

# Draft Letter responding to CAM Sub Strategy Stakeholder Consultation

Dear Mayor Palmer

## **CAM Sub Strategy Stakeholder Consultation Response from Cambridge City Council and South Cambridgeshire District Council**

This response to the CAM Sub Strategy is provided on behalf of Cambridge City Council and South Cambridgeshire District Council. It is provided in the context that officers and members from Greater Cambridge are committed to working with the CPCA and the CAM team on the refinement of the current document, and to providing additional information or clarification as appropriate.

Both Councils in Greater Cambridge recognise the potentially transformational role that an integrated public transport system such as the CAM could make. The adopted 2018 Local Plans and accompanying Transport Strategy for Cambridge and South Cambridgeshire 2014 (a daughter document to the Cambridgeshire Local Transport Plan 2011-26) outlined the beginnings of a journey towards genuine sustainable growth with policy commitments to the creation of new high quality public transport corridors underpinning growth at Bourn Airfield and Waterbeach. With the subsequent commitment towards net zero carbon being a stated ambition for both the CPCA's adopted Local Transport Plan (LTP) 2020 and our Councils' forthcoming joint Greater Cambridge Local Plan, ensuring that the CAM has the potential to play a part in the realisation of that future ambition will therefore be important if we are to deliver this important national and local objective.

The CAM Sub Strategy also has the potential to play an important part in demonstrating the partners' commitment towards genuinely sustainable alternatives to private car use, whilst pointing towards the necessarily phased and carefully sequenced delivery process that will need to be followed, as CAM aims to support a sustainable growth strategy to be set out in the statutory "development plans" of Greater Cambridge and its neighbours across Cambridgeshire and Peterborough and beyond.

Against that backdrop, and alongside the detailed specific points in the attached schedule, which we would suggest require careful consideration, both Councils would be supportive of a CAM Sub Strategy that can clearly set out how the more advanced corridor schemes that will support growth contained in the adopted Local

Plans (and being delivered by GCP) can be brought forward as a first phase, and be compatible with the future full CAM scheme, whilst recognising that such early elements will not in themselves meet all the CAM objectives in full.

However, the current drafting of the CAM Sub Strategy appears to confuse the relationship of CAM with the development strategy. It describes the CAM as a “critical” part of delivering the current growth strategy. It is not appropriate for the Sub Strategy to say that the CAM is ‘critical’ to delivery of the adopted development strategy (on page 12 under the heading CAM 2). That is not consistent with the adopted Local Plans - which are not specific as to how high quality public transport connecting with Cambridge should be provided, or the parent LTP - where the emphasis is on the future economic and other benefits that CAM could bring to the wider area, and not about implementation of the adopted development plans.

The Sub Strategy, in the section under CAM 2, also appears to misunderstand the role that the LTP and any related sub strategy plays in determining the future spatial strategy that Councils will set out in their new Greater Cambridge Local Plan. The CAM cannot pre-determine the development strategy or the types of location for, and nature of, future growth – that role sits with the Councils as local planning authorities. Any local plan that did not fully assess reasonable options for the development strategy would be at risk of challenge and a finding at examination that it is not legally compliant and is “unsound”. This is because the Local Plan must have regard to a wider range of evidence and options than the CAM and is produced through a clear statutory process with substantial consultation and public scrutiny. The Sub Strategy should take care to not imply any decisions on the development strategy for the next Local Plan.

Taking the above factors together, in our view, the sub strategy should be refined to:

- Clearly set out how delivery of CAM will, by necessity, be phased – from early schemes that support the current Local Plans and can form an early phase, building towards delivery of a future solution supporting further planned growth and technological innovation in low carbon public transport.
- Develop further the core principles in respect of impacts on heritage and natural community assets, environmental net gain requirements and other environmental enhancements.
- Further acknowledge that the ambitions for net zero carbon and doubling nature must be fully considered as the scheme is developed.
- Ensure some of the objectives better reflect the technological, regulatory and spatial planning activities being led by the CAM Project Team and by partner Councils and bodies.
- Build confidence through demonstrating how it will integrate with and complement the wider suite of local/regional strategies across a wide of

themes, not just from the Combined Authority but also the area's partners, to reinforce a shared and coherent vision for the area for the future.

In working with the CAM team preparing the outline business case, officers have sought to explore how the CAM and Local Plan process can be better integrated and will continue to work positively and constructively with the CA.

Yours sincerely

Cllr Bridget Smith

Leader, South Cambridgeshire District  
Council

Cllr Lewis Herbert

Leader, Cambridge City Council

## CAM Sub Strategy Stakeholder Consultation Response from Cambridge City Council and South Cambridgeshire District Council

Section	Comment	Relevant questionnaire question no.
Page 3 – Policy Alignment	<p>The section entitled ‘The Cambridgeshire Autonomous Metro – Policy Alignment’ on page 3, does not make any reference to adopted local plans, such as the Cambridge Local Plan (2018) or the South Cambridgeshire District Local Plan (2018), which set out the development strategy and planning policies for these areas to 2031. Neither does it make any reference to emerging local plans, such as the Greater Cambridge Local Plan.</p> <p>There is reference to being in alignment with the Cambridgeshire and Peterborough Independent Economic Review (CPIER), however it is important to note that this is not a policy document as the section heading suggests. It would be more appropriate to reference the Local Industrial Strategy.</p>	Q15 - any additional comments
Page 5 – CAM sub-objective CAM-E2	The second bullet point, which specifically refers to new Garden Village settlements, should be replaced with ‘Future growth as identified in Local Plans’. All reasonable options must be considered as part of the statutory Greater Cambridge Local Plan process; Garden Villages are only one of the spatial options available.	Q7
Page 6 – CAM sub-objective CAM-E8	Improve CAM-E8 by deleting ‘(existing designations)’. In this way the sub-objective would also apply to any key housing sites that are identified in emerging Local Plans as sites for future growth as well as existing designations in	Q7

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	adopted plans.	
Page 8/9 – CAM-EV1 and EV2	<p>Support CAM-EV1 that identifies importance to minimise adverse impacts on heritage and natural community assets.</p> <p>However, this specifically refers to protecting the character of villages, but should be amended to also apply to the city of Cambridge, including the historic city centre, green spaces and fringes of the city.</p> <p>Support the environmental net gain requirements and other environmental enhancements where possible.</p> <p>Support CAM-EV2 which states that the CAM infrastructure will utilise zero emission vehicles. This is in line with Cambridge City Council and South Cambridgeshire District Council policies to transition to net zero carbon by 2050 and will also help to improve air quality.</p> <p>The ambitions for net zero carbon and doubling nature must be fully considered as the scheme is developed.</p>	Q9
Page 10, Network map	The CAM network map needs correcting to be clear that Bourn Airfield (rather than Bourn village) on the St Neots radial, is east of Cambourne, not to the west as shown.	Q10
Page 10	On Page 10 of the document the suggestion is for an “interim review” of the Cambourne to Cambridge and Cambridge to Waterbeach phases of the project, in light of other major transport	Q10

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	<p>infrastructure developments in those corridors; but that the 'regional routes' become operational by 2024 (next paragraph). The programme timetable set out in different parts of the document requires clarification.</p> <p>Given the commitment to an interim review and the differing delivery timetables set out in the CAM Sub Strategy, it would be helpful for the Strategy to set out a clear timetable for the whole CAM, and for each phase, to assist partners understand the overall CAM programme and how it might interface with other programmes. This should clearly set out how delivery of CAM will, by necessity, be phased – from early schemes that support the current Local Plans and can form an early phase, building towards delivery of a future solution supporting further planned growth and technological innovation in low carbon public transport.</p>	
Page 12, CAM 2	<p>The first paragraph relating to CAM 2 on page 12 states that local councils in the area have plans in place for an additional 61,000 homes by 2031 and that CAM is 'critical to delivering sustainable transport to support that growth'.</p> <p>The Cambridge and South Cambridgeshire Local Plans 2018 plan for 33,500 homes and it is assumed the remainder referred to are beyond Greater Cambridge.</p> <p>It is not appropriate for the Sub Strategy to say that the CAM is 'critical' to delivery of the adopted development strategy (on page 12 under the heading CAM 2). That is not consistent with:</p> <ul style="list-style-type: none"> <li>• The adopted Local Plans - the adopted</li> </ul>	Q11

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	<p>2018 South Cambridgeshire Local Plan requires new high quality segregated bus links to Cambridge to connect the new settlements at Waterbeach and Bourn Airfield. At the time of the Local Plan examinations, the GCP schemes were coming forward and considered to be a positive way of meeting the Local Plan requirement. CAM was not included in the LTP at that time; or</p> <ul style="list-style-type: none"> <li>• the parent CPCA adopted Local Transport Plan (LTP) 2020 - where the emphasis is on the future economic and other benefits that CAM could bring to the wider area, and not about implementation of the adopted development plans.</li> </ul> <p>CAM could also be a way of delivering high quality public transport, but it is not accurate or appropriate to characterise it as 'critical' to supporting that growth.</p> <p>The Sub Strategy, in the section under CAM 2, also appears to misunderstand the role that the LTP and any related sub strategy plays in determining the future spatial strategy that Councils will set out in their new Greater Cambridge Local Plan. The CAM cannot pre-determine the development strategy or the types of location for, and nature of, future growth – that role sits with the Councils as local planning authorities. Any local plan that did not fully assess reasonable options for the development strategy would be at risk of challenge and a finding at examination that it is not legally compliant and is “unsound”. This is because the Local Plan must have regard to a wider range of evidence and options than the CAM and is produced through a clear statutory process with substantial</p>	

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	<p>consultation and public scrutiny. The Sub Strategy should take care to not imply any decisions on the development strategy for the next Local Plan.</p> <p>As such, reference to 'Garden Villages' in such an affirmative way is premature, for example saying that the 'locations of Garden Villages will be examined through the planning process'. This could be addressed by amending this section to read 'the appropriateness and locations of new settlements will be examined through the planning process', removing the specific references to Garden Villages, and changing in the fifth line from 'will' to 'would' be exemplars.</p>	
Page 14, CAM 3	In the section with the sub-heading 'Integration with emerging highways schemes (A428, A10, A505)' there is reference to road schemes being developed by the Greater Cambridge Partnership, however we would question whether there are any. Also, the A428 road scheme is being developed by Highways England, not by the Combined Authority.	Q12
Page 13, CAM 3: Promote Equity	The document does not indicate how it will prioritise CAM over private car use in urban areas. This principle would help manage urban conflicts with private vehicles.	Q8
Programme	The programme as presented raises some questions. It is important to clearly set out how delivery of CAM will, by necessity, be phased – from early schemes that support the current Local Plans and can form an early phase, building towards delivery of a future solution supporting further planned growth and technological innovation in low carbon public transport.	Q14

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	<p>On a particular point of detail, the Sub-Strategy suggests that the first phase will be for the Regional Routes to be operational from 2024. Is this the case? Is this referring to the GCP corridors rather than the wider radials beyond?</p>	
Other	<p>Building on the previous point above, there is no reference in the CAM Sub Strategy to early phases of CAM being provided as high quality public transport infrastructure that is capable of being incorporated into the full CAM scheme as it comes forward, or how such early phases will be assessed against the Sub Strategy.</p> <p>The GCP schemes are described in the LTP (para 3.61): “Work is already underway on the first phase of the CAM through the Greater Cambridge Partnership’s programme to provide high quality, segregated public transport routes along key corridors, including links to Cambourne, Granta Park, Cambridge East and Waterbeach.”</p> <p>As first phases of HQPT ahead of the full CAM project, GCP schemes will not necessarily meet all the policies for the full CAM, but can be capable of being incorporated into the full CAM as and when it may come forward. As such they can provide an important interim step towards the ambition shared by all public bodies to improved public transport infrastructure, which will contribute to sustainable travel and low carbon living, and help deliver the current growth strategy. Inclusion of reference to this would help consistency with the parent LTP.</p>	