

Cambridge Science Park North Local Plan Representations: Policy S/NEC: Northeast Cambridge

N20/194827
December 2021

1. This note has been prepared behalf of Trinity College Cambridge as the principal owner and custodian of the Cambridge Science Park (CSP). The note supports representations on the Greater Cambridge Local Plan (Regulation 18) First Proposals Document.
2. The proposals do not incorporate a draft allocation for CSP North at this stage. We consider that this is a significant omission in respect of the delivery of Policy S/NEC and the Northeast Cambridge Action Plan (NECAAP).
3. At this stage the Transport Evidence base for the Local Plan is not complete. Our understanding is that this is pending a review of the strategic transport model. However, the NECAAP has been developed with a supporting evidence base which has been reviewed and commented on by Trinity College Cambridge.
4. The overall Transport Strategy for the NECAAP is based on the premise that peak hour capacity on the Milton Road corridor is at capacity. As such any development must come forward without adding additional peak hour vehicle trips.
5. The Transport Evidence Base sets out an approach that defines a Trip Budget, fixing the number of NECAAP vehicle trips during the morning and evening peak hours.
6. The clear conclusion of the Evidence Base is that in order for wider development across the NECAAP site to come forward, existing uses, with a significant leaning and reliance on CSP, must reduce car trips.
7. Prior to the inclusion of CSP as part of an expanded NECAAP, it is not clear what the strategy for achieving this could have been. The likelihood is that in order to for the Trip Budget concept to be promoted, additional existing sites were required that will need to reduce trips to enable a balance of movement across the area. Without CSP, other existing land uses would need to reduce trips to unachievable levels.
8. To be clear, we fully support the approach that prioritises sustainable, active and shared travel modes over single occupancy (generally car) vehicle trips to deliver future development. Any approach that advocates a Vision and Validate approach, stepping away from a Predict and Provide model is supported.
9. However, we are concerned that the analysis the Trip Budget is based upon may be inaccurate and present a situation that ultimately makes the strategy undeliverable.

10. Further, the Transport Strategy contradicts itself in many areas and ultimately, will not be convincing enough to allow Trinity Collage to engage with leaseholders on the park and encourage the change in travel modes that the NECAAP strategy relies upon.

Early concerns

11. We have previously identified clear concerns associated with the methodology used to reach the conclusion that a Trip Budget is required to deliver the NECAAP.
12. The key transport evidence supporting the NEC AAP is the North East Cambridge Area Action Plan Transport Evidence Base (September 2019). Previous submissions query a range of matters associated with:
 - Assumptions over floor areas which appeared inaccurate
 - Job numbers assumed at CSP which were too low
 - A reliance on reducing car parking at CSP, ignoring the complexities over delivery of this associated with long leaseholders.
 - Unclear application of committed developments, particularly at CSP.
13. Whilst questions have been asked and discussions with the highway authority and Greater Cambridge undertaken, the assumptions made, and nature of the assessment has never been clearly explained or resolved.
14. The Evidence Base also stopped short of clearly identifying how the Trip Budget would be allocated across each individual site within the NECAAP. This is a key omission and without understanding the target vehicle trips that the strategy might dictate, and effective and achievable Transport Strategy cannot be prepared.

NECAAP's Transport Topic Paper (November 2021)

15. The Transport Topic Paper is the key transport document associated with the evidence base. It seeks to provide an update following the preparation of the original Evidence Base document from 2019.
16. In reviewing this document there are a number of points that stand out.

17. Under the heading Land Use and Parking it is stated that:

'Parking cars (private vehicles and car club shared vehicles) off-plot in hub car parks will create better places by freeing up the public realm for people and enabling higher density development to sustain high quality public transport services and provide space to seamlessly interchange between sustainable modes'
18. This is consistent with the original Evidence Base that identified such parking linked through seamless segregated travel corridors as an essential component of the Transport Strategy.
19. CSP North Is able to deliver this through the provision of a Busway connection, consolidated car parking, the potential to relocate the Milton Park and Ride and onward last mile mobility solutions.
20. No other development across the NECAAP is able to deliver such a transport measure or once that can have such a significant positive contribution towards sustainable travel in the area.
21. The Trip Budgets are again repeated in Table 2 but the Transport Topic Paper continues to fail to reference to how this is allocated across sites. The omission of this raises serious concerns regarding the ability for any site to bring forward development or prepare a Transport Strategy where the target is unknown.
22. Whilst there will be mutual benefits across the NECAAP, each site needs to be considered in isolation as part of delivering a strategy as a whole. For CSP, this clearly relates to the principle of reducing trips for the benefit of the wider NECAAP.
23. The key concern here relates to how committed development at CSP has been considered and the level of trips assumed within CSP. The original Evidence Base seems to make some allowance for this without setting this out in detail. This should be provided.
24. Figures suggest that an increase in trips over the 2017 baseline are assumed. However, the modelling used to set the Trip Budgets is not based on the scenario that allows for committed developments, instead using the 2017 situation as the baseline
25. Effectively this means that not only is the NECAAP expected to deliver development without increasing trips, but is also expected to reduce overall trips into the NECAAP below that already approved through the granting of previous planning permissions. We suggest this is likely to be unattainable.
26. The clear conclusion here must be that in order for the NECAAP to come forward, CSP must reduce its peak hour vehicle trip attraction below that already considered acceptable and approved by the planning and highway authorities for the benefit of development across the wider NECAAP.
27. It therefore begs the question of what happens if no development at CSP takes place and no reduction in trips occur? This overreliance on the reduction in trips without securing effective transport solutions is a clear concern.

28. The original Evidence Base tested several development scenarios to arrive at an average Trip Budget.
29. The Proposed Submission NECAAP outlines approximately 8,350 and 15,000 jobs. This scenario does not relate to the range of scenarios tested in modelling and the original Evidence Base from over 2 years ago. Simply it is considered that the modelling and analysis needs to be revisited, if only to assess the current proposals in terms of jobs and homes.
30. The proposals for NECAPP therefore remain untested.

Cambridge Science Park North

31. The proposals at CSP North has the potential to deliver real change to the area and help deliver the NECAAP. Key components of the CSP North strategy are:
 - Early delivery of the first phase of the Waterbeach to Cambridge Busway
 - Provision of a seamless link between the Milton Park and Ride and consolidated car parking facilities, an essential transport measure identified in the Transport Strategy for the NECAAP.
 - Potential to relocate or complement the Milton Road Park and Ride
 - Ability to relocate car parking away from CSP further contributing to the Trip Budget
 - Provision of a Consolidation / Logistics Hub with the potential for last mile delivery solutions that will reduce delivery trips across the NECAAP
32. The measures summarised above are all components of the strategy identified in the Transport Evidence Base for the NECAAP. CSP North is able to deliver these key mobility measures, identify location and a strategy for implementation not identified elsewhere in the Evidence Base.
33. The reviews undertaken by the Greater Cambridge Partnership confirms that the route through CSP North is the preferred way to deliver a seamless link to Park and Ride facilities. The strategy for CSP North positively provides for the link and the ability to provide consolidated, displaced parking or additional or relocated Park and Ride facilities.
34. Whilst the provision of a Consolidation or Logistics Hub is identified in the NECAAP policies at CSP, the early delivery and the provision of space makes this especially well-suited to CSP North.
35. The above measures will reduce movements on Milton Road and contribute positively towards the Trip Budget.

Summary

36. The Transport Evidence Base promotes the principle of a vehicle Trip Budget to deliver the NECAAP. The Trip Budget advocates a no net increase in vehicle trips across the NECAAP sites. In reality, overall trips must reduce once committed developments are accounted for.
37. The allocation of Trip Budget across individual sites is not defined, nor is there a clear set of assumptions over existing trips against which such allocations might be compared. The data and evidence that the Trip Budget is based upon is questioned where this might not properly reflect the situation.
38. CSP is essential to this strategy where without reducing vehicle trips, other areas that are currently undeveloped may not come forward without breaching the Trip Budget. The NECAAP is therefore reliant upon the ability for CSP to reduce peak hour vehicle trips.
39. A range of measures are identified in the Transport Evidence Base and CSP North can deliver several of these. Significantly, the seamless traffic free link from Park and Ride is identified and CSP can deliver this alongside consolidated, displaced car parking. The space for and early delivery of a Logistics Hub will further add to the strategy making a significant positive contribution towards the Trip Budget.
40. Without significant interventions such as those which may be delivered by CSP North, a reduction in vehicle trips at CSP, sufficient to allow the delivery of the wider NECAAP will be difficult to deliver.

