Technical Note 01

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Subject:	**Greater Cambridge Local Plan – Regulation 19 Submission Review**		
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Executive Summary

This Technical Note (TN01) has been prepared by AECOM on behalf of National Highways (NH) to document a review of the Greater Cambridge Local Plan Regulation 19 submission which is a new joint Local Plan for Cambridge (Cambridge City Council) and South Cambridgeshire (South Cambridgeshire District Council) being delivered by Greater Cambridge Shared Planning.

The emerging Local Plan outlines the options for growth in the Greater Cambridge area for the period of 2024 to 2045, with NH providing comment previously at Regulation 18 Consultation (Preferred Options) stage.

A number of site allocations are proposed for inclusion within the emerging Local Plan and AECOM has considered the evidence provided in relation to these allocations.

Recommendations regarded as critical to the acceptability of the Regulation 19 Local Plan Submission:

1. *Strategic Modelling*: At present, further strategic and operational modelling evidence (including consideration of cumulative impacts), together with supporting assumptions and validation information, is required to demonstrate that the proposed level of growth is sufficiently assessed and can be accommodated on the SRN and that any necessary mitigation measures are deliverable and capable of maintaining acceptable operating conditions on the SRN. It should be ensured that these mitigation measures are reflected in the Infrastructure Delivery Plan (IDP). (para 2.11).

2. *Policy S/CBN Cambourne North*: Additional information regarding the Modal Demand & Externalisation of Settlements (MoDES) methodology should be provided so that the forecast trips and multi-modal demand can be validated, including the tool's assumptions, inputs and outputs (para 3.7).

3. *Policy S/CBN Cambourne North*: The distribution of development traffic trips asserted on the SRN relating to the Caxton Gibbet Junction, the Cambourne A428 dumbbell junctions and the Scotland Road dumbbell junction (and any other affected SRN junctions) should be quantified so that the transport impacts of the strategic allocation at Policy: S/CBN can be established (para 3.8).

4. *Policy S/CBN Cambourne North*: With regards to the CapCAM model, AECOM requires further information of the assumptions, validation and calibration used in order to improve the reliability of mitigation measures and trip budgets, and the robustness of the model outputs (para 3.9).

5. *Policy S/AMC/NEC North East Cambridge*: Evidence is required detailing junction capacity at the A14 Junction 33 and SRN junctions, to determine whether the SRN has the capacity to accommodate the proposed trip budget. Should the proposed trip budget not be achieved, sensitivity testing should be conducted and appropriate mitigation, monitoring and intervention measures should be identified (para 3.20).

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6. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: Trip generation relating to relevant employment uses should be undertaken using TRICS and included within the assessment (para 3.31).

7. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: TEMPro growth should be applied with the relevant assumptions to ascertain future background growth in the local area (para 3.34).

8. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: Justification is required for the use of Lane Simulation mode instead of the standard ARCADY model, and the A11 / A1307 junction should be modelled without the Lane Simulation Mode activated (para 3.7).

9. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: The junction modelling should be rerun to match the correct entry to exit separation distances as per the CSET Phase 2 model (para 3.7).

10. *Policy S/CE Cambridge East*: A detailed, evidence-based approach relating to trip distribution and assignment should be provided so the impact on the SRN junctions during peak hours can be suitably determined (para 3.44).

11. *Policy S/CE Cambridge East*: An operational assessment is necessary to demonstrate that the proposed trip budgets can be accommodated on the SRN, including A14 Junctions 34 and 35, and Junctions 24 / 24A respectively, as well as additional implications of the proposed trip budget on SRN junctions. Furthermore, mitigation measures necessary for upholding suitable operating conditions, if required, should be provided (para 3.45).

12. *Policy S/SHF Land north of A1307, Bar Hill (Slate Hall Farm)*: The decision for using the South Cambridgeshire 005 MSOA over the South Cambridgeshire 003 MSOA should be justified, with the trip distribution analysis updated accordingly if necessary (para 3.51).

13. *Policy S/SHF Land north of A1307, Bar Hill (Slate Hall Farm):* TEMPro growth rates should be applied to the assessment, including any assumptions and the sources for future year 'Without Development' flows on the SRN (para 3.54).

14. *Policy S/SHF Land north of A1307, Bar Hill (Slate Hall Farm):* The junction capacity modelling results/reports should be provided so that the impacts of the existing layout of the A14 / B1050 (Bar Hill junction) roundabout, alongside the need for any mitigation, to assess the scale of impact on the SRN (para 3.55).

15. *Policy S/SHF Land north of A1307, Bar Hill (Slate Hall Farm):* The proposed mitigation modelling should be provided for review to enable confirmation that the proposed trip budget can be accommodated without unacceptable impacts on the SRN (para 3.56 & 3.57).

16. *Policy S/SHF Land north of A1307, Bar Hill (Slate Hall Farm):* Any future proposals should be complemented by a Travel Plan, outlining measures which will be taken to encourage and maximise sustainable modes of transport, such as active travel and public transport (para 3.59).

17. *Policy S/RRA/SCS Land to the south of Cambridge Services, A14*: The source for vehicular trip rate generation used in should be provided for review. (para 3.63).

18. *Policy S/RRA/SCS Land to the south of Cambridge Services, A14*: Further information is necessary to demonstrate the projected distribution of development trips on the SRN (para 3.64).

19. *Policy S/RRA/SCS Land to the south of Cambridge Services, A14:* Any future proposals should be complemented by a Travel Plan, outlining measures which will be taken to encourage and maximise sustainable modes of transport, such as active travel and public transport (para 3.65).

20. *Policy S/RRA/SCS Land to the south of Cambridge Services, A14*: Given the scale and nature of the proposed development, a significant number of trips are likely to be generated. Operational assessment evidence should be provided demonstrating the impacts of the allocation on the A14 Junction 24/24A complex and identifying any resulting mitigation requirements (para 3.66 & 3.67).

Recommendations regarded as important but not critical to the acceptability of the Regulation 19 Local Plan Submission:

21. *Policy S/CBN Cambourne North*: Further Discussions with NH should take place to better consider the feasibility of emerging crossing locations and bridge improvements, as well as to ensure any commitments and costs are updated within the Infrastructure Delivery Plan (para 3.4).

22. *Policy S/CBN Cambourne North*: Adoption of the budget should be justified alongside additional information to evidence whether the trip budget can be accommodated on the SRN (para 3.10).

23. *Policy S/CBN Cambourne North*: A breakdown of the additional trips demonstrating the extent to which freight and East West Rail movements contribute to the demand should be provided (para 3.11).

24. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: A sensitivity test is recommended to test alternative employment internalisation assumptions, including a lower bound scenario (para 3.24).

25. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: Evidence of local school availability should be provided to justify the assumed education internalisation rates as well as the implications if those assumptions are not realised (para 3.25).

26. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: Separate tables for internal and external trip mode shares should replace Table 1.2, with additional consideration for internal trips of car driver mode share (para 3.29).

27. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: The TRICS output for the residential element of the site should be provided in the report for review (para 3.30).

28. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: Evidence of the trip generation related to committed developments should be provided alongside the build-up of the future year traffic flows, for review (3.32).

29. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: Justification for the changes made to the CSET Phase 2 model regarding the A11 / A1307 junction should be provided (para 3.37).

30. *Policy S/GF Land adjacent to A11 and A1307 at Grange Farm*: Clarification is required over why Table 1.5 shows that the junction operates over capacity whereas the results in Appendix A show that the junction operates within capacity (para 3.38).

31. *Policy S/CE Cambridge East*: Additional information is required during the planning application stage to demonstrate that the mode shares from Eddington can be realistically applied in Cambridge East (para 3.43).

32. *Policy S/SHF Land north of A1307, Bar Hill (Slate Hall Farm)*: The B2 and B8 TRICS outputs should be provided for review (para 3.50).

33. *Policy S/SHF Land north of A1307, Bar Hill (Slate Hall Farm):* Evidence-based HGV trip distribution should be presented during the planning application stage, so that impacts on SRN junctions can be adequately assessed (para 3.52).

1. Introduction

1.1. AECOM has prepared this Technical Note (TN01) on behalf of National Highways (NH) to document a review of the Greater Cambridge Local Plan Regulation 19 submission by Cambridge City Council and South Cambridgeshire District Council (Greater Cambridge Shared Planning).

1.2. NH 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, NH has responsibility for the M11, A11, A14 and A428.

1.3. The emerging Local Plan aims to establish the options for growth and the impact that this growth may have on the Greater Cambridge area for the period between 2024 and 2045. The current consultation is to focus on the Proposed Submission Consultation (Regulation 19 publication). NH has provided comment at Regulation 18 Consultation (Preferred Options) stage, with the review attached in **Appendix A**.

1.4. The key purpose of this TN is to review the Greater Cambridge Local Plan evidence base documents, assess the proposed areas of growth and identify allocations which may affect the performance of the Strategic Road Network (SRN). From a NH perspective, the review considers whether sufficient evidence has been provided to demonstrate that the proposed strategy and allocations are sound, deliverable and capable of being accommodated without unacceptable impacts on the SRN. In particular, the review focuses on whether the evidence base provides sufficient information to understand the implications of the proposed allocations for the SRN and whether any necessary mitigation measures can be delivered.

1.5. The structure of this document consists of a review of the emerging Greater Cambridge Local Plan site allocations, with comments / concerns on the following allocations:

- Policy S/CBN: Cambourne North;
- Policy S/NEC: North East Cambridge;
- Policy S/GF: Land adjacent to A11 and A1307 at Grange Farm;
- Policy S/CE: Cambridge East;
- Policy S/SHF: Land north of A1307, Bar Hill (Slate Hall Farm); and
- Policy S/RRA/SCS: Land to the south of Cambridge Services, A14.

1.6. The documents that have formed the basis of the review and are of particular relevance to NH are set out as follows:

- Proposed Submission Greater Cambridge Local Plan (2026) and associated inset maps;
- Greater Cambridge Local Plan – Infrastructure Delivery Plan (IDP);
- Site Allocations Topic Paper;
- Cambourne Growth Strategy Programme: Annex 1: Transport Strategy Addendum;
- Cambourne's Spatial Framework Strategy Addendum;
- Cambourne's Green and Blue Infrastructure Framework;
- Cambourne Station Enhancement Study;
- Grange Farm Transport Analysis and Evidence;
- Cambridge East Transport Topic Paper 6 – First Phase and Trip Budget;
- Slate Hall Farm: Transport and Highway Assessment Evidence; and
- Land adjacent to Cambridge Services: Regulation 19 Transport Submission.

1.7. This review will be considered in the context of Policy PM15 of the National Planning Policy Framework (NPPF), which requires Plans to be:

a) **Positive** – the plan sets out a positive approach to delivering growth to meet the development needs of the area in accordance with policy S1, and is based on effective joint working on cross-boundary strategic matters;

b) **Appropriate** – the plan sets out an appropriate strategy to enable the delivery of sustainable development, taking into account reasonable alternatives, and is based on proportionate evidence;

c) **Effective** – the plan sets out effective policies for development, and there is a reasonable prospect that its site allocations are capable of being deliverable at the time envisioned;

d) **Consistent with national policy** – the plan accords with the policies for plan-making in this Framework and other statements of national planning policy where relevant, and does not include policies which duplicate, substantively restate or are inconsistent with the content of national policies for decision-making; and

e) **Conformity** – the plan is in general conformity with any adopted spatial development strategy for the area.

1.8. For ease of reference, AECOM's main comments and recommendations are presented in bold and underlined text throughout the note. Recommendations that are likely to be critical to agreement of the Local Plan are highlighted **red**. Recommendations that are considered important but not critical to agreement of the Local Plan are highlighted in **amber**.

2. Background

2.1. The Greater Cambridge area consists of the Cambridge City Council and South Cambridgeshire District Council authority areas in the East of England region.

2.2. The area borders Huntingdon District and East Cambridgeshire District to the north, West Suffolk District and Braintree District to the east, Uttlesford District and North Hertfordshire District to the south and Central Bedfordshire District to the west.

2.3. The City of Cambridge is the principal settlement in the Greater Cambridge Area home to 145,700 inhabitants at the 2021 ONS census, a 17.6% increase on the previous census making the City of Cambridge the fastest growing district in the East of England.

2.4. Other notable settlements in the Greater Cambridge Area include the towns of Cambourne, Longstanton, Waterbeach, Great Shelford, Linton, Melbourn and Gamlingay, as well as numerous small villages. These settlements lie in the more rural South Cambridgeshire District and enjoy proximity to the SRN.

2.5. South Cambridgeshire District is a largely rural area which encloses Cambridge to the north, south, east and west. At the 2021 ONS census South Cambridgeshire had a population of 162,000 and is amongst the least dense districts in the UK.

2.6. Within the Greater Cambridge Area, the SRN comprises the M11, A11, A14 and A428. The M11 provides access to London and Stansted Airport to the south, the A11 links the area to Norfolk, the A14 connects the region with the Midlands and the A428 provides access to Cambourne and St Neots to the west.

2.7. Policy S/GB sets a requirement for the Cambridge Green Belt to be maintained to preserve Cambridge's unique identity and setting whilst preventing urban sprawl. Roughly 26% of the Greater Cambridge Area is covered by the Green Belt, with South Cambridgeshire District comprising much of this.

2.8. Greater Cambridge's future housing need for the plan period is set out in Policy S/JH of the emerging Local Plan which identifies a requirement for at least 48,069 new homes and approximately 73,300 additional jobs. This allocation includes existing consented schemes that are currently being constructed, including Darwin Green, Northstowe, Eddington, and Waterbeach. These allocations alongside windfall sites equate to approximately 38,378 homes to be delivered by 2045. The Plan therefore identifies a residual requirement, including flexibility and contingency, to be addressed through additional allocations.

2.9. 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. The cumulative impact of the level of housing and employment growth needs to be evidenced in line with Regulation 19 allocation proposals.

2.10. Settlements will be grouped by their size, characteristics and sustainability in accordance with Policy S/SH, to establish a settlement hierarchy which will guide the locations of future development. Windfall sites, where development is unallocated, will be determined based on the category their settlement falls under in the hierarchy.

2.11. The proposed development strategy is broadly consistent with national objectives of directing growth towards sustainable locations, existing sites, urban extensions, and new strategic villages and towns. The focus on public transport, active travel and infrastructure-led growth is welcomed; however, the scale of growth proposed within the emerging Local Plan is substantial and relies heavily upon future transport interventions, ambitious mode share assumptions, trip budgeting, and Monitor and Manage approaches. NH will require confidence that the cumulative impacts of all allocations on the SRN have been robustly assessed and key transport infrastructure and any required mitigation can be delivered. **At present, further strategic and operational modelling evidence (including consideration of cumulative impacts), together with supporting assumptions and validation information, is required to demonstrate that the proposed level of growth is sufficiently assessed and can be accommodated on the SRN and that any necessary mitigation measures are deliverable and capable of maintaining acceptable operating conditions on the SRN. It should be ensured that these mitigation measures are reflected in the Infrastructure Delivery Plan (IDP).**

2.12. The following sections of this TN will detail the outcome of AECOM's review of the Local Plan evidence base documents.

3. Site Allocation Review

Policy S/CBN: Cambourne North

3.1. A Regulation 19 Transport Strategy Addendum has been submitted in support of the proposed strategic allocation at Cambourne North (Policy S/CBN). The proposed allocation, located north of the A428 adjacent to Cambourne, comprises approximately 13,000 homes and 6,000 jobs, supported by local services, green infrastructure, and active travel links to Cambourne and surrounding villages.

3.2. Cambourne North will be served by four access junctions, including two on the SRN: one via the A428 at Junction 3 and another via the existing connection to St Neots Road at Junction 5, providing onward access to Broadway. The comment provided by NH at Regulation 18 stage on access arrangements is replicated in the following Section 3.3.

3.3. 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.

3.4. The emerging Local Plan text identifies a number of potential additional bus routes intended to address gaps in north–south connectivity and improve access between surrounding villages, Cambourne North, and key regional destinations, including the proposed EWR station. **AECOM recommends further discussion with NH 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).**

3.5. It is noted that five additional strategic cycle links are proposed to complement the LCWIP network, enhancing connectivity, providing high-quality walking, and cycling access to Cambourne North, the EWR station, and the C2C HQPT corridor from Cambourne and surrounding villages.

3.6. The proposal to restrict construction access to the two access points on the A1198 is supported, as it ensures that construction traffic is not routed via the A428. The commitment to submit a Demolition and Construction Environmental Management Plan (DCEMP) and a Construction Traffic Management Plan (CTMP) is also supported, as these documents will help manage construction-related impacts and traffic movements effectively.

3.7. For the initial Transport Assessment, Arup's Modal Demand & Externalisation of Settlements (MoDES) tool has been used to forecast multi-modal travel demand and estimate the proportion of internal and external trips across different transport modes. However, the Addendum does not provide sufficient information regarding the methodology, input assumptions, calibration, or validation of the tool. Consequently, it is not possible to verify the robustness of the forecasting outputs or independently validate the results presented. **Further information should be provided regarding the MoDES methodology, assumptions, inputs and outputs, including its relationship to the proposed trip budget and resultant SRN impacts.**

3.8. While an initial highway trip assignment exercise has been undertaken and corresponding trip distribution proportions are reported within the Addendum, the assessment fails to quantify the number of development-generated trips assigned to the SRN. Therefore, the impact of the development on the Caxton Gibbet Junction, Cambourne A428 dumbbell junction (north and south) and Scotland Road A428 dumbbell junction has not been established at this stage. **Further information should be provided demonstrating the distribution of development traffic to nearby SRN junctions, including the forecast number of trips using the Caxton Gibbet Junction, the Cambourne A428 dumbbell junctions and Scotland Road (as well as additional SRN junctions further afield that may be impacted).**

3.9. The Cambridgeshire and Peterborough Combined Authority Model (CaPCAM) is being used to assess the transport impacts of Cambourne North and inform both the trip budget and mitigation strategy. However, the Cambourne North Development Strategic Modelling Technical Note included in Appendix A presents model outputs only and does not provide sufficient information on the model methodology, assumptions, calibration, or validation. Consequently, the robustness of the forecasting outputs and the reliability of the resulting trip budget and mitigation measures cannot be independently verified. **Further information should be provided regarding the strategic modelling assumptions, validation and outputs used to inform the proposed trip budget and mitigation strategy.**

3.10. A trip budget of 4,000 two-way peak-hour vehicle trips has been identified through a first-principles assessment and agreed with CCC, with scope for refinement as the C2C, EWR, and wider transport policy framework evolve. However, given the scale of the proposed development, the trip budget may underestimate the likely transport demand generated. **AECOM has not identified sufficient information to determine whether the proposed trip budget is robust or whether it can be accommodated without unacceptable impacts on the SRN.**

3.11. The difference between the adopted trip budget (4,000 trips) and the AM and PM peak hour trip generation outputs from the CaPCAM model is approximately 1,900 trips. The consultant has attributed this difference to freight movements and East West Rail-related trips. However, given that freight traffic typically operates outside the AM and PM peak periods, it is unclear whether freight movements would adequately explain the magnitude of the discrepancy. **A quantitative breakdown of the additional trips and supporting evidence demonstrating the extent to which freight and East West Rail-related movements contribute to the modelled demand should be shared. Further justification is also required for the adoption of only 4,000-trip budget, including its derivation and relationship to the CaPCAM model output.**

3.12. The following assessment scenarios have been considered:

- **CaPCAM 2046 Cambourne North 'Do Nothing' Scenario** – Removes Cambourne North growth assumptions from the **CaPCAM 2046 reference case** and incorporates CtoC HQPT and EWR proposals as key enablers of the development.
- **CaPCAM 2046 Cambourne North 'Do Minimum' Scenario –** 'unconstrained' Highway access junctions.
- **CaPCAM 2046 Cambourne North 'Do Something' Scenarios** – Three intervention packages were tested, with **DS3** representing the most comprehensive scenario.

3.13. AECOM agrees that the scenarios assessed are reasonable. However, the underlying modelling assumptions, inputs, and outputs should be provided to enable a comprehensive review and informed assessment of the findings and conclusions. **This should include details of the committed development assumptions, background growth forecasts, growth factors, trip generation assumptions, network coding, demand matrices, mode share assumptions, and key network performance indicators to allow the robustness of the assessment to be fully evaluated.**

3.14. It is supported that the following access and off-site junctions have been identified for local junction assessment:

- Cambourne A428 dumbbell junction (north),
- Knapwell High Street / St Neots Road,
- Caxton Gibbet junction,
- Cambourne A428 dumbbell junction (north and south); and
- Scotland Road A428 Dumbbell Junction.

3.15. Whilst a substantial transport evidence base has been prepared in support of the allocation, AECOM has not identified sufficient information to determine whether the proposed trip budget and associated mitigation measures can be accommodated without unacceptable impacts on the SRN. Additional information relating to modelling assumptions, trip distribution, operational assessment, and mitigation is therefore required before NH can reach a conclusion regarding the implications of the allocation for the SRN. Accordingly, NH cannot currently determine whether the proposed allocation is capable of being accommodated on the SRN without additional mitigation.

Policy S/AMC/NEC: North East Cambridge

3.16. No additional evidence related to transport has been provided in regard to Policy S/AMC/NEC: North East Cambridge. The comment provided by NH at Regulation 18 stage is replicated in the following paragraphs.

3.17. 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 320,000m2 of additional business floor space, 27,300m2 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, NH will object to any structures placed within the highway boundary and recommend this is reflected within the policy moving forward.

3.18. 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, NH are supportive of this, subject to the correct structural and safety assessments completed and appropriate agreements ensuring ongoing maintenance and required funding are met.

3.19. NH 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. NH 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.

3.20. It is noted that in the previous Regulation 18 response, NH would require an understanding of the impact of NEC and the cumulative impact on the A14 Junction 33 should the trip budget not be met. AECOM has not identified sufficient evidence demonstrating the implications of the proposed trip budget for A14 Junction 33 and the SRN should trip budget assumptions not be achieved. **An evidence-based assessment should be carried out and provided for review, including junction capacity assessments of relevant SRN junctions, to determine if the proposed trip budget can be accommodated on the SRN as well as sensitivity testing where forecast modal shift assumptions are not achieved. The assessment should also identify any monitoring, intervention and mitigation measures required should the agreed trip budget not be achieved.**

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

3.21. A Regulation 19 Transport Analysis and Evidence document, prepared by KMC, has been submitted in support of the proposed allocation at Grange Farm (Policy S/GF). The site proposes to deliver 4,500 dwellings and 35,000m^2 employment floorspace, along with a range of ancillary facilities. The site is situated within the vicinity of the SRN, notably the A11 and A11/A1307 Fourwentways interchange. AECOM has reviewed Topic Papers 1-3 within the Transport Analysis and Evidence document.

3.22. The Transport Analysis and Evidence documents adopts a vision-led transport strategy which is dependent on significant reductions in private car use, high levels of sustainable travel and trip internalisation. AECOM acknowledges the vision-led approach; however, it is noted that further evidence at planning application stage would be required to demonstrate the proposed mode share and trip budget remains achievable throughout the build-out of the development.

3.23. The CSRM Do Something 2 scenarios has been used to identify an initial vehicular trip budget of 1,114 two-way vehicular trips in both the AM and PM peak hour. It is acknowledged that the trip budget will be refined as the project progresses into planning application stage.

3.24. The document sets out potential internalisation ranges for the development. For commuting/business on-site, an internalisation range of 30-40% is presented, with 30% expected to work from home + at least 10% work on-site at employment and co-working spaces. AECOM considers that the assumed level of homeworking appears optimistic and further evidence or sensitivity testing should be provided to demonstrate its robustness. The site is proposed to provide 35,000m^2 of employment floorspace, with over half to be provided as B2 and B8 uses. This level of employment is unlikely to support employment for more than 10% of residents. **It is recommended that sensitivity testing is undertaken using alternative employment internalisation assumptions, including a lower bound scenario based on the proposed employment provision within the allocation.**

3.25. Additionally, the internalisation of education trips seems high given the lack of evidence to support such levels of internalisation. A robust approach would include all staff trips to be external to the development with higher levels of internalisation of primary, secondary, and sixth form dependent on local availability. **A review of local school availability and supporting evidence should be provided to demonstrate the basis for the assumed education internalisation rates and the implications should those assumptions not be achieved.**

3.26. AECOM agrees that the internalisation rates for shopping, other work, escort, personal business, local leisure, holiday, day trip, and other are reasonable. It is noted that the timing of delivery of infrastructure and amenities within the site is important to ensure trips can be internalised from the outset at the levels set out in the document.

3.27. The document sets out vision-led mode shares in Table 1.2 (Topic Paper 3) for internal and external trips by trip purpose. Limited supporting evidence has been supplied to justify these mode shares and further information should be provided demonstrating the basis for the assumptions adopted and the implications for the SRN should those assumptions not be achieved. It is noted that the high public transport mode shares are reliant on delivery of Cambridge South East Transport (CSET) and associated bus priority/segregated links, and the 28% car driver commuting mode share is reliant on infrastructure being delivered in the early phases, therefore a Monitor and Manage approach is required to ensure that the site remains within the allocated trip budget.

3.28. Moreover, NH stated in their Regulation 18 response to the emerging Local Plan that the proposed CSET extension crossing would be required to be grade separated and not rely on the A11 junction as this would likely interfere with the operation of the junction.

3.29. Additionally, the proposed car driver mode share appears high for trips that are internal to the development. Given the site is proposing place-based ingredients and 'development will be concentrated around mobility hubs, with homes, school, shops, and services all within walking and cycling distance' as set out in Topic Paper 1, an internal car driver mode share of 34% for shopping and 71% for business seem high when these trips should ideally be undertaken by active travel modes. **It is recommended that Table 1.2 is split into separate tables for external and internal trip mode share, with further consideration to the car driver mode share for internal trips.**

3.30. Section 1.7.1 of Topic Paper 3 states that the TRICS outputs have been provided, however, AECOM have been unable to identify these in Appendix D, therefore, are unable to provide comment on the validity of the chosen sites. **The TRICS outputs for the residential element of the site should be provided for review.**

3.31. The document does not include a trip generation assessment for the proposed employment land use. The policy for the allocation states provision of 15,000m^2 of E(g) office floorspace to meet local needs generated by the new settlement, as well as 20,000m^2 of B2 and B8 through provision of a local last-mile logistic hub/warehousing. Given the likely travel characteristics of the B2 and B8 land uses, including HGV trips onto the SRN, a trip generation exercise for the employment area should be included within the trip budget and analysis. **TRICS should be run to derive trip rates relating to the employment aspect of the development and these should be included within the assessment to determine the likely impact on the SRN.**

3.32. The assessment includes the committed developments from planning applications 21/03822/FUL and 22/05449/OUT. The assessment should provide the trip generation associated with these applications and clearly set out the methodology used to derive the future year traffic flows. **Evidence of the committed development flows and the build-up of the future traffic flows should be provided for review.**

3.33. Furthermore, the assessment has not included TEMPro growth at the risk of double counting traffic given that the allocation is represents a large proportion of growth in the area. However, AECOM has reviewed the TEMPro v8.1 planning data for South Cambridgeshire 017 MSOA, within which the site is located, to identify forecast growth in households and jobs between 2026 and 2045, representing the end of the emerging Local Plan. The base and future households and jobs are shown in **Table 1**.

Table 1. South Cambridgeshire 017 MSOA - TEMPro v8.1 - Households and Jobs

Area	Base Households	Base Jobs	Future Households	Future Jobs
South Cambridgeshire 017	3,650	9,901	3,924	10,184

3.34. This indicates growth of 274 households and 283 jobs, indicating that the proposed allocation does not appear to be fully represented within the TEMPro planning data. Moreover, even assuming no growth in households or jobs can still mean that background growth can increase due to car ownership and behaviour. A review of TEMPro v8.1 for the South Cambridgeshire 017 MSOA with no growth in households or jobs (applying alternative assumptions) provides a growth rate of 1.0624 in the AM peak and 1.0595 in the PM peak. **The assessment should be rerun to include future background growth using TEMPro, applying relevant assumptions.**

3.35. Scenarios are presented with 2,550 dwellings to reflect Local Plan build-out and 5,000 dwellings to reflect the full build-out. Additionally, scenarios are presented with all trips using a singular access off the A1307 as well as a proposed access off the A11 slip, with an assumption that 30% of trips will utilise this access. AECOM agrees based on the CaPCAM distribution of trips that this assumption is reasonable.

3.36. The 2025 base data and modelling have been taken from planning application 25/04541/OUT (Land North of Cambridge Road Linton). This application has not yet been determined, and NH has not yet made comment. It is also noted from CCC's TA team comments (dated 17th August 2026) that there were inconsistencies in the flow diagrams, and the transport consultants of that planning application were requested to check the flow diagrams and the model input flows. AECOM has not been able to determine if the transport consultants of the 25/04541/OUT planning application has corrected these inconsistencies. Given that the model has been replicated from a planning application that has not yet been approved, AECOM cannot independently validate the modelling results presented within the assessment. Notwithstanding this, AECOM have reviewed the junction modelling assessment for the A1307 / A11 junction which is set out in the following paragraphs.

3.37. The junction capacity model for the A1307 / A11 junction has been obtained from the Transport Assessment (January 2025) for the CSET Phase 2 scheme. AECOM has reviewed the junction modelling against that submitted as part of the CSET Phase 2 scheme and identified several discrepancies between the two models. The effective flare length has been increased to 12 metres on the A11 (North) arm in the model submitted for this allocation. The inscribed circle diameter has also been increased from 100 metres to 170 metres on the A11 arms, which has the potential to materially influence junction capacity. AECOM queries why these changes have been made as no justification for refinement has been included in the document. These changes have the potential to materially influence junction performance and therefore require justification. **Evidence as to why changes have been made from the CSET Phase 2 model for the A11 / A1307 junction should be provided.** Additionally, the assessment for Grange Farm uses Lane Simulation mode. AECOM would expect to see a typical ARCADY model without Lane Simulation provided in the first instance and justification as to why the Lane Simulation mode has been used. **Reasoning for using Lane Simulation mode, as well as a model for the A11 / A1307 junction without Lane Simulation mode activated should be provided.** The entry to exit separation does not match that provided in the CSET Phase 2 model and appears incorrect with the separation for the A11 arms inserted as the separation for the A1307 and vice versa. **The model should be updated to reflect the correct entry to exit separation distances, or justification provided.**

3.38. The results included in Table 1.5 (Topic Paper 3) for the junction capacity assessment for the A11 / A1307 junction indicates that the junction will operate over capacity, with an RFC of 0.99 on the A11 (S) arm in the AM peak. However, the results included in Appendix A (with committed development included) show that the junction operates within capacity. This appears to be a discrepancy and **AECOM requests clarification as to why the results in Table 1.5 show that the junction operates over capacity but the results in Appendix A show that it operates within capacity.**

3.39. Subject to the validation of the modelling assumptions and results set out in the previous paragraphs: the base results show a maximum RFC of 0.99 at the junction; NH would expect junction capacity improvements to be delivered at the very beginning of the development to ensure nil detriment throughout the full delivery of the development. Junction upgrades should be implemented prior to the delivery of the number of dwellings/floorspace that would take the junction above nil detriment or capacity thresholds, in line with the Monitor and Manage framework to be agreed.

3.40. Until this information is available, NH cannot determine whether the proposed allocation and associated trip budget can be accommodated without unacceptable impacts on the A11 corridor and SRN.

Policy S/CE: Cambridge East

3.41. A Regulation 19 Transport Topic Paper number six by KMC, examining the first phase and trip budget that could potentially be delivered under a first phase of the allocation has been provided for review. This policy is to allocate approximately 8,000 dwellings, as well as significant employment floorspace creating a new city district. AECOM has also reviewed the Transport Approach Summary document by KMC and the Transport Topic Papers (1-5), submitted as part of the Draft Plan Consultation in 2025.

3.42. 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, with target mode shares of 18% and 22% car driver in the AM and PM peaks respectively for both 2045 and full build-out. 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.

3.43. The Vision-led scenario set out in Topic Paper 6 is dependent on achieving a 14% car driver mode share based on monitoring data from Eddington in 2024. Whilst this performance is acknowledged and as set out within the paper, Eddington benefits from a specific set of transport conditions and infrastructure provision. Further evidence would be required to demonstrate that comparable transport conditions can be achieved at Cambridge East and that the assumed mode shares are realistic and deliverable throughout the development lifecycle. **It is recommended that further evidence is provided at planning application stage to demonstrate the mode shares of Eddington can be applied to Cambridge East.**

3.44. Whilst transport evidence has been prepared in support of the proposed trip budget approach, AECOM has not identified sufficient trip distribution and assignment evidence to determine the implications of the allocation for SRN junctions. Future residential and employment trips may have different distribution characteristics from the existing airport-related traffic and therefore further evidence is required. **An evidence-based trip distribution approach should be undertaken to determine the number of trips that will use local SRN junctions in the peak hours.**

3.45. It is stated in Topic Paper 2 'Establishing and Working within a Trip Budget' that at Regulation 19 Local Plan stage ('The Refinement Stage') of defining a trip budget, more advanced assumptions on land-use mix, quantum, and mitigation packages arise, along with a number of standalone operational models which would seek to validate conclusions drawn from previous stages of the assessment. AECOM has not identified sufficient operational assessment evidence demonstrating the impact of the proposed trip budget on local SRN junctions, including A14 Junctions 34 and 35. Therefore, the proposed trip budget cannot be supported at this stage as AECOM has not identified sufficient operational evidence demonstrating that the proposed trip budget can be accommodated on the SRN. **Operational assessment evidence should be provided demonstrating the effect of the proposed trip budget on A14 Junctions 34 and 35, including any mitigation measures that may be required to maintain acceptable operating conditions.**

3.46. At Regulation 18 stage, NH commented that they would require, as part of the Local Plan process, to understand the impact of this development and the cumulative impact of A14 Junction 34, prior to the agreement of the proposed trip budget, and agreement of appropriate mitigation measures should the trip budget not be met under a Monitor and Manage Framework. Similarly to the point mentioned in Section 3.44, no junction capacity assessment has been undertaken to understand the impact of this development and cumulatively on the SRN.

3.47. Whilst a significant transport evidence base has been prepared in support of the allocation, additional operational modelling and trip distribution evidence is required before NH can determine whether the proposed trip budget can be accommodated on the SRN.

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

3.48. A Regulation 19 Transport Note has been submitted by KMC in April 2026 for a site proposed for allocation of approximately 240,000m^2 GIA of new employment/commercial uses, allowing for a flexible range of units supporting a wide range of business. The site is located to the north of the A1307, within the vicinity of the SRN – A14 J25.

3.49. The split of B2 and B8 land use is 10% designated for B2 and 90% designated for B8. Given that the end occupiers are unknown and different employment land uses may result in different travel characteristics, further evidence at planning application stage would be required to ensure that the land use split remains representative and does not understate impacts on the SRN.

3.50. AECOM has considered the presented vehicular trip rates for B2 and B8 and these are reasonable. However, the TRICS outputs have not been provided for validation and review. **It is recommended that the B2 and B8 TRICS outputs are provided for review.**

3.51. It is noted that the staff trip distribution analysis uses the 2011 Census dataset WU03EW – Location of usual residence and place of work by method of travel to work. AECOM agrees that the 2011 Census journey to work data is appropriate given the impact that Covid -19 had on the 2021 Census. The South Cambridgeshire 005 Middle Super Output Area (MSOA) is used for this analysis, despite the site being located within the South Cambridgeshire 003 MSOA. Given the nature of both MSOAs are rural in nature, AECOM questions why South Cambridgeshire 005 MSOA was used instead. **Justification should be provided for the use of the South Cambridgeshire 005 MSOA data in the trip distribution analysis. If South Cambridgeshire 003 MSOA is more representative of future travel patterns, then the trip distribution analysis should be updated accordingly.**

3.52. The HGV trip distribution is to and from the A14, with a 50/50 split between A14 eastbound and A14 westbound. At this stage, this approach is considered reasonable given the balance of key origins and destinations in both directions. **Given the scale of B8 development proposed, evidence-based HGV distribution, for example from a traffic survey, should be presented at planning application stage to ensure that impacts on individual SRN junctions are appropriately assessed.**

3.53. The following traffic modelling scenarios have been assessed:

- 2030 + Northstowe Committed Development (Local Roads) / TEMPro (SRN);
- 2030 + Northstowe Committed Development (Local Roads) / TEMPro (SRN) + Proposed Development (assuming full build out);
- 2035 + Northstowe Committed Development (Local Roads) / TEMPro (SRN);
- 2035 + Northstowe Committed Development (Local Roads) / TEMPro (SRN) + Proposed Development (assuming full build out);
- 2045 + Northstowe Committed Development (Local Roads) / TEMPro (SRN); and
- 2045 + Northstowe Committed Development (Local Roads) / TEMPro (SRN) + Proposed Development (assuming full build out).

3.54. AECOM agrees that the scenarios assessed are reasonable, as well as the inclusion of the Northstowe committed scheme. TEMPro growth rates have been applied to the SRN however these have not been provided for review. **The TEMPro growth rates, including the dataset, assumptions, and sources used to derive future year 'Without Development' flows on the SRN should be provided for review.**

3.55. The junction capacity modelling results or report for the existing layout for the A14 / B1050 (Bar Hill Junction) roundabout have not been included within the report. Consequently, it is not possible to determine the extent of impact resulting from the proposed development on the SRN. It is not possible to agree mitigation without reviewing the impact of the development in the existing arrangement. **The existing layout modelling results should be provided for review, together with sufficient information to allow assessment of the scale of impact on the SRN and the need for mitigation.**

3.56. Additionally, the proposed LinSig mitigation modelling report, including the mitigation of signalising the A14 off slips have not been included for validation by AECOM. **The proposed mitigation modelling should be provided for review to enable confirmation that the proposed trip budget can be accommodated without unacceptable impacts on the SRN.**

3.57. The junction capacity modelling results and report for A14 J24 have not been included within the report. Consequently, it is not possible to determine the extent of impact resulting from the proposed development on the SRN. **The junction capacity modelling reports and any associated mitigation for the A14 J24 should be provided for review.**

3.58. The note states that a Monitor and Manage strategy is proposed, with trigger points for implementing mitigation. In addition, the Monitor and Manage approach, along with any mitigation package needs to be approved and agreed with the relevant highway authorities. The assessment should demonstrate that any mitigation is capable of being delivered if monitoring identifies impacts that are greater than anticipated on the SRN. Monitoring should not replace the need to demonstrate that the development can be accommodated on the network.

3.59. The submission does not identify mode share targets or provide a Travel Plan. **Future proposals should be supported by a Travel Plan which sets out aspirational mode shares, maximising travel by sustainable modes.**

3.60. Whilst transport evidence and preliminary mitigation proposals have been prepared, further information is required to demonstrate that the proposed trip budget and associated mitigation strategy can be accommodated without unacceptable impacts on A14 Junctions 24 and 25 and the wider SRN.

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

3.61. A Regulation 19 Transport Submission has been submitted by Richard Jackson Ltd in May 2025 for a site proposed for allocation of approximately 90,000m^2 GIA of B2/B8 land uses and 2.25ha focused on lorry parking to provide approximately 150 spaces, located adjacent to Cambridge Services, A14.

3.62. The site comprises of an area which was previously used a temporary works area for the A14 upgrade but is now vacant.

3.63. The submission includes vehicular trip generation for the 90,000m^2 B2/B8 land use only, excluding the proposed 150 HGV parking spaces. AECOM has been unable to verify the vehicular trip rates presented in the submission as the source of the data has not been provided. **It is recommended that the source of the proposed vehicular trip rates, whether that be from TRICS or another application, are provided to enable a review.**

3.64. Whilst the assessment states that there will be a requirement for all HGV movements to be via the A14 Junction 24/24A, no trip distribution exercise has been undertaken to quantify the number of development trips that would utilise the SRN. Therefore, the impact of the development on the A14 has not been established at this stage. **Additional information should be provided demonstrating the likely distribution of development-generated traffic and the resulting implications for the SRN.**

3.65. The submission does not identify mode share targets or provide a Travel Plan. **Future proposals should be supported by a Travel Plan which sets out aspirational mode shares, maximising travel by sustainable modes.**

3.66. The site needs to evidence that it can be accommodated on the A14 through agreement of operation junction assessment. No junction capacity modelling has been provided in the assessment, therefore, the likely impact in terms of capacity on the A14 has not been identified. **Given the scale and nature of the proposed development, a significant number of trips are likely to be generated. Operational assessment evidence should be provided demonstrating the impacts of the allocation on the A14 Junction 24/24A complex and identifying any resulting mitigation requirements.**

3.67. The submission identifies that off-site highway mitigation may be required at the A14 J24 junctions, however, as no assessment has been undertaken to identify the likely impact and whether mitigation is required. **Should the capacity assessment identify a material impact on the operation of the SRN, an appropriate and deliverable mitigation strategy should be prepared and agreed with NH.**

3.68. Based on the details provided within the submission, AECOM cannot currently determine the impact of the proposed development on the operation of the SRN. Further evidence is required, including validated trip generation, trip distribution, junction capacity assessment, and any mitigation that may be required, to establish whether the development can be accommodated on the SRN.

Other site allocations

3.69. NH are currently consulted on planning applications that are included within the emerging Local Plan. Therefore, no additional comments have been made outside of those planning applications. These site allocations are as follows:

- Policy S/CB: Cambourne;
- Policy S/BA: Bourn Airfield New Village;
- Policy S/NS: Northstowe;
- Policy S/ED: Eddington;
- Policy S/HHR: Land between Huntingdon Road and Histon Road (Darwin Green), Cambridge;
- Policy S/WC: West Cambridge;
- Policy S/WGC: Wellcome Genome Campus; and
- Policy S/WNT: Waterbeach New Town.

3.70. It is noted that NH are currently consulted on Policy S/ED: Eddington, for the increased quantum of development on Site. NH has offered no objection subject to the inclusion of suggested conditions, including the requirement for a Travel Plan with a sufficient monitoring regime to ensure that the development does not result in additional trips on the SRN, namely M11 Junction 10.

3.71. AECOM see no reason for NH to have significant concerns with regards to a number of the smaller sites, and those relatively remote from the SRN in isolation. Whilst AECOM do not offer specific comments on a number of the smaller sites, and those relatively remote from the SRN in isolation, it is suggested that these sites are included in a cumulative impact assessment to ensure that 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.

4. Modelling

4.1. No additional evidence has been provided relating to the Greater Cambridge Local Plan Transport Evidence Report (October 2025), published as part of the Draft Local Plan – Regulation 18 consultation stage. NH has reviewed this report previously at Regulation 18 stage in relation to the Cambourne North proposed allocation. Therefore, the comments at Regulation 18 stage remain the same and AECOM has not provided any further comment. The previous comment provided by NH is as follows:

4.2. *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.*

4.3. *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 NH 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.*

4.4. AECOM refers back to the recommendation raised in Paragraph 2.11 with regards to the cumulative assessment of the current Local Plan proposals on the SRN.

5. Conclusion

5.1. AECOM has undertaken a review of the Greater Cambridge Local Plan Regulation 19 Submission and the relevant associated transport evidence base documents on behalf of National Highways (NH). The review has focused on the potential impacts of the proposed growth strategy and strategic site allocations on the performance of Strategic Road Network (SRN), comprising M11, A11, A14, and A428.

5.2. AECOM's main comments and recommendations are presented in bold and underlined text throughout the note and are also listed within the executive summary. Recommendations that are likely to be critical to agreement of the Local Plan are highlighted **red**. Recommendations that are considered important but not critical to agreement of the Local Plan are highlighted in **amber**.

5.3. AECOM acknowledges that the emerging local plan seeks to direct growth towards sustainable locations and is supported by a vision-led approach which prioritises public transport, active travel, trip internalisation and infrastructure-led development. In principle, this approach is consistent with aspirations of National Planning Framework (NPPF). The scale of growth proposed within the plan, however, is substantial and includes significant housing and employment allocations located in close proximity to the SRN.

5.4. Whilst transport evidence has been prepared in support of the strategic allocations, AECOM's review identifies a number of outstanding concerns relating to the modelling assumptions, trip budgets, trip generation forecasts, trip distribution methodologies, growth assumptions, and the validation of junction capacity assessments.

5.5. In relation to the strategic allocations at Cambourne North, North East Cambridge, Grange Farm, Cambridge East, Slate Hall Farm, and Land South of Cambridge services, AECOM has identified a number of areas where further evidence is required before NH can fully assess the likely impact on the SRN. In particular, additional information is required regarding strategic and highway modelling methodologies, trip distribution to the SRN junctions, junction capacity assessments, committed development assumptions, future year growth forecasts, mitigation measures, and the derivation of proposed trip budgets.

5.6. AECOM notes that, for several allocations, additional information and validation is required before it can be determined whether the proposed trip budgets can be accommodated on the SRN and whether the proposed mitigation measures are capable of maintaining acceptable operating conditions.

5.7. Based on the information reviewed, AECOM has not identified sufficient evidence to conclude that the impacts of the proposed allocations on the SRN have been fully assessed, that the proposed trip budgets can be accommodated on the SRN, or that all required mitigation measures have been demonstrated to be deliverable. NH therefore requires the additional information identified throughout this Technical Note before a fully informed conclusion can be reached regarding the implications of the proposed allocations for the SRN.

Appendix A – National Highways Regulation 18 Review

National Highways

Woodlands

Manton Lane

Bedford

MK41 7LW

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



Alice Lawman

Spatial Planner

National Highways Spatial Planning (East)