

Ermine Street, Papworth Everard Local Plan evidence base review - HELAA

195030/N05

1. The Greater Cambridge Housing and Economic Land Availability Assessment (HELAA) forms part of the evidence base for the emerging Greater Cambridge Local Plan.
2. The HELAA assesses sites submitted as part of the Call for Sites process in terms of their suitability, availability and achievability.
3. Sites have been assessed using a methodology that incorporated a 'Red, Amber, Green' (RAG) scoring system. The assessment largely seems to have been carried out using judgement although specialist consultees were used.
4. Sites were deemed to be 'unsuitable' if they were assessed as 'Red' against any of the criteria used, were deemed to be 'unavailable' where there was no evidence that the site was available and were deemed to be 'unachievable' where it was considered there was no reasonable prospect that the site could be developed.
5. As part of the suitability criteria, a number of elements associated with transport matters were considered.

HELAA transport assessment criteria

Accessibility to Local Services and Facilities

6. In this context the accessibility was considered by non-car travel. A range of categories were considered which generally are more applicable to housing sites. An overall numerical score of 0 to 2 was provided against each to consider an overall RAG score. The key criteria was a distance metric. Whilst this can be debated or challenged for individual movements, generally seems appropriate for a high-level assessment.
7. Categories such as proximity to health, primary and secondary schools were considered alongside the proximity to public transport and cycle networks. Proximity to local, city or district centre were assessed in addition to major employment sites.
8. The assessment commentary recognises the relevance of providing new infrastructure and facilities, but it is not clear how this has been applied, for example how planned public transport routes are considered.

Site Access

9. Cambridgeshire County Council (CCC) were consulted to inform this assessment. The potential to provide a suitable and safe access for both construction and occupation phases of a development were assessed.
10. A Green score means access is possible, Amber that there are constraints that can be overcome and Red that there is no possibility of providing access. It is assumed a judgement on this basis was made by individuals within CCC.

Transport and Roads

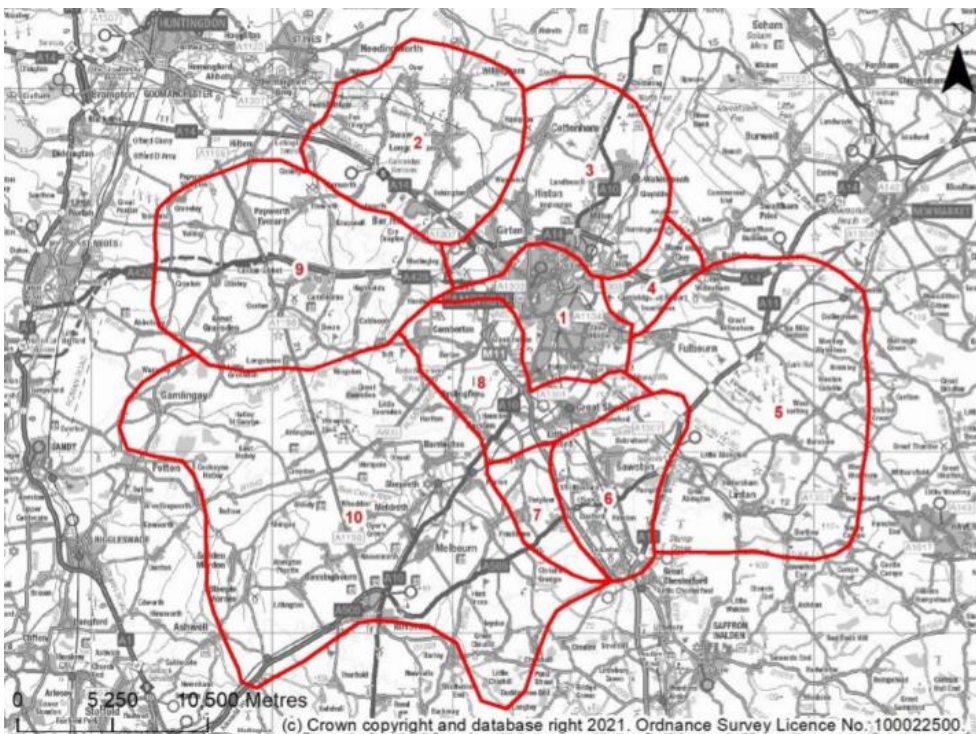
11. The document suggests that CCC undertook transport assessments of each site, considering the potential impact of each on the local transport network, trunk routes, and local roads. Internal workshops were run to review and moderate the individual site assessments.
12. Key considerations included:
 - the current and future potential for site accessibility / connectivity,
 - the proximity to areas of known safety/congestion issues,
 - the proximity to strategic investment, and
 - the current and future level of sustainable transport provision.
13. Factors that contributed to a 'Red' score included:
 - there were any large, committed developments close to the site,
 - the site was located in a congested corridor,
 - the site was located near a problem junction,
 - the site was not sustainable,
 - the site needed major transport infrastructure to be delivered,
 - the site was located in an area with ongoing transport improvements,
 - the site was located by a major accident cluster, and
 - the site was located by a major TIP Scheme- indicate contributions may be required.
14. The Transport Assessments for each site are not provided. It is also unclear how some of the assessment criteria may have been applied. For example, a site may have scored Red if located in an area with ongoing transport improvements. However, it might be considered that the opposite of such a location is true in that a site near improvements can benefit from those improved links through improved accessibility.

- 15. Equally, a large, committed development might provide benefits if mutually beneficial i.e. a site promoting employment near to a committed development of housing will be beneficial in terms of locating new jobs close to new homes.
- 16. The RAG criteria is presented below but there are no details over how the transport assessments were used to determine a score against this.

Score	Assessment Criteria
Red	Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated.
Amber	Any potential impact on the functioning of trunk roads and/or local roads could be reasonably mitigated.
Green	Development of the site will not have a detrimental impact on the functioning of trunk roads and/or local roads.

Strategic Highways Impact

- 17. Highways England (now National Highways) were consulted to consider how impacts on the Strategic Road Network (SRN) might be assessed. This assessment was based upon the capacity of junctions but it is not clear what data or models were used.
- 18. Zones were identified to consider how sites are located proximate to the SRN as presented below.



- 19. The site is located in Zone 9, A428 which was allocated an Amber score with capacity for growth. It does highlight the local constraints at Madingley might be experienced.

Ermine Street, Papworth Everard – Site specific assessment

20. The site is referenced as number 48096 in the HELAA document referred to as Land at Crow's Nest Farm, Papworth Everard.
21. In terms of the site assessment, the suitability outcome is Red. This includes Transport and Roads.

Accessibility to Local Services and Facilities

22. An Amber score was provided for this suitability assessment criteria.
23. Based on the assessment criteria, an Amber score is considered to be correct. Generally, we would agree with the scoring against the distances to the services identified.
24. However, in terms of cycling, there is a cycle route constructed to the south which would bring the distance criteria into Green.
25. It is recognised that addressing these points will not increase the overall score from Amber to Green. However, addressing these points will help confirm the overall accessibility of the site.
26. In addition, comments are made in this section relating to facilities.
27. It is stated that the site has '*Adequate accessibility to key local services, transport, and employment opportunities*' which is clearly positive.
- 28.

Site Access

29. The site was provided an Amber score meaning there are potential access constraints, but these could be overcome through the development of the scheme.
30. It is not clear what constraints may have been identified or what, for this or any site, would enable a Green score, '*access by all means is possible*', to be provided.
31. It is assumed that full agreement from the highway authority would be required to enable a Green score to be provided. This would mean a preliminary design to be agreed and passed through a Stage 1 Road Safety Audit. It would also require a Transport Assessment to ensure sufficient capacity.
32. The further commentary for the site states that '*The proposed site is acceptable in principle subject to detailed design*' which is positive.
33. A score of Amber is expected at this stage of the planning process and it is considered unlikely that any site can achieve the degree of certainty required to achieve a Green score.

Transport and Roads

34. The site was provided a Red score meaning that the conclusion for this criteria was that the *'Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated'*.

35. There is little detail provided to determine how the conclusion was reached and no assessment has been provided. However some comments are made as follows:

The applicant will have to consider development impacts with and without the Highways England Black Cat to Caxton Gibbet highways scheme.

36. This is agreed. The modelling that supports the application for the Development Consent Order clearly identifies that in the future year, the proposed scheme at Caxton Gibbet will have significant residual capacity. This will be more than sufficient to accommodate the relatively low vehicle trips that might be generated by development of the site.

The A428 corridor is congested towards Cambridge and cannot accommodate the large level of growth this site is proposing.

37. The evidence to support this is not provided. The A428 is free flowing through to Cambridge. Not all trips associated with development of the site will use this route.

It is anticipated that this site will be heavily car dominated which the Highway Authority cannot support.

38. This statement is made in advance of any Transport Assessment. Planned sustainable transport improvements in the form of the EWR station and the C2C route, the current delivery of enhanced cycle links to Cambourne, together with the mobility enhancements development of the site might bring such as a Rural Travel Hub, supported bus services and further enhancements to cycle routes will all provide clear alternatives.

A high sustainable mode share would be essential to allow this site to be developed. The applicant will need to consider mass transit solutions (i.e. how it could tie in with planned sustainable corridor investment).

39. EWR and the C2C schemes are planned locally and a new cycle route is in the process of being delivered on Ermine Street. Local bus and shuttle services link to the EWR station and CSC route. Additionally, local cycle routes can be extended and improved to increase accessibility, including a route on St Neots Road and links to the proposed scheme at Caxton Gibbet.

The current cycle mode share Cambourne is low. A direct walking and cycling link connecting to St Neots and Cambourne will be expected. There is potential to improve the Bridleway routing through Elsworth.

40. The value of a walking and cycling link to St Neots is perhaps limited. However, improved links to Cambourne being delivered and enhancements are planned. These can be further extended.

Routes can link with the C2C scheme for onward cycle routes to Cambridge. The Bridleway improvements through Elsworth can certainly form part of the overall strategy.

The applicant should be aware of some local major accident clusters located at the A428/St Neots Road/B1040 junction and at the A428 Caxton Gibbet junction.

41. Caxton Gibbet is planned for improvement. Development of the site would place very few vehicle movements through the A428/St Neots Road/B1040 junction.

Development of the site would have an unacceptable impact on the functioning of trunk roads and/or local roads that cannot be reasonably mitigated.

42. The assessment used to reach this conclusion has not been presented. Locally, roads will be improved through planned investment, there are significant high-capacity transit systems planned and the development of the site will deliver a mobility strategy that includes a Rural Travel Hub, investment in bus services and additional cycle route improvements.
43. High-capacity mass transit systems that are accessible from the site in the form of EWR and the C2C scheme are planned. Investment in the SRN locally and improvements to Caxton Gibbet will enhance road capacity. The site will provide a mobility strategy with enhancements to mobility solutions locally. Accordingly, it cannot be true that impacts associated with development of the site cannot be reasonably mitigated.
44. At very least the development should attract an Amber score where some additional mitigation might allow roads to function effectively. The indicators within the DCO assessment suggest significant future year capacity regardless.

Strategic Highways Impact

45. The site was provided an Amber score due to its location within Highways England Zone 9 – A428 West and meaning there is considered to be capacity for growth but with potential constraints to the local road network at Madingley.
46. Given the improvements planned to the A428 and Caxton Gibbet it is surprising that a Green score has not been provided. It is assumed this relates more to the local road network at Madingley rather than the SRN.
47. The local road network is unlikely to be significantly affected by development at Crow's Nest Farm. Any impacts will be even more limited at Madingley, associated with only those trips heading towards the western section of Cambridge. Any trips generated by the site will be dispersed across multiple routes.
48. Additionally, plans are in place to provide alternative movement corridors into Cambridge. EWR and the C2C proposals will be accessible from the site and provide an alternative to car travel.
49. We therefore question the rationale behind a blanket Amber score for this Zone, more so in application to the site.

Summary

50. There are a number of schemes being delivered, that are planned, or can form part of the strategy for development of the site that will ensure sustainable travel or ensure local roads have sufficient capacity for additional growth. These include:
- Planned improvements to the A428
 - Improvements to Caxton Gibbet which will increase capacity and improve connectivity to Cambourne
 - The delivery of a cycle route on Ermine Street
 - Planned movement corridors in the form of EWR and the CSC scheme
 - Mobility strategy for the site which as a minimum will include a Rural Travel Hub, bus service improvements and enhanced cycle routes
51. On the basis of the above, it is requested that the *Transport and Roads* assessment be revisited to ensure proper consideration of these measures are accounted for and a positive score provided.