UTTLESFORD LOCAL PLAN 2036: CONSULTATION DRAFT JULY 2017 RESPONSE BY CAMBRIDGESHIRE COUNTY COUNCIL

1. INTRODUCTION

- 1.1 Cambridgeshire County Council welcomes the opportunity to respond to the draft Uttlesford Local Plan. These comments have been prepared by Officers of the Council and submitted in accordance with the instructions and timescales set out by Uttlesford. It should be noted that the same comments will be reported to the next meeting of the Economy and Environment Committee (12th October) for formal endorsement by this Council.
- 1.2 The comments set out below refer specially to the proposed North Uttlesford Garden Community.
- 1.3 Each representation is prefixed with 'support', 'object' or 'comment' to clarify the status of each comment.

2. EDUCATION

- 2.1 COMMENT: The proposals for a new garden village at North Uttlesford do not raise significant education concerns for the Council as whilst there is currently no surplus capacity within the adjacent school catchment areas in South Cambridgeshire, it is expected that development of this scale, in Essex, would provide appropriate on site mitigation to meet the growth in demand resulting from the proposed development.
- 2.2 COMMENT: As adjacent education authorities, officers already work closely with colleagues from Essex County Council, who are the statutory education authority in this case, in planning for strategic development. If, as part of any Essex County Council review on the impact of the proposed development, there is a need to give wider consideration to the pattern of provision of Secondary, Post-16 and SEN provision, then Cambridgeshire County Council officers would assess what the implications of any changes would be and consider what patterns of cross border movement may exist, or emerge, and how the two authorities can work together to best meet the needs of children and young people in their areas.
- 2.3 Any impact on Cambridgeshire infrastructure would need to be fully funded by the development.

3. TRANSPORT

North Uttlesford Garden Community

- 3.1 COMMENT: The highway network in this area of South Cambridgeshire already experiences severely congested conditions at peak times, with the A505 between Royston and the A11 one of the most heavily trafficked routes in Cambridgeshire. In addition many of the junctions in the area are already extremely congested at peak times, particularly around the junction with the A505 and A1301 and at Junction 10 of the M11. Council officers have welcomed the opportunity of involvement with Uttlesford District Council on its transport evidence base its Traffic Study and the South Cambridgeshire Junction Assessments work to investigate these issues. However, to date, Council officers have not been satisfied with the conclusions drawn from these studies with regards to improvements to junctions on the A505 in Cambridgeshire and the ability of any development to mitigate its impact in transport terms.
- 3.2 OBJECTION: Cambridgeshire County Council (and South Cambridgeshire District Council) officers jointly share the concern that the development at NUGC is reliant on large-scale improvements to the A505 for which no scheme has been identified and no firm timescales are in place for study work to begin.
- 3.3 COMMENT: The draft Local Plan states that the proposed developer funded highway improvements could accommodate up to 3,300 homes at the proposed development. Development beyond that would depend on strategic highway improvements e.g. upgrading the A505 between the M11 and A11.
- 3.4 COMMENT: The Council wishes to continue dialogue with UDC regarding the proposed cap on development of 3,300 homes until strategic highway improvements are implemented, as well as on the detail of the proposed infrastructure improvements. It would seem that even the delivery of these 3,300 homes would remove any 'spare' capacity on the Cambridgeshire highway network close to the Uttlesford border, and officers are already aware of growth aspirations of employment sites in this part of South Cambridgeshire.
- 3.5 COMMENT: The Council firmly believes that development in Uttlesford should demonstrate that its impacts on the Cambridgeshire transport network could be mitigated, and would urge that all new development proposed should take account of existing congestion issues and aim to promote travel by non-car modes.
- 3.6 COMMENT: Council officers are keen to continue to work with UDC on the development framework for the North Uttlesford Garden Community and wishes to

be consulted on any planning applications under the duty to co-operate, as well as on any travel plans for the proposed site.

- 3.7 COMMENT: Given the high levels of car ownership in Uttlesford District and a high proportion of travel to work journeys being made by car (around 70%), Council officers would question the assumptions made about the high levels of self-containment anticipated at the site.
- 3.8 COMMENT: Related to this, the draft Local Plan states that the A11 and A1307 would form the main route from the proposed site towards Cambridge, and that around 32% of work trips are estimated to be towards Cambridge. The A1307 already experiences congestion at peak times and has a long history of safety issues. The Council requires reassurance that these issues have been taken into consideration and also that liaison has taken place with Suffolk County Council and neighbouring districts regarding growth plans for Haverhill and the surrounding area.

A505 Strategic Study

- 3.9 COMMENT: In 2016 the Council bid for funding for a for a strategic transport study of the A505 corridor. However, the bid was unsuccessful. The Council still intends to undertake a study to look at the A505, however, currently there are no timescales for when this work could start. Officers would like to work with UDC as we take this study forward.
- 3.10 COMMENT: Recently, the Department for Transport has published proposals for a Major Roads Network. It is possible that the A505 may form part of this network in the future and this may provide access to a national funding pot.

Greater Cambridge Partnership - A1307 scheme development

- 3.11 COMMENT: As part of the <u>Three Campuses to Cambridge Scheme</u> options are being developed to improve connections along the A1307 between the major employment sites of Granta Park, Babraham Research Campus and the Cambridge Biomedical Campus for bus, cycling and walking journeys and there may be opportunities for any developments bordering Cambridgeshire to contribute to these transport interventions as they develop.
- 3.12 COMMENT: Officers from Cambridgeshire County Council (and South Cambridgeshire District Council) welcomed the opportunity for early dialogue with the promoters of the NUGC site and their transport consultants at a meeting on 9th August, but do not share the view that relieving pressure on the M11 junction 8 is a good enough justification for development in the north of Uttlesford district, when transport mitigation of this site has not been demonstrated.

3.13 COMMENT: Officers do agree, to an extent, that there are opportunities at the NUGC for improving travel by sustainable modes, with rail stations at Great Chesterford and Whittlesford Parkway and opportunities for bus travel improvements and more local journeys made by foot and bicycle. However, evidence to demonstrate such sustainable travel patterns would be required.

Transport Evidence Background Growth

- 3.14 COMMENT: The transport evidence has compared growth rates from the industry transport modelling tool 'TEMPRO' with dwelling growth from Uttlesford's own growth assumptions, as set out in its 'uncertainty log' (a record of assumptions made in the model that will affect travel demand and supply). In instances where TEMPRO projects a higher growth rate than the uncertainty log, the evidence has assumed TEMPRO level of growth.
 - For housing, by using TEMPRO, substantially more housing is assumed as committed development across Cambridge and South Cambridgeshire by 2033 than if Objectively Assessed Need as set out in Cambridgeshire local plans (+3,386 in Cambridge, -558 in South Cambridgeshire) was used. This represents a robust future year assessment though has the potential to underestimate the proportional impact from Uttlesford developments.
 - For employment TEMPRO generates a figure for jobs across Cambridge and South Cambridgeshire of 24,042 by 2033 which is 20,058 fewer than the objectively assessed need for jobs from our Local Plans (44,100 extra jobs), which is a significant difference and causes concern to CCC that assumptions regarding background employment growth are not robust.