#### CENTRAL BEDFORDSHIRE LOCAL PLAN 2035: CONSULTATION DRAFT JULY 2017 RESPONSE BY CAMBRIDGESHIRE COUNTY COUNCIL

### 1. INTRODUCTION

1.1 Cambridgeshire County Council welcomes the opportunity to respond to Central Bedfordshire's draft Local Plan. These comments have been prepared by Officers of the Council and submitted in accordance with the instructions and timescales set out by Central Bedfordshire. 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.

### 2. GENERAL TRANSPORT COMMENTS

#### The A428 and A1 Corridors

- 2.1 The primary transport corridor between Central Bedfordshire and Cambridgeshire centres on the A428, which has a number of existing congestion issues, particularly around St Neots at the western end, at the Caxton Gibbet roundabout at the junction of the A428 and the A1198 and then again at the Cambridge end of the road. In addition to this, it should be noted that a number of development/growth proposals already exist at various points along the A428, with growth at St Neots in the Huntingdonshire District and also at both Cambourne and Bourn Airfield in the South Cambridgeshire District.
- 2.2 Highways England has consulted on route options for an improved A428 dual carriageway between Caxton Gibbet and the Black Cat roundabout, forming part of the Oxford to Cambridge Expressway. It is anticipated that a preferred route announcement will be made in autumn 2017, with construction expected to start in 2020.
- 2.3 The Council notes that Highways England is also exploring options for improving the A1 between the M25 and Peterborough for possible inclusion in the Government's Roads Investment Strategy (RIS2). Indeed, the draft Local Plan is reliant on improvements to the A1 to facilitate development at Tempsford.
- 2.4 Specifically in relation to infrastructure for this corridor, CCC would highlight the Greater Cambridge Partnership's proposals for the A428 corridor. This study is focussing on improved bus priority, potentially with the inclusion of increased Park & Ride capacity, between Cambourne and Cambridge along the A428, and part of the 'Tranche 1' schemes, scheduled for development in the first 5 years of the City Deal programme (to 2020). CCC would therefore urge that any infrastructure proposals for the A428 corridor as a result of Central Bedfordshire Local Plan should look to complement the A428 bus priority proposals being developed as part

of the Greater Cambridge Partnership (City Deal). Further Information on this can be found here: <u>Greater Cambridge Partnership</u>

2.5 The Council also has transport strategies that relate to this area which should be considered when developing infrastructure proposals to support the Local Plan. The <u>St Neots Market Town Transport Strategy</u> deals with proposals for St Neots area and the <u>Transport Strategy for Cambridge and South Cambridgeshire</u> has proposals for the A428 corridor, which were developed alongside the South Cambridgeshire District Council Local Plan growth proposals.

## Draft Local Plan

- 2.6 With large development proposals close to the Cambridgeshire border, the Council has concerns about the potential impacts of the sites on the transport network in Cambridgeshire. Combined with growth proposed near Wyboston as part of the Bedford Borough Local Plan, these impacts could be severe if improvements to infrastructure and services do not come forward.
- 2.7 The Council believes that development in Central Bedfordshire 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. It is therefore clear that more detailed analysis of this site and its transport impacts is required. The Council would therefore be very keen to continue liaison with Central Bedfordshire Council on transport matters as the Local Plan process progresses.

## Tempsford Growth Location

- 2.8 The vision for this new market town of 7,000 homes heavily relies on the delivery of the East West Rail central section with a new station to serve the site, A1 enhancements, as well as improvements to the A428 between Caxton Gibbet in Cambridgeshire and the Black Cat. Given the long lead in times for much of this enabling infrastructure, it is considered that more detailed deliberation of the strategic infrastructure requirements and timings of these to support the proposed development is needed.
- 2.9 The draft Local Plan acknowledges that the development would likely cause additional pressure on the A1 and increase vehicular movements in surrounding settlements as traffic heads towards St Neots. Furthermore, these impacts would be significant if the strategic transport infrastructure improvements mentioned above did not come forward. However, the draft Local Plan does not give detailed consideration to the impacts of Tempsford on the transport network outside of Central Bedfordshire, including potential for rat-running through Cambridgeshire villages to access jobs and services in Cambridgeshire, and exacerbating congestion on the existing A428. In addition, there is insufficient information available to show what assumptions have been made regarding the level of

development in adjacent authorities and how these will interact, especially the possible new development at Wyboston, the Tempsford Growth Location and planned development in St Neots. Therefore it is not possible to assess the impacts of the proposals outside of Central Bedfordshire.

- 2.10 Neighbourhood planning consultation demonstrates that residents of Gamlingay in South Cambridgeshire have a strong desire for cycle connections between the village and Sandy Railway Station to be improved.
- 2.11 The work by Network Rail and the East West Rail consortium to identify a preferred route is ongoing, with a number of route options under consideration, including routes to the north of Bedford and to the south of Sandy. The assumption in the draft Local Plan regarding a preferred route for East-West Rail would appear therefore to be premature. The indicative route shown on plan would have significant issues with the topography east of Tempsford. Cambridgeshire County Council would like to understand the impact on the proposed new town and on the transport network should Tempsford not lie on or close to the route of East West Rail.

### East of Biggleswade Growth Location

- 2.12 The draft Local Plan acknowledges that this development is also dependent on improvements to the A1 and also the local road network. Improvements to public transport links to Biggleswade railway station will also be required. The Council supports the aim of improving public transport, walking and cycling links to Biggleswade railway station in order to maximise rail mode shares.
- 2.13 The draft Plan states that the development would likely cause additional pressure on the A1 and would increase vehicular movements through neighbouring villages. However, no detail is provided on the level of impacts outside of Central Bedfordshire, particularly on the B1040 and B1042 into Cambridgeshire. Again, no information is provided about what level of growth outside of Central Bedfordshire has been assumed.
- 2.14 The draft Local Plan acknowledges that development of the scale proposed in this location would require highway improvements to the local and strategic network. The Council would therefore be very keen to continue liaison with Central Bedfordshire Council on transport matters as the Local Plan process progresses.

## 3. TRANSPORT MODELLING

3.1 This section provides technical comments to the Stage 1A Transport Modelling (July 2017) report. At time of AECOM TN (Oct 2016) the model was being updated to give a 2016 base year due to be completed early 2017. Clarification is sought regarding the status of the revised model and has it been signed off as suitable for use in the assessment of the local plan options.

3.2 The draft Local Plan also states that the transport modelling in support of the emerging local plan is being undertaken in two stages, with Stage 1 being split into two distinct parts. This methodology appears reasonable, however, the Council is interested to understand what progress has been made on the further stages of modelling.

## Area B – East / A1 corridor

- 3.3 The draft Local Plan states that Area B (East / A1 Corridor) also presents potential for all levels of growth, mainly along the A1 and the East Coast Mainline corridors, as the main south-north transport corridors. New settlements may be created if adequate infrastructure is provided. This is the area that would have the greatest impact on South Cambridgeshire. The Council would like to understand what Central Bedfordshire is proposing in terms of mitigation. Figures 3.1 and 3.2 do not cover the whole of the district and importantly do not include the area around Tempsford nor do they include any information for the areas outside the district boundary. The Council is keen to understand how the proposals at Tempsford relate to the proposed new settlement at Wyboston in the Bedford Borough Local Plan consultation that took place in July 2017.
- 3.4 Figure 4.3 and Figure 4.4 show the stress levels on the highway links and nodes in Area B for the 2035 Reference Case scenario in the morning and evening peak hours respectively. These figures need to include Tempsford.
- 3.5 The modelling shows that in addition to the A1, the A507 to the west of Stotfold, B658 to the west of Biggleswade, B1042 at Potton and several roads in Sandy are predicted to operate under stress for the 2035 Reference Case, as shown in the Figure 4.3 and Figure 4.4.
- 3.6 All new potential growth within Area B is likely to have an impact on the A1 and cause further congestion, as it is the main strategic route in the area. Infrastructure improvements are likely to be required to accommodate further growth and avoid additional stress on the highway network if new developments are to come forward in this area. The Council would like to understand the nature of these improvements.

# Mitigation considerations – A1

3.7 The outputs from the 2035 Reference Case scenario show congestion on several sections of the A1 for both morning and evening peak hours. This situation is likely to deteriorate if new developments are expected in Central Bedfordshire, particularly for Area B and Area D. Improvements on the A1 junctions at Biggleswade and Sandy may be necessary to accommodate further growth in the these areas.

3.8 There is nothing in this section that looks into South Cambridgeshire so it is not possible to assess the impacts of the various scenarios outside of Central Beds.

## Stage 1a Modelling

- 3.9 The Council is concerned that none of the modelling figures take account of development outside of Central Bedfordshire. Furthermore, the model for the Local Plan is not constrained to NTEM. The Council is interested to understand why this is the case and how the level of growth has been controlled to enable comparison between the various development options.
- 3.10 The only access to Tempsford is shown as via a level crossing. The Council would like to understand how the level crossing was modelled in both the base and future cases and what is Network Rail's view of this site and the proposed mitigation.

## 4. NORTH GROWTH OPTIONS STUDY (NOVEMBER 2016)

4.1 The following comments relate to the Transport Assessment detailed methodology as set out in Appendix 4.

## Key Commuter Travel Mode Split

4.2 This section refers to using the Census data, this is reasonable but the section also refers to;

"2011 census data for Lower Super Output Areas (LSOAs) which contained the growth option, or the share that was thought to share similar urban characteristics to the growth option under analysis."

4.3 However there is nothing in the information provided to date setting out how the suitability of the LSOA's used was assessed.

## Public Transport Accessibility

4.4 The assessment of accessibility with in a 60 minute journey time appears reasonable although this should be checked against the actual destinations of existing work journeys in the district.

## **Road Accessibility**

4.5 What is the basis for the 30 minute cut off on the work destinations? The distribution of work trips should be based on the Census Journey to work data for all trips not just those within 30 minutes as this could be restraining the level of car trips within the district.

# Indicative Existing Traffic Conditions

4.6 Greater information is required in order to enable the methodology set out in this section to be agreed.

# **Personal Injury Collisions**

4.7 The use of Crash map data means that there was no assessment of any accident data for 2016, nor does this section cover the areas affected outside the district.

### Main Train Station Car Parking Facilities (to facilitate park and ride)

- 4.8 The assumptions as to which rail station would be used appears reasonable.Simplified Multi-Criteria Analysis
- 4.9 The methodology proposed appears reasonable.