

Local Authority Transport Statement
for
Appeal under the Town and Country Planning Act, 1990
by Brookgate Land Ltd on behalf of The Chesterton Partnership
Regarding Land North Of Cambridge North Station Milton Avenue Cambridge
Cambridgeshire

Application Reference: 22/02771/OUT

Planning Inspectorate Appeal Reference APP/W0530/W/23/3315611

By Jez Tuttle, Team Manager, Transport Assessment Team, Cambridgeshire County Council, New Shire Hall, Emery Crescent, Alconbury Weald, Huntingdon PE28 4YE

1 Personal

I am employed as a Team Manager within the Transport Assessment Team at Cambridgeshire County Council. My role is to assess the impacts of developments and to determine interventions to mitigate the transport impacts.

2 Background

The appeal has been made to the Secretary of State against the non-determination of the application.

The aspect that I will refer to in this submission is that without a substantial contribution towards strategic transport infrastructure, and this infrastructure being implemented, that the development could result in a higher vehicle trip generation than projected, and would therefore be detrimental to the operation of the local highway network and would compromise the comprehensive development of the surrounding area.

NEC AAP Area

This development falls within the NEC AAP area, and were it to follow once the Area Action Plan had been finalised and approved, then it would need to follow the

Infrastructure Development Plan (IDP) agreed at that time. The IDP sets out that the NEC area as a whole requires a significant amount of internal, local and strategic infrastructure, to enable the area to achieve the high non car mode share for trips that is required.

The Infrastructure Delivery Plan is part of the suite of documents that make up the proposed submission of the NEC AAP. This document details the transport infrastructure that is required to enable the Area Action Plan to come forward in a way that would enable trips to and from the area to be by non car modes. The IDP also sets out the approximate cost of this infrastructure and the overall amount of financial contribution which should be sought from developments within the NEC AAP for the wider transport infrastructure for the NEC area,

The transport infrastructure in the IDP is largely based on the infrastructure requirements list in the Transport Evidence Base (TEB), which is focused on the immediate A10 corridor between Cambridge and Ely. Whilst the developer consortium for the NEC area has been working on this list to update it, this work has not yet been concluded.

The development is expected to increase the number of pedestrian, cycle and public transport trips to the site, and the Transport Evidence Base determines that with the additional infrastructure in the area that is identified within the Infrastructure Delivery Plan, then it is possible for the additional development in the AAP to be brought forward.

CCC acknowledged that the AAP and thus the IDP documents have not been formally adopted as policy and thus have limited weight in relation to this application.

Notwithstanding the above, the interventions that are contained within the IDP stem from the Transport Evidence Base modelling which sits outside the AAP and IDP process. Its therefore asserted that the interventions identified are appropriately related to this development as part of the overall NEC development site.

Size of the Development

The total floor area for the NEC Local Plan allocation is planned to be 188,500sqm, with 23,500sqm within the Chesterton sidings area of this application location. This

application is on half of this area, and is for 65,000sqm, (as set out in the Transport Assessment) or approximately 34% of the total planned development of office and lab within the whole AAP area. The mitigation sought is considered to be CIL compliant as it is in proportion to the size of this development.

Distribution of Trips

The analysis by the applicant on the population growth in the surrounding area, and the ability for future employees in the City and South Cambridgeshire districts to switch from car driving to bus and cycling highlights that the very low car drive mode share is possible in this area.

Table 4.1 details that the distribution of trips to work in this area is from the whole sub region and not just the Ely to Cambridge corridor identified in the IDP. The commercial development will attract 27% of its trips from the City, 39% from South Cambridgeshire and 34% from other districts and outside of the area.

This does mean that this development is dependant on strategic transport infrastructure outside of the TEB area (A10 corridor) to come forward, to enable employees to use the bus and cycle to and from the site.

The Greater Cambridge Partnership (GCP) are responsible for the implementation of strategic transport infrastructure in the Cambridge area. They highlight that if budgets for schemes have inflated costs this may impact on the deliverability of the overall programme of schemes that the GCP are seeking to fund. There is therefore no certainty that all of the strategic schemes outlined in its programme can and will be implemented. This therefore presents a risk to the comprehensive development of the NEC area, that it may in future not be possible to keep within the trip budget if development continues over and above the projected quantum in Local Plan, and the strategic transport investment that is needed cannot be fully implemented.

Mode Share of Trips

The applicant has undertaken some more detailed work on the potential for mode shift and has projected that the eventual mode shares will be broadly similar to the mode shares at CB1 adjacent to Cambridge Station. This supports the assertion by the applicant that CB1 can be used as a guide for this location.

Table 4.2 details the projected mode share for journeys to work in this area. This will vary with the district as different areas have varying potential to switch modes. Overall the non-car driver mode shares assume that 19% of trips will be by train, 8% are walk or run, and 25% are cycle.

Table 4.3 details where people who live in this location will work. This shows that 55% of those living in the area will work in Cambridge City, 34% within South Cambridgeshire and only 10% working further afield. All of these trips will be by non car modes as there is no car parking provided for these dwellings. Table 4.4 shows that 48% are projected to cycle, 23% by bus, 15% by train and 12% on foot.

The applicant has considered where people currently live and where they might live in the future, and what mode of travel they can use, and applied this to the approximately 3000 new jobs that are being created in Appendix C. This picks out that changes in population are due in the Chesterton area of the City, within Northstowe and Waterbeach in particular in South Cambridgeshire. Analysis has also been undertaken on how mode shift can occur from each area to enable the development mode shift targets to be met.

Appendix C details that for trips coming to the area from within the City the car driver mode share is projected to fall from 37% in the 2011 census to 5%. Bus use is projected to increase from 6% to 15%, and cycling increasing from 41% to 52%. The bus mode share across the City is in line with some of the higher areas of bus use, to reflect increased bus use of the Citi 2 route and that enabled by the improvements to Cambridge bus services that are proposed by the GCP. The cycle mode share is also increased to reflect the improved connectivity offered by the Chisholm Trail, Madingly Road, Milton Road as well as other works within the City to improve cycle routes that are proposed by the GCP.

Within South Cambridgeshire the car driver mode share is projected to fall from 78% to 34%. Bus use is projected to increase from 2% to 17%, and cycling increasing from 9% to 25%. The bus mode share is in line with the expected improvements to several key bus corridors to Cambourne, Waterbeach and Cambridge Airport by the GCP. The cycle mode share is also increased to reflect the improved connectivity to South Cambridgeshire from the 12 radial Greenway routes that radiate from Cambridge into the surrounding area, as well as work within the City to connect

these routes to the Chisholm Trail and to improve cycle routes within the City – all being completed by the GCP.

Travel by train represents the largest proportion for trips from outside of the area with a projected mode share of 39%. Overall train travel is projected to represent 19% of trips to the site. This is slightly below the proportion for CB1 and reflects the lower train frequencies and destinations that are served from Cambridge North.

Mode Share Guarantee

It is clear that in the future when this development is built and many of improvements to bus and cycle connectivity to the City and South Cambridgeshire region are completed, that these will enable the required mode shift to take place. This includes measures to improve bus services as part of the making connections, the new busways to Cambourne and Waterbeach, as well as the dozen greenway cycle routes, completion of the Chisholm Trail and other improvements to cycle routes and bus routes within Cambridge City. This package of measures is considered necessary to ensure that the low car mode share projected is achieved in this area.

The Greater Cambridge Partnership have highlighted to their Executive Board a risk that some infrastructure programmed may not be able to be delivered, should cost exceed the budget. If this was to impact upon infrastructure deemed to enable the mode shift required for the NEC area to take place, then it may result in developments in the NEC area not being able to fully meet their projected mode share targets as highlighted above.

As a result CCC must seek a substantial contribution towards strategic transport infrastructure from this development. This is to ensure that the GCP are able to implement the transport infrastructure that is deemed necessary for the NEC area as a whole, and for this development in particular. With a substantial contribution from this development and with the role of this infrastructure in enabling development to take place, then it is hoped that this additional funding sought will help to mitigate any risk that the GCP may not fully implement the infrastructure required for the NEC area, and this development. Therefore this helps to ensure that the mode shares projected by the appellant are achieved.

There is potential for the Heads of Terms to contain a comprehensive package of measures that provide internal works to provide pedestrian and cycle connectivity, as well as a substantial transport contribution that will have the ability to help fund strategic infrastructure, and any improvements required in the local area.

Comprehensive Development

The mitigation sought seeks to ensure that a comprehensive package of strategic transport infrastructure can be funded by a combination of the GCP's funds and developer contributions from the NEC area. This will help to ensure that there can be a comprehensive development of the NEC area.

Without a substantial transport contribution then CCC fear that there is a risk as set out above, that the projected mode shares are not reached, leading to a vehicle trip generation that exceeds the trip budget, and therefore leads to a halt in the wider development of the area, until such a time as the trip budget is not exceeded. This may only be possible with the implementation of additional non car transport infrastructure by the GCP or others.

In the absence of the NEC AAP, CCC is content that the mitigation package sought from this development mitigates the transport impact of this development, as well as mitigating the risk that wider more comprehensive development of the area is not possible.

Policy SS/4 of the South Cambridgeshire Local Plan 2018 seeks that development would not compromise opportunities for the redevelopment of the wider area. This is to ensure that sufficient contributions are sought towards strategic infrastructure, to enable development of the wider area to come forward.

A14 / A10 Interchange

Whilst CCC are the highway authority for the roundabout above the A14 National Highways manage the on and off slip ramps leading to and from the A14.

Congestion on Milton Road can lead to blocking back onto the interchange, which in turn can lead to blocking back on the off slips onto the A14 itself.

There is potential that within the Heads of Terms that this risk is mitigated for by ensuring that a portion of the strategic transport contribution can be allocated to

works at the interchange to improve capacity, or for any other similar local scheme should this be deemed necessary from a highway capacity and safety perspective. This is a precautionary measure, as it is hoped that all of the transport contribution could be allocated to infrastructure to enable the projected mode shares for non car modes.

CPCA Draft Local Transport Plan

The Draft Local Transport Plan dated 2021 prepared by the Cambridgeshire and Peterborough Combined Authority notes that the Climate Change Commission for the CPCA notes that the emissions from surface transport are increasing in this area higher than the rest of the UK. It made several recommendations to reduce the carbon emissions from transport. Of these one is for a 15% reduction in driven car miles by 2030. Any reduction in road traffic as a result of the covid pandemic and changes to employees working practices represents an opportunity for this part of Cambridge City to meet this objective. It would therefore not be appropriate to see all of any road capacity taken up by development traffic, rather that the trip budget approach should continue to be applied to this area with or without the NEC AAP in place.

CIL Compliance

3.20 In line with CIL Regulation 122 a planning obligation may only constitute a reason for granting planning permission for the development of the obligation is: -

- i) Necessary to make the development acceptable in planning terms;
- ii) Directly related to the development; and,
- iii) Fairly and reasonably related in scale and kind to the development.

The mitigation package accords with the relevant tests of the NPPF and the CIL Regulations. Specifically, the tests are necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development.

i) Necessary to make the development acceptable in planning terms:

Strategic transport infrastructure is required to ensure that the development trips are able to access the development from the wider area, and will help ensure that the

development is able to meet is low target mode share for car travel. The trip budget for the area and this application location when applied mean that the amount of vehicle trips to and from the location are limited. The Transport Evidence Base details a comprehensive list of transport interventions, presented in Table 55, which have been identified and would help to support the delivery of the ambitious mixes of development under consideration for the area.

Policy SS/4 of the South Cambridgeshire Local Plan 2018 seeks that development would not compromise opportunities for the redevelopment of the wider area. This is to ensure that sufficient contributions are sought towards strategic infrastructure, to enable development of the wider area to come forward.

ii) Directly related to the development.

Transport infrastructure is directly related to the development as it ensures that employees and residents travelling to and from and within the development have adequate infrastructure to access the development site and area. They relate to the trips to and from and within the development area.

iii) Fairly and reasonably related in scale and kind to the development.

The total contribution and works to be delivered by the applicant are considered to be in scale and proportion to the development size and quantum in the context of the above.

The mitigation is considered to be a CIL compliant way of addressing the need for this development to contribute to infrastructure, taking into account the size of this application, the distribution and mode share of trips to the area and the current status of the IDP.

2 Summary

CCC supports development as long as the transport infrastructure that supports it is in place to enable the very low car drive mode share. It therefore seeks the contribution to strategic and local transport that is made by the applicant is in the order to ensure that strategic transport infrastructure is implemented, in order to mitigate the impact of the development related trips on the surrounding transport network.

In summary it is recognised that if sufficient funding is not secured, then it would compromise the wider comprehensive development of the area as sought through the Local Plan. The failure to secure sufficient funding through developer contributions will not allow sufficient transport intervention to be implemented such that the traffic impact for the area as whole can be mitigated.