

Cambridge City Council and South Cambridgeshire District Council

Response to the Draft Local Transport Plan Consultation

Overall Approach

- A.1 As a direction of travel the Draft LTP offers very positive outcomes and provides a solid basis to build on. However, future reviews will need to build on these policies with innovative transport schemes which push boundaries to deliver sustainable transport solutions if the objectives are to be fully achieved, and to support delivery of the net zero carbon target. Delivery of the plan will need effective engagement with partners, including Local Planning Authorities, in particular regarding approaches to funding.

Planning for Future Growth

- A.2 One of the key functions of the LTP is to support the growth identified by the current local plans, which is reflected in Phase 1 of the CPCA Non-Statutory Spatial Framework. The Draft LTP responds to the current development strategy by including schemes which support the planned growth. This includes the transport schemes identified in the Greater Cambridge Partnership transport programme. The inclusion of these schemes is supported as they are important to assist delivery of the current development strategy, and the growth identified in currently Local Plans, including delivery of growth sites on the fringes of Cambridge and at new settlements.
- A.3 The Draft LTP also aims to provide a platform for future growth, with development of a transport system and policy framework that could support the level of economic growth identified in the CPIER and CPCA's Growth Ambition Statement. Development of the LTP was intended to be in parallel with the Non-Statutory Spatial Framework Phase 2, which would look towards 2050. The Phase 2 discussion paper was deferred by the CPCA board at the same meeting the Draft LTP was approved for consultation. There are references to the Phase 2 NSSF that will need to be amended given that this process is still being reviewed.
- A.4 It is important to note that the levels and locations of future growth will be matters for the review of statutory Local Plans, in the case of Cambridge and South Cambridgeshire through the new Greater Cambridge Local Plan.

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- A.5 In due course the LTP will need to be updated to respond as necessary to the new Local Plan's development strategy. Para 1.35 acknowledges that it may be necessary to refresh the Local Transport Plan. The Combined Authority says it will continue to work closely with its partners in spatial planning, delivery of transport priorities, and in identifying the most appropriate time to refresh the Local Transport Plan over the coming years. This statement is supported.
- A.6 The Draft LTP objectives, strategy and policies therefore provide the start of a journey, setting out some key transport principles that support the current local plans, and which can be further refined to respond to the future development strategy.

Child Documents to the LTP

- A.7 The previous LTP (Cambridgeshire LTP3) informed the policy direction of a number of 'child documents'. These include:
- Area specific strategies for Cambridge & South Cambridgeshire, East Cambridgeshire, Fenland and Huntingdonshire
 - The Rights of Way Improvement Plan
 - The HGV Routing Strategy (and map)
 - Highways Policies
 - Smart Transport Strategy
 - Existing or new mode specific strategies such as for Public Transport, Active Travel (including the Local Cycling and Walking Infrastructure Plan)
- A.8 It is unclear from the current Draft LTP what status the current documents will have when the new plan is adopted, and who will be responsible for producing or updating them. This is a key point as these documents typically go into a level of detail that is not covered by an LTP, or they could follow the main LTP depending on timing in relation to development plan making. They therefore play a pivotal role in the formulation of evidence bases for Local Plans, for transport schemes and programmes, and for the negotiation of transport related planning obligations from development.

The Following sections follow the structure of the main document:

Exec Summary

- A.9 The section on Transport and the Economy does not fully cover the benefits to the economy of cycling and walking in terms of health and accessibility to jobs, both for short journeys and for longer journeys when combined with public transport and suitable infrastructure. Cycling is a key mode for the Greater Cambridge area. This can be resolved by addressing cycling and walking more

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clearly in this section, including to emphasise the importance of these transport modes in the Greater Cambridge area.

Aims and Objectives

- A.10 The Draft LTP aims and objectives towards addressing economic, social and environmental transport issues are supported. The graphic regarding the objectives could more clearly show that objectives are linked, rather than appearing as separate goals.
- A.11 Many of the key objectives stated in the Draft LTP align with those of the Councils, such as:
- 'Reduce emissions to as close to zero as possible to minimise the impact of transport and travel on climate change'
 - 'Deliver a transport network that protects and enhances our natural, historic and built environment'
 - 'Promote social inclusion through the provision of a sustainable transport network that is affordable and accessible for all'
 - 'A commitment to environmental net gain through investment in transport'.
- A.12 Alignment of the objectives with those set out in key economic evidence base documents such as the CPIER and Local Industrial Strategy (LIS) are supported, along with the inclusion of key environment and societal objectives.
- A.13 Cambridge City Council have declared a Climate Emergency. South Cambridgeshire District Council is targeting net zero carbon by 2050. The government have also amended the Climate Change Act (2008) to bring net zero carbon by 2050 into law. Interim targets are in place for a 51% reduction by 2025 and a 57% reduction by 2030 on a 1990 baseline. Transport is a major contributor to the carbon footprint of the UK and Cambridgeshire. References to national ambitions to significantly reduce greenhouse gas emissions by 2050 will therefore need to be updated. This should be addressed directly in the vision and objectives. It is suggested to amend the objective 'Sustainable growth' to by adding to the end, 'and supports the transition to a net zero carbon society', so that it reads, 'the network will support the delivery of future economic and housing growth across the region that enhances overall quality of life and protects or enhances the environment and supports the transition to a net zero carbon society'.
- A.14 The CPCA should consider how it brings the "net zero" policy position into the assessment of its transport programme and schemes, and the trajectory of emissions reduction from the transport sector that will be needed to meet the national objective. It should also consider in detail how the use of existing and planned new infrastructure may need to evolve over time to make the most efficient use of it, in terms of energy usage, emissions, capacity and

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congestion. It should look to secure that the initial benefits of new infrastructure are not lost as suppressed demand or transfer of mode to car leads to unintended increases in private car travel with an attendant increase in emissions.

- A.15 Paragraph 1.97 of the LTP details a proposed metric on transport emissions based on CO₂ emissions from travel along Cambridgeshire and Peterborough's road network. Tackling the operational carbon footprint of the vehicle fleet will come through the provision of clean energy to support electric vehicles but unless access to clean energy is carefully planned and EV charging infrastructure developed properly, the transition to EV's could be pushed into the future when this is needed now. It is worth highlighting that simply replacing one petrol/diesel car with an electric car will bring down operational carbon emissions but this does not address emissions associated with construction of transport infrastructure and the manufacture of the vehicle fleet, which will also need to be taken into account in the future. Even with an all-electric vehicle fleet, there will still be a requirement for "net zero" power generation for the manufacture and operation of that fleet if it is to meet the "net zero" objective.
- A.16 Carbon footprint work is currently being carried out for Cambridgeshire County Council by the University of Cambridge Science and Policy Exchange (CUSPE). This will identify scenarios for getting to net zero by 2050 for all sectors including transport. We would strongly recommend that this work be included as part of the LTP evidence base to supplement section 2.41- 2.45 and inform future scheme prioritisation and delivery plans still under development. It's important to note, Figure 2.8 on transport CO₂ emissions per capita (Evidence Base Annex), show emissions reductions from 2005 to 2015 but this graph would benefit from updating with where these are today and more importantly on the graph show where they need to be by 2025, 2030 and 2050 in line with the 4th, 5th and 2050 government targets.
- A.17 When considering the prioritisation of its programme in the context of climate change and emissions, Combined Authority should place a greater focus on the provision of mobility services (e.g. autonomous vehicles) and use of public transport, given the strength of the high technology sector in this area. The Grand Challenges theme set out in the Government's Industrial Strategy (BEIS 2018) is driving the UK's ambition for our 'Clean Growth' and for 'Future of Mobility Services' to be world leading. Emissions per passenger mile are generally far less than those associated with a private car, even if the vehicle is not 'green' and the emissions per vehicle are higher.
- A.18 In addition to the climate emergency, Cambridge City Council has pledged to develop plans to secure further biodiversity net gain, in recognition of the global

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biodiversity emergency and the local impact this could have on the communities and businesses. South Cambridgeshire District Council has resolved to aim to double the area of rich wildlife habitats, tree cover and accessible green space in order for nature and people to thrive, and businesses to prosper, recognising we are facing an ecological emergency.

- A.19 The commitment to environmental net gain through investment in transport in the Draft LTP is supported. The main Draft LTP document does not reference the vision of the Local Nature Partnership, and this should be added. It should also reference the Oxford-Cambridge Arc Local Natural Capital Plan, and the importance of collaboration between projects within the area.
- A.20 On a technical note the references to biodiversity net gain and environmental net gain should be checked, to ensure consistency within the document.
- A.21 Improving air quality is identified as a key priority of the LTP throughout the document and the impact of emissions from transport is both evidenced and acknowledged. We welcome this. Cambridge City Council's Air Quality Action Plan (AQAP) and other supporting evidence including the nature and extent of the region's Air Quality Management Areas are acknowledged and referenced. Defra guidance under the 1995 Environment Act recommends that Air Quality Action Plans should be integrated into the current Local Transport Plan. Reference should be included in the main document as well as the annexes. It is crucial that all schemes proposed in the LTP are subject to air quality assessment, including consideration given to how air quality standards will be met.
- A.22 Cambridgeshire also suffers with a disparity in accessibility by transport, with rural areas heavily reliant on private car, creating issues in terms of access for jobs, healthcare, services and leisure, subsequently creating inequality. When South Cambridgeshire District Council consulted on their Business Plan in early 2019, almost 50% of respondents said that the economic development priority should be transport. This is a vital issue for the LTP to address, so the inclusion of aims and objectives around this is welcomed.

Metrics

- A.23 The draft LTP includes a number of metrics, which will be used to inform and test the transport delivery plan.
- A.24 Paragraph 1.97 refers to further metrics being developed with partners. Metrics will need to consider embodied carbon in addition to emissions (from both construction and in operation), to understand the impact of transport towards the transition to net zero carbon. Other metrics should also consider roll out of

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electric vehicle infrastructure, and monitoring of mode share / take up of sustainable modes of travel, and healthy lifestyles/active travel.

Guiding Principles

- A.25 The Councils generally support inclusion of the User Hierarchy; however, it is important to consider opportunities to create areas of enhanced 'Place', and how spaces within streets can be reallocated to create a high-quality public realm whilst supporting sustainable modes of travel. The Councils and GCP are developing a spaces and movement strategy titled 'Making Space for People' for Cambridge, which is exploring how to deliver an inclusive and walkable city centre. This work is being done in a parallel process to the GCP City Centre Access Programme. Reference to this should be added to the Draft LTP.
- A.26 Other principles of supporting shift towards sustainable transport modes, the integration of the network to enable multimodal trips and uptake of future technologies are also important and are supported. It is vital that the LTP is adaptable so that it can reflect progress as technology changes and is positioned to support the implementation of technological solutions.
- A.27 Whilst the major schemes listed in the plan improve transport opportunities on key corridors, it will be crucial to consider how villages and communities away from these corridor schemes can effectively link to these routes and transport hubs like the Park & Ride sites. Links to education facilities from the villages and communities they serve should also be a priority. This is a key issue for communities in South Cambridgeshire, where children are often required to travel between villages to access schools. This includes situations where local primary schools are full and pupils must travel to other villages. The issue is even more apparent for accessing further education. Similarly, not all villages have healthcare facilities, and higher order health services are provided centrally. A key element of implementing the LTP will be improving public transport, cycling and walking links so that people can access the transport routes and hubs proposed, and the delivery of an integrated transport system.

Transport schemes

Walking & Cycling

- A.28 The Draft LTP aims to support investment in world-class walking and cycling facilities, including a network of segregated cycleways. The plan includes a number of multimodal corridor schemes which include cycling and walking provision, and the Greenways project. Whilst these high-quality schemes are supported, it will be important to improve the wider urban and rural network, so people can connect to these. Links to the corridor improvements must be

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addressed in the LTP, and through the Local Cycling and Walking Infrastructure Plan.

Public Transport

- A.29 Inclusion of the Greater Cambridge Partnership public transport schemes within the LTP is supported. The Councils also support the inclusion of the CAM and the desire to deliver high quality, high frequency, segregated public transport offerings to connect key housing and employment destinations. In particular the Councils support the Greater Cambridge Partnership corridor schemes, which are proposed as a first phase. CAM will need to be complemented by measures being explored by the Greater Cambridge Partnership through the Cambridge City Centre Access Project.

Rail

- A.30 The inclusion of proposed rail enhancements in the LTP is supported. Rail is a key transport mode for the area. The Councils support the inclusions of new stations at Waterbeach and Cambridge South, as well as increased frequency of services across the network. The Councils are also pleased to see the inclusion and support for East-West Rail.
- A.31 Potential for new stations at Fulbourn and at Cherry Hinton should be included within the long-term rail aspirations in the LTP. These proposals have previously featured in the Cambridgeshire Long Term Transport Strategy (a child document to the LTP) as part of a vision to increase the rail offering to the east of the county.
- A.32 More emphasis on electrifying the entire rail network in the CPCA area would be welcomed, in the light of a need to tackle climate change and emissions.

Roads

- A.33 The road improvements proposed in Greater Cambridge largely respond to planned growth in the area.
- A.34 It is also recognised that in some cases road capacity improvements are necessary in order to respond to safety issues, and address congestion to support and enable economic and housing growth. However, it is important that for the benefit of the built and natural environment, that all options of viable alternatives to providing for the private car should be considered alongside road capacity increases. This includes by making schemes are multimodal.

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- A.35 Proposals to improve the A10 north of Cambridge seek to address a key corridor for existing travel which is already heavily congested, and for future housing and economic growth including at the new town north of Waterbeach. This must be delivered alongside investment and effective integration with infrastructure to support sustainable travel modes.
- A.36 Inclusion of the A505 study as multimodal is also supported. As well as being a key route for an existing Biotech Cluster, there are also currently significant safety concerns on much of the route.
- A.37 The Councils are responding to the consultation on the A428 Black Cat to Caxton Gibbet scheme, supporting in principle but seeking clarification in relation to in relation to the Government's and Councils' net zero carbon ambitions.
- A.38 The project proposing a Girton Interchange study is supported. This will explore the case for improvements to Girton Interchange to add additional links not served by the existing junction, subject to engineering feasibility and value-for money. The A428 is a key growth corridor in the district. It is important to ensure the effectiveness of this junction and this route as whole.

Electric Vehicle Network

- A.39 There is a need for specific plans to support low emission vehicle roll out and use, with a strategy for increasing chargepoint capacity across Cambridgeshire and Peterborough, and including rapid chargepoints at strategic points. The Combined Authority should seize the opportunity to state an aim for the Cambridgeshire and Peterborough region to have a world class network of electric and low emission vehicle charging vehicles and infrastructure.
- A.40 The LTP currently states the current electricity grid prevents this, and that the CPCA will engage with the relevant bodies and stakeholders to improve the grid capacity. Cambridgeshire County Council has shared with the CPCA a project under development with UK Power Networks, businesses, Greater Cambridge Partnership and Local Authorities, to integrate land use, transport and energy planning. The aim of this project is to develop an energy infrastructure plan and funding strategies to deliver a 'whole energy system' that supports the decarbonisation of transport (heat and growth too) by 2050 at least cost. It will be helpful if the project is included in the LTP as supporting the delivery of the ambitions of the strategy and the decarbonisation of transport. Further details can be shared with the Combined Authority. This project will identify the EV infrastructure requirements across Greater Cambridge and

East Cambridgeshire initially to support future projections and demand for electric and low emission vehicles and provide a clear plan of action.

LTP Policy Annex

Note: In this section we have provided a summary of the issues raised to assist members consideration of the response:

Policy Theme 1 Housing and Development

- A.41 Summary: identifies that the Combined Authority will ensure that there are a wide range of high-quality public transport options between new and existing residential areas and major employment sites and other key services and amenities; drive the use of 'sustainable' transport modes, particularly the 'active' modes of walking and cycling through infrastructure provision, education and incentive schemes; encourage developers to place sustainable transport and its promotion at the heart of new developments; and carefully consider the location of new housing development and integrated land uses of development, looking to minimise the length of journeys between housing, key services, and amenities.
- A.42 Response: The aims of the policies regarding enabling development in this theme are supported. They address reducing the need to travel, prioritising sustainable modes, and access to jobs, services and amenities.

Policy Theme 2 Improve Access to Jobs

- A.43 Summary: This theme highlights that the CPCA will work with partners to: work closely with developers to ensure that transport planning is integrated into every stage of new housing development plans; widen the geographical scope of the transport network, providing better connectivity between major urban areas and the rest of the Combined Authority area; and, tackle congestion, by providing better 'sustainable' transport options such as public transport and cycling infrastructure and providing infrastructure interventions at key 'pinch points'.
- A.44 Response: The policy principles are supported.
- A.45 Policy 2.1.2 seeks to ensure that developers provide sufficient transport capacity and connectivity to support and meet the requirements arising from development. The policy is sound, reflecting national guidance in the National Planning Policy Framework that seek to ensure 'appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location' and that 'any significant impacts from

the development on the transport network can be cost effectively mitigated to an acceptable degree.’

- A.46 There are sites in Greater Cambridge, such as North East Cambridge where an Area Action Plan is being prepared by the Councils, where there are genuine opportunities to significantly change transport behaviours. The encouragement developers and partners to work together to deliver shared ambitious solutions is supported in policy 2.1.1. However, further text should be added in the overview section to emphasise these opportunities.
- A.47 Similarly, policy 2.1.3 regarding parking should addresses situations where it would be appropriate to reduce or control existing parking to support sustainable travel. This issue is picked up in policy 18.2, but should be referenced here for consistency.
- A.48 Theme 2.2 seeks to expand labour markets by improving transport and making employment more accessible. This should include ‘investment in our cycling and walking network to improve accessibility’ not just ‘investment in and improvement of public transport and the highway network’. Policy 2.2.1 includes measures to reduce peak demand on the highway network. These measures are supported. Policies 2.2.2 and 2.2.3 address public transport and highway improvements to improve accessibility. An additional policy should also address cycling and walking improvements which will also improve access to jobs.

Policy Theme 3 Enhance business connections

- A.49 Summary: Accessing ports and airports addresses links to these key transport hubs, but also addresses the visitor economy, connection between key employment sites, and freight movement. Policy theme 3.2: Supporting the local visitor economy acknowledges the importance of the visitor economy to Cambridge and the surrounding rural areas. Policies propose working with partners to: improve connectivity to international gateways and large centres; deliver an integrated transport network navigable by passengers who are visiting the region for the first time; deliver sustainable transport connectivity to tourist destinations in rural areas, such as the Cambridgeshire Fens; and provide sufficient space and appropriate infrastructure for coach services to manage the impacts of day visitors on our highway and parking infrastructure. Policies in section 3.3 acknowledge the importance of help to ensure excellent connectivity between key employment sites to support employment clusters.
- A.50 Response: Day visitors impact on Cambridge’s transport infrastructure. Policies to address infrastructure and management of coach services, and to enable visitors to access and move around by sustainable modes are supported.

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- A.51 Linking employment clusters is a key issue for Greater Cambridge given that its clusters involve firms spread geographically across the subregion. Linkages that enable firms to cooperate successfully are important to the success of the area, and the measures proposed in these policies are supported.
- A.52 Given the net zero carbon ambitions of Cambridge City Council and South Cambridgeshire District Council, the measure proposed in section 3.4 to transfer freight from road to rail are also supported.
- A.53 Policy 3.4.3 seeks to promote sustainable urban freight distribution. Deliveries cause congestion issues for the central area of Cambridge, so greater emphasis on 'Last Mile' deliveries by cycle as a solution would be welcomed. Promotion and support of consolidated deliveries by small electric vehicles and cycles should also be included in this section.

Policy Theme 4 Secure resilience and reliability

- A.54 Summary: This section addresses the changes and measures required to adapt the transport network to climate change, identifying risks and responding when designing schemes and carrying out maintenance. It also considers maintenance issues and asset management, proposing to explore harmonisation of highway maintenance standards and encourage partnership working between agencies.
- A.55 Response: There is a need to ensure that all new transport infrastructure is designed and constructed with climate change in mind. References to avoiding exacerbating flooding should also include the requirement for opportunities for flood risk mitigation to also be explored and taken to reduce risk to communities. Reference to the guidance provided by the Cambridgeshire Flood and Water Supplementary Planning Document would be beneficial.
- A.56 Linear transport networks can have wider catchment impacts, therefore there may be opportunities to bring about a reduction in flood risk rather than just maintaining the status quo. Opportunities should be explored with flood management bodies including the Environment Agency and Cambridgeshire County Council / Peterborough City Council as lead local flood management authorities.
- A.57 Reference should also be added to addressing overheating on public transport as well as addressing the impacts that heatwaves can have on physical transport infrastructure.

Policy Theme 5 Embed Safety

- A.58 Summary: Includes measures to address safety and security. Proposing a multi-agency approach to improving road safety.
- A.59 Response: The 'Vision Zero' – zero fatalities or serious injuries – and proposals for a 'safe systems' approach, across the Combined Authority area are supported.

Policy Theme 6 Deliver affordable and accessible transport networks.

- A.60 Summary: Policies propose to work with transport operators to make public transport more affordable and flexible. Includes support for technological developments such as connected and autonomous vehicles (CAVs), and Mobility as a Service (MaaS) business models, and increasing accessibility to transport data (such as real time service information). The Plan sets out the CPCA approach to: promote and support work undertaken by Smart Cambridge; provide the infrastructure which will enable the uptake and optimisation of new transport technologies; and guiding the development of a regulatory framework under which new transport technology providers operate. The plan also supports working with partners to secure the introduction of electric vehicle charging points on the road network to facilitate use of electric vehicles, including taxis.
- A.61 Response: New transport technologies have the potential to benefit many people, but there is also a need for active engagement with all community groups, including more vulnerable groups to ensure social inclusion. Recognition of this in the plan is supported. There is also continued recognition of the role of community transport.

Policy Theme 7 Promote healthy and active lifestyles

- A.62 Summary: This theme addresses smarter choices and travel planning, as means of encouraging healthier transport choices and active travel. Policies on Rights of Way aim to maintain and enhance the network of routes.
- A.63 Response: The Rights of Way network is important for connecting communities, and for connecting to the green infrastructure network. Policy aspirations to enhance the network are supported. Continued support for travel planning and promotion of sustainable travel choices, which are important elements of reducing reliance of private cars, are also welcomed.
- A.64 This section should also address embedding walking and cycling infrastructure into new developments or retrofitting it to existing or be clearer that these issues are addressed under the modal policies of walking and cycling.

Policy Theme 8 Improve air quality

- A.65 Summary: The section acknowledges the impacts of air quality on public health, and the challenges faced in the area, including the existing Air Quality Management Areas. Policies for improving air quality within the Combined Authority area are focused on harnessing improvements to vehicle technology and disincentivising travel by high polluting modes to reduce road traffic emissions.
- A.66 Response: Policy goals regarding air quality improvements are supported, however, delivery of specific actions and schemes will be crucial to secure these goals, and which will enable Cambridge to meet its legal obligations on improving Air Quality in the short and medium term. The impact of these schemes will require careful monitoring to ensure the desired impacts are being achieved.
- A.67 The Combined Authority has confirmed that it will work in partnership with the constituent Local Highway and Planning Authorities to maintain statutory duties under the Environment Act 1995, and develop new air quality / planning policies. This is supported.
- A.68 We welcome the inclusion of air quality assessments as part of the scrutiny process for development of transport schemes. There is an 'aim to ensure transport initiatives improve air quality across the region, exceeding good practice standards' but no explanation of which standards are being referenced. These should be added.
- A.69 Paragraph 8.13 in 'Our Policies' states clearly that minimum bus emission standards should be set but presents no details of how this might be delivered. We welcome that the need for minimum standards to be set (or reset) for buses is stated, but some detail is required to demonstrate how these might be realised. The Clean Air Zone Feasibility Study recommended that buses, coaches and LGV would have to be Zero Emission or Ultra Low Emission to reduce and maintain levels of nitrogen dioxide, whilst increasing the number of services.

Policy Theme 9 Protect and enhance the environment

- A.70 Summary: This section acknowledges that the construction of new transport infrastructure has the potential to damage the local natural environment. Policies require all transport initiatives in to be developed in line with the mitigation hierarchy which avoids, minimises, remediates and as a last resort compensates for adverse impacts on biodiversity. It also includes the principle

of biodiversity net gain and, as principles are developed, environmental net gain. Policies also seek to achieve improvements to the urban realm.

- A.71 Response: Cambridgeshire is one of the fastest growing areas within England. It is important that, in planning for this growth, steps are taken to ensure the conservation and enhancement of the natural environment, which plays a pivotal role in our economy and well-being, providing wide-ranging benefits. Inclusion of environmental net gain principles in the LTP is therefore supported. Reference to work of the Local Nature Partnership, could be strengthened to require schemes to consider how their development can help deliver the Local Nature Partnership's strategy and goals, including the ambition to double the area of rich wildlife habitat and natural greenspaces by 2050. A joined-up approach is required along with other forms of growth planned in the CPCA area.
- A.72 The plan should include a measurable target of 20% biodiversity net gain as a minimum, focussing on delivering and maintaining strategic opportunities for landscape scale enhancement and creation. A balance will need to be struck for providing publicly accessible natural green space and areas primarily for habitat creation. It should also recognise that transport linear schemes have the potential to damage and sever existing habitat sites and corridors should be made, along with an explicit commitment that route selection and scheme development will include ambitions to protect and link existing sites and create significant new areas of high quality habitat. The long-term management of biodiversity assets must also be addressed.
- A.73 Reference to flood risk in paragraph 9.19 should also refer to taking opportunities for mitigation for areas at risk when developing transport infrastructure, rather than simply avoiding exacerbating risk.
- A.74 Paragraph 9.16 refers to considering the impacts on a range of issues from transport schemes, including noise. This section needs to address noise impacts of existing transport infrastructure as well as planned schemes. The draft LTP does not adequately consider transport related noise and most importantly opportunities to reduce noise from local transport sources.
- A.75 Recently published [DEFRA Noise action plans \(Round 3\) for agglomerations \(large urban areas\), roads \(including major roads\) and railways \(including major railways\)](#) 2 July 2019 state that while noise is a natural consequence of a mature and vibrant society, it can have serious implications for human health, quality of life, economic prosperity and the natural environment. For roads, the management of the roads covered by the Action Plan rests with the relevant highway authority through the implementation of the Highways Act 1980 (as

amended). This includes Highways England which is responsible for England's strategic road network. The remaining roads are the responsibility of local highway authorities either as part of a County Council, a Unitary Authority. The plans detail several possible approaches to control the impact of noise from road traffic, including 'planning controls – through the operation of the national and local transport and land use planning system'.

- A.76 Transport-related noise is an important quality of life issue for many communities. DfT Guidance on Local Transport Plans 2009 (now withdrawn), advise that local authorities in devising LTPs, should consider how LTP policies and proposals could reduce existing sources of problem noise and minimise any adverse noise impacts of new proposals. There are opportunities to reduce road noise using Local Transport Plans. This may, for example, be the design of roads or public transport services, the maintenance of highway surfaces, the design of traffic management and road safety infrastructure, or the use, siting and design of public transport infrastructure used by travellers at night. A similar approach to rail noise is recommended. When proposing the construction of a new railway, or additional lines to an existing rail corridor, a noise impact assessment must be carried out. Mitigation such as optimising the track construction and alignment and the use of noise barriers, either through landscaping or purpose-built walls or fences, should be considered in the design to minimise any adverse noise impact should be considered.
- A.77 Appropriate policies should be added to this section. The Strategic Environmental Assessment (SEA) and Community Impact Assessment (CIA) should also be reviewed and updated to include a comprehensive consideration of the impacts of noise on health, and effective mitigation.
- A.78 The Historic Environment section could be clearer that it includes a wide range of elements, from designated and undesignated buildings and assets, and historic landscapes. It should also reference potential use of the assets for the benefit of people rather than just something that needs to be protected. Heritage sites are places to visit, and promoting these as destinations should be part of any strategy supporting sustainable transport modes.

Policy Theme 10 reduce emissions

- A.79 Summary: Policies support: using new technologies as they become available to minimise the environmental impacts of transport; managing and reducing transport emissions; and encouraging and enabling sustainable alternatives to the private car including reducing the need to travel.
- A.80 Response: As addressed earlier in this response it is crucial that the LTP responds to issues regarding climate change and air quality.

- A.81 Electrification of rail routes, referenced as a project, is important to supporting reduction of the environmental impact of travel, and should be given greater prominence in the main strategy document.
- A.82 The plan references that the Greater Cambridge Partnership recently agreed to fund both an electric bus and hybrid bus in Cambridge to understand and examine their operation on the local network. Policies support 'greening' of public transport modes such as buses and trains by examining alternative fuels such as electricity and hydrogen. These measures are supported. Exclusion of reference to biofuels is also supported, due to their potential impact on emissions.
- A.83 The objective to reduce emissions should include reference to air quality as well. For example, "Reduce emissions to as close to zero as possible to minimise the impact of transport and travel on climate change and air quality."
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- A.84 Policy 10.1.2 refers to investigating the feasibility of introducing incentives for taxi operators to electrify their fleet. To accompany this will also require charging infrastructure. There is reference to supporting area wide taxi-only electric vehicle rapid charging infrastructure in Policy 8.1.1, and such measures are crucial if the move to electrify the fleet is to be successful.

Policy Theme 11 and 12 address walking and cycling.

- A.85 Summary: Cycling and walking policies are informed by the work of the Greater Cambridge Partnership. Policies include a range of measures to enhance the cycling network, improve cycle parking and ensure new developments support walking and cycling.
- A.86 Response: The section on walking seeks to support walking trips, but it would benefit from an additional policy seeking walking infrastructure through new developments in a similar fashion to policy 12.4 for cycling.
- A.87 Generally, the LTP could place stronger emphasis on the role cycling plays in commuter movements, particularly in the Greater Cambridge area. Cycling provides for over 1/3 of journey to work trips in the Greater Cambridge area and this needs to be reflected as strongly as possible within the LTP. It should also acknowledge that the arrival of affordable e-bikes is an opportunity to significantly lengthen the distances that people will cycle to work.
- A.88 A wide range of measures are identified, and their inclusion is supported. There are references to 'Dutch-standard segregated walking and cycling

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infrastructure', however, the term is not defined in the plan, and a clearer definition should be provided, including examples.

- A.89 Segregation for cycling in the draft LTP refers to segregation from traffic. There will also be circumstances where there should also be segregation from pedestrians. This should be stated in the LTP, and such circumstances should be described.
- A.90 Maintenance of cycling and walking infrastructure is also important, such as maintaining the width of paths by controlling vegetation and keeping surfaces in good repair. The importance of maintaining cycling and walking infrastructure should be addressed in theme 18.
- A.91 The plan will need to be updated to include reference to the soon to be published Local Transport Note 1/19, all cycling infrastructure should meet this standard which includes reference to the needs of all users including those with adaptive cycles and those carrying children.
- A.92 An additional policy or detail within a policy is needed to ensure that cyclists needs are considered at the design stage of any highways and transport improvement schemes.
- A.93 Under priorities within and around the Market Towns is the point 'ensuring new developments include cycle provision to a minimum standard' which is very unambitious. Developers should be providing cycling and walking infrastructure to a high standard throughout the region. A change should be made to clarify this.
- A.94 Reference should be made to the National Cycle Network (NCN) in the region and that the Combined Authority and other Councils will work with Sustrans to promote and improve lengths of the NCN that run through the Combined Authority area.
- A.95 Mention should be made of Bike sharing schemes – supporting and encouraging them as well as managing on-street dockless schemes so that they are not to the detriment of the public realm. They should accord with the agreed Code of Conduct for Cambridge which can be used as a basis for the rest of the region if dockless bike schemes are introduced outside Cambridge.
- A.96 The Local Cycling and Walking Infrastructure Plan (LCWIP) should be referenced with regard to assessment of schemes – this will be a key document when identifying walking and cycling schemes, including making linkages with the strategic schemes referenced in the main document, filling in the gaps and enabling easy active travel between and within towns and villages.

Policy theme 13 delivering a seamless public transport system

- A.97 Summary: Policies aim to explore new methods of ticketing to improve ease and affordability of travel, improving journey information, and delivery of multimodal transport hubs, including new park & ride sites further out from Cambridge which link to the CAM. This includes encouraging new methods of mobility such as 'Mobility as Service'.
- A.98 Response: These policy goals are supported. Significant rail improvements are planned, including new stations. It will be important that other sustainable transport modes are supported allow effective connections to railway stations to support onward journeys.

Policy theme 14: Rural transport services.

- A.99 Summary: The CPCA will explore different mechanisms to help deliver a more integrated, coherent rural transport network, in collaboration with operators, local councils, communities and stakeholders. They will also support local community transport. A key element is how rural bus services are provided. The CPCA, in line with the recommendations of the Strategic Bus Review, is beginning engagement with local operators on how to improve service provision and integration through 'Enhanced Partnerships'. high-quality Enhanced Partnerships could not successfully be negotiated with operators, the Combined Authority will explore alternative franchising options for the bus network, allowing them to directly control routes, services and fares, in line with the requirements under the Bus Services Act 2017.
- A.100 Response: Measures to support rural transport services are supported, particularly given pressure on transport subsidies in recent years. The interchange between different services and transport modes is crucial, to allow access to a range of destinations. In our response on the guiding principles above we commented on the need to consider movement between villages as well as to Cambridge. This is an important consideration for rural bus services as well, due to certain key facilities not being available in every village, but with nearby villages acting as rural hubs, particularly for health and education facilities. This should be referenced in paragraph 11.69 of the policy document.

Policy theme 15: Improving public transport in our towns and cities

- A.101 Summary: Policies aim to deliver transformational mass transit, in the form of the CAM, road space for buses, and respond to air quality issues, working with GCP and local councils. This includes specifically, through bus operating models, the requirement for ultra-low emission hybrid and zero emission

electric vehicles, and delivery of the infrastructure needed to support them. It also supports establishment of a 'Clean Air Zone' within Cambridge and/or Peterborough City Centre, if pursued by local councils.

- A.102 Response: Such measures are supported, and vital to maintain and improve the quality of the urban environment.

Policy Themes 16 and 17 address traveling by coach and rail.

- A.103 Summary: Policies aim to support measures to deliver a more reliable, integrated, passenger-friendly rail network; facilitate improvements to stations; explore options to expand the rail network to link to new settlements, corridors and growth areas; and support frequency and journey time enhancements on our rural and intercity rail links to improve connectivity and capacity. Working with operators to increase the frequency of trains on key routes, and deliver new infrastructure such as the relocated Waterbeach station, a station at the Cambridge Biomedical Campus, and rail capacity improvements.
- A.104 Response: Proposals to expand and make greater use of the rail network are supported. As stated earlier in this response, potential for new stations at Fulbourn and at Cherry Hinton should be included within the long-term rail aspirations.

Policy theme 18: The local road network.

- A.105 Summary: Promotes the efficient maintenance and use of the local road network. This relates also to reducing the need to travel and promoting the use of more sustainable modes of transport. It proposes to identify a key local road network, to identify parts of the network which should be prioritised for management and maintenance.
- A.106 Response: Maintenance of transport networks is an important issue. Maintenance programmes need to be meaningful and measurable, and this should be added to 18.3. The focus of this chapter is on maintenance of the road network, but the cycling and pedestrian network also needs to be appropriately maintained, particularly if it to encourage use, and this should be addressed in the LTP.

Policy theme 19: Parking

- A.107 Summary: explores the importance of appropriate parking levels. The importance of delivering enough parking in the right places, but also the costs it brings in terms of land use and potentially encouraging car travel. Policies support the use of maximum and minimum standards developed through local

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plans, demand management, use of technology, and encouragement of electric vehicles.

- A.108 Response: Such measures will be important when addressing future transport issues and planning for new development, their inclusion is therefore supported.

Policy theme 20: Making long-distance journeys by car

- A.109 Summary: States that it is still important to address pinch points in the strategic road network, to alleviate congestion, improve reliability and enhance the region's accessibility. Support for Highways England schemes on A428, working with the Greater Cambridge Partnership to dual the A10 between the Milton Interchange and Waterbeach New Town, and exploring the A505 corridor.
- A.110 Response: The response to road schemes in Greater Cambridge is addressed earlier in this response.