Appendix 1: CCC Combined LTP response (DRAFT)

General Direction of the LTP

CCC Supports the general direction of the CPCA Draft LTP. It highlights the important issues within Cambridgeshire and Peterborough, and is positive in its standpoint in tackling these key transport issues facing the region.

Exec Summary

The section on Transport and the Economy does not cover the benefits of cycling and walking to the economy in terms of health and accessibility to jobs, both for short journeys and longer journeys when combined with public transport. There is also no mention of how the rise of the e-bike is enabling longer journeys to be made by bike. Cycling is a key mode for the Greater Cambridge area.

Aims and Objectives

The draft aims and objectives, as set out in the LTP are generally supported.

We are pleased to see alignment of these objectives with those set out in key economic evidence base documents such as the CPIER and LIS, but also the inclusion of key environment and societal objectives. Air Quality is a key issue for parts of the County and it is important that the LTP continues to tackle this. Tackling Climate Change is also key, particularly with constituent Local Authorities, including Cambridgeshire and Peterborough, recently declaring Climate Emergencies.

Cambridgeshire also suffers with a disparity in accessibility by transport, with rural areas heavily reliant on private car, creating issues in terms of access for jobs, healthcare, services and leisure, subsequently creating inequality. This is a vital issue for the LTP to address, so the inclusion of aims and objectives around this is welcomed.

Road Building

We recognise the issues with road capacity and congestion across much of the county, and the impact this has on restricting economic and housing growth. It is also recognised that in some cases road capacity improvements are absolutely necessary in order to help mitigate this. However it is important that for the benefit of the built and natural environment, and also in the interests of cost benefit, that all options of viable alternatives to providing for the private car should be considered alongside road capacity increases. In most cases, a multimodal package of transport measures are required to alleviate issues and deliver real transport benefits.

Partnership working

We are pleased to see the commitment to work in partnership with key local stakeholders and business community. Local Authority Partners, including CCC, are keen to work closely with CPCA to achieve the aims and objectives of the LTP. It is vital that the work of the CPCA

is aligned with those at the GCP and that the LTP is aligned with Local Plan aspirations at the District and City Councils.

Child Documents to the LTP
It is noted that there will be an LTP delivery plan, which is yet to be published for consultation.

However, despite this, the LTP has a role as an overarching strategy document to a number of 'child documents'. Currently for the Interim CPCA LTP and in the past for the CCC LTP, these include more focussed Market Town Transport Strategies, area strategies (such as the Transport Strategy for Cambridge & South Cambridgeshire, for East Cambs, for Fenland and for Huntingdonshire) and also the Long Term Transport Strategy. Furthermore, the Rights of Way Improvement Plan and the HCV routing map also benefit from being attached to the statutory nature of the LTP. It could also include other more focussed implementation strategies, such Smart Transport Strategies, Active Travel and Public Transport Strategies.

It is unclear from the current Draft LTP what these documents will be, where they will sit and who is responsible for producing them. This is a key point as these documents play a pivotal role in the formulation of evidence bases for Local Plans, Transport Developments and Planning decisions.

User Hierarchy
General support for this, however it is important to consider an opportunity to create areas of enhanced 'Place' where they may be existing high movements, particularly in urban areas. The document could also be ordered in a different way to reflect the commitment to the User Hierarchy, with sustainable modes and initiatives placed towards the front end of the Plan and road building/private car initiatives towards the end.

Climate Change, Emissions and Energy Reduction

The term used in the LTP is to 'significantly reduce greenhouse gas emissions by 2050'. This needs to acknowledge **net zero carbon by 2050** – "significantly reduced" is not in line with national policy. Whilst CCC support the reducing emissions aspect of the objectives under the climate change section, there is currently a lack of delivery timescales and locations for chargepoint infrastructure.

Road building, and the encouragement of use of the private car is not in line with local and national carbon reduction efforts or air quality standards. Despite the Evidence Base acknowledging that any initiatives enhancing private car use need to be accompanied by measures, such as promotion of low emission vehicles, to mitigate environmental impact. As it stands the plan consists of concrete proposals for increasing the capacity of the road network by duelling the A47 and A10 (as well as proposals for the A505, A141 and support for National Strategic schemes such as the A1 and A428), but lacks accompanying specific plans to support low emission vehicle roll out and use e.g. a strategy for increasing

chargepoint capacity at destination points along these routes and rapid chargepoints at strategic points on route.

Greater focus should be placed on the provision of public transport as well as the "greenness" of it.

The evidence base annex within the LTP lacks a clear understanding of the carbon impact of these proposals. These should be modelled o establish the appropriateness of these plans, within the context of supporting the transition to net zero carbon by 2050 which will be enshrined in law. Carbon footprint work currently being carried out for the County Council by the University of Cambridge, could be a starting point for this (due to be completed end of August). At the moment their metrics related to carbon on page 56 of the plan only relate to emissions from vehicles, but they also need to consider the emissions associated with construction of these projects which could be significant.

EV network ("world class network")
The LTP should seize the opportunity to state an aim for the Cambridgeshire and Peterborough region to have a world class network of electric and low emission vehicle charging vehicles and infrastructure. The Plan currently states the current electricity grid prevents this, and that it will engage with the relevant bodies and stakeholders to improve the grid. However there is an opportunity for the LTP to aim for a roll out of the necessary infrastructure to support it, in time to meet future projections and demand for electric and low emission vehicles. As well as defining timescales for EV and low emission vehicles, a clear plan of action should be included to deliver, and encourage third party delivery of, the required charging capacity.

Technology & SMART Transport
This is an important inclusion within the plan. The LTP contains some 'hooks' for improvement of the Smart transport network throughout the CA area, which is positive. However, the LTP does not mention some major themes within smart transport technology, such as Mobility as a Service. It is vital that the Plan is adaptable so as technology changes, the LTP can reflect progress and is positioned to support the implementation of technological solutions. Like many other areas, CCC would like to see a focussed Smart Technology Strategy as a child document to help deliver the overall approach and aspirations set out within the LTP on this.

Major Schemes
CAM
CCC fully supports the inclusion of the CAM in the LTP's major scheme proposals. Previous LTP's have included the desire for high quality, high frequency, segregated public transport offerings to connect key housing and job destinations. As with all major scheme proposals, CCC are keen to ensure viable alternatives are also considered alongside these, especially where viability and funding may be prohibitive.

A505

CCC are pleased to see the inclusion of the A505 as a multimodal study for development within the LTP for Greater Cambridge. As well as being a key route for an existing Biotech Cluster, there are also significant safety concerns on much of the route. CCC would however urge the CPCA LTP to prioritise the A505 study more highly within the LTP in order to reflect the importance of the route as key part of Cambridgeshire's Major Road Network. Furthermore, collaboration with Hertfordshire County Council and other key neighbouring Local Authorities on this study needs to be very high.

M11

CCC is pleased to see support for the M11 Smart Motorways proposals. We would urge the CPCA to work closely with Highways England to also tackle junction congestion around Cambridge. At the already heavily congested Junction 11, CCC believe the delivery of Cambridge South Station could have a significant beneficial impact, with evidence suggesting that many of the journeys entering the city from the M11 at this junction, are aiming for the Cambridge Biomedical Campus – this will only increase with the growth at this vital economic and healthcare location.

A10

The inclusion of the A10(N) improvements as a key priority within the LTP is supported. This a key corridor for existing travel, for future housing and economic growth and is already heavily congested.

A428

The inclusion of A428 (Ox-Cam) expressway as a priority within the LTP for the delivery of growth along this key corridor is supported.

A47

We support the collaboration with Highways England on the proposals to improve the A47, a key route in the north of Cambridgeshire.

A1

CCC echoes the inclusion and support in the LTP of proposals for A1 improvements.

A141

CCC echoes the inclusion and support in the LTP of proposals for A141 improvements.

A142

CCC echoes the inclusion and support in the LTP of proposals for A142 improvements

Rail

CCC are pleased to see the inclusion of a number of proposed rail enhancements in the LTP. Rail is a key mode for the area.

CCC strongly supports the inclusions of new stations at Soham, Waterbeach and Cambridge South, as well as increased frequency of services across the network, including to Newmarket. CCC is also pleased to see the inclusion and support for East-West Rail. The proposals to reopen the rail link between March and Wisbech is also supported, along with the Fenland Stations regeneration work.

Level crossing improvements at Foxton and Kings Dyke, are also supported, as are the rail capacity enhancements identified by the Cambridgeshire Rail Study and those through the Ely Area Capacity Enhancements.

CCC would like to see potential new stations at Fulbourn and at Cherry Hinton included within the long term rail aspirations in the LTP. These proposals have featured in the Cambridgeshire Long Term Transport Strategy (a child document to the LTP) as part of a vison to increase the rail offering to the east if the county.

More emphasis on electrifying the entire rail network in the CPCA area would be welcomed, in the light of a need to tackle climate change and emissions.

Buses and bus Franchising
The LTP notes the possibility to reform the bus network through franchising. The opportunity to improve bus provision in Cambridgeshire is supported by CCC, and the possibility of improving the bus fleet in relation to emissions should be taken. This could be reflected more thoroughly in the LTP, reflecting the experiences of low emission vehicles used by Transport for London and is particularly important in areas of poor Air Quality.

The role of buses as a means of public transport, particularly in areas where rail and where the CAM type schemes may not reach should not be underestimated. In rural areas of the county, buses can be the only viable alternative to the private car.

Cycling
We note and support the presence of active travel and cycling specific objectives, and the inclusion within the LTP to improve this as a mode. However the LTP could place stronger emphasis on the role cycling plays in commuter movements, particularly in the Greater Cambridge region. Cycling provides for over 1/3 of journey to work trips in the Greater Cambridge area and this needs to be reflected as strongly as possible within the LTP.

Progress to date: 1.15
This is out of date. The Ambition Grant money has been spent and includes improved links to employment areas such as Wandlebury to Babraham, Whittlesford Station to Granta Park, A10 Harston and innovative raised cycle lanes on Huntingdon Road, Hills Road and Trumpington Road.

Fig. 1.1 should include (at the bottom) the Local Cycling and Walking Infrastructure Plan (future).

<u>Evidence Base</u>
There is no mention of the fact that cycling and walking levels outside of the Greater Cambridge area are low in comparison to the Greater Cambridge Area and that enabling residents to cycle or walk to public transport hubs is also an opportunity. Also that the arrival of affordable e-bikes is an opportunity to significantly lengthen the distances that people will cycle to work.

<u>Implementing the Strategy</u>
There is no mention of the Local Cycling and Walking Infrastructure Plan (LCWIP) with regards to assessment of schemes – this will be a key document when identifying walking and cycling schemes.
There is no target relating to cycling and walking, for example mode share, in the key metrics section.

<u>Guiding Principles</u>
Whilst encouraging a modal shift to 'active travel' is included, more emphasis on making shorter journeys by bike and on foot the obvious, most convenient choice for residents would be welcomed. If it is easy to drive for short journeys people will continue to do so whether or not there are good walking or cycling alternatives unless there is more incentive in terms of speed, cost and convenience. The experience of Stevenage is a good example of this.

The section on 'Integration' does not mention cycling links to P&R sites and transport Hubs which should be an important part of the strategy.

Equally, in 2.48 on Transport and Environment multi-modal travel there is no mention of consideration of cycling and walking for all new Highway and public transport schemes, for example that CAM will include high quality cycle and pedestrian provision along all of the routes.

<u>Local strategies</u>
Greater Cambridge – this touches on the Cambridge cycling phenomenon but doesn't acknowledge the ever growing importance of cycling as a mode of transport in Cambridge, with figures similar to some Dutch cities or the high level of cycling in South Cambridgeshire compared to the rest of the region (where the census shows falling cycling levels).

3.57 –the Cycling Ambition Grant schemes have all been delivered.

Despite the high numbers of people cycling to school, college and work on the cycle route alongside the existing busway, cycle provision alongside the new CAM routes are not mentioned in this section and this could give the impression that longer distance routes like these are not seen as important transport options. The Greenways themselves were

inspired by the success of providing high quality longer distance provision for cycling, walking and equestrian use alongside the busway.

There is reference to the network of Greenways being developed for Greater Cambridge although not for East Cambs and Huntingdonshire where the Greenways do extend partly.

Deliveries cause congestion issues for the central area of Cambridge, so more of a mention of last mile delivery by cycle as a solution would be welcomed. Promotion and support of consolidated deliveries by small electric vehicles and cycles should also be included in this section.

Mention should be made of Bike sharing schemes – supporting and encouraging them as well as managing on-street dockless schemes so that they are not to the detriment of the public realm. They should accord with the agreed Code of Conduct for Cambridge which can be used as a basis for the rest of the region if dockless bike schemes are introduced outside Cambridge.

Huntingdonshire

3.97 This suggests that Huntingdon, St Ives and St. Neots all have high quality dedicated cycle networks which is not the case. This is evidenced by the low level of cycling in the three towns.

There is inconsistency for the different districts - there is no mention of providing cycle routes connecting to public transport hubs for more rural areas in Huntingdonshire (which is policy 12.2 within the modal policies section) or for East Cambs, but it is for Fenland.

The LCWIP is described as 'Local Cycling and Walking **Implementation** Plan' throughout the document, this should be **Infrastructure** Plan.

There is no mention of the LCWIP with regard to prioritisation or implementation of cycling and walking improvements for any of the districts.

Ecology

We welcome the commitment of the LTP *"integrate environmental considerations, including biodiversity net gain, into our thinking throughout the development of the future transport network and ensure that all new transport schemes cause minimal disruption to the environment both during construction and operation."* However, greater commitment is required if the Combined Authority is to truly demonstrate its support of Natural Cambridgeshire Local Nature Partnership's ambition to double the area of rich wildlife habitat and natural greenspaces by 2050 (see Section 5, NSSF Part 2) and meet the expectation that mandatory net gain will be included within the forthcoming Environment Act, expected September 2019 (as highlighted within the Chancellor's spring statement).

1.97 Key and Other Important Metrics

We welcome the inclusion of metrics for environmental net gain. This should be developed in consultation with Natural Cambridgeshire Local Nature Partnership, local government officers, statutory bodies and nature conservation organisations (e.g. Wildlife Trust). Local natural capital investment planning should be undertaken to identify the most effective way to deliver appropriate environmental net gain across the region and individual projects.

In terms of biodiversity net gain, the metric should follow Natural England's new biodiversity net gain metric (version 2.0), which is expected to be published by the end of July 2019. We suggest that a target of 20% net gain in biodiversity value be set across the LTP projects, in order to deliver a measurable net gain in biodiversity (NPPF 2019). This figure has been derived locally through consultation with local government ecologists and Wildlife Trust based on Cambridgeshire & Peterborough having a more impoverished natural environment than most of England. Currently, discussions are underway with Greater Cambridge Partnership to implement a 20% biodiversity net gain across its projects. It is also important that all project deliver long-term management in order for habitats to establish and achieve biodiversity net gain.

2.37
Regarding: *"Looking further ahead, we may consider a link road connecting the M11 in the Girton area to the A47 in the Guyhirn / Wisbech area"*. This project hasn't been identified within the LTP projects or HRA assessment and therefore, assume this would be developed beyond the lifespan of the LTP. However, given the significant fragmentation of the landscape caused by the proposed LTP projects, we would seek that any creation of a new road across the landscape be avoided or mitigated against wherever possible.

3.118-3.119 St Ives and Wyton Airfield
The corridor of the River Great Ouse and its associated wetland / wet grassland habitats around Huntingdon and St Ives are key biodiversity habitats, which is reflected with the myriad of international, national and locally designated nature conservation sites. It is also identified as a key location for habitat creation as part of Riquotte, J (2019) habitat opportunity maps.

There is potential for any works associated with Wyton Airfield and the third crossing of the River Ouse at Huntingdon has the potential to adversely impact these habitats. It will be challenging for the LTP projects to deliver schemes to deliver CA's commitment to biodiversity net gain.

3.61-3.64 Cambridge Autonomous Metro (CAM)
We are concerned that the creation of CAM, particularly tunnelling works, have a potential to result in significant impact on the natural environment. It will be a challenge to deliver a scheme that will not impact on locally and nationally important nature conservation sites and gain biodiversity net gain, particularly in Cambridge. As a result, CCC would be keen to work very closely with the CPCA in any scheme of this scale and nature.

The location and design of additional Park & Ride capacity, including at M11 Junction 11, must take into account cumulative impact from other pressures on the landscape from all forms of development. In particular, the impact on Trumpington Meadows County Park, which was designed to specifically address adverse impact on biodiversity within the southern fringes of the city.

Flood Risk

The Plan does not really cover the topic of Flood Risk and Drainage as a result of transport infrastructure. A policy or policy hook requiring new transport schemes to be designed, where viable, to be designed as per flood risk and drainage criteria set out in the Cambridgeshire Flood and Water Supplementary Planning Document, would be beneficial.

Historic Environment

General comments (Main document)

We welcome the commitment to the Historic Environment seen in the Environmental headlines and on p.18.

However more should be made of potential use of the assets for the benefit of residents rather than just something that needs to be protected. Heritage sites are places to visit, and promoting these as destinations should be part of any strategy. The Chisholm Trail is a good example where it links with the Leper Chapel, and on the Waterbeach cycle path we are looking to promote Car Dyke Roman Canal and the GHQ Switch Line as part of that initiative – people are likely to travel, especially cycle, if there is something to see.

The Evidence base

2.35 and 2.36 is too focused on cities. Cambs has over 250 scheduled monuments and thousands of listed buildings and other designated heritage assets. We are happy to supply more details, but they are referenced in Figure 2.7. The implications section in 2.36 is good though and reflects the point above.

SEA

6.2.10 says Policy 10.1.1 has no impact on the historic environment. Actually engine fumes and acid rain are a major source of damage to historic structures, especially ones built of limestone and clunch, as many of ours are.

GCP Projects

TSF team is pleased to see the support for the GCP schemes and studies in the Greater Cambridge Area.

Third River Crossing

CCC are keen to work closely with the CPCA and Huntingdonshire DC on any proposals for a new crossing over the Great River Ouse (the 'Third River Crossing') where there are very important environmental considerations to any scheme.

Powered Two Wheelers
There doesn't appear to be any serious reference to powered two wheelers or policies around these except on road safety.

Policies & Policies Annex
General
The policies within the Draft LTP are generally supported. These are positive and cover most of the issues facing the region.

There could be more of an emphasis within some of the policies on delivery. For example, on setting specific targets, on how and when targets are going to be met and on implementation of methods to achieve this. This is particularly pertinent to targets on Air Quality and Emissions, Climate Change etc. as well as Road Safety and Mode Split.

There are no specific objectives relating to the need to provide a transport network which promotes and encourages a healthy lifestyle with the provision of high quality, convenient cycling and walking networks and the document in general treats cycling as an add on rather than a vital element of any transport network in the region, particular in Greater Cambridge

The Modal Policies for cycling and walking are generally good but they do not appear to be embedded throughout the document.

Policy 2.2
Should include 'investment in our cycling and walking network to improve accessibility' not just investment in and improvement of PT and the Highway network.

Policy 3.4 Freight
The policy on freight makes no mention of promoting or supporting last mile delivery by cycle which is particularly important in Cambridge.

Policy 9: Protect and enhance the environment
Greater detail is required within policy 9 to demonstrate how the Combine Authority will achieve net environmental gain as part of the LTP, especially to demonstrate how it will help deliver double the area of rich wildlife habitat and natural greenspace by 2050 (Section5, NSSF Part 2).

Policy 9, and throughout the wider LTP document, implies there is "high quality" natural environment across the Combined Authority area, which is not correct. It is important that the LTP assessment recognises that while there are some areas of high quality natural environment, these are relatively small isolated sites across an impoverished landscape.

Riquotte, J. (2019) shows there has been significant decline in biodiversity value across Cambridgeshire and Peterborough due to agricultural intensification and development (e.g. housing) with the loss of 84% of our semi-improved grassland since 1930s (from 23.7% of land cover in 1930s to 4.5% by 2018). By 2018, habitats of potential high biodiversity value (semi-natural and marshy grassland, woodland, scrub and trees and water) only account for 11.4% land of the Cambridgeshire and Peterborough; and only 6.4% of the area has any nature conservation designation.

Small isolated habitats and the species they support are vulnerable to additional pressures, such as pollution and climate change. Any subsequent sterilisation of the landscape, such as LTP projects, have potential to have significant impact on the remnant habitats and the resilience of the habitats and species to adapt to these and future pressures. Policy 9 should seek to protect the CA's existing biodiversity assets and avoid adverse impact to any nature conservation designations (including locally important sites) wherever possible through the delivery of the LTP.

Furthermore, Policy 9 should demonstrate how the Combined Authority will ensure the conservation of biodiversity, and wider environmental net gain, will be delivered. We are concerned that some of the LTP projects may conflict with the habitat opportunities map produced by Riquotte, J. (2019), which identify the best location for the creation of semi-natural grassland, wet grassland /wetland and broadleaved / mixed woodland. We therefore recommend that a clear green infrastructure / biodiversity strategy across the Combined Authority to identify the most effective way to deliver appropriate environmental net gain as part of the LTP, such as the use of natural capital investment planning, and deliver strategic scale biodiversity enhancement across the region and delivery of landscape-scale projects (e.g. Great Fen) to ensure protection of existing biodiversity and overall measurable biodiversity net gain.

Policy 9 should also provide a commitment to a specified level of biodiversity net gain upon which the LTP projects will be delivered and recommend that 20% increase in order to deliver a measurable net gain in biodiversity (NPPF 2019) - this figure has been derived locally through consultation with local government ecologists and Wildlife Trust based on Cambridgeshire & Peterborough having a more impoverished natural environment than most of England. Greater Cambridge Partnership are also looking to implement this figure within their projects.

Policy 9 should also commit the Combined Authority to long-term management of the biodiversity assets for the lifetime of the operational phase of the transport projects, to continue the conservation of habitats and prevent biodiversity loss in the long-term.

Policy 9.2 could benefit from a definition of the Historic Environment – the one in the NPPF would be appropriate. It's too 'buildings focussed' as it stands and ignores non-designated heritage assets - this carries through the SEA report 6.2.9. We note that in Appendix C - Scoping Consultation Log, that Historic England made a comment (point 2) along these lines as well. Motts state that "Information on non-designated heritage assets has been included in the baseline." I cannot find this.

Policy Themes 11 & 12 (walking and cycling) could include the objective of developing destinations as per above. Also SEA 6.2.11

Policy 11.1 Walking
The policy should include reference to convenience and maintenance. There should be an additional policy relating to new developments, similar to policy 12.4 for cycling.

Policy 12.1 Cycling
Should include reference to the soon to be published Local Transport Note: 1/19, all cycling infrastructure should meet this standard which includes reference to the needs of all users including those with adaptive cycles and those carrying children.

An additional policy or detail within a policy is needed to ensure that cyclists needs are considered at the design stage of any highways and transport improvement schemes. This theme is partially included under 12.4 but doesn't fit there as this should relate to all schemes not just those related to new developments.

Under priorities within and around the Market Towns is the point 'ensuring new developments include cycle provision to a minimum standard' which is very unambitious. Developers should be providing cycling and walking infrastructure to a high standard throughout the region.

Policy 12.3
Should include reference to bike-sharing schemes and the code of conduct for dockless schemes as above.

Reference should be made to the National Cycle Network in the region and that the Combined Authority and other Councils will work with Sustrans to promote and improve lengths of the NCN that run through the Combined Authority area.

CCC Highways Response (submitted separately to CPCA)

Comments from Asset Management
The second main part of the LTP is the Transport Delivery Plan (TDP) which should include arrangements for the day-to-day management and maintenance of proposed infrastructure. This will be an important document from an asset management perspective, especially for those assets for which CCC/PCC will become responsible. However, this part of the document is being developed during the consultation period for the draft LTP.

Many of the comments from CCC asset management will require sight of this part of the document, in good time for these comments to be considered prior to finalisation of the LTP document.

Will processes for scheme development and prioritisation take account of the ongoing costs of managing and maintaining the infrastructure?

The yet-to-be-developed Transport Delivery Plan should aspire to be a fully integrated programme, co-ordinating works to deliver new infrastructure with that required for ongoing maintenance of existing infrastructure.

Comments focusing mainly on the safety elements:
- The safety objective to "Embed a safe systems approach into all planning and transport operations to achieve Vision Zero – zero fatalities or serious injuries" is very welcome as this follows international best practice
- Draft Policy Theme 5.1 covers all the areas we would look to prioritise from a safety perspective and makes some promising noises
- The devil is going to be in the detail of what the KPIs look like to drive this vision and monitor progress. Some considerations as follows:
    - Needs to have interim (5 / 10-year interval) targets working towards "zero"
    - Needs performance measures other than casualty reduction targets such as, but not limited to (further recommended actions from the Road Safety Management Capacity Review referenced in the LTP document are included at the end of this document):
        - Increasing compliance with speed limits on different road types,
        - Reducing average speeds on different road types,
        - Increasing the level of seat belt use and child restraint use,
        - Increasing the level of helmet use for two-wheeled vehicle users,
        - Reducing driving while impaired by alcohol and drugs,
        - Increasing compliance with in-car telephone use rules,
        - Increasing the safety quality of the SRN and main road network to the highest iRAP *rating,
        - Increasing the safety quality of the new car fleet to the highest Euro NCAP * rating, and
        - Increasing compliance with emergency medical response times
- Consideration needs to be given to the Major Road Network (MRN) and pushing for funding opportunities from DfT related to this – believe this includes: A10, A505, A142 & A141. There is a call for the same level of safety analysis to be undertaken on the MRN as the SRN, including risk rating the MRN – Kent have already done theirs using the iRAP/VIDA methodology.
- The LTP Policy Assessments in relation to safety appear to be accurate although a couple of points:
    - not sure if there is sufficient recognition that an increase in vulnerable mode users needs to be compensated with improved provision for those users,
    - that new technology such as the Cambridge Autonomous Metro (CAM) will come with additional risks initially while the technology is refined
    - that increases in traffic flow are linked to increases in collisions – i.e. reducing congestion in some cases may increase collisions – not just related to increases in vehicle numbers.

- Further actions suggested in Road Safety Management Capacity Review:
    o Adopt a policy of promoting evidence-based approaches to road safety to make best use of public resource.
    o Engage fully and support the national implementation of the Safe System approach by implementing it into the mainstream of local authority activity in all relevant sectors, e.g. highway engineering, public health, procurement of transport services.
    o Increase levels of enforcement of key road safety rules related to the prevention of death and serious injury.
    o Support improved crash investigation
    o Promote the shared responsibility for road safety at a high level to provide local and city leadership.
    o Promote Safe System and Towards Zero as the new transport safety culture to professionals, businesses and the community.
    o Allocate at least 10% of all road infrastructure investment to road safety intervention, as recommended in the UNRSC's Global Road Safety Plan for the Decade of Action, and to ensure embedding of the Safe System approach into the mainstream of highway engineering practice.
    o Identify, in partnership with local authorities, road sections for priority treatments on the Major Roads Network and local roads using iRAP tools.
    o Carry out in-service training in implementing the Safe System approach.
    o Review local road classification to ensure that speed limits match function, road design and layout to conform with Safe System principles.
    o Adopt the Safe System approach into the mainstream of highway engineering
    o Ensure that the prevention of death and serious injury is an explicit objective in asset management activity (including maintenance).
    o Target improvements in iRAP star rating on A roads.
    o Work with partners to improve speed limit compliance and promote the benefits of speed cameras.
    o Include speed limit compliance in policing priorities and work with DfT, HE and local authorities to combine publicity and police enforcement of speed limits.
    o Acknowledge the central role of speed and its management to a Safe System approach and review priority interventions for local roads.
    o Require ISA in the public procurement of transport services.
    o Promote vehicle safety technologies such as Intelligent Speed Adaptation, Autonomous Emergency Braking for Pedestrians and improvements in key crash tests for front, side and pedestrian protection, in regulation, consumer information and procurement policies.
    o Include Euro NCAP 5* rating and key vehicle safety measures in the public procurement of local transport services.
    o Review how Safe Road Use can be supported within a Safe System approach (in addition to that provided by other Safe System elements) through improved road user standards and assisting compliance with key road safety rules.
    o Carry out THINK! campaigns across a wide range of media, coordinated with police enforcement effort, to promote Towards Zero and secure better compliance with key road safety rules.

- Commission research into public perception of the risk of being detected for key road safety offences, e.g. excess alcohol and speed.
- Upgrade the priority given to enforcement in policing strategy and increase activity.
- Devise community engagement strategies to promote the Towards Zero goal of the ultimate prevention of deaths and serious injuries.
- Ensure capacity and budget for the publicity work of road safety officers to ensure combined publicity and enforcement of key road safety rules.
- Ensure an evidenced-based approach to determining priorities for safe road use and adopting Safe System principles and appropriate capacity for local education, training and combined publicity and enforcement of key road safety rules.
- Play a highly visible role in supporting evidence-based intervention for Safe Road Use.
- Include post-crash care in road safety strategy to improve survivability and reduce permanent impairment resulting from road collisions.
- Review the contribution of improvements to response rates, trauma care and long-term rehabilitation of crash victims to reducing death and the long-term consequences of serious injury.
- Address regional variations in emergency medical response times.
- Report on the effectiveness of major trauma care in preventing death and the long-term consequences of serious injury.
- Commission research on the cost of long-term care resulting from permanent impairment from road traffic injury.
- Recognise that road traffic injury is a major cause of premature death and long-term serious injury in their Strategic Plan and include road safety as an area for action.
- Actively include post-crash care as a key road safety strategy in a Safe System approach.
- Work with the local health sector to identify local improvements in post-crash care.
- Encourage modal shift in support of environmental, safety and health objectives by promoting the use of the safest modes e.g. rail, bus and coach travel and the healthiest modes of walking and cycling.
- Support walking and cycling with safety improvements to address risks of serious and fatal injury risks associated with cycling and walking which are lower than for motorcycling but appreciably higher than those travelling by car or public transport.
- Substantially upgrade the priority given to the safety of pedestrians which compares poorly internationally.
- Establish measurable safety performance indicators which relate to the prevention of death and serious injury to pedestrians and cyclists in the new national road safety strategy.
- Carry out a national review of urban design standards with pedestrians and cyclists in mind and align with Safe System principles.
- Support demonstration projects applying innovative Safe System treatments.

- o Consider extending the Safety Helmet Assessment and Rating Programme (SHARP) scheme to include bicycle helmets.
- o Review the urban street classification and align with Safe System principles.
- o Ensure that there is safe access to public transport taking account of the needs of elderly and disabled people.
- o Improve compliance with urban speed limits.
- o Ensure capacity for effective community pedestrian safety initiatives.
- o Provide guidance on speed hump design for local authorities
- o Work with the HSE to provide governmental leadership and better coordination for effective work-related road safety activity in Britain.
- o Conduct a research programme to extend the evidence base for effective national work-related road safety.
- o Review the reporting of 'journey purpose' in STATS19 data in the STATS19 review.
- o Encourage the adoption of BSI: ISO 39001 Road Traffic Safety Management System Standard through public procurement policies and other incentives, following a review of how greater take up can be encouraged.
- o Support local authority work-related road safety activity.
- o Establish a Safe Travel Policy for government services taking Safe System principles into account.
- o Upgrade priority given to work-related road safety, which is the leading cause of death at work.
- o Require reporting of work-related road collisions to RIDDOR when someone has been injured on the roads whilst using the road for work, or when someone driving or riding for work injures a member of the public.
- o Engage with local employers on work-related road safety.
- o Encourage the adoption of BSI: ISO 39001 Road Traffic Safety Management System Standards through public procurement policies and other incentives.
- o Establish a Safe Travel Policy for local government services taking Safe System principles into account.

Comments regarding Heavy Goods Vehicles:
Will the LTP will have any bearing or suggest any changes to the Cambridge County Council's advisory freight routes, which were developed to balance the needs of local communities and the requirements of lorry operators. There doesn't appear to be any reference to it, but the emerging Mineral and Waste Local Plan has a policy which requires HGV's to use this network wherever practicable.

Freight is essential to the effective functioning of our economy and to our towns and cities in particular, which are often the final destination for goods. The way in which these goods reach our urban areas; how they are dealt with, when they arrive, and how they are transported for the final part of their journey, has wide ranging implications for the economy, employment and growth, but also for congestion, safety, emissions and for quality of life within the urban realm.

Some suggested actions:

a) Encouraging HGV's to use the advisory route network.

b) Providing clear advice to local planning authorities in respect of highways and freight implications of new development proposals.

c) Encouraging a shift from road-borne freight to less environmentally damaging modes such as rail.

d) Supporting the formation of Quality Partnerships between interested parties.

e) Monitoring changes in HGV and LGV activity to inform possible solutions which reconcile the need of access for goods and services with local environment and social concerns.

f) Supporting improvements in HGV provision in the county, including overnight parking, in appropriate locations.

g) Utilising traffic management powers, where appropriate to do so, to manage access and egress from specific locations.