



East Cambridgeshire  
District Council

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Evidence Report on  
Strategic Transport -  
implications and related  
issues of the Proposed  
Submission Local Plan

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November 2017

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## Contents

<b>1. Introduction</b>	<b>1</b>
<b>2. Local Background Context</b>	<b>3</b>
<b>3. Latest Updates in relation to Strategic Transport</b>	<b>6</b>
<b>4. Local Plan Review</b>	<b>10</b>
<b>5. Duty to Cooperate Considerations</b>	<b>16</b>
<b>6. Overall Conclusion</b>	<b>18</b>

# 1. Introduction

## 1.1. Purpose of Report

- 1.1.1. The purpose of this Report is to provide an evidence base in support of the preparation and examination of the East Cambridgeshire Local Plan, 2016-2036 ('the Local Plan'). It will provide a context for the new Local Plan, in terms of strategic transport, and set out recommendations for the Local Plan.
- 1.1.2. Ultimately, its prime purpose is to establish confidence that the growth identified in the Local Plan is deliverable, from a strategic transport perspective.

## 1.2. National Policy

- 1.2.1. Both the National Planning Policy Framework (NPPF) and National Planning Policy Guidance (NPPG) must be taken into account in preparing a Local Plan. In respect of strategic transport the NPPG states that,

*"It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.*

*The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources."*

Paragraph: 001 Reference ID: 54-001-20141010

- 1.2.2. Further, the guidance states:

*"A robust evidence base will enable an assessment of the transport impacts of both existing development as well as that proposed, and can inform sustainable approaches to transport at a plan-making level. This will include consideration of viability and deliverability.*

Paragraph: 002 Reference ID: 54-002-20141010

- 1.2.3. And, it states:

*"The key issues, which should be considered in developing a transport evidence base, include the need to:*

- *assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms*
- *assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport*
- *highlight and promote opportunities to reduce the need for travel where appropriate*
- *identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate*
- *consider the cumulative impacts of existing and proposed development on transport networks*

- *assess the quality and capacity of transport infrastructure and its ability to meet forecast demands*
- *identify the short, medium and long-term transport proposals across all modes*

*The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.”*

Paragraph: 003 Reference ID: 54-003-20141010

- 1.2.4. The NPPG has further more detailed suggestions and matters which could be addressed or considered as part of strategic transport evidence base.
- 1.2.5. However, and taking precedence over the NPPG, the NPPF makes it clear that, in preparing a Local Plan, local authorities should use a ‘proportionate evidence base’ (para 158) and ensure that “*the Local Plan is based on adequate, up-to-date and relevant evidence*”. This is important context – what national policy is making clear is that there is no need to prepare excessive, costly or time consuming evidence in support of its Local Plan. It need only prepare proportionate, adequate, up-to-date and relevant evidence.

## 2. Local Background Context

### 2.1. East Cambridgeshire Local Plan 2015

- 2.1.1. East Cambridgeshire already has a very recent adopted ‘full’ Local Plan in place, found sound by an Inspector in March 2015 and adopted in April 2015. The timeframe for that plan is 2011-2031.
- 2.1.2. A full review of that Local Plan commenced preparation almost immediately post its adoption. It is important to explain this context in some detail.
- 2.1.3. First, the review of the Local Plan was not triggered due to a desire for a radically different Local Plan to be put in place, or a radically different forecast for housing need arising. Neither was it triggered because of a lack of supply of housing over the plan period. A key reason in triggering the review was the fact that in June 2015 (just 2 months after Local Plan adoption) an Inspector determined that the Council could not demonstrate a five year land supply of housing. The Council could demonstrate a 15 year supply over the plan period, just not a sufficient supply in the immediate five years.
- 2.1.4. Because of its recent adoption, it is worth setting out the relevant aspects (for the purpose of strategic transport) of the Local Plan 2015:

Topic	Headline Policy (2015)
Housing (GROWTH1)	11,500 new homes (2011-31)
Jobs (GROWTH1 + GROWTH4)	9,200 new jobs, supply of 139ha of B-use employment land
Locational Strategy (GROWTH2 + Table 3.2)	<p><i>“development will be focussed on the market towns of Ely, Soham and Littleport” and</i></p> <p><i>“more limited development will take place in villages”</i></p> <p>Ely = 4,043 homes</p> <p>Soham = 2,290 + 600 (assumed at broad locations) = 2,890 homes</p> <p>Littleport = 1,449 + 1,200 (assumed at broad locations) = 2,649 homes</p> <p>Total Market Towns = 9,582 homes (80%)</p>

	Villages/Rural = 2,418 homes (20%)
Transport Policy (COM7)	<i>“Development should be designed to reduce the need to travel, particularly by car, and should promote sustainable forms of transport...”</i>
Infrastructure (GROWTH3)	<p>General policy around the need for infrastructure and developer contributions.</p> <p>Plus, specific ‘key infrastructure’ listed.</p> <p>For Transport, the ‘key infrastructure’ listed is as follows:</p> <ul style="list-style-type: none"> <li>• Highway and sustainable transport infrastructure improvements associated with the development of North Ely, including pedestrian and cycle routes to the station and the town centre.</li> <li>• Major improvements to the A142 between Angel Drove and Stuntney Causeway.</li> <li>• Dualling of the A10 between A142 Witchford Road and A142 Angel Drove.</li> <li>• Improvements to Queen Adelaide Way.</li> <li>• Improvements to the junctions of the A14/A142 and A14/A10.</li> <li>• Capacity and junction improvements to the A10.</li> <li>• Development of Soham Railway Station.</li> <li>• Improvements to Ely Railway Station (passenger transport interchange, improved pedestrian and segregated cycle access and increased car and cycle parking) and Littleport Railway Station (increased car and cycle parking).</li> <li>• Improved rail and bus services.</li> <li>• Improvements to pedestrian and cycle networks within settlements and between settlements (including segregated cycle routes with appropriate crossings at key points where possible)</li> </ul>

## 2.2. Evidence Base for the Local Plan 2015

2.2.1. A wide range of evidence was submitted to the Inspector examining the Local Plan, including, for example:

- East Cambs Transport Modelling Report (2012)
- Various Ely related transport evidence reports (in connection with the southern bypass; cycling and level crossing)
- Soham Railway Station evidence
- The Infrastructure Investment Plan (IIP) (Sept 2013)

## 2.3. Inspector Conclusions

2.3.1. Overall, the Inspector found the Local Plan ‘sound’ (subject to modifications), but more specifically reported on infrastructure matters at paras 68-75. A summary of those conclusions are as follows:

68 *“...the Local Plan is supported by an Infrastructure Investment Plan (IIP) which was updated in September 2013 to take account of the additional growth levels that the Council now proposes in line with the MoC. The IIP is based on a review of the plans and priorities of stakeholders, as well as various studies of infrastructure capacity and constraints. These include a Water Cycle Strategy, Transport Modelling Report and Green Infrastructure Strategy, as well as the open space and recreation assessments referred to above. Taken together, these demonstrate that there is no overall infrastructure constraint to development within the District.”*

71 [in respect of viability assessment] *“...I have seen no substantive technical challenge to the methodology or conclusions of these assessments and I am satisfied that they support the Council’s view that they demonstrate the broad delivery of the Plan as a whole”*

75 *“...I conclude that Local Plan provides satisfactorily for the delivery of development.”*

## **3. Latest Updates in relation to Strategic Transport**

### **3.1. Introduction**

- 3.1.1. This part of the Report highlights some of the key strategic transport measures which have recently been delivered, are in the process of being delivered or being actively considered. This will assist in bringing up-to-date the evidence, compared with the situation at the point the Inspector examined the 2015 Local Plan.
- 3.1.2. It also provides the latest situation in respect of local transport policy.

### **3.2. Strategic Highway Update**

#### **A142 Ely Southern Bypass:**

- 3.2.1. The A142 Ely Southern Bypass is currently under construction, with completion due around mid 2018. This will ease congestion significantly within Ely, especially in the 'station gateway' area, as well as provide a considerably less congested journey for through traffic (i.e. traffic travelling along the A142, but not stopping in Ely).

#### **A142 (A14 - A10 corridor)**

- 3.2.2. The Council has very recently (Oct 2017) been successful in securing £300,000 from the Combined Authority to pay for feasibility work along the A142 and junctions on the A14. This money will help us gain a better understanding of what highway infrastructure is needed to unlock and deliver growth in our area, and will put the Council on a firm footing for future bids to deliver schemes.

#### **A14/A142 junction (Newmarket):**

- 3.2.3. This junction is linked to the above study. Whilst outside the district (it is located in Forest Heath administrative area), a great deal of traffic which uses this junction will include, as part of that trip, a journey within East Cambridgeshire. As such, growth in East Cambridgeshire could place additional pressure on that congested junction. Cambridgeshire CC, Suffolk CC, East Cambridgeshire DC and Forest Heath DC are engaging constructively and on an on-going basis to establish detailed solutions for this junction. East Cambridgeshire District Council is confident that appropriate and deliverable solutions can be found, to ease existing congestion, and accommodate any future additional congestion arising from growth across the sub-region.

#### **A10 corridor:**

- 3.2.4. A wide-ranging multi-modal transport study has been commissioned that will consider the overall transport capacity requirements of the Ely to Cambridge corridor. The Ely to Cambridge Transport Study will consider the strategic transport network that feeds into the corridor, and identify options to provide for future transport demand in a sustainable manner. This is in the context of significant growth on the northern fringe of Cambridge, at a new town to the north of Waterbeach and in East Cambridgeshire and beyond. It will also identify specific requirements for the new town north of Waterbeach and also Cambridge Northern Fringe East. The study will consider how trips from these sites into Cambridge city centre can be accommodated without increasing levels of vehicular traffic within the city or, if possible on the wider Ely-Cambridge corridor.
- 3.2.5. In addition, the Cambridgeshire and Peterborough Combined Authority has commissioned a study to investigate the potential viability of an extension to the M11 linking to the A47 in Fenland. The two studies will remain separate, however there will be an interaction between them as emerging highway options from the Ely-Cambridge Transport Study could help inform options for the southern section of any such link.
- 3.2.6. The Ely-Cambridge Transport Study will conclude at the end of December 2017 and its findings will be of relevance to the programmes of Cambridgeshire County Council, the Greater Cambridge

Partnership and the Cambridgeshire and Peterborough Combined Authority. Local Planning Authorities will also have an interest in the findings as they will help to inform the mitigations required for developments set out in their Local Plans, as well as contributing to discussions on planning applications. The M11-A47 Study will conclude in summer 2018.

### **Ely specific:**

- 3.2.7. In addition to the broader Ely-Cambridge Corridor study, a more detailed study is under preparation in relation to a key traffic congestion hotspot to the south-west of Ely, focussed around three roundabouts in the area:
- A10/A142 (west) roundabout ('the BP Garage roundabout')
  - A10/A142 (east) roundabout ('the south Ely roundabout')
  - A142 / Lancaster Way roundabout, east of Witchford
- 3.2.8. The project is to produce a feasibility study, together with costs, to recommend a scheme to accommodate for the current capacity issues surrounding the three roundabouts and the known future developments identified. The feasibility will review the current pedestrian and cycling provision from the Ely rail station to these developments and incorporate recommendations within the design proposals.
- 3.2.9. These studies are driven by existing commitments, especially growth at Lancaster Way Business Park (Enterprise Zone) and Ely North. The studies will determine the precise strategic transport solutions and delivery mechanisms for these three roundabouts (and the connections between them).
- 3.2.10. The findings of the studies are due to be completed by spring 2018. ECDC officers are involved in both of these studies as ECDC is a vital stakeholder in this process.

### **Elsewhere:**

- 3.2.11. Other highway related studies are under preparation elsewhere, though these are primarily developer led, in relation to specific development sites which they will serve, for example at Littleport and Kennett. These are focussed on delivering specific sites, and are not of a strategic nature. Nevertheless, once prepared, they assist in giving greater confidence to the delivery of specific sites allocated (or proposed to be allocated) in the Local Plan.

## **3.3. Rail Update**

- 3.3.1. Of significant benefit to East Cambridgeshire is the **Cambridge North station**, opened in May 2017. This currently provides up to 4 trains per hour to/from Ely, and gives residents of East Cambridgeshire (especially Ely and surrounding locations) rail access to the large number of business parks located in northern Cambridge, whereas previously access by car, via the A10, would be the only realistic option for East Cambridgeshire residents. As such, the opening of this station, which has occurred since the adoption of the current Local Plan in 2015, will provide positive relief on the A10, and in turn help to mitigate wider growth within East Cambridgeshire. It is too early to quantify the precise benefits of this station, due to its very recent opening.
- 3.3.2. Work to reintroduce the **Soham railway station** also continues to progress. Whilst there is no certainty of this being delivered, it received a significant boost with reference to it in the Cambridgeshire and Peterborough Devolution Deal and the new Local Transport Plan approved by the Combined Authority (June 2017). This would particularly assist congestion on the A142/A14 junction area.

- 3.3.3. In addition, reintroduction of the **Newmarket Curve** continues to receive support, and again positive reference is made to it in the Devolution Deal. Whilst there is no certainty of this project being delivered, if it does so, this will provide further opportunities for rail travel to Cambridge, especially if Soham railway station is reopened. This would particularly assist congestion on the A142/A14 junction area. However, it is accepted that this project is a 'long-term' one, with no guarantee as to it coming into fruition.
- 3.3.4. More generally, **other rail initiatives** in East Cambridgeshire continue to be explored, such as increasing capacity on the Ely-Ipswich line, improvements to the Ely North junctions (in order to increase capacity), and improved and increased passenger services along various routes.
- 3.3.5. Overall, East Cambridgeshire is very well served by rail services, particularly considering its rural nature, and the further improvements highlighted will only serve to make such facilities even more attractive to users, which in turn will mitigate the impact of growth on the highway network.

### **3.4. Bus Update**

- 3.4.1. There are a number of bus services operating across East Cambridgeshire. Like rail, Ely has the greatest concentration of services, and routes to/from Cambridge also have relatively good services. Broadly speaking, East-West travel across the district is more challenging, and some villages have poor or non-existent bus services.
- 3.4.2. To help plug some of the poorly served gaps, from April 2017, East Cambs Connect is a new bookable, flexible, door to door, mini bus service for everyone living, working and visiting East Cambridgeshire who can't access scheduled bus services to where they want to go. The service is managed by Cambridgeshire County Council who has contracted ESACT to run the service Monday to Friday from 7am to 7pm. This new service will assist those in particular who do not have access to the car, but should also reduce some car usage in favour of the mini-bus.

### **3.5. Local Transport Policy Update**

- 3.5.1. The Local Transport Plan has recently shifted from a Cambridgeshire CC responsibility to a Combined Authority (CA) responsibility. At the CA June 2017 meeting, an Interim LTP was approved, thus replacing the Cambridgeshire (and, incidentally, the Peterborough) LTP.
- 3.5.2. A new Transport Strategy for East Cambridgeshire, prepared by the County Council, was consulted upon in 2016, and published in July 2017. This is a comprehensive report, which provides the strategy basis for transport measures in East Cambridgeshire along with an action plan of specific transport schemes. The strategy provides the context to housing and employment growth planned for East Cambridgeshire and goes on to develop objectives and policies which provide the framework for the development of an action plan of schemes. The document also provides information on the funding of the transport schemes within the action plan. The Strategy covers the period 2016-2031, thus covering the majority of the emerging Local Plan period.
- 3.5.3. This Strategy is an important supporting document to the Local Plan, setting out realistic and reasonable measures to tackle congestion and help accommodate growth, in a sustainable way. Whilst fundamentally it has been prepared to support the 2015 Local Plan, its context and actions remain valid for the emerging Local Plan.

### **3.6. CA / Mayor proposals**

- 3.6.1. Of particular significance, in terms of recent changes, is the new Combined Authority (CA) for Cambridgeshire and Peterborough, which commenced its operations in earnest from the election of a Mayor in May 2017. The CA has wide ranging powers and substantial funding responsibilities, with a particular focus on infrastructure. This is a rapidly moving area, with a large number of

exciting projects being commissioned and explored by the CA, in relation to improving the strategic transport network.

- 3.6.2. Of particular significance to East Cambridgeshire are proposals exploring major infrastructure improvements to the A10, possible delivery of an M11 extension through East Cambridgeshire to the A47, and a wide range of other infrastructure projects, some of which are touched upon above. A key focus for the CA is to facilitate the delivery of growth, and the CA is committed to assisting delivery of local plans, through infrastructure improvements, and looking to seek 'additionality' where possible (i.e. speed up growth, or create the right environment to enable increased growth).

### **3.7. Conclusion**

- 3.7.1. In the past two years or so since the adoption of the Local Plan, a number of important strategic transport measures have progressed. These will have a positive impact on the strategic transport network, especially the opening of Cambridge North station (which should significantly reduce commuter car traffic on the A10, and possibly the A142) and the Ely Southern Bypass (which should reduce localised impacts in the Ely area, as well as potentially make the wider network more robust).
- 3.7.2. In addition, since 2015, new and significant commitments have been made by government and local authorities in the form of the Devolution Deal and the powers (and money) handed to the new Combined Authority. These new commitments should further strengthen the ability for major strategic transport improvements to be made in East Cambridgeshire over the plan period, measures which were either not envisaged or were less certain in 2015.
- 3.7.3. Also, as can be seen above, a wide range of studies are underway, to develop detailed solutions to some of the congestion hotspots in the district, especially in the Ely area, and along the A142 and A10.
- 3.7.4. Further, the district now has the benefit of a newly updated Transport Strategy for East Cambridgeshire, which brings together the latest proposals, both local and strategic, and will greatly assist in the delivery of a high quality, functioning and sustainable transport network. That strategy is based on accommodating growth, such growth levels being as set out in the 2015 Local Plan. As will be seen later in this report, there is no material difference in the level of growth, so such a strategy remains robust.
- 3.7.5. Overall, therefore, there is no evidence to suggest that the situation has materially deteriorated from the perspective of strategic transport infrastructure proposals or evidence base – if anything, the situation has improved, with key transport infrastructure now delivered/being delivered rather than simply proposed (eg Ely Southern Bypass / Cambridge North Station), new East Cambridgeshire Local Transport Strategy updated, and a set of wide ranging powers and funding available to the new Combined Authority.

## 4. Local Plan Review

### 4.1. Introduction

- 4.1.1. This part of the Report demonstrates the key similarities or differences between the 2015 Local Plan and the emerging Local Plan.
- 4.1.2. This is an important step in the process, and in particular in the context of the NPPF advising that ‘proportionate’ evidence is needed – in short, a plan which is similar to the one it is replacing (and replacing one which has recently been produced) would likely need less evidence base preparing than a plan which is significantly different.

### 4.2. Comparison between the 2015 Local Plan and the emerging Local Plan

- 4.2.1. The table provided in section 2 (which reviewed the 2015 Local Plan) is repeated below, but added to with a further two columns. These two additional columns summarise the emerging Local Plan:

Topic	Headline Policy (2015)	Headline Policy (Proposed Submission LP)	Commentary (further details in paragraphs which follow)
Housing	11,500 new homes (2011-31) Or 575 pa (GROWTH1)	10,835 new homes (2016-36) Or 542 pa	Very similar growth level, though note differing time period. Reduced annual target. Note: 2011-16 completions = 1,253 homes.
Jobs	9,200 new jobs, supply of 139ha of employment land (GROWTH1 + GROWTH4)	6,000 new jobs, 150-160ha of employment land  New Enterprise Zone	Both plans make provision to meet the job forecasts, but more importantly both plans ‘over supply’ employment land, in order to facilitate employment growth. Enterprise Zone at Lancaster Way, Ely, now confirmed (wasn’t in 2015)
Locational Strategy	“ <i>development will be focussed on the market towns of Ely, Soham and Littleport</i> ” and  “ <i>more limited development will take place in villages</i> ”  Ely = 4,043 homes Soham = 2,890 homes (assumes 600 on ‘broad locations’) Littleport = 2,649 homes (assumes 1,200 on ‘broad	“ <i>distribution of growth and investment will be main towns-led, together with an element of proportionate growth across the district to boost delivery and supply...</i> ”  Ely = 3,325 Soham = 2,097 Littleport = 2,453 Total Market Towns = 7,875 homes	Broadly similar intent in terms of distribution of growth.  Actual distribution is also similar, though a slight reduction in emphasis on the three market towns, and a greater emphasis on the larger villages (such as Fordham). The proposal at Kennett (500) is also of significance and new to the emerging Local Plan.

	locations’)  Total Market Towns = 9,582 homes (GROWTH2 + Table 3.2)		
Transport Policy	<p><i>“Development should be designed to reduce the need to travel, particularly by car, and should promote sustainable forms of transport...”</i></p> <p>(COM7)</p>	<p><i>“...reduce the need to travel by ensuring that development is accessible...”</i></p> <p><i>“...priority to sustainable travel modes”</i></p> <p><i>“any development that has severe transport implications will not be granted planning permission...”</i></p> <p>(LP17)</p>	General policy thrust very similar
Infrastructure	<p>General policy around the need for infrastructure and developer contributions.</p> <p>Plus, specific ‘key infrastructure’ listed</p> <p>For Transport, the ‘key infrastructure’ listed is as follows:</p> <ul style="list-style-type: none"> <li>• Highway and sustainable transport infrastructure improvements associated with the development of North Ely, including pedestrian and cycle routes to the station and the town centre.</li> <li>• Major improvements to the A142 between Angel Drove and Stuntney Causeway.</li> <li>• Dualling of the A10 between A142 Witchford Road and A142 Angel Drove.</li> <li>• Improvements to Queen Adelaide Way.</li> <li>• Improvements to the junctions of the A14/A142 and A14/A10.</li> <li>• Capacity and junction</li> </ul>	<p><i>“All new development should be supported by...all necessary infrastructure”</i></p> <p>General policy around the need for infrastructure and developer contributions. ‘Key infrastructure’ items not listed within the policy, but reference to IIP is.</p> <p>(LP16)</p>	<p>Policy thrust similar, perhaps sharper and more explicit in the emerging plan about the need for infrastructure.</p> <p>A list of key infrastructure not included, as the list can quickly date, and is not useable by future decision makers. It is better to make reference to the latest IIP.</p> <p>Nevertheless, all of the ‘key infrastructure’ as listed in the 2015 Local Plan remain objectives of the Council and/or partners.</p>

	<p>improvements to the A10.</p> <ul style="list-style-type: none"> <li>• Development of Soham Railway Station.</li> <li>• Improvements to Ely Railway Station (passenger transport interchange, improved pedestrian and segregated cycle access and increased car and cycle parking) and Littleport Railway Station (increased car and cycle parking).</li> <li>• Improved rail and bus services.</li> <li>• Improvements to pedestrian and cycle networks within settlements and between settlements (including segregated cycle routes with appropriate crossings at key points where possible)</li> </ul> <p>(GROWTH3)</p>		
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### 4.3. Housing Growth

- 4.3.1. The above table illustrates that the two Local Plans are very similar in terms of overall housing growth. However, it is worth exploring the numbers in a little more detail.
- 4.3.2. First, the new Local Plan is promoting a **lower rate of growth** (542pa compared with 575pa – a drop of 10%).
- 4.3.3. Second, in the period 2011-2031, the new Local Plan is promoting **a lower overall quantum of growth** (9,383 homes (542x15 + 1,253) compared with 11,500 homes – a drop of 18%).
- 4.3.4. Third, the **overall growth post 2011 is slightly increased** by virtue of the new Local Plan (12,088 homes compared with 11,500 – an increase of 508 or 4%), albeit 5 more years to deliver it (namely years 2031-2036).
- 4.3.5. Another way of looking at it, and expressing it at its worst (and for this scenario it assumes the rate of growth is retained as being the same as the 2015 Local Plan, not the slower rate set out in the emerging Local Plan), is that the new Local Plan is simply suggesting (when compared with the already adopted 2015 Local Plan) that 508 extra homes will be built, and these will be between 2031-36.
- 4.3.6. It is therefore deemed appropriate to conclude that, **on the basis of the overall housing growth alone, no extensive transport modelling work is necessary for the emerging Local Plan**, because housing growth is materially no different to the period to 2031 (if anything, it is lower), and for the period 2031-36 it is only loading 508 more homes. Not only is 508 homes a relatively small amount, in strategic terms, but it is extremely difficult (to the point of impossibility) to forecast what travel patterns such people, especially such a small number of people, in 2031-36 will undertake,

by what form of vehicle and at what time of day. It would be a meaningless exercise to attempt to forecast the impact of those 508 homes. And it certainly would not be 'proportionate' to attempt to do so.

#### 4.4. Jobs / Employment Land

4.4.1. In essence, both Local Plans promote economic development, and both facilitate the ability to meet the forecast growth in jobs. This is relevant to the strategic transport network, because if the plan failed to do so, it could result in further net increases in out-commuting, which would clearly have an impact on the strategic transport network.

4.4.2. However, as there is:

- no material change in the approach to economic development,
- no material change to the quantity of land to be provided (if anything, the emerging Local Plan allocates slightly more land for economic development)
- a status change of employment land at Lancaster Way to Enterprise Zone (this status change has been confirmed by Government and is not a proposal of the Local Plan – see <http://www.elyenterprisezone.co.uk/> )

it can be reasonably assumed that the emerging Local Plan slightly further assists the delivery of local jobs, and thus reduces the impact on the strategic transport network (due to a lessening in out-commuting). It was the promotion of local jobs which played an important part in the transport modelling work of 2012 (and its subsequent conclusions), prepared in support of the now adopted 2015 Local Plan. The fact that job/employment land provision has shown no material change is important context.

4.4.3. It is therefore deemed appropriate to conclude that, **on the basis of job/economic growth alone, no extensive transport modelling work is necessary for the emerging Local Plan**, because there is no substantive change between the plans, and if anything the prospect of lower out commuting than the previous Local Plan.

#### 4.5. Locational Strategy

4.5.1. Broadly speaking, the two Local Plans are very similar, with a focus on Ely / Soham / Littleport.

4.5.2. However, there is a slightly greater emphasis on growth in villages in the emerging Local Plan. This is for two prime reasons. First, and to match expectations in the NPPF, it is deemed appropriate that villages take a reasonable share of the growth. The 2015 Local Plan has some examples whereby relatively well serviced villages received very little growth, and in doing so, were not only not contributing to the national and local need for new homes, but at risk of not sustaining the vitality and viability of those villages. Second, the Inspector decision of June 2015 clearly highlighted a failure in the 2015 Local Plan to allocate sufficient small to medium sites, across a wide area. If the Local Plan had done so, it could have better demonstrated that a five year land supply was available.

4.5.3. Kennett aside, the growth in villages is broadly proportionate to their size – in essence a natural evolution of the village. Some of the villages with relatively high growth are a reflection of permissions already existing in that locality (eg Fordham and Witchford).

4.5.4. For Kennett, detailed strategic transport implications of that proposal have been worked up by the promoter, and is clearly a 'special case', it being identified in the Devolution Deal for growth.

4.5.5. In terms of Ely and Littleport (which more directly impact on the A10), the earlier table identifies quite a significant drop in growth compared with the 2015 Local Plan. Whilst some of that drop is subsequently redistributed to the villages (primarily to sites already with consent), which in turn will

likely feed into the A10, there is not a net increase in dwellings loaded into areas which would naturally feed into the A10.

- 4.5.6. It is therefore deemed appropriate to conclude that, **on the basis of locational strategy alone, no extensive strategic transport modelling work is necessary for the emerging Local Plan**, because there is no substantive change between the plans, and if anything, the slightly revised strategy is one which will reduce the impact on the Cambridge end of the A10, rather than increase it.

#### **4.6. Transport Policy**

- 4.6.1. There is no difference in the approach between the two plans: for example, they both seek a reduction in the need to travel, and, where travel is necessary, promote sustainable travel.
- 4.6.2. It is therefore deemed appropriate to conclude that, **on the basis of transport policy alone, no extensive transport modelling work is necessary for the emerging Local Plan**, because there is no substantive change between the plans.

#### **4.7. Infrastructure Policy**

- 4.7.1. Again, there is no difference in the approach between the two plans: for example, both require necessary infrastructure, and both seek developer contributions.
- 4.7.2. It is therefore deemed appropriate to conclude that, **on the basis of infrastructure policy alone, no extensive transport modelling work is necessary for the emerging Local Plan**, because there is no substantive change between the plans.

#### **4.8. Broad view on Trip Generation**

- 4.8.1. All of the above point to a Local Plan which is, from a strategic perspective, very similar to the adopted Local Plan. The only aspect which some may argue to fundamentally differ is a slight shift away from the three main settlements to elsewhere.
- 4.8.2. However, to a large degree, that is a fait accompli. A significant number of consents away from the three main settlements have been granted, and therefore cannot be challenged in this Local Plan (eg at Witchford, Fordham, Wicken and Burwell). Additional growth away from the main settlements, which hasn't consent or realistic prospect of consent prior to adoption of this Local Plan, is very limited indeed, and largely limited to small scale sites scattered across the district, amounting, in strategic terms, to very limited growth. Any off-site highway impact of these sites can be comfortably accommodated by the policy framework set out in LP17 (and at a higher level, LP16).
- 4.8.3. An exception to this is large scale growth at Kennett.
- 4.8.4. Thus, that exception aside, a broad view on trip generation arising as a result of this Local Plan can be made, and that broad view is one of negligible difference to the current Local Plan, from a strategic perspective.

#### **4.9. Conclusion**

- 4.9.1. Overall, this part of the Report concludes that, in terms of the content of the emerging Local Plan, there appears to be no evidence which leads to the conclusion that there is a need for a comprehensive transport modelling work to be commissioned. In simple terms, the emerging plan is so similar to the recently adopted Local Plan, in strategic terms, that it would not be proportionate to 'retest' what is already adopted in the development plan. And, in terms of a broad

view on trip generation, the effects of the Local Plan (i.e. the effects of what is new in the Local Plan compared with existing commitments, rather than the Local Plan as a whole), is that the Local Plan will have negligible effect. That does not mean there will be no strategic transport implications of the growth in the Local Plan. There will, but those implications are either already committed, or are being addressed by careful policy wording in the plan.

## 5. Duty to Cooperate Considerations

### Introduction

- 5.1.1. Strategic transport is clearly something which falls within the category of a matter which may require cooperation, under the Duty to Cooperate (DtC), with appropriate bodies and authorities.
- 5.1.2. East Cambridge District Council has attempted to work closely with its DtC partners, and in terms of strategic transport, this applies in particular to Cambridgeshire County Council (CCC), South Cambridgeshire District Council (SCDC) and Cambridge City Council (CCityC).

### Representations received

- 5.1.3. At the Further Draft stage, a joint letter from CCityC and SCDC highlighted that, in relation to the proposals in the plan, *“there are likely to be significant impacts on the A10”*. Further, it was stated that:

*“the Councils would welcome further engagement to ensure that the proposed development strategies for Greater Cambridge and East Cambridgeshire, and their cumulative impacts on the A10 and any other transport infrastructure, can be acceptably mitigated.”*

- 5.1.4. Also at the Further Draft stage, CCC made the following representation:

*“There is a need for an assessment of the overall impact of all the proposed development sites and the cumulative impact these may have on the transport network in both East Cambridgeshire and further afield. This assessment should provide evidence to demonstrate that the proposed growth scenario is the most sustainable, including on transport grounds. The “Site Assessment Evidence Report” does this to some extent on a site by site basis but does not provide any strategic transport analysis to support the preferred strategy.*

- 5.1.5. For information, no representations were received from Highways England.
- 5.1.6. Post the Further Draft stage, a number of email exchanges have taken place, and some brief meetings, on the matters raised above.
- 5.1.7. To assist, drafts of this report have, from time to time, been circulated to the above bodies for comment, and, where practical and appropriate, amendments to the report have been made.

### Responding to representations

- 5.1.8. In response to the above representations, a number of exchanges have taken place between the Council and the three mentioned authorities above, including meetings as part of, or as an aside to, the regular monthly meeting of planning policy leads across Cambridgeshire.
- 5.1.9. Such discussions helped explain (where perhaps such understanding was not fully developed by all parties at the Further Draft stage) that the emerging Local Plan is, in strategic terms, of very limited difference to that in the adopted Local Plan 2015.
- 5.1.10. Nevertheless, the writing of this explanatory evidence report was agreed to be appropriate by all parties, in order to set out more clearly the facts and illustrate the strategic transport context in more detail.
- 5.1.11. Partly reflecting the issues raised above, and the now likely strategic transport issues for some of the larger allocations in the plan, it is considered important that the Local Plan be strengthened, compared with the Further Draft version, to emphasise the need for an appropriate transport strategy to be prepared for such larger sites.
- 5.1.12. Standard wording, along the lines of as follows, for each major allocation in the Local Plan (around 500 or more, less in some circumstances if necessary) is therefore appropriate:

[The allocated site should:]

- *Provide a detailed Travel Assessment and Travel Plan, which will demonstrate, amongst other matters, how any adverse impacts on the local highway network will be mitigated. This Assessment should pay particular attention to demonstrating how cost effective improvements to the transport network will be provided, as required by policies LP16 and LP17, in order to appropriately mitigate against the impacts of development;*

5.1.13. The addition of the above policy wording, which reinforces the policy requirements of LP16 and LP17, is a proportionate response to the issues which have arisen, and in the context of the wider evidence which is being drawn together as set in this report.

#### **Duty to Cooperate (strategic transport) Conclusion**

5.1.14. ECDC considers this report to be a pragmatic and proportionate response to the issues raised.

## **6. Overall Conclusion**

### **6.1. Conclusion**

6.1.1. This Report has sought to set out whether or not it is necessary for comprehensive transport modelling work is needed. Such work would be needed if the emerging Local Plan was proposing any of the following:

- significant new growth
- significantly different strategic distribution of growth
- materially different policy approach to transport and/or infrastructure
- significant change in the wider policy approach in the sub-region, in respect of strategic transport policy, proposals or funding.

6.1.2. This Report assess each of the above aspects, and reaches the conclusion that it would not be proportionate to commission extensive strategic transport assessment or modelling work. This conclusion is reached following two broad findings:

- (a) There is materially very little difference between the Local Plan 2015 and the emerging plan, and what differences there are would be insignificant at a strategic transport level.
- (b) The wider infrastructure delivery, policy framework and funding available has, if anything, improved since 2015, thus giving greater (rather than reduced) confidence compared with the situation in 2015 that the strategic transport measures necessary will be delivered.

6.1.3. Overall, therefore, ECDC has concluded that the need for extensive strategic transport assessment or modelling work has been determined as unnecessary, and will not be commissioned. Nevertheless, the introduction of policy wording emphasising the need for appropriate Transport modelling work is a prudent measure.

6.1.4. However, it is important to note that this report is only concerned with the strategic implications of the Local Plan on the strategic transport network. Clearly, individual site proposals will have their own local impact (both on and off site) and these are matters addressed in other evidence material in support of the Local Plan, and are addressed as policy requirement (LP16, LP17 or site specific) in the Local Plan itself.