

East Cambridgeshire District Council (ECDC) – Supplementary Report in relation to the November 2017 and May 2018 Evidence Reports on Strategic Transport

Representations on behalf of the Newmarket Horsemen's Group (NHG) – 13 September 2018

1. Introduction

- 1.1. COTTEE Transport Planning (CTP) are instructed by the Newmarket Horsemen's Group (NHG) to make representations on Transport related matters and issues associated with the **East Cambridgeshire District Council – Supplementary Report in relation to the November 2017 and May 2018 Evidence Reports on Strategic Transport (PE28B)**. This document was submitted by the Council¹ in response to the Inspector's letter dated 17/8/18 (ED037). The Inspector has allowed interested parties to comment on this material and this note constitutes the NHG's response.
- 1.2. The content of the East Cambridgeshire District Council (ECDC) supplementary report is considered in the following paragraphs using their headings.

2. Cross boundary impacts of the proposed developments, to the south of the district, on the West Suffolk Councils, and Newmarket, in particular – further evidence to justify the plan

- 2.1. ECDC rely on Forest Heath District Council's (FHDC) evidence prepared by Aecom. At paragraph 2.2.6 ECDC say they 'confidently move onto the recommendations of the Aecom study...' In particular paragraph 9.2.23 which refers to improvements at Junction 37 of the A14 and some white line improvements at junction 38. However, the quote opens with the phrase 'based on the preliminary indicative results...'; and it is on this basis that NHG consider Aecom's 'preliminary indicative results' and vague references to junction 37 improvements do not reasonably justify ECDC's confidence and do not provide the necessary underpinning evidence required for a sound Plan.
- 2.2. ECDC 'confidence' is based on the assumption that their 8,586 homes figure (8,086 without Kennett) is a small increase on the 2015 Local Plan figure of 7,803. However, with Kennett the increase is significant at 10%; and the figures quoted in ECDC's 3 August letter refer to 11,960 homes (an increase of 1,125 from 10,835). These figures are 39% and 53% higher than the figures considered by Aecom and there is no evidence that increases of this scale have been examined.
- 2.3. The link to the minute that ECDC refer to at paragraph 2.2.9 (dated June 2017) includes a statement by Suffolk County Council's (SCC) Strategic Traffic Manager Peter Grimm as follows:

'The projects which had been included in Suffolk County Council's Road Investment Strategy 2 (RIS2) funding bid for the period 2020 to 2025, this being:

¹ ED041 and ED042

A14/A142 Junction 37 (Exning)

The lack of capacity at this Junction led to extensive queueing, particularly on the A142 from Cambridgeshire. These conditions were likely to get worse following the opening of the Ely Bypass in 2017. Improvements were required to address the existing problems and to support growth in East Cambridgeshire and in Newmarket.

The recommended option proposed a reduction in accident rates due to new compliant grade separated junctions. Better flow of traffic and additional capacity as the new design complied with the Design Manual for Roads and Bridges (DMRB) standards. Total cost £17.6m.'

- 2.4. At section 4 of their report ECDC state that the Ely Southern Bypass is due to open next month (October 2018) therefore based on **SCC's stated position the opening of the Ely bypass will make the extensive queueing at junction 37 of the A14 worse; and DMRB compliant designs are required at a cost of £17.6m. However, despite ECDC's assertion that the junction improvements are a case of 'when' not 'if' at paragraph 2.2.10 there is no evidence that funding will be forthcoming, nor are there any timescales for delivery; and even if RIS2 funding is forthcoming there is according to SCC set to be a worsening of conditions for up to 7 years from now (based on the ECDC 2020 – 2025 dates) before a scheme is implemented. This is a major concern to the NHG.**
- 2.5. At paragraph 2.2.10 ECDC say that detailed design options are well advanced but there is no evidence and they have chosen not to disclose information relating thereto. However, in Aecom's Cumulative Impact Study Addendum prepared for FHDC dated March 2018 and released on 26 April 2018 states at Table 11 reference 18 that: **'The enhanced signalised option for the junction to be explored'** confirming that insufficient work had been undertaken 6 months ago and that further design work and analysis was required.
- 2.6. NHG's representations on Matter 5 deal with this issue comprehensively at point 12; and there is nothing in the ECDC Supplementary report that changes the NHG's conclusions. **There is simply no appropriate evidence underpinning ECDC's assertions, therefore the plan should be found to be unsound in this regard.**
3. **Transport Effects on the multi million pound horse racing industry at Newmarket and the surrounding villages**
 - 3.1. ECDC claim that the work undertaken by FHDC is sufficient for them to rely on. They cite the construction of horse crossings. However, this misses the point. Whilst NHG consider that improvements to all horse crossings are needed; and collaboration between Jockey Club Estates and SCC has led to some progress in this regard. **The principal concern as set out in NHG's representations on Matters 5 and 16 is that existing traffic conditions require the improved horse crossings.** The rationale for them is not Local Plan growth. Furthermore, there are capacity and delay issues on Newmarket's roads currently. The addition of Local Plan traffic growth of 28%-33% and the growth in horse numbers has not been modelled properly by anyone therefore evidence is needed to prove that these substantial Local Plan related traffic increases will not lead to a severe traffic impact in Newmarket.
 - 3.2. Areas where further evidence is required from ECDC to underpin their Local Plan are as follows:
 - Analysis of the impact of traffic increases with Pegasus crossings (signal controlled horse crossings) in place bearing in mind the need for crossings is a response to existing issues. Once the Pegasus crossings are implemented at key locations it may not be possible to accommodate the full Local Plan traffic growth

without severe impact due to queuing and delay issues. Given Newmarket's unique nature a microsimulation model should be prepared in the first instance to replicate existing conditions; then the effects of new signalised horse crossings should be considered based on existing traffic conditions; and then various Local Plan scenarios can be examined to determine whether severe traffic conditions result. By way of example only, severe conditions would be when traffic queues back up to and impedes traffic flow at other junctions; and, in the case of Newmarket, whether Horse Racing Industry personnel can undertake their often emergency and/or time critical work without hindrance to their movement;

- ☐ Consideration of and commitment to improving facilities for non-car modes including: bus / rail / pedestrian / cycle facilities – to keep traffic increases in check.
- ☐ Funding review since this appears uncertain despite Aecom's assertions.
- ☐ Evidence as to how ECDC will deal with delivery and funding for the 6 crossings located in Cambridgeshire County Council / East Cambridgeshire.
- ☐ Engagement with an equine expert to assess safety issues and risks.

4. **Transport patterns potentially affected by the Ely southern bypass due to open in October 2018**

4.1. ECDC state at paragraphs 4.2.4 that:

'In short, the opening of the bypass is not identified to have any impact on traffic (i.e. increase or decrease) in the vicinity of the East Cambridgeshire / Forest Heath (Newmarket) border area....'

4.2. However, there is no evidence to support ECDC's assertion and their statement directly contradicts that of the Highway Authority SCC's Strategic Traffic Manager Peter Grimm who, as stated earlier, confirms that the opening of the Ely bypass will make the extensive queuing at junction 37 of the A14 worse; and DMRB compliant designs are required at a cost of £17.6m.

4.3. **The NHG's case is that there are no guarantees as to when or if the DMRB improvements required at junction 37 will happen; but in the meantime the extensive queuing cited by SCC will worsen.**

4.4. At paragraph 4.2.5 ECDC state that:

"If anything, the opening of the bypass will have a positive effect on traffic congestion in the Newmarket area, because Newmarket-Ely buses will move more freely through the currently congested area, making bus travel a more attractive option for Newmarket-Ely journeys. However, it is acknowledged this is likely to have negligible positive impact on the highway network around Newmarket."

4.5. It appears that ECDC are claiming that the Ely Bypass will have a positive impact on the Newmarket network as a result of more people using the Newmarket-Ely buses rather than travelling by car. However, a closer examination of the facts shows their argument to be flawed.

- 4.6. Census data has been examined to determine the origin – destination travel to work trips undertaken from Newmarket to Ely. 82 residents of Newmarket work in Ely; and of these 2 travel by bus
- 4.7. Census data has also been examined to determine the origin – destination travel to work trips undertaken from Ely to Newmarket. 148 residents of Ely work in Newmarket; and none of these travel by bus.
- 4.8. Bus travel is therefore not a popular mode of travel between Newmarket and Ely and although modal shift from car to bus is a desirable aim, given that congestion is predicted by SCC to worsen at junction 37 it is considered that ECDC cannot reasonably claim that modal shift to buses will happen and lead to a positive effect on Newmarket traffic congestion.
- 4.9. There is no reference within the Ely Southern Bypass Transport Assessment to a positive effect on Newmarket traffic congestion.
- 4.10. The overall conclusion is that the Ely Bypass will make the extensive queuing at Junction 37 worse; and therefore traffic congestion in the Newmarket area will worsen as a result. There is no evidence whatsoever to support ECDC's claims of improvement in conditions.