



National Highways

Woodlands

Manton Lane

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30 January 2026

Dear Sir/Madam

Regulation 18 Consultation (Preferred Options) – Greater Cambridge Local Plan to 2045

National Highways welcomes the opportunity to comment on the Greater Cambridge Draft Local Plan Regulation 18 Preferred Options consultation. The emerging Local Plan aims to set out the required growth and development for the period of 2024 to 2045.

National Highways is responsible for the operation, maintenance, and improvement of the Strategic Road Network (SRN) in England on behalf of the Secretary of the State. In the area within and surrounding the Greater Cambridge area we have responsibility for the M11, A11, A14 and A428.

National Highways is a key delivery partner for sustainable development promoted through the plan-led system, and as a statutory consultee we have a duty to cooperate with local authorities to support the preparation and implementation of development plan documents. National Highways is aware of the relationship between development planning and the transport network, and we are mindful of the effects that planning decisions may have on the operation of the SRN and associated junctions. We cannot be expected to cater for unconstrained traffic growth generated by new developments, and we therefore encourage policies and proposals which incorporate measures to reduce traffic generation at source and encourage more sustainable travel behaviour.

Policy S/JH identifies Greater Cambridge's future housing needs for the plan period to be for at least 48,195 new homes and approximately 73,300 additional jobs. This allocation includes existing consented schemes that are currently being constructed, including Darwin Green, Northstowe and Waterbeach. These allocations alongside windfall sites equate to approximately 37,865 homes to be delivered by 2045. The Plan therefore identifies a residual requirement, including flexibility and contingency, to be addressed through additional allocations.

Policy S/DS sets out the Development Strategy identifying growth areas around Cambridge and the Greater Cambridge area. The growth areas for housing, particularly those around the SRN, include (but not limited to) substantial growth at Cambourne, North East Cambridge, Cambridge East, and Grange Farm, adjacent to the A11 at the Fourwentways junction. The employment strategy includes developing sites around the SRN corridors, including Slate Hall Farm, Junction 25 A14, Land to the south of the A14 Services, and expansion of existing research campuses such as Wellcome Genome and Babraham Research Campus, both near the A11.

National Highways have reviewed the Greater Cambridge Local Plan site allocations, and have particular comments and concerns on the following sites:

- Policy S/CBN: Cambourne North

National Highways are engaged in ongoing discussions with East West Rail (EWR) regarding the delivery of a new railway station at Cambourne, north of the A428. Highway improvements needed to facilitate the station and associated track are currently being considered, and implications for future-proofing are being reviewed. We suggest a meeting is needed early in 2026 between the LPA, EWR and National Highways to discuss cumulative impacts of the rail proposals and emerging Local Plan at this location. This session can further consider the necessary transport evidence and modelling needed to ensure the implication of all proposals at Cambourne on the SRN are fully understood and enabled to be effectively delivered.

As currently drafted, considered alongside the transport evidence so far published, the Local Plan growth at Cambourne appears likely to bring significant and potentially unacceptable adverse impacts on the safe and efficient operation of Cambourne Junction on the A428. Commentary in the 'Draft Greater Cambridge Transport Evidence Report' (2025) identifies that access arrangements assumed for the extension of Cambourne to the North of the A428 in DS1 resulted in unrealistic levels of internalisation and mode shares due to the congestion at the site access junction meaning that very few trips by all modes could exit the site in the peak periods. DS2 proposed expanded sustainable transport improvements and roads around the site were improved to A-Road standard to facilitate direct access to the A1198 and the A14 as well as the A428. Despite issues being improved in the DS2 scenario, the report identifies that there is still significant congestion on the highway network around the site meaning that the model suggests high levels of trips will still remain within the sector.

To manage SRN impacts the emerging Local Plan proposes an indicative trip budget of approximately 2,500 trips in both the AM and PM peaks, with a refined trip budget to be based on more detailed evidence prior to submission of an outline application. National Highways are unable to agree to this proposed approach at this stage without the benefit of further modelling work for the proposed development. Operational assessment work is required to demonstrate the scale of growth deliverable at Cambourne prior to SRN mitigation. If a trip budget is to be proposed this needs testing within an operational model, with detailed timings/parameters identified and a monitoring approach agreed. Without this further work National Highways are unable to confirm whether Local Plan proposals at Cambourne are deliverable in SRN terms. As identified in Circular 01/22, SRN capacity enhancements need to be identified as part of the plan making process, because this provides the best opportunity

to consider the cumulative impacts of development and identify appropriate mechanisms for delivery.

National Highways endorse the Local Plan work on 'Transport Vision and Principles' for Cambourne (Arup report dated September 2025) which considers opportunities to move to sustainable modes and has recognition of severance associated with the North Cambourne site and the A428. We support the report's identified next steps, highlighting that additional work is required to consider achievability of vision assumptions and to ensure a robust evidence base is established to support a site allocation of this significance; we note that even with an ambitious shift to alternative modes demand still exceeded the trip budget.

The emerging Local Plan text and Figure 78 identify a number of additional active travel crossings over the A428, with mention of potential bus provision in associated documents. We recommend further discussion with National Highways regarding emerging crossing locations / existing bridge improvements to consider feasibility and to ensure suitable commitments and costings are included in the Infrastructure Delivery Plan (including commuted sums when relevant). It may be practical, demonstrated through further modelling work, to consider the need for additional A428 bridge crossing options for private cars, to remove local trips from Cambourne Junction.

- Policy S/NEC: North East Cambridge

North East Cambridge (NEC) is a new inclusive district which builds on the strengths of Cambridge's existing innovation hubs and enabling them to evolve to meet future needs., including intensification of existing commercial and industrial spaces as well as creating new housing and civic spaces. The policy seeks to allocate approximately 8,500 new homes, up to 320,000 sqm of additional business floor space, 27,300sqm of additional industrial floorspace for mid-tech, light industrial and creative industries. The policy refers to the requirement for noise mitigation from the A14 due to the significant noise from traffic. The policy states that the preference with a noise barrier near the road. It should be noted that Paragraph 57 '*For reasons of safety, liability and maintenance, any physical infrastructure that is necessary to mitigate the environmental effects of or on development must be located outside of the highway boundary of the SRN.*' In conclusion, National Highways will object to any structures placed within the highway boundary and recommend this is reflected within the policy moving forward.

The policy also seeks an upgrade or new crossings for the A14, such as Jane Coston Bridge and underpasses, to assist with the wider connectivity requirements. In principle, National Highways are supportive of this, subject to the correct structural and safety assessments completed and appropriate agreements ensuring ongoing maintenance and required funding are met.

National highways are aware of the trip budget principle currently applied to the NEC area which has the aim to ensure additional development do not add additional pressures to the existing road networks. For the overall trip budget to be met, it is crucial individual sites do not exceed their trip budget, and breaches are controlled appropriately to reduce trips back in accordance with the agreed budgets. National Highways would require as part of the local plan process to understand the impact of this development and the cumulative impact on the

A14 junction 33 should the trip budget not be met and ensure appropriate mitigation measures are secured as part of the plan making process.

- Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm

The policy seeks to allocate approximately 6,000 new homes with approximately 20,000 sqm of B2 and B8 uses and 15,000 sqm office space. The aim of the development proposal is to create a fully functional, self-contained new settlement. It is understood that the Local Plan growth at Grange Farm appears likely to bring significant and potentially unacceptable adverse impacts on the safe and efficient operation of the A11 and the SRN junction, based on the transport evidence currently available. It is acknowledged that the testing of the Draft Plan in the transport evidence currently available, demonstrated that the development of this site is reliant on the introduction of an extension to the Cambridge South East Transport Scheme over the A11. National Highways require this crossing to be grade separated and not rely on the A11 junction as this would likely interfere with the operation of the junction.

- Policy S/LAC: Other site allocations in Cambridge

This policy identifies site allocations within the city centre. Whilst National Highways do not offer specific comments on these sites due to the distance from the SRN, National Highways suggest these sites are included in a cumulative impact assessment to ensure the impact on the SRN is appropriately managed and mitigated. In particular, the impact on the SRN including junctions on the M11, A11 and A14.

- Policy S/CE: Cambridge East

This policy is understood to allocate approximately 8,000 dwellings, as well as significant employment floorspace creating a new city district. The current capacity of the trip budget has been identified at approximately 1,500 trips in the AM peak and 1,800 trips in the PM peak. This level of trips is understood to have been tested with the regional model and is considered to be able to be accommodated within the local road network, including the local SRN junctions. National Highways would require as part of the local plan process to understand the impact of this development and the cumulative impact on the A14 junction 34 prior to agreeing the trip budget and agreement of appropriate mitigation measures should the trip budget not be met.

- Policy S/NWC: Eddington, Cambridge

North West Cambridge has an allocation within the current local plan but has been recognised that there is the ability to increase the capacity for new homes. National Highways are currently consulted on the planning application for the increased quantum of development on site. National Highways offered no objection subject to the inclusion of suggested conditions, including the requirement for a Travel Plan with a sufficient monitoring regime to ensure the development does not result in additional trips on the SRN, namely M11 junction 10.

- Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm)

The proposed allocation is situated adjacent to the A14, providing good access to the SRN. The proposed development capacity for approximately 220,000 sqm and is anticipated to support a range of logistics and industrial uses. Similar approach as to other proposals, suggests that the site could operate with a trip budget. This approach, although in principle is acceptable to National Highways, needs to be subject to a full operational junction assessment

of the A14/ A1307 junction to ensure that the trip budget can be accommodated without severely impacting the SRN. It should be noted that this area is known to experience congestion during peak times. Depending on the outcomes of this modelling exercise, the proposed development may need to provide suitable mitigation package, potentially requiring physical mitigation works to the junction to accommodate the planned growth. In addition, the Monitor and Manage approach, along with any mitigation package needs to be approved and agreed with the relevant highway authorities.

- Policy S/RRA/SCS Land to the south of Cambridge Services, A14

The proposed site for the allocation of approximately 90,000sqm of B2 and B8 uses also benefits from good access on to the SRN. The site needs to evidence it can be accommodated on the A14/Boxworth Road junction through agreement of operation junction assessment. National Highways supports the inclusion of proportionate and necessary facilities required to support 24-hour lorry parking for 150 spaces within the policy.

At present based upon our review National Highways cannot establish whether the level of growth proposed can be accommodated on the SRN. We therefore request the provision of the transport evidence base, appropriate strategic transport model assessment and any supporting modelling to be provided. This will enable us to undertake a full and robust assessment of the proposals and understand the potential impact on the safe and efficient operation of the SRN. National Highways is committed to continue to work with your authority in a collaborative and constructive manor to support the progression of the plan. As part of this work, we will need to work with you to develop a greater understanding of the impact of the development upon the SRN. In addition, it should be noted that each site will be required to provide supporting evidence their developments can be accommodated safely and without resulting in a severe impact or delay on the SRN. Consequently, National Highways are unable at this stage to offer a view on the overall acceptability of the individual sites, beyond those comments made above.

Due to water scarcity issues in Cambridge, the local plan identifies short- and medium-term solutions to enable the required growth. Shorter term solutions include improving the efficiency of water usage. Medium term solutions include the delivery of the Grantham to Cambridge pipeline, to be operational from 2032 and the Fens Reservoir will further increase supplies from mid-2030's (subject to a DCO). It is National Highways understanding that new strategic sites, including North East Cambridge, Grange Farm, Cambridge East and Cambourne construction would be limited until 2032 therefore, National Highways recommend that traffic modelling reflects the expected delivery timescales.

Aside from traffic generation from development sites, when land is allocated within proximity to the SRN, the increased number of residents can give rise to other issues. It is likely that these locations will be impacted by noise pollution from the SRN National Highways will not allow noise barriers, and other structures on its land. In addition, National Highways will not accept third party connections to its drainage systems as highlighted within paragraph 59 of the Circular 01/2022. Paragraph 59 also states that developments must not add extra run off to existing systems where existing informal or formal connections exist.

In addition to this, due to the proximity of allocations around the SRN, some locations may result in potential severance issues. Consequently, provision needs to be accounted for infrastructure, such as overbridges, to minimise severance across settlements and new developments. As stated above, any crossings of the SRN will be subject to the correct structural and safety assessments completed and appropriate agreements ensuring ongoing maintenance and required funding are met. Once any requirements for additional crossings of the SRN have been established, National Highways recommends engagement with appropriate teams.

National Highways have reviewed the Draft Infrastructure Topic Paper, published as part of this consultation. The Infrastructure Topic Paper identifies infrastructure to support new development to deliver sustainable communities, particularly the infrastructure required for the plan period. It is understood that this document will feed into the work currently being prepared by the Cambridgeshire and Peterborough Combined Authority (CPCA), and the preparation of the Local Transport and Connectivity Plan (LTCP). The aim of this plan is to set out the long-term strategy for transport in Cambridgeshire and Peterborough. National Highways will continue to work with the LPA and the CPCA to ensure the appropriate level of mitigation is secured as part of the Local Plan to accommodate the proposed allocations and the growth across the district. National Highways note that the local plan should provide appropriate evidence base needs to *'provide a robust assessment of any positive and negative impacts on the SRN and inform a transport strategy and the Strategic Environmental Assessment (SEA) for the study area that aligns with the safe operation and long-term integrity of the SRN'* (paragraph 26 of Circular 01/2022. Further to this, in accordance with paragraph 33, robust evidence is required including demand forecasting modelling of the future development. The models will inform the analysis of alternative solutions by accounting for the effects of possible mitigation scenarios and mode share shift. It should be noted that Paragraph 29 outlines, where new connections and capacity enhancements to the SRN are considered necessary, these should be identified during the plan-making process and should identify appropriate mechanism for the delivery of strategic highway infrastructure. It should be noted that there cannot be any presumption that the infrastructure will be funded through a future Road Investment Strategy (RIS). At this stage, National Highways are unable to commit funding and that no such studies are currently in the National Highway pipeline for future projects.

We trust the feedback above is useful in the progression of your proposals and welcome continued discussions with the council to this end. If you have any questions, please do not hesitate to contact me directly.

Yours Sincerely



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