

Houghton & Wyton Parish Council response and comments on the Cambridgeshire & Peterborough Local Transport Plan (LTP) Consultation

1. Overall Approach, Process and Consultation

1.1 We applaud some of the vision statements such as a transport network that is no longer dependent on using the private car and aspiring to one that actually protects and enhances the environment.

1.2 We also note that the LTP is heavily influenced by the strategic recommendations set out in the Cambridge and Peterborough Independent Economic Review (CPIER) which again we broadly support.

1.3 We understand and support the process and document hierarchy shown in fig 1.1 (reproduced below) which affirms the importance of CPIER in informing the delivery of the Local Industrial Strategy as well as the Non-Statutory Spatial Framework Phase 2 from which the LTP is ultimately derived.

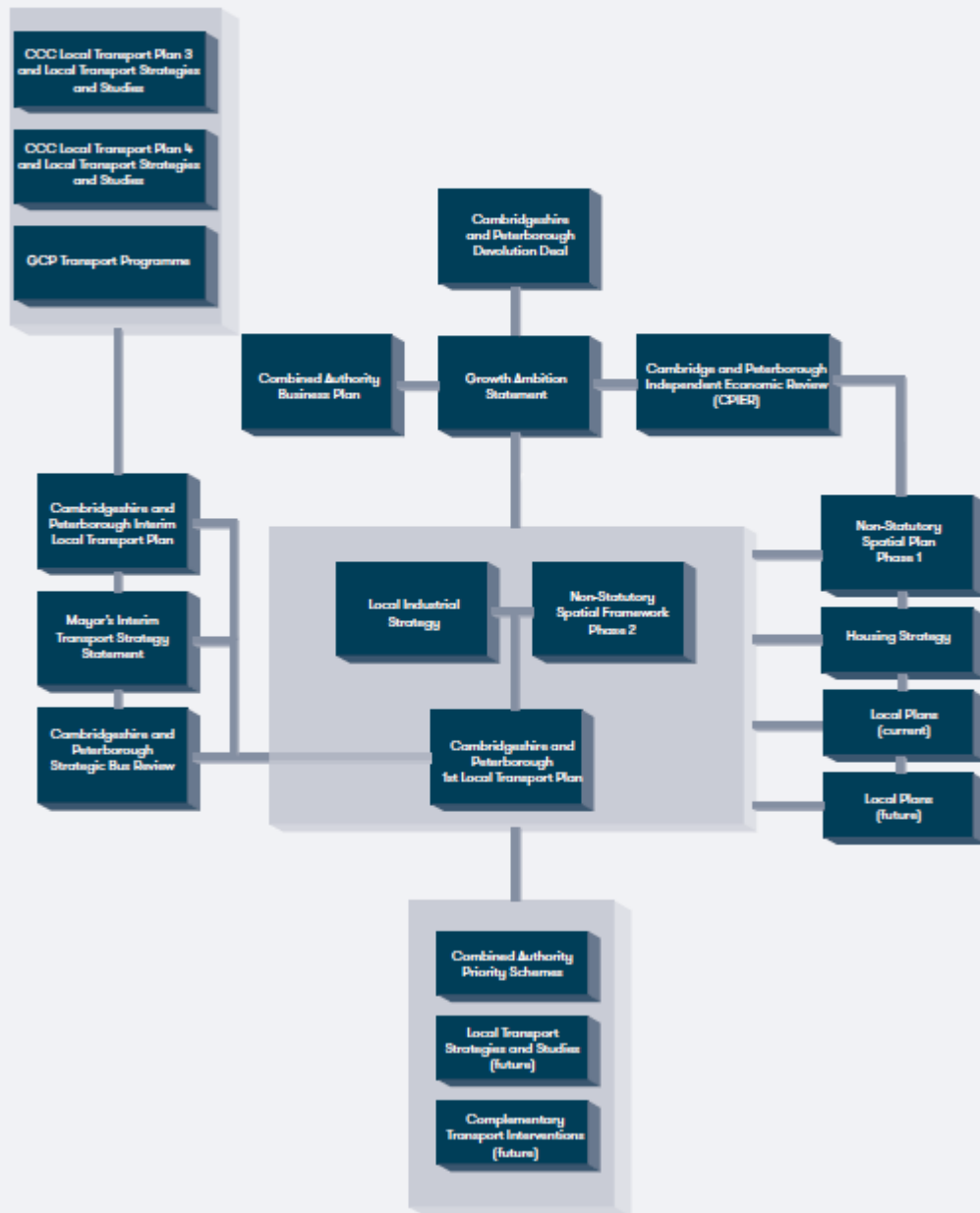
1.4 According to the section entitled Policy Alignment, the Non-Statutory Spatial Framework Phase 2 was supposed to provide the spatial context for the LTP looking out to 2050. Having signed off £135k for the study in 2018 we can understand the decision to delay writing this document until the recommendations from CPIER could be digested, but it is disappointing that the Non-Statutory Spatial Framework Phase 2 was not available before the LTP was finally written or certainly for viewing during this consultation.

1.5 Having decided to delay because of CPIER we would consider it equally sensible to delay the draft publication of the LTP and consultation until the Phase 2 document was actually available for those consulting to read. Hence rather than the policies being aligned as stated in the LTP forward, without this document the plan development process has become dislocated and it renders the consultation incomplete and therefore in our opinion, invalid.

1.6 Because of the delay in publication, the LTP has had to rely on the Non-Statutory Spatial Framework Phase 1 which in Para 3 of the policy Alignment section of the LTP states that it reflects current levels of growth forecast and allocated in existing Local Plans with time horizons out to early 2030's. As such it is largely out of step with the growth ambition of the LTP and many of the schemes put forward.

1.7 Consequently given this consultation is incomplete. We find it difficult to make meaningful comments without being able to read and digest the Spatial Framework Phase 2 - a keystone document. In order to provide a legitimate mandate for the LTP we believe the consultation should be re-run when all of the documents which make up the LTP are available. Simply to rely on the consultation as it stands and go on to approve the LTP at board level, would in our opinion be both un-democratic and un-lawful as the CPCA would be acting ultra vires.

Figure 1.1 The Local Transport Plan and other strategic documents



2. General Comments:

Where we are able to make comments, we put forward the following points notwithstanding the fact that our comments may be different were we provided with the Spatial Framework Phase 2 beforehand:

2.1. We feel there is a strategic disconnect between CPIER and the LTP.

2.2 CPIER states that it is vital that steps proposed and actions taken are based on sound evidence and command widespread support. The detail, evidence base and rationale put forward for some of the schemes within the LTP consultation is thin, inconsistent with CPIER, incomplete or for example in parts of the Strategic Environmental Assessment, simply unknown or dismissed (e.g. the Third River Crossing). For these reasons we believe the consultation fails to meet the requirements set out in The Transport Act 2000 (as amended by the Local Transport Act 2008) or the requirements of the SEA Regulations 2004 and should therefore be withdrawn.

2.3 The prioritisation and hence the stages and timing of what needs to be addressed via the LTP in order to fulfil the vision and goals is unclear. CPIER is much more single minded stating in their conclusion (Para 1 page 9) *'Therefore, we conclude that improvements in infrastructure, and further development, must start in and around Cambridge'*. (emphasis added)

CPIER goes on to state *'A package of transport and other infrastructure projects to alleviate the growing pains of Greater Cambridge should be considered the single most important infrastructure priority facing the Combined Authority in the short to medium term. These should include the use of better digital technology to enable more efficient use of current transport resources.'* (emphasis added)

CPIER key recommendation⁷ highlights that the Combined Authority is young and developing its capacity quickly but that it needs to focus. Unfortunately the LTP appears to take a shot gun approach by looking to progress multiple projects across the whole region, in the same time frame.

2.4 CPIER puts forward a model of three very distinct but mutually beneficial economies of the Combined Authority region and highlights the differences between them.

It recommends that a tailored approach be taken to the three areas, reflecting their very different needs, with a focus on housing densification and infrastructure within Cambridge and, in the Peterborough and Fens region, to improve productivity through improving skills and education. We do not feel this is sufficiently reflected through the LTP.

2.5 CPIER addresses the role of Market towns and concludes that *'At the heart of the issue is the economic rationale for each market town and how this fits with its physical, transport and social infrastructure. The Combined Authority has made a start on approaching this strategically through Market Town Masterplans'*

Reading the LTP it is not obvious how the strategic Market Town Masterplans fit into the plan.

2.6 CPIER goes on to mention that steps to improve connectivity between the 3 areas in all its forms (e.g. partnerships, collaboration, knowledge networks, digital, 5G infrastructure, public transport) should be an aim but for the longer term (with the belief that digital connectivity has the power to be transformative. The LTP appears to be placing a high and early priority on physical connectivity schemes covering the region which seems at odds with CPIER.

2.7 Allied to this point, the LTP is naturally focused on the physical connectivity and states that it reflects a blended strategy. However the LTP appears to place greater emphasis on transport corridors and large housing schemes dispersed across the 6 council districts in the hope that business and employment will be encouraged to relocate rather than a business first, agglomeration approach as argued for in CPIER.

For example the LTP states *'Our Ambition 1.38 In striking a balance between the different possible patterns for future settlements through the Spatial Framework, the Combined Authority will encourage development, where good transport can be provided, including along transport corridors and new garden villages. By linking the Spatial Framework and Local Transport Plan, this approach will guide the investment in transport infrastructure that is needed to meet the area's growth ambitions, enable improved connectivity and act as a key enabler for job creation, economic and housing growth'*(emphasis added)

LTP 'Expansion of the transport network will open areas for future housing growth'
(emphasis added)

LTP 'Our Strategy 2.12 Growth will be inclusive, truly sustainable and spread evenly across the entirety of the area', (emphasis added)

This is at odds with CPIER which states *'We conclude that a dispersal strategy, which seeks to relocate homes and businesses away from city centres is unlikely to be successful, as it is 'agglomeration' – the desire to be near other companies – that attracts companies to the area'.*(CPIER KR1) (emphasis added)

2.8. Specifically in relation to the reference in 1.38 Our Ambition about transport corridors we question whether the concept as defined by CPIER has been fully understood. It states *'The final approach is transport corridors. This term needs careful definition, to avoid being misunderstood. It does not describe an approach where a connection is simply made from point A to point B, with houses and jobs spread along it evenly – this is unrealistic, undermining the universal principle that people and businesses naturally gravitate towards centres. Rather, it should be seen primarily as a way of expanding the economic benefits of the urban area. Like densification, it maintains the strength of the city core by not attempting to remove jobs and disperse them.'* (emphasis added)

2.9. In relation to Market Towns CPIER also warns *'Nonetheless, we must consider the likelihood of sufficient jobs moving into the market towns to make dispersal work on a large*

scale. In some cases it may, but it would be high risk to attempt to build many houses in the hope that jobs would follow. Should they fail to do so, commuting problems into cities will intensify, and a growing sense that the towns are merely ‘dormitories’ will develop. A ‘jobs-first’ approach to market towns, which focuses first on bringing employment, and then second on housing, is preferable.’ (emphasis added) The justification for schemes in Huntingdonshire has an over focus on housing and doesn’t fit with the CPIER approach and whilst we feel it is important to support the growth of market towns, we believe the evidence suggests dispersal should not be the main paradigm for development.

2.10. CPIER goes on to argue that too much Dispersal of development will make achieving GVA growth more difficult. *‘The broader spatial strategy (discussed below) will also impact GVA – a dispersal strategy in particular will make achieving the target harder, due to location of jobs away from productivity hotspots.’* (emphasis added)

‘We argue that many innovation-rich firms, if pushed to move, would relocate abroad’ (CPIER KR2) and that adopting a ‘Cambridge or overseas’ philosophy is key. (emphasis added)

Again our concern is the relative balance within the blended strategy between Dispersal/ Transport corridors and Densification/Fringe Growth approach – particularly focused on Cambridge and Peterborough.

2.11. A further factor in the provision of housing which influences the LTP is the behavioural research findings again quoted in CPIER particularly in relation to younger people and which again begs the question of whether the overall Spatial Framework and housing need embedded within the LTP adequately reflects this.

CPIER quotes ‘We believe the way millennials view the housing market reflects their modern lifestyles... Living in central, well-connected and vibrant areas is important for many young professionals and as such, sacrificing lifestyle in order to save for a home, or commuting longer distances to access more affordable locations, are not likely to be high on their agenda.’

2.12. Related to all of the points above is the CPIER key recommendation 4 which states *‘we believe the accumulated housing deficit in Cambridge and Peterborough is so acute that the local authorities should re-examine their assessments of housing need, setting higher numbers, which at the least reflect previous under-delivery’.* (emphasis added)

We are not aware that this work has been done but we would argue that a more strategic, comprehensive, joined-up approach to the housing and business development needs covering the Combined Authority is taken quickly and then reflected in the LTP rather than the more disconnected six individual council approach which dominates the LTP housing delivery at present. We see the absence of such an approach as an inherent weakness in the current LTP and why we feel more work is required.

2.13 Picking up CPIER Key recommendation 6, we do not see sufficient emphasis placed upon the value of the environment to the economic prosperity of the region and health and

well being of the population within the LTP. The region is competing on a world stage and as such faces comparisons with other competing areas for quality of life and attractiveness and retention of talent to our region.

CPIER state *'This should include a concern for the quality of place in existing communities, and an area-wide environmental strategy.'*

We are not aware of an Environmental Strategy being written for the Combined Authority region and subsequently reflected in this LTP.

2.14. Linked to this we feel the Strategic Environmental Assessment (SEA) is particularly weak as a support for such a key planning document and in our opinion to rely on its conclusions would render the SEA unlawful.

When making a broad assessment of the policy choices and schemes, it mentions a number of outcomes which could be concerning but which appear to carry no weight when the summary assessment for each policy is presented. The SEA states on many occasions that *'Negative effects could include habitat loss and fragmentation, death, injury or disturbance to species, visual impacts, damage to heritage assets and archaeology, effect on setting of heritage assets, landtake including loss of agricultural land, and water pollution'*.

It recognises that certain Policies such as 1.1.1 *'contains a number of road, rail and light rail related projects which will have the potential to have mixed effects on health of the local population, safety of the transport network, air quality and GHG emissions. The road schemes may lead to a reduction in congestion, however it may also attract additional vehicles. There is potential for the policy to have negative effects on biodiversity, the historic environment, landscape, soils, the water environment, flood risk and climate resilience given the proposal include new transport infrastructure.* (emphasis added)

By way of a further but not the only example Policy 1.1.3 states *This includes improving or constructing new transport infrastructure which therefore has the potential to negatively affect biodiversity, the historic environment, landscape, soils, the water environment, flood risk and climate resilience.* (emphasis added)

However despite these references being made across most of the policies which contain an element of transport infrastructure the SEA is weak both lacking detail and without assessment of alternatives it does not and arguably cannot assess the scale of impact that may ensue.

In many cases there is insufficient detail to even produce a view and in these cases it is disappointing to see that the deferred outcome is always neutral. The extract of the table below is a typical example.

		facilities.
Biodiversity / Geodiversity	?	The LTP facilitates modal shift to sustainable transport modes which will have benefits for biodiversity. However, projects proposed within the LTP have the potential to negatively affect biodiversity through habitat and disturbance.
Historic Environment	?	The LTP facilitates modal shift to sustainable transport modes which is likely to have benefits for the historic environment. However, projects proposed within the LTP have the potential to negatively affect the historic environment through new infrastructure affecting the setting of heritage assets and potential disturbance of archaeology.
Landscape	?	The LTP facilitates modal shift to sustainable transport modes which is likely to have benefits for landscape. However, projects proposed within the LTP have the potential to negatively affect the character of the landscape through new infrastructure effects on visual amenity, tranquillity, and openness of the countryside.
Soils	?	The LTP facilitates modal shift to sustainable transport modes which is likely to have benefits for soils. However, projects proposed within the LTP have the potential to negatively affect soils through agricultural land loss.
Water	?	The LTP facilitates modal shift to sustainable transport modes which is likely to have benefits for the water environment. However, projects proposed within the LTP have the potential to negatively affect the water environment through water quality issues.
Flood Risk	+	The LTP aims to ensure transport project do not increase flood risk and that appropriate design features such as SuDS are included.
Air Quality	+	The LTP facilitates modal shift to sustainable transport modes which will reduce

For this reason we do not feel the SEA is sufficiently robust to lawfully support the LTP and especially the schemes that are proposed.

2.15. Finally within this plan we do not believe the LTP has adequately addressed the potential which the Combined Authority has to use the rights to franchise bus services to greatly improve connectivity, particularly in areas beyond the major cities of Cambridge and Peterborough including with better timetabling and reliability which could help to improve public perception of buses. This also fits with CPIER which recommends capitalising on proven, existing technologies as quick wins to deliver some of the aims of the LTP.

3. Specific Comments regards the Third River Crossing scheme:

3.1 The so called third river crossing is considered a priority scheme.

Exactly what problem this scheme is trying to address is unclear. The justification within the front sections of the LTP state it is to connect the highway network north of River Great Ouse to the strategic road network and open up the Fens. Later in section 3 of the LTP the rationale becomes one of facilitating the development of RAF Wyton.

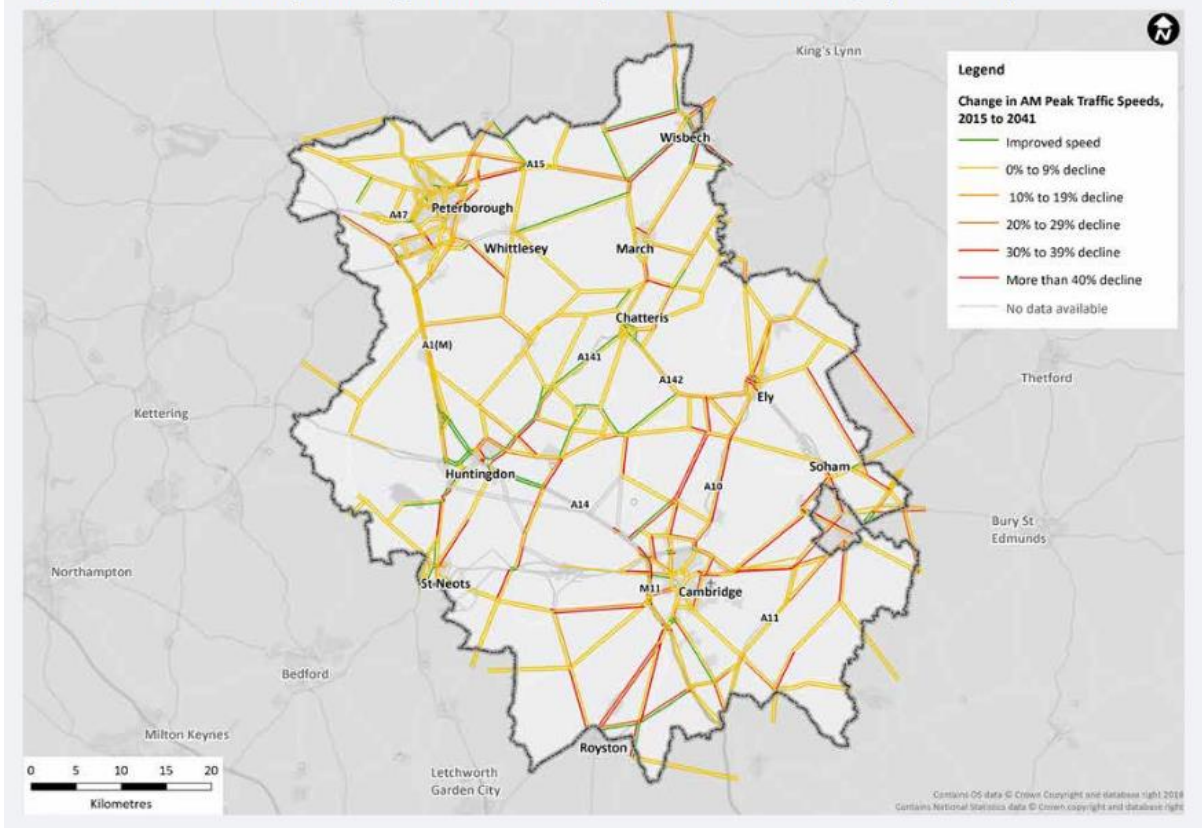
But looking at the evidence provided for the LTP in terms of road commuting maps; predicted traffic congestion modelling through to 2041; the Fenland local strategy section of the LTP; the HDC Local Plan; together with the many years of study data which accumulated whilst HDC tried unsuccessfully to develop RAF Wyton for housing, we can find no hard rationale as to either the problem this is trying to resolve or the viable strategic opportunity it will unlock.

3.2 Commuting data shows Peterborough and Cambridge as the magnets pulling traffic towards them from the Fens, which does not appear to be trying to go south through Huntingdon.

LTP Figure 1.5 outlines how traffic congestion across the region is forecast to worsen in the absence of further investment, based on outputs from Highways England's traffic modelling for 2041, however in respect of the A141 north between Huntingdon to Chatteris, the model actually shows it as being one of only a handful of roads in the region which will actually improve and therefore not present as a priority for distance travel.

Likewise the Fenland Local Strategy contains no need to improve connections with Huntingdonshire, rather their focus is on connections with Peterborough, Cambridge, March and Wisbech and rail links to Wisbech, Cambridge, Ely and London.

Figure 1.5 Forecast Change in Congestion in Cambridgeshire and Peterborough (2015 - 2041)



3.3 When a strategic transport study by Mott MacDonald was undertaken in 2018 for HDC and the development of the Local Plan, a bridge to facilitate a major housing scheme at Wyton was not considered the best solution (in fact a river crossing at St.Ives rather than Huntingdon came out as the least-worst option in terms of congestion), in fact Mott MacDonald suggested the better solution for housing, would be to locate nearer to Cambridge and to save money by not to building a bridge, but locating housing south of the river to take advantage of the £billions of readymade infrastructure which exists in the form of the new and old A14 trunk roads.

Cambridgeshire County Council also conducted a large traffic modelling study and in 2014 ruled out a bridge crossing as it failed to improve the situation and they became concerned

about the environmental impact. They subsequently removed it from their Long Term Transport Strategy.

Huntingdonshire District Council removed RAF Wyton as a strategic housing site from the Local Plan to 2036, satisfying the housing need elsewhere across the District. Hence the development of RAF Wyton is not part of delivering the Objectively Assessed Housing Need for Huntingdonshire through to 2036.

3.4 Despite this it is somewhat surprising to see within the appendices of the LTP that Cambridgeshire County Council are named as '*Delivery partners*' for the scheme through 2025 – 2030, albeit subject to '*scheme development, business case and funding*'. This is despite the scheme being rejected by them previously.

3.5. HDC have stated that the site (*RAF Wyton*) is sensitive and where housing is concerned faces 'very challenging' environmental constraints, surface water flooding and waste water disposal, but that they would work positively with promoters of the site to secure a sustainable, viable reuse subject to resolution of these challenges.

However the LTP fails to mention these real, challenging constraints and simply states 3.99 '*Future development at Wyton Airfield dependent upon securing significant upgrades to Future development, in particular at Alconbury Weald and Wyton Airfield, is dependent on securing significant upgrades to the region's highway and public transport infrastructure.*' (emphasis added) Mention of the other constraints is seemingly no longer an issue.

3.6 Likewise, we know this statement to be untrue.

For example, the proposal currently being considered by Marshalls Aerospace to relocate from Cambridge to RAF Wyton. Whilst not housing development, this would bring economic benefits to Huntingdonshire and Marshalls have stated publically on more than one occasion that their move is NOT dependent upon a new river crossing or require significant improvements to the A141 and so removing some of the challenging environmental and infrastructure constraints.

It would occupy nearly all of the brown field land contained on the site and leave the remaining area as greenfield. Other schemes such as solar power generation have also been suggested.

3.7 The Objectively Assessed Need (OAN) for Huntingdonshire is already satisfied through the recently adopted Local Plan to 2036. Beyond this we do not know the extent of housing provision that will be required. A new Objectively Assessed Housing Need beyond 2036 has not been assessed, nor have alternative locations for new strategic housing and economic development sites which best reflect the CPIER recommendations been considered either. However without this work, it would be unsafe to simply assume RAF Wyton was a given location for purely housing.

3.8 Where other schemes provide detail of what and why they are required, the case for the river crossing is not well made or convincing. There is a complete lack of detail (or indeed any information at all) on the actual route or possible routes within the draft LTP or any of

the supporting consultation documentation. The closest we get to it, is an empty box on an illustrative map. This is most unsatisfactory especially given that there has been plenty of previous study work undertaken which could have been used to illustrate the possibilities.

3.9. In addition to the lack of details regards the scheme, the LTP fails to consider alternatives or show how this scheme integrates with the wider transport policy.

3.10. Within Section 3 which covers Huntingdonshire's local strategy LTP 3.119 of the LTP states *'Furthermore, the Combined Authority wishes to understand how the highway network north of the Great River Ouse can be more effectively connected with the wider strategic road network. A key part of this will involve examining the feasibility, viability, benefits and impacts (including environmental) of a road link, the 'Third River Crossing', connecting the A141 primary route to the north of the river and the existing A14 trunk road. An initial feasibility report is expected in March 2020'*(emphasis added)

Given the previous findings we would question whether spending nearly £400k on a further study is a wise use of public funds. However, if a further study as defined in 3.119 above can be justified then we would argue that the study area shown in figure 3.3 is far too narrow. It only looks at one small area for a potential crossing point and precludes better case alternatives from previous studies being considered.

3.11. Most concerning is the claim that the LTP states that the priority schemes have been through a due diligence process and based upon an extensive evidence base. Hence the fact that they are all included as parts of the LTP, can only imply that they have all passed that test successfully. Which given the points above we find quite shocking.

LTP Page 20 Scheme Assessment states that *'The schemes that have been included in the draft Local Transport Plan havebeen reviewed with key officer stakeholders at a local, regional and national level. The schemes have been through relevant due diligence processes. In addition, an assessment framework, developed for the Local Transport Plan, has been deployed. In line with good practice, the assessment framework includes consideration of schemes against their potential contribution towards the strategic objectives for the Local Transport Plan, as well as consideration of their value for money, affordability, environmental impacts (including air quality) and engineering deliverability.*' (emphasis added)

4. Conclusion:

4.1 We conclude by saying that for the consultation to be valid the Spatial Framework Phase 2 needed to be available part of the suite of documents, as well as significantly more detail on the schemes proposed.

4.2 We expect to see all of the CPIER recommendations embedded in the LTP.

4.3 In line with this we expect to see a revised OAN assessment for the whole of the combined authority and especially the cities.

4.4 Based on CPIER, we expect to see a more holistic approach taken to housing and business development locations which deliver a better blended spatial strategy, again more in keeping with CPIER.

4.5 We would expect to see all of the objectives and justifications for schemes aligned.

4.6 We would expect to see a much more detailed SEA which is compliant with the relevant legislation.

4.7 We expect to see the third river crossing study either removed or the study brief take a much more strategic approach, defining the need more carefully – including that of non housing development, as well as housing development sites nearer to Cambridge, assessing previous evidence and if still going ahead, significantly increasing the study area to embrace alternative solutions including public transport.

4.8 Finally, in line with other public consultations we would expect to see all of the comments published and the various points addressed.