

Appendix A: Proposed Greater Cambridge response to Cambridgeshire and Peterborough Local Transport and Connectivity Plan: draft plan consultation

A1. This is a joint response to the Cambridgeshire and Peterborough Local Transport and Connectivity Plan: draft plan consultation by Cambridge City Council and South Cambridgeshire District Council.

Overview comments

Overall direction

A2. We are strongly supportive of the overall direction of the LTCP, including its vision, goals and guiding principles, encompassing a broader range of priorities than the adopted LTP. These align with the Councils' own respective corporate priorities, the emerging Greater Cambridge Local Plan themes, and the Greater Cambridge City Deal programme. We would suggest that the LTCP could show greater ambition for the natural environment as part of providing new and enhanced transport schemes, to reflect the Combined Authority's aim of doubling nature.

COVID

A3. We welcome recognition of potential impacts, uncertainties, and need to learn lessons from COVID, but would suggest that consideration of impacts may be more nuanced than currently presented. We would suggest that the final LTCP should reflect on potentially differing COVID impacts at different locations and growth sites, and that it should recognise current evidence suggesting that in certain locations within Greater Cambridge car traffic is now at pre-pandemic levels.

Climate change

A4. We support the principle of the LTCP's commitment to a reduction in car mileage by 15%, using a 2019 baseline, across the region, drawing on the recommendations outlined in the Cambridgeshire and Peterborough Independent Commission on Climate Report. This

aligns with Cambridge City Council and South Cambridgeshire District Council's net zero carbon aspirations. We note that the practical application of this commitment and therefore its specific impacts remain to be worked through.

Greater Cambridge

- A5. We are supportive of all the content included in the Greater Cambridge section, including in particular the inclusion of the GCP programme which underpins delivery of the current local plans and will help achieve sustainable transport goals. Within this, we strongly support the inclusion of forthcoming proposals following the GCP Making Connections consultation that seek to improve public transport and air quality and reduce congestion and pollution in Cambridge.
- A6. We strongly support the Combined Authority's intention to work with relevant partners to prepare a Transport Strategy for Cambridge and South Cambridgeshire to support the emerging Greater Cambridge Local Plan as a child document to the LTCP. Within this, we also strongly welcome the support for policy measures such as trip budgets where considered appropriate, to limit the transport and environmental impacts of new development.
- A7. We welcome the proposals to transform the Greater Cambridge bus network, but strongly suggest that reference is added to the need to significantly increase bus depot provision in the Greater Cambridge area to support this. We would also suggest that to support the shift towards electric vehicles, additional reference is made to the need to enhance electrical grid connection and distribution, as well as E-charging infrastructure.

Introductory sections

Introduction

- A8. Summary: The introduction sets the context for, and purpose and content of, the refreshed Local Transport and Connectivity Plan, noting that the LTCP vision will be delivered in conjunction with the CPCA's Assurance Framework, which provides a rigorous process for transport scheme prioritisation and development, and that the LTCP will set the framework for a Delivery Plan to be adhered to and monitored.
- A9. Comment: We support the focus on the implementation of LTCP priorities via the Assurance Framework and a Delivery Plan. It will be important that the LTCP once adopted is used rigorously to inform transport scheme prioritisation and development to ensure that the ambitious environmental, social and economic priorities within it are delivered in practice.
- A10. In relation to ensuring delivery against the LTCP's ambitions, we note that the draft LTCP proposes guiding transport spend and schemes against its vision, goals, the road user hierarchy and the Six Themes taken from the Combined Authority's Sustainable Growth Ambition Statement, and that beyond this the LTCP also includes objectives and guiding principles. We note that the policies are structured by the objectives, but the performance framework is structured to measure delivery of the goals. As per our responses below to relevant sections, we support the intention of these various elements but suggest that additional consideration is required, including potentially rationalising some of this content, to clarify exactly what ambitions schemes will be prioritised and assessed against.

COVID

- A11. Summary: includes a section on COVID-19, referencing shorter and longer term impacts, noting uncertainties. In summary it notes

that we need to continue to learn lessons and ensure the transport network is flexible enough to cater for changes of a “new normal” and respond to emerging guidance going forward.

A12. Comment: We welcome recognition of potential impacts, uncertainties, and need to learn lessons from COVID, but would suggest that consideration of impacts may be more nuanced than currently presented. We note that the draft LTCP states in some places “transport is unlikely to return to as it was prior to the pandemic” however in other areas it says it is already at pre-pandemic levels. We would suggest that the final LTCP should reflect on potentially differing COVID impacts at different locations and growth sites, and that it should recognise current evidence suggesting that in certain locations within Greater Cambridge traffic is now at pre-pandemic levels. Further development may exacerbate these trends, such that overall the growth levels in our area may cancel out traffic reduction changes in specific locations.

What is a Local Transport and Connectivity Plan?

A13. Summary: Sets the LTCP in the context of other relevant plans and strategies.

A14. Comment: We note that the National Industrial Strategy referred to here no longer exists. This has been transitioned to the UK’s ‘Plan for Growth’. In relation to the content referred to in the Employment and Skills Strategy we recognise and support the need to enhance affordable, frequent and reliable transport and connectivity across the day and evening, particularly for students, adult learners and low income earners, including those living in our towns and rural communities, noting that the LTCP provides an opportunity to address these issues. We note England’s Economic Heartland’s Regional Transport Strategy, and suggest that this LTCP section references that document.

Our transport vision

Vision

A15. Comment: We support the content of the proposed vision which encompasses a broader range of issues than the adopted LTP, including references to health, fairer society, climate change, environment, clean air, and sustainable economic growth. This aligns strongly with the Greater Cambridge approaches, including the emerging Greater Cambridge Local Plan's seven themes of climate change, biodiversity and green spaces, wellbeing and social inclusion, jobs, homes and infrastructure, and the City Deal programme which has stretched its focus on a broader set of priorities, particularly considering and addressing the criticality of climate change, the environment, inclusive growth and improving health.

A16. On specific wording points, we would suggest that the phrasing regarding the natural environment is amended to read "protect and enhance our environment", noting Cambridgeshire and Peterborough's doubling nature ambition, and Greater Cambridge's 20% Biodiversity Net Gain aims. We would also suggest removing "very" from the phrase "very rural areas" so as to encompass the full range of locations including better connected rural areas.

Goals

A17. Summary: six goals, developed from the three outlined previously in the 2020 LTP: productivity, connectivity, climate, environment, health, safety.

A18. Comment: We support all the goals referenced. Under productivity or connectivity we would suggest that reference should be made to modal shift and potentially also to reducing congestion as key priorities for the LTCP. Under health, we would suggest adding reference to active travel.

Objectives

A19. Summary: 11 objectives, each connected to one of the 6 objectives. These are identical to those in the adopted LTP, except for the addition of connectivity – digital.

A20. Comment: We support the comprehensive objectives including the addition of digital connectivity. We'd suggest that there is an opportunity to quantify the natural environment objective, potentially via referencing the doubling nature ambition in a similar way to the climate objective referring to net zero emissions by 2050.

Evidence Base

A21. Summary: Notes updates to the evidence base since the 2020 LTP, identifying points relevant to Greater Cambridge including: Knowledge Intensive business concentrations and associated inequalities; significant growth in sustainable travel journeys into Cambridge; conversely, rising fares and general cost of living are reducing the affordability of the public transport network; the Cambridgeshire and Peterborough Commission on Climate Change's recommendations relevant to transport; and potential COVID impacts.

A22. Comment: We support recognition of the key social, environmental and economic issues raised by the LTCP's evidence base. As per our comments on the introductory section we suggest careful review of COVID impacts and assumptions accounting for site-specific and sub-regional differences.

Our overall strategy

Productivity

A23. Summary: Identifies congestion as a key challenge to economic productivity and the key actions needed to address it including: investment in public transport and active travel, travel hubs allowing car users to switch to modes earlier and travel sustainably for a large proportion of their journeys; policy measures such as trip budgets and alternative methods of providing car parking, where considered

appropriate, particularly in Cambridge and its urban edge; and working with partners on a regional Freight Strategy.

A24. Comment: We support the content of this guiding principle. In particular we support the use of trip budgets where considered appropriate. These are identified by the Transport Evidence supporting the emerging Greater Cambridge Local Plan as required policy tools to support development at specific locations. We also particularly support the focus on freight, including exploring the potential for more freight to be transported by sustainable modes while accounting for the local impacts, and also first/last mile deliveries, which are a particular issue for Cambridge. To achieve this we very much support the Combined Authority's intention to liaise with Planning Authorities to identify and investigate freight issues and bring together spatial planning, freight transport and transport planning interests.

A25. Further to this, we support the aspirations of the Bus Service Improvement Plan. We would highlight that the location of bus depots and layover facilities are important for productivity.

Connectivity

A26. Summary: focus on digital connectivity and reference to preparation of Cambridgeshire and Peterborough Digital Connectivity Infrastructure Strategy, and also emerging digital transport tools

A27. Comment: we support the focus on digital connectivity for all, and the intention to explore demand responsive transport for more rural areas, noting the digital connectivity and public transport accessibility challenges faced by our more rural communities. We would suggest that further consideration could be given to how rural centres and nearby villages can sustain themselves as networks and connect effectively into other larger centres and more strategic transport options.

Health

A28. Summary: notes the impact of transport on physical and mental health including active travel and air quality.

A29. Comment: We support this content. We would note that additional reference could be made to:

- initiatives for adults to bring them back to cycling as well as encourage their children
- building greater links with schools to promote benefits to pupils of walking and cycling and forming healthy habits/behaviours early
- the safety of walking routes, which needs to be addressed to encourage use by all users.
- The Cambridgeshire and Peterborough Health and Wellbeing Strategy 2020-24, and the emerging Active Travel Strategy

Place Making & Public Realm

A30. Summary: identifies importance of public realm in placemaking, the need to integrate spatial and transport planning including via the Combined Authority's Non-Statutory Spatial Framework to reduce the need to travel, and supporting 20 minute neighbourhoods

A31. Comment: We support the approach to integrating spatial and transport planning, which reflects the approach we are taking in the emerging Greater Cambridge Local Plan to locating new development close to sustainable travel opportunities. As noted elsewhere in our response, on the topic of integrating spatial and transport planning we strongly support the Combined Authority's intention to work with relevant partners to prepare a Transport Strategy for Cambridge and South Cambridgeshire to support the emerging Greater Cambridge Local Plan as a child document to the LTCP.

Safety

A32. Summary: noting the priority of improving road safety across the region, working via the Cambridgeshire and Peterborough Vision Zero Partnership

A33. Comment: We support this content.

Climate Change

A34. Summary: references local climate impacts, the net zero carbon by 2050 target, commitment includes a reduction in car mileage by 15%, using a 2019 baseline, across the region, the need to tackle embodied carbon, the East Anglian Alternative Fuels Strategy (EAAFS), Greater Cambridge Partnership's work on a Clean Air Zone Feasibility Study, zero emissions buses, and Air Quality Action Plans.

A35. Comment: We support this guiding principle. We welcome the principle of the LTCP's commitment to a reduction in car mileage by 15%, using a 2019 baseline, across the region, drawing on the recommendations outlined in the Cambridgeshire and Peterborough Independent Commission on Climate Report. This aligns with the Cambridge City Council and South Cambridgeshire District Council's net zero carbon aspirations, and also broadly aligns with the GCP's existing aim of reducing traffic within Cambridge by 10-15% on 2011 levels. We note that the practical application of this commitment and therefore its specific impacts remain to be worked through.

A36. We also welcome:

- The intention to consider embedded carbon within transport scheme assessment
- the reference to the Cambridge City Council Air Quality Action Plan (AQAP) 2018-23, which will be reviewed in 2022/23. A reference to compliance with future AQAP should be included in the final LTCP. We welcome the LTCP's support for the key actions identified in the AQAP.

A37. Following current content regarding the Intelligent City Platform, we would ask that the following wording be added: "In addition the Smart Cambridge programme has been using real time public transport data to provide clear information for travellers across the County through both an app-based interface and travel screens, helping to provide real time information to travellers and local authorities about the functioning of the transport network".

Natural Environment

A38. Summary: references the intention to protect the natural, historic and built environment, and to integrate biodiversity net gain into transport schemes.

A39. Comment: We support the aims set out. As per our comments elsewhere, we would suggest that the LTCP could be more specific in its ambition for the natural environment, potentially adopting the Greater Cambridge ambition such that transport schemes would seek to deliver 20% Biodiversity Net Gain.

Attractive Alternatives

A40. Summary: references the Cambridgeshire Active Travel Strategy as a child document to the LTCP, a first/last mile strategy for deliveries, and the Greater Cambridge Partnership's Making Connections project.

A41. Comment: We support the focus on active travel. We would suggest this principle needs to acknowledge the importance of considering all users, including those who may struggle with walking.

Demand Management

A42. Summary: defines Travel Demand Management as an umbrella term for the application of strategies and policies to reduce travel demand, or to redistribute this demand in space, mode or in time, and identifies the intention to investigate such measures in specific locations across the region, accounting for local issues.

A43. Comment: We strongly support the application of travel demand management tools in appropriate locations, as per our comments on the Productivity section.

Shaping our investment

A44. Summary: identifies features that will guide consideration of transport spend and schemes alongside the LTCP's vision and 6 goals, including: a road user hierarchy including place and movement

functions, and six themes taken from the Combined Authority's Sustainable Growth Ambition Statement: people, climate and nature, infrastructure, innovation, reducing inequalities, financial and systems.

A45. Comment: We support assessing transport schemes against a wide range of indicators going beyond GVA to encompass environmental and social priorities. Equally, to ensure delivery against LTCP ambitions, as per our comments on the introductory section we suggest that additional consideration is required, including potentially rationalising some of this content, to clarify exactly what ambitions schemes will be prioritised and assessed against.

A46. On a point of detail, we note that no reference is made within the user hierarchy to e-scooters, and suggest that the LTCP needs to be flexible and forward looking to account for emerging transport modes of travel, including within the user hierarchy.

Local Strategies

East Cambridgeshire

A47. Summary: points relevant to Greater Cambridge include the intention to address capacity constraints on the A10 between Ely and Cambridge; provision of a new Park and Ride at Waterbeach; reference to Network Rail's Ely Area Capacity Enhancement (EACE) scheme facilitating additional rail services to Cambridge, as well as additional services to Peterborough, Ipswich, and Norwich.

A48. Comment: Our comments on this section are limited to those relevant to Greater Cambridge. We support the intention to address A10 capacity issues and provision of a new Park and Ride at Waterbeach, which are requirements to support full development at Waterbeach New Town. In relation to Network Rail's Ely Area Capacity Enhancement (EACE) scheme, as per our response to the EACE consultation in 2021, EACE provides only limited additional future rail capacity. Ongoing engagement with Network Rail and local partners is required to ensure that there is sufficient rail capacity to

cater for all planned growth to 2040 and beyond, including accounting for the increasing proportion of journeys being taken by rail. Also included in our response to the EACE consultation, we also note the pressing need to address exclusion of the community severed by the Chesterton Fen Road crossing caused by the existing and forecast increases in barrier down time. We look forward to working with the Combined Authority, Network Rail and other partners to address this issue.

Greater Cambridge

Background and recent developments

A49. Summary: summarises key issues characterising Greater Cambridge transport context, noting recent developments including those included in the adopted 2018 Local Plans. Expresses the intention to working in partnership with the Local Planning Authorities, Greater Cambridge Partnership, Cambridgeshire County Council, and other relevant partners to deliver a world class transport network in Greater Cambridge, including supporting the potential role of a sub-strategy for the Greater Cambridge area, that would update the previous Transport Strategy for Cambridge and South Cambridgeshire that was prepared in parallel with the 2018 Local Plans under a previous Local Transport Plan, which will form a 'child' document to the LTCP.

A50. Comment: We recognise the characterisation of Greater Cambridge, with very different issues faced by Cambridge from more rural parts of South Cambridgeshire. Given this context, we note that the challenges and opportunities for Greater Cambridge, and indeed for Cambridgeshire and Peterborough as a whole, are to consider the very different characteristics of the region and then look at how walking, cycling and public transport can support a post-COVID economy with a reduced need to travel (supported by technology and services such as last mile delivery), including rebalancing streets and spaces which encourage and support active travel options.

A51. We strongly support the Combined Authority's intention to work with relevant partners to prepare a Transport Strategy for Cambridge

and South Cambridgeshire to support the emerging Greater Cambridge Local Plan as a child document to the LTCP.

A52. We'd suggest that the text on page 68 could be clarified to note that the environmental and social impact of journeys being made by private vehicle are current and not solely related to future planned growth, as is expressed later in the same paragraph. In relation to air pollution we would note the negative impacts of particulate matter from transport within Cambridge, in addition to the impacts of nitrogen dioxide (NO₂) already noted.

Transport Challenges

A53. Summary: identifies key transport challenges for Greater Cambridge, including high housing costs and associated longer distance commuting; congestion and associated impacts including air pollution and bus service inefficiencies.

A54. Comment: We recognise the transport challenges identified. We'd note the additional challenges not mentioned in this section of:

- Meeting the growing demand for fast deliveries of goods and services in a way that avoids negative impacts. Numerous vehicles pulling up at the kerb to make deliveries has an impact on the public realm, public safety (conflict with pedestrians and cyclists) and the quality of life of people living and working in the area, adding unnecessarily high levels of congestion, pollution and environmental impacts.
- The Government's drive towards phasing out petrol and diesel vehicles, which will see a shift to electric vehicles. Electrical grid distribution and connection, already a key challenge within Greater Cambridge as explored by GCP, will need to be enhanced to support this shift together with jobs and housing growth. In addition, public charging infrastructure needs to keep pace and will need to accommodate a wider range of vehicles including mobility scooters, electric cycles and electrification of the bus fleet. Poorly located and designed e-charging infrastructure could cause conflicts, for example with pedestrian and cyclist routes.

Our approach

A55. Summary: identifies the approaches being taken to addressing Greater Cambridge's transport challenges, including transforming the public transport network of bus services including in rural areas, enhancing travel hub capacity, addressing congestion and associated impacts in Cambridge via the GCP's City Access project (including a scheme to reduce congestion and pollution and raise money to invest in sustainable transport improvements), a revised Cambridge road network hierarchy, parking controls, investment in active travel, a 'decide and provide' policy approach to strategic new development, and addressing highway pinch-points.

A56. Comment: We are supportive of all the content included in this section, including in particular the inclusion of the GCP programme which underpins delivery of the current local plans and will help achieve sustainable transport goals.

A57. Within this, we strongly support:

- the inclusion of forthcoming proposals following the GCP Making Connections consultation that seek to improve public transport and air quality and reduce congestion and pollution in Cambridge. Delivery of these proposals is expected to achieve the modal shift required to address existing issues and support development identified in the adopted plans and emerging local plan.
- The 'decide and provide' policy approach, as per our comments on the Productivity guiding principle.

A58. We strongly suggest that reference is added to the need to significantly increase bus depot provision in the Greater Cambridge area to support the proposed increases in bus services. The location of new depots and their potential impacts will require thorough consideration.

A59. In addition, we suggest that the following further enhancements are made to this section:

- Make additional reference to electrical grid connection and distribution, as well as E-charging infrastructure to support the shift towards electric vehicles, as per our comments regarding transport challenges
- Make additional reference to meeting the growing demand for fast deliveries of goods and services, including first/last mile delivery, as per our comments regarding transport challenges
- Make greater reference to future mobility and Mobility as a Service (MaaS) to support the work being undertaken by Smart Cambridge on these topics, noting that MaaS could be transformative for many journeys, not just for first/last mile journeys as currently suggested by the draft LTCP.

Strategic and local projects

A60. Summary: Identifies the schemes and policy approaches required to support committed development, and to address existing and future transport challenges in Greater Cambridge.

A61. Comment: We are strongly supportive of the identification of transport schemes and policy approaches required to address existing and future transport challenges in Greater Cambridge.

A62. We would request the following changes to references to the identified schemes to ensure factual accuracy, and that the relative status and certainty of schemes is correctly referenced:

- Schemes identified as required to support the adopted Cambridge and South Cambridgeshire Local Plans:
 - This list includes schemes that are coming forward but were not identified as required to support the adopted plans. We support reference to these schemes in the Greater Cambridge section, but request that the list of schemes identified as required to support the adopted plans is amended to include only the following schemes:
 - Greater Cambridge Partnership (GCP) schemes:
 - Cambourne to Cambridge
 - Cambridge South East Transport Study

- Cambridge South West Travel Hub
 - Waterbeach to North East Cambridge
 - Cambridge Eastern Access Phase A
 - City Access
 - GCP Cycle Schemes
- Waterbeach station relocation
- A10 (Waterbeach to Cambridge) highway improvements
- Drawing on the above, we support reference in the LTCP Greater Cambridge section to the following schemes that are being developed but are not specifically required in the adopted plans, including:
 - Foxton Rural Travel Hub
 - A10 (Ely to Cambridge) highway improvements
 - A428 Black Cat to Caxton Gibbet
 - Cambridge South Station
- Our understanding is that there is no firm planned scheme to enhance M11 capacity, and as such would recommend deletion of this reference.
- Schemes identified as required to support the emerging Greater Cambridge Local Plan (GCLP):
 - These schemes are identified in GCLP First Proposals transport evidence, but relate to draft allocations which could be subject to change. We suggest replacing this text with “Further potential transport schemes were identified as required to mitigate the transport impacts of draft allocations included in the 2021 Greater Cambridge Local Plan First Proposals consultation. The revised Transport Strategy for Cambridge and South Cambridgeshire child document to this LTCP will be prepared to support later stages of the GCLP. This will confirm the transport infrastructure and policies required to mitigate the proposed sites, once the development strategy is confirmed”.
- Schemes not currently referenced:
 - We’d suggest that GCP’s Whittlesford Transport Masterplanning Exercise is added to the Strategic Projects and the Regional Initiatives diagram

- We'd suggest that reference is made to the proposed improved rail services from the north which should be unlocked by the Ely Catchment Capacity Area work and other related rail proposals.

Our policies

A63. Summary: Sets out policy themes by objective. Officers understand that policy summaries will be added following the consultation.

A64. Comment: Under productivity we note the theme of 'expanding labour markets'. In line with the climate ambitions set out elsewhere in the document we note the importance of achieving this goal by sustainable travel modes if it is not to have adverse environmental and social effects.

Monitoring and performance

A65. Summary: Sets out locally relevant performance indicators, structured by the LTCP's six goals, for measuring the progress of implementing the LTCP, and for informing decision making about future priorities for funding in pursuit of the aims and objectives of the LTCP.

Comment: We would note that GCP is now conducting a comprehensive data audit with a view to proposing metrics for its programme supporting its Gateway review, as well as its inclusive and sustainable growth strategy. The intention is to develop measures that demonstrate delivery against the 6 capitals framework which is similar to that of the Combined Authority's Economic Growth Strategy and broader vision. GCP partners would welcome the opportunity to discuss the potential alignment of LTCP and GCP measures, and beyond that to share understanding and intelligence as the LTCP is rolled out so that we can evidence impact collectively.

Habitat Regulations Assessment (HRA)

We note that Cambourne to Cambridge Public Transport Scheme is assessed in the HRA for the draft LTCP as a scheme that is new to the LTCP (ie not included in the LTP 2020). We note that this is incorrect:

page 51 of the HRA accompanying the LTP 2020 identified Cambridge to Cambourne and St Neots.