3.6, Para 3.6.1 to 3.6.4

⁹ CEG Transport Evidence Base, September 2013, Tables 3 & 4, pg 15

¹⁰ Major Transport Scheme Programme including housing trajectory (RD/CEG/020)

¹¹ IDS Update 2013 Appendices B to D (RD/T/020)

¹² PPG Paragraph 001 Reference ID 54-001-20141010, Last sentence of 1st sub para)(RD/NP/020)

¹³ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – 'Lessons from Cambourne Review'

	BGH/ITP Commentary
Policy TSCSC 5: Planning obligations	
<p>A comprehensive approach will be applied to secure the provision of new and improved transport infrastructure, in a timely manner to ensure that accessibility is maintained and the impact(s) of developments are addressed, in line with this Strategy approach.</p> <p>Developers will be required to make provision to mitigate both the site specific and network impacts of their planning proposal. Mitigation measures will be secured by direct improvements carried out by the developer, and through the Community Infrastructure Levy (CIL) and/or a Section 106 (S106) agreement.</p> <p>The nature and scale of mitigation/contributions will be determined by, the scale and type of development, as well as the transport impact and demands this places on the site and the local network.</p> <p>In Cambridge (and South Cambridgeshire where applicable), until such time as CIL is implemented, planning obligations will continue to be secured through the Area Transport Plan process.</p>	<ul style="list-style-type: none"> • The Plans will not deliver housing/employment in combination with improved transport infrastructure in a timely manner¹⁴. Delivery of A14 improvements in advance of other sustainable transport infrastructure will encourage use of the private car and not deliver sustainable accessibility and travel patterns.

¹⁴ Major Transport Scheme Programme including housing trajectory (RD/CEG/020)

	BGH/ITP Commentary
Policy TSCSC 6: Transport Assessments	
<p>Transport Assessments (TA) will be required to support any planning application that produces a net increase of approximately 500 person trips (by all transport modes) per day. For smaller scale developments a Transport Statement (TS) will generally be required. However a full TA may also be required if the development falls below this threshold but there are other local issues that may need to be addressed.</p> <p>Early engagement with the local highway authority is strongly advised to agree the scope of the TA or TS and ensure that all the required data and information is provided when a planning application is submitted.</p> <p>For the larger sites, it is expected that robust land use and transport modelling will be undertaken to assess not only the specific impact of the development but to assess the cumulative impact of the proposal on the surrounding transport network. The detail of this would need to be discussed and agreed with the Local Highway Authority.</p>	<ul style="list-style-type: none"> • Not applicable to Plan making
Policy TSCSC 7: Supporting sustainable growth	
The transport network will be developed in line with the strategy	<ul style="list-style-type: none"> • The Local Plan will not deliver the identified 'necessary' and

	BGH/ITP Commentary
<p>approach and objectives, to provide the capacity necessary to accommodate planned growth levels while protecting the area's distinctive character and environment.</p> <p>New development will be required to make provision for integrated and improved transport infrastructure to ensure that most people have the ability to travel by foot, bicycle or by passenger transport and in line with specified modal split targets where relevant.</p> <p>Access by walking, cycling and public transport will be maximised in all new developments, ensuring that planning contributions are sought for transport improvements where appropriate.</p>	<p>'critical' major transport infrastructure in a timely manner to provide the capacity necessary to accommodate planned growth levels.¹⁵</p> <ul style="list-style-type: none"> • The New Settlement Strategy sets out in the Local Plans encourages an increased reliance on private car use and does not promote sustainable transport choice.¹⁶ • The location of the new settlements in relation to the Cambridge Urban Area will not maximise access by walking, cycling and public transport.¹⁷
Policy TSCSC 8: Improving bus services	
<p>The County Council will work with partners and passenger transport operators to develop an improved and integrated network of High Quality Passenger Transport.</p> <p>The County Council will use existing channels, such as the Quality Bus Partnership to raise standards and monitor service provision.</p>	<ul style="list-style-type: none"> • The Plans' significant transport infrastructure costs will limit the opportunity for funding of quality bus partnerships in the future¹⁸
Policy TSCSC 9: Access to jobs and services	
<p>Access to areas of employment and key services will be maximised, particularly by sustainable modes of travel, to:</p>	<ul style="list-style-type: none"> • The New Settlement Spatial Strategy set out in the Local Plans will not maximise access to areas of employment and key

¹⁵ Major Transport Scheme Programme including housing trajectory (RD/CEG/020)

¹⁶ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – 'Lessons from Cambourne Review'

¹⁷ CEG Transport Evidence Base, September 2013, figures 8 to 11, pg's 46 to 48

¹⁸ CEG Matter 5 'Matters and Issues Statement para 2.4, pg 5/8

	BGH/ITP Commentary
<ul style="list-style-type: none"> • Provide a transport network that is efficient and effective • Provide good accessibility to services and for businesses • Provide a HQPT and cycle network to routes near major employment, education and service centres. 	<p>services by sustainable modes of travel.¹⁹</p>
<p>Policy TSCSC 10: Improving Rail Services</p>	
<p>The County Council will work with other authorities and the rail industry to bring forward service enhancements and new infrastructure to increase rail use, through frequency and capacity improvements and increasing the proportion of freight moved by rail in line with the Strategy approach.</p>	<ul style="list-style-type: none"> • The ‘critical’ rail infrastructure schemes identified in the IDS²⁰ are not embedded in the Plans and therefore this will increase the risk of failure to deliver. Examples of such schemes are the proposed new Station at Waterbeach
<p>Policy TSCSC 11: Improving community transport services</p>	
<p>The County Council will work with partners, the voluntary sector and passenger transport operators to develop an improved and integrated network of community transport services.</p>	
<p>Policy TSCSC 12: Encouraging cycling and walking</p>	
<p>The capacity, quality and safety of walking and cycling networks will be increased to enhance and promote healthy and active travel. The highest possible standard of cycling and walking infrastructure</p>	<ul style="list-style-type: none"> • The New Settlement Spatial Strategy set out in the Local Plans will not encourage cycling and walking to jobs and key services in the Cambridge Urban Area.²¹

¹⁹ CEG Transport Evidence Base, September 2013, figures 8 to 11

²⁰ IDS Update 2013 Appendix C South Cambridgeshire Infrastructure Schedule Ref 1000, 1502 (RD/T/020)

²¹ CEG Transport Evidence Base, September 2013, figures 8 to 11, pg’s 46 to 48

	BGH/ITP Commentary
<p>appropriate to a location will be pursued in line with this strategy and the emerging cycle strategy.</p> <p>All new development must provide safe and convenient pedestrian and cycle environments including adequate and convenient cycle parking and ensure effective and direct integration with the wider network.</p> <p>Where development opportunities arise, land should be released to improve the existing cycle network, for example the elimination of pinch points. New links should also be provided to expand the network as set out in the DfT LTN 1/12, LTN 2/08 and Manual for Streets.</p> <p>Where feasible, pedestrian and cycle facilities will be provided alongside HQPT and new road infrastructure (citing the Busway facilities as a standard example).</p> <p>Through the planning system future cycle and walking routes should be safeguarded, where appropriate/feasible.</p> <p>Cycle routes should be maintained where possible to offer year round and all-weather availability.</p>	
<p>Policy TSCSC 13: Provision of new highway capacity</p>	
<p>Where there is a requirement for new roads or increased road capacity, these should adhere to the highest possible design standards. Where feasible, pedestrian and cycle facilities will be provided alongside new road infrastructure (citing the Busway facilities as a standard example). The needs of public transport services will be considered in all road schemes, and priority for services should be</p>	

	BGH/ITP Commentary
<p>provided on any new road where there is an expectation of regular bus usage, and an expectation that services reliability and timeliness would otherwise be disadvantaged.</p> <p>This policy applies to new roads delivered by the County Council, new roads that will be passed to the Council through a relevant legal agreement, and those that will remain in third party ownership.</p>	
<p>Policy TSCSC 14: New roads within development sites, or to provide access to development</p>	
<p>Where there is a requirement for new distributor roads or through routes as part of a development, adherence to the need to prioritise pedestrians, cyclists and public transport users will remain. This will include:</p> <ul style="list-style-type: none"> • Providing the highest possible standard of pedestrian, cycling and public transport infrastructure as part of the road where feasible and necessary 	

	BGH/ITP Commentary
<ul style="list-style-type: none"> • Discouraging speeding • Restricting through access for general motor traffic (unless specifically required as part of the development). • Ensuring that there are safe and appropriate access arrangements to the adjoining public highway network and minimising the possibility of additional car traffic in the local area as a result of the new road. <p>This policy applies to both roads that will be passed to the County Council through a relevant legal agreement and those that will remain in third party ownership.</p>	
<p>Policy TSCSC 15: Managing travel demand</p>	
<p>Appropriate measures and interventions will be introduced to manage the demand for general vehicular travel, and reducing through traffic in Cambridge in line with the strategy approach.</p> <p>Further work is proposed to determine the specific priorities which will be consulted on over time with such measures expected to include;</p> <ul style="list-style-type: none"> • Reallocation of road space to be used by passenger transport, pedestrians and cyclists • Access restrictions for general vehicular traffic • Parking restrictions 	<ul style="list-style-type: none"> • The location of jobs and key services in Cambridge in relation to the proposed new settlements will encourage the demand for through traffic which is contrary to the strategy approach.
<p>Policy TSCSC 16: Road safety</p>	
<p>The safety of users of all modes of travel is a top priority, both on the existing network and through all new developments and schemes. The County Council will:</p> <ul style="list-style-type: none"> • Implement road safety initiatives to reduce road traffic accidents 	<ul style="list-style-type: none"> • The reliance on private car use of the New Settlement Strategy set out in the Local Plans could to lead to an increased risk of road safety issues and a need to implement road safety initiatives on rural roads ²²

²² CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – ‘Lessons from Cambourne Review’

	BGH/ITP Commentary
<ul style="list-style-type: none"> • Work towards road safety targets held locally and nationally • Prioritise pedestrian and cycle safety • Work to increase cycling without increasing accidents 	
Policy TSCSC 17: Air quality	
<p>The County Council is committed to working with partners to achieve air quality improvement targets both in Cambridge and in South Cambridgeshire. Particular emphasis will be placed on reducing emissions from transport in existing and future air quality management areas.</p> <p>The County Council will work with partners to ensure that passenger transport operators use increasingly ‘clean’ fleets and monitor air quality and implement Air Quality Action Plans where relevant to ensure agreed targets are met.</p>	<ul style="list-style-type: none"> • The New Settlement Strategy set out in the Local Plans adjacent to high speed dual carriageways will encourage use of the private car and increase emissions ²³
Policy TSCSC 18: Protecting the environment	
<p>The County Council will work with key partners including transport operators and businesses to reduce transport related emissions, to help protect and enhance the area’s distinctive character and environment, while supporting sustainable growth and identifying solutions that will help to achieve longer term environmental benefits.</p>	<ul style="list-style-type: none"> • The impacts of the transport infrastructure in will have a significant impact on the natural environment, heritage and landscape that has not been tested in any detail through the Plan preparation ²⁴

²³ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – ‘Lessons from Cambourne Review’

²⁴ PPG Paragraph 010 Reference ID 54-010-20141010 | Last sentence of 1st para (RD/NP/020)

	BGH/ITP Commentary
Policy TSCSC 19: Carbon emissions	
The County Council will work with key partners and transport operators and businesses to reduce transport related emissions of carbon and pollutants to help achieve agreed targets.	<ul style="list-style-type: none"> The New Settlement Strategy set out in the Local Plans adjacent to dual carriageways will encourage use of the private car and increase CO₂ emissions²⁵
Policy TSCSC 20: Planning obligations for Waterbeach Barracks	
<p>A comprehensive approach will be used to secure provision of infrastructure and improvements in a timely manner to ensure that accessibility is maintained and that the impacts of developments are mitigated in line with the Strategy approach.</p> <p>Developers will be expected to make provision for mitigation of the site specific and network impacts of their proposal. The following</p>	<ul style="list-style-type: none"> The transport infrastructure schemes are not embedded in the Plans, thereby increasing the risk of a failure to deliver a comprehensive approach being taken to deliver the necessary infrastructure in a timely manner and mitigating the impacts of developments contrary to paragraph 177 of NPPF.²⁶

²⁵ CEG Transport Evidence Base, September 2013, Appendix (iv) Assessment of Alternative Sites Travel Distances (by road) and/emission levels

²⁶ NPPF Paragraph 177 (RD/NP/010)

	BGH/ITP Commentary
<p>interventions are expected to be required (subject to more detailed Transport Assessments agreed with the Highway Authority) intended to help mitigate and support the impact of development at Waterbeach Barracks:</p> <ul style="list-style-type: none"> • Additional capacity on the A10 between the northernmost access to the new town and the Milton Interchange of the A10 with the A14. • Additional capacity at the A14/A10 Milton Interchange • Waterbeach Barracks to north Cambridge Busway • Waterbeach Park & Ride • Waterbeach new station • Direct, segregated high quality pedestrian and cycle links to north Cambridge including to Cambridge Science Park, Milton, Cottenham, Histon, Impington, Landbeach, Horningsea, Fen Ditton, Chittering, Stretham and the Cambridge Research Park • Delivery or funding of any measures required to mitigate the traffic impact of the new town on Horningsea, Fen Ditton, Milton and Landbeach • A smarter choices package including residential, school and workplace travel planning 	
<p>Policy TSCSC 21: Planning obligations for Bourn Airfield and West Cambourne</p>	
<p>A comprehensive approach will be used to secure provision of infrastructure and improvements in a timely manner to ensure that accessibility is maintained and that the impacts of developments are mitigated in line with the Strategy approach.</p> <p>Developers will be expected to make provision for mitigation of the site specific and network impacts of their proposal, and the following</p>	<ul style="list-style-type: none"> • The transport infrastructure schemes are not embedded in the Plans, thereby increasing the risk of a failure to deliver a comprehensive approach being taken to deliver the necessary infrastructure in a timely manner and mitigating the impacts of developmet contrary to paragraph 177 of NPPF.²⁷

²⁷ NPPF Paragraph 177 (RD/NP/010)

	BGH/ITP Commentary
<p>interventions are expected to be required (subject to more detailed Transport Assessments agreed with the Highways Authority) to help mitigate and support the development at Bourn Airfield and West Cambourne.</p> <ul style="list-style-type: none"> • Busway between West Cambourne site and the junction of the A1303/A428. • Segregated bus links between the A428 and the M11. • A1303 / A428 outer Park & Ride capacity. • Direct, segregated high quality pedestrian/cycle links to west Cambridge, Papworth Everard, Highfields, Hardwick, Caxton, Bourn, Caldecote, Comberton, Bar Hill and Dry Drayton. • Any mitigation measures needed at the junctions of the A428 with the A1303 and A1198. • Delivery of funding of any measures required to mitigate the traffic impact of the developments on Bourn, Caldecote, Toft, Comberton and Barton. • A smarter choices package including residential school and workplace travel planning. 	
<p>Policy TSCSC 22: Planning obligations for Northstowe</p>	
<p>A comprehensive approach will be used to secure provision of infrastructure and improvements in a timely manner to ensure that accessibility is maintained and that the impacts of developments are mitigated in line with the Strategy approach.</p> <p>Developers will be expected to make provision for mitigation of the site specific and network impacts of their proposal, and the following interventions are expected to be required (subject to more detailed</p>	<p>The transport infrastructure schemes are not embedded in the Plans, thereby increasing the risk of a failure to deliver a comprehensive approach being taken to deliver the necessary infrastructure in a timely manner and mitigating the impacts of development contrary to paragraph 177 of NPPF.²⁸</p>

²⁸ NPPF Paragraph 177 (RD/NP/010)

	BGH/ITP Commentary
<p>Transport Assessments which will need to be agreed with the Highways Authority) to help mitigate and support the development at Northstowe:</p> <ul style="list-style-type: none"> • Busway loop through Northstowe (as part of Northstowe development). • High quality cycle, pedestrian and public transport links to key employment sites, schools, services, and to and from neighbouring local communities. • Off-site highway improvements should Transport Assessments indicate a need for these. • Northstowe access roads (as part of Northstowe development). • A smarter choices package including residential, school and workplace travel planning. 	

Appendix 3

Appendix 3

Bryan G Hall/ITP audit of Transport Evidence Base with paragraphs 54-001-20141010 to 54-011-20141010 of Planning Practice Guidance

	x/✓/?	BGH/ITP Commentary
Paragraph 004 When should the transport assessment of the Local Plan be undertaken?		
<ul style="list-style-type: none"> As part of the initial Evidence Base in terms of issues and opportunity. 	x	The councils have used the Cambridge Sub Regional Model to test the transport impact of the Local Plans. The Phase 1 runs were carried out in Autumn 2012 but the first time the results were made publicly available was in July 2013 in the CSRM Modelling Summary report for Cambridge and South Cambridgeshire Local Plans – July 2013. The Phase 1 modelling tested seven different scenarios based on the sites in the Issues and Options consultation which were consulted on between June and September 2012. This Phase 1 modelling could not have informed part of initial evidence in terms of issues and opportunities. The Phase 1 modelling did not test any intervention opportunities. ¹
<ul style="list-style-type: none"> As part of options testing. 	x	The first time interventions were tested was after Phase 2 and this was limited to detailed testing of interventions for three options, namely, village focused development in South Cambridgeshire, development at Bourn Airfield and a new town at Waterbeach. The modelling of transport intervention opportunities did not inform the decision on short listing the strategic options. ²
<ul style="list-style-type: none"> As part of the preparation of the final submission. The last of these stages 	x	The Phase 3 modelling published in July 2013 tested the preferred Local Plan strategies. The Phase 3 modelling did not include major transport

¹ CSRM Modelling Report, July 2013 (RD/strat/160) Section 1.3, 2nd paragraph, page 2

² CSRM Modelling Report, July 2013 (RD/strat/160) Section 2.2, page 3

	x/√/?	BGH/ITP Commentary
should highlight the scale of and priorities for investment requirements and support infrastructure spending plans.		infrastructure identified in the IDS Update such as the A14/A10 Milton Interchange. ³ Conversely, the Caxton Gibbet to Black Cat Improvement Scheme is included in the modelling ⁴ but not the IDS Update. The scale and priorities for investment were only initially identified in April 2014 at the time the plan was submitted for examination and were not available at the time of public consultation. ⁵
Paragraph 005 What baseline information should inform a transport assessment of a Local Plan?		
<ul style="list-style-type: none"> • Current transport issues. 	x	The baseline information ignores key aspects of transport issues of previous similar new settlement strategies such as Cambourne. ⁶
<ul style="list-style-type: none"> • The potential options to address the issues identified. 	x	The transport assessment work fails to identify a reasonable potential range of options such as location of new development to address the issues identified.
<ul style="list-style-type: none"> • The locations of proposed land allocation. 	✓	
<ul style="list-style-type: none"> • Solutions to support a pattern of development that facilitates use of sustainable modes of transport. 	✓	The baseline information identifies solutions however for the reasons identified in the CEG Transport Evidence Base and CEG Matter 5 & 7 Statements it is not considered that the solutions will be effective in facilitating the use of sustainable modes of transport that supports the proposed pattern of development.
<ul style="list-style-type: none"> • The scope and options for maximising travel planning and behavioural change. 	x	The TSCSC dated March 2014 notes that further analysis and work is proposed to help understand which demand management measures would assist in reducing traffic growth. ⁷

³ IDS Update 2013 (RD/T/020) Appendix C, Waterbeach – 2021 to 2026 Ref 1004

⁴ CSRM Modelling Report, July 2013 (RD/strat/160) Appendix B, Table B1 and Figure B1

⁵ Transport Strategy for Cambridge and South Cambridgeshire, Action Plan and Scheme Details (RD/T/120)

⁶ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – ‘Lessons from Cambourne Review’

⁷ TSCSC, March 2014 – Transport Strategy and High Level Programme (RD/T/120) page 2-3 last paragraph

	x/✓/?	BGH/ITP Commentary
Paragraph 006 What detailed information is required for the transport assessment of the Local Plan?		
<ul style="list-style-type: none"> Baseline existing conditions which need to be established accurately to understand fully the context of the Local Plan policies and proposals. 	x	The baseline existing conditions do not take into account experience of Cambourne in the context of informing the Local Plan policies and proposals. ⁸
<ul style="list-style-type: none"> The existing integrated transport networks and any gaps in these as well as service and quality. 	✓	
<ul style="list-style-type: none"> Opportunities to change to other forms of transport. 	✓	
<ul style="list-style-type: none"> The current use and demand by all different types of transport including cumulative trips into and out of the area. 	✓	
<ul style="list-style-type: none"> The availability of information from travel plans, previous assessments, transport operators etc. 	x	The transport assessment fails to take into account evidence of existing travel plans. ⁹
<ul style="list-style-type: none"> Capacity data on rail and tram networks and constraints across the area. 	x	The transport evidence used in the preparation of the Local Plan does not identify capacity data on rail and constraints across network such as at

⁸ CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – ‘Lessons from Cambourne Review’

⁹ CEG Transport Evidence Base, September 2013, Appendix E – Comparative analysis of existing travel plans, table 1, page 8

	x/✓/?	BGH/ITP Commentary
		Waterbeach where a new relocated station is identified as critical to facilitate development. ¹⁰
<ul style="list-style-type: none"> Walking and cycling facilities and movement including future predicted trips. 	✓	Included in TSCSC
<ul style="list-style-type: none"> Description and functional classification of the road network. 	✓	Included in TSCSC and LTP
<ul style="list-style-type: none"> Current traffic flows including peak periods on roads, links and key junctions. 	✓	Included in CSRM
<ul style="list-style-type: none"> Parking facilities, including any Park and Ride and existing under-provision of off-street space. 	✓	
<ul style="list-style-type: none"> Journey purpose of trips. 	✓	
<ul style="list-style-type: none"> Identification and assessment of key links and junctions on the highway network to establish existing conditions. 	✓	
<ul style="list-style-type: none"> Committed network improvements. 	✓	
<ul style="list-style-type: none"> Personal injury accident records, including cyclist safety. 	x	The Transport Evidence Base fails to consider the personal injury accident records on the network.
<ul style="list-style-type: none"> Any programmed public transport improvements including type, timing and promoter information. 	x	Type and timing of programmed public transport improvements is not clearly identified.

¹⁰ IDS Update 2013 (RD/T/020) Appendix C – Waterbeach 2012-2026, Ref 1000

	x/✓/?	BGH/ITP Commentary
<ul style="list-style-type: none"> • Pollution, including baseline carbon emissions broken down by type of travel. 	x	Not included in transport evidence base
<ul style="list-style-type: none"> • Existing transport-related environmental impacts. 	x	Not included in transport evidence base
<ul style="list-style-type: none"> • Established best practice in transport provision and the share of each type. 	x	The evidence base does not take into consideration recent historical evidence of similar developments at Cambourne such as the share of each type of transport. ^{11/12}
<ul style="list-style-type: none"> • At a broad level, journey purpose and origin and destination currently and how it is likely to change or desired to change – for all types of transport. 	x	Not included in Transport Evidence Base
<p>Paragraph 007 How can a transport assessment of the Local Plan be undertaken?</p>		
<ul style="list-style-type: none"> • A transport assessment is likely to be scenario based and in terms of projections look at a range of potential outcomes given a number of assumptions, for example, a movement in the proportion of people using different forms of transport consistent with best practice. 	x	The CSRM Transport Evidence Base only considers the impact of a single intervention scenario and does not look at a range of potential outcomes given a number of assumptions. An example could be, testing a range of modal shift assumptions on the basis of phased delivery of development and transport infrastructure.
<ul style="list-style-type: none"> • The use of any area-wide traffic model 	✓	

¹¹ CEG Transport Evidence Base, September 2013, Appendix E – Comparative analysis of existing travel plans, table 1, page 8

¹² CEG Transport Evidence Base, September 2013, Appendix C – Cambourne Case Study – ‘Lessons from Cambourne Review’

	x/✓/?	BGH/ITP Commentary
or background growth rates should be agreed with the relevant transport or highway authority at the evidence gathering stage of the Local Plan.		
<ul style="list-style-type: none"> Care needs to be taken when considering using any model that it takes account of the need to address historic travel patterns not necessarily reinforce them. 	x	The CSR Modelling Report identifies that road space is freed up by developing in more sustainable locations but that the benefit is eroded as suppressed demand returns. These findings warranted further investigation of measures that would address the issue referred to as backfilling rather than relying on historical travel patterns contrary to PPG advice. ¹³ The CSR Modelling Summary Report does not provide full transparency on the modelling input data but these modelling output results suggest the output results are based upon the reinforcement of historical travel patterns.
<ul style="list-style-type: none"> To assess the availability of the capacity of the road network, the transport assessment should take into account: <ul style="list-style-type: none"> Recent counts for peak period turning movements Queue length surveys Journey time surveys Freight counts Abnormal load counts Pedestrian and cyclists counts 	?	It is not clear from the CSR Modelling Report that the Evidence Base takes into account these factors. It is important that the transport assessment takes into account freight and abnormal counts given the significant highway infrastructure relied upon such as the A14 improvements.
<ul style="list-style-type: none"> Capacity assessments for roads, rail and bus should also be obtained. 	x	There is no evidence of any capacity assessments of rail and bus.
Paragraph 008		
How should the impact of land allocations		

¹³ PPG Paragraph 010 Reference ID 54-007-20141010 – 4th sub para (RD/NP/020)

	x/✓/?	BGH/ITP Commentary
be considered in assessing the transport implications of Local Plans?		
<ul style="list-style-type: none"> The first step in quantifying the impact of proposed land allocations in the Local Plan in the transport system is to provide an estimate of the person trips (for all types of transport) that are likely to be generated by it. 	✓	The TSCSC includes this
<ul style="list-style-type: none"> An assessment of the impacts of the proposed additional land allocations can be initiated once initial potential allocations have been determined. 	x	The CSRSM modelling does assess the impacts of the proposed additional land allocations, however, there is not development/infrastructure phasing modelling that could influence the residual impacts.
Paragraph 009 How should safety considerations be addressed and accident analysis used effectively in the transport assessment of the Local Plan?		
<ul style="list-style-type: none"> Critical locations on the road network with poor accident records should be identified. This is to determine if the proposed allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident rates should be compared with accident rates on similar local roads. 	x	This has not been addressed in the Local Plan Transport Evidence Base.
Paragraph 010		

	x/✓/?	BGH/ITP Commentary
How is the WebTAG approach useful in the transport assessment of the Local Plan?		
<ul style="list-style-type: none"> An assessment should adopt the principles of WebTAG by assessing the potential impacts. 	x	
<ul style="list-style-type: none"> Assessments involving major new transport infrastructure should employ the methods set out in WebTAG. 	x	There have been no assessments of the major new transport infrastructure in accordance with the methods set out in WebTAG. The major schemes are not justified in terms of effectiveness and value for money. ¹⁴
<ul style="list-style-type: none"> Although this approach is typically applied when planning for local transport infrastructure, adopting this approach for Local Plan transport assessments will ensure that any proposed land allocation impact is considered in the context of two alternative scenarios, 'with development' and 'without development' and will enable a comparative analysis of the transport effects of the proposed allocation. 	x	The supporting CSRMs do not use the WebTAG approach to major new transport infrastructure and therefore an inadequate approach has been taken to allow a comparative analysis of the transport effects of the proposed allocation and the site options testing. The WebTAG approach to assessing the impact of the proposed allocations and associated necessary and critical infrastructure has not been tested.
Paragraph 011 Over how long a period should the assessment of the transport impact of the Local Plan cover?		
<ul style="list-style-type: none"> Circular 02/2013 	✓	

¹⁴ TSCSC April 2014 – Action Plan and Scheme Details (RD/T/120) section 4, page 4-1

Appendix 4

Appendix 4

Comparative List of IDS Update Major Transport Schemes against Schemes input into CSRM Modelling

Major Schemes >£2million

	Scheme	IDS Update 2013 ¹		CSRM Modelling Summary Report for Cambridge and South Cambridgeshire Local Plans – July 2013 ²
		Necessary/ Critical	Cost	
1	Mill Road Public Realm	Necessary	£2m	✓
2	Mitcham's Corner Improvements	Necessary	£2m	
3	Riverside Public Realm	Necessary	£4.1	
4	Hills Road	Necessary	£25m	✓
5	Arbury Court Public Realm Improvements	Necessary	£7.3m	
6	Third City Centre Cycle Park	Necessary	£5m	
7	St Johns Public Realm	Necessary	£2.8m	
8	Hobsons Street Public Realm	Necessary	£2.8m	
9	Market Square Public Realm	Necessary	£5.5m	
10	A1303 Inbound Bus Priority (A428-M11)	Critical	£14m	✓
11	A1303 Madingley Road Inbound Bus Priority	Critical	£31m	✓
12	Busway from Caxton Gibbet to A1303	Critical	£30m	✓
13	High Quality Pedestrian and Cycle Links to Cambourne/Bourn Airfield	Critical	£10m	
14	Milton Road Outbound Bus Lane	Critical	£29m	✓
15	Waterbeach Park and Ride	Critical	£12m	
16	A14/A10 Milton Interchange Improvement	Critical	£86m	
17	New Station at Waterbeach	Critical	£42m	
18	A10 Dualling	Critical	£79m	✓
19	Segregated Busway from New Station to Town Centre and onto North Cambridge	Critical	£125m	
20	High Quality Pedestrian and Cycle Links to Cambridge	Critical	£16m	
21	Relocated Railway Station	Critical	£20m	
22	Relocation and Expansion of Newmarket Road P&R	Critical	£14m	✓
23	Hills Road Inbound Bus Lane	Critical	£12m	✓
24	Ring Road Bus Priority Addenbrooke to Coldham Ln	Critical	£12m	✓
25	Ring Road Busway Bus Priority Coldhams Lane to Newmarket Road	Critical	£4m	✓
26	Newmarket Road to Cambridge Science Park Station	Critical	£60m	
27	Addenbrookes Access Road Phase 2	Critical	£6.6m	
28	Cambridge Guided Busway (Southern Fringe)	Critical	£4.7	
29	Southern Area Corridor Transport Plan Committed Schemes	Critical	£3.2m	
30	Northern Area Corridor Transport Plan Committed Schemes	Critical	£3.3m	
31	Enhanced Network of Rights of Way	Necessary	£2m	✓
32	Cambridge Science Park Station	Critical	£30m	
33	Newmarket Road Busway	Critical	£77m	✓
34	Chisholm Trail Cycle Route	Necessary	£10m	✓
35	Enhanced Network of Rights of Way	Necessary	£2m	✓
36	A14 Ellington to Milton Scheme	Critical		✓
37	A428 Caxton Gibbet to Black Cat Scheme		N/A	✓
	Total Costs (excl A14 Ellington to Milton Scheme)		£791m	

¹ IDS Update 2013 Appendices B to D (RD/T/020)

² CSRM Modelling Report, July 2013 Appendix B (RD/strat/160)