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Our ref: C12010



#### **Cambridge Cycling Campaign**

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#### Cambridge City Council Local Plan 2012: Issues and Options consultation Our responses

This document lists all our submissions to this consultation.

By way of a summary, the key points that we make in our submission below are:

- 1. Cambridge should be aiming for 40% of trips by cycle. The level of housing growth in and around the city is such that any other policy will lead to even further levels of congestion. (See Representation 14949 and others nearby.)
- 2. New developments must be planned to Dutch standards of provision for cycling and walking. The Local Plan should adopt this as a major new policy. (See Representation 14949 and others nearby.)
- 3. Dutch-quality infrastructure, that we argue for, can be defined as follows:
  - i) A network of properly-segregated cycleways that are more convenient than the road, with space properly allocated to enable this. These are not shared with pedestrians; retain priority at junctions (so they are safe and quick); are wide (2-3m wide, usually on both sides of the road); are continuous (i.e. fully joined-up); are properly surfaced with proper foundations. Major roundabouts should have tight geometries and a separate cycle ring.
  - ii) For minor, residential streets: 20mph speed limit, avoiding long uninterrupted stretches, home-zone feeling.
  - iii) Good quality, secure cycle parking which is above all convenient is also provided at residential areas and at all destination points.

Gallery at: http://www.cyclestreets.net/galleries/212/

In other words, the kind of infrastructure that actively encourages new people to cycle rather than use the car, and which existing confident cyclists would not hesitate to use.

- **4. Improvements to the Cycle Parking Standards**, to improve their enforcement and to fix various problems. (See Representation 15027 and others nearby.)
- 5. The need to safeguard land for the Chisholm Trail against development.
- 6. Various comments on area-specific issues.
- 7. Various other points.

Here are our official submissions, with links to each option/question/paragraph:

#### Section: 2 - Vision, Option 1

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29672#d29672

Representation ID: 15218 Support/Object: Support

Before these houses are built we want to see Dutch quality cycle infrastructure put in place. As more people move into the city more traffic will be created and it's important, if we wish to reduce any possible congestion, that we encourage people as much as possible to choose sustainable modes of transport such as the bicycle.

Dutch-quality infrastructure can be defined as:

- i) A network of properly-segregated cycleways that are more convenient than the road, with space properly allocated to enable this. These are not shared with pedestrians; retain priority at junctions (so they are safe and quick); are wide (3m wide, usually on both sides of the road); are continuous (i.e. fully joined-up); are properly surfaced with proper foundations. Major roundabouts should have tight geometries and a separate cycle ring.
- ii) For minor, residential streets: 20mph speed limit, avoiding long uninterrupted stretches, home-zone feeling.
- iii) Good quality, secure cycle parking which is above all convenient is also provided at residential areas and at all destination points.

#### **SUMMARY**

Before these houses are built we want to see Dutch quality cycle infrastructure put in place. As more people move into the city more traffic will be created and it's important, if we wish to reduce any possible congestion, that we encourage people as much as possible to choose sustainable modes of transport such as the bicycle. Our definition of Dutch quality is outlined in our full response.

# Section: 3 - Spatial Strategy, Option 9 - Development within Urban Area of Cambridge

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29795#d29795

Representation ID: 15219 Support/Object: Support

New houses within the built up area are less likely to create additional traffic and this makes it easier to favour pedestrian and cycle modes.

#### Section: 3 - Spatial Strategy, Option 10: Broad Location 1: Land to the North and South of Barton Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29798#d29798

Representation ID: 15220 Support/Object: Object

Development here should require full Dutch-style provision on Barton Road, in both directions, with the removal of the parking. The current cycleway is narrow, shared with pedestrians, subject to blocking bins and emerging vehicles and requires constant stopping at junctions.

#### Section: 3 - Spatial Strategy, Option 11: Broad Location 2 - Playing Fields off Grantchester Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29800#d29800

Representation ID: 15221 Support/Object: Object

Grantchester Road is a poor cycle route on a fast and fairly narrow semi-rural road. Any development would need substantial work to address this so it does not make it more car focussed but more cycle friendly.

### Section: 3 - Spatial Strategy, Option 12: Broad Location 3: Land West of Trumpington Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29802#d29802

Representation ID: 15222 Support/Object: Object

- Grantchester Road is a poor cycle route on a fast and fairly narrow semi-rural road. Any development would need substantial work to address this so it does not make it more car focussed but more cycle friendly.

### Section: 3 - Spatial Strategy, Option 12: Broad Location 3: Land West of Trumpington Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29802#d29802

Representation ID: 15227 Support/Object: Object

The cycleway outside the Botanic Garden on Trumpington Road is of very poor quality as it is in the dooring zone, in contravention of national policy on this. The car parking needs to be removed. Development here will only increase the necessity for this removal. Work would need to be done to remodel the Royal Cambridge Hotel junction to improve its safety record with CIL/S106 monies being used for this. This would help to address what is currently a very busy route into the city. It is crucial if any of these sites are further developed that best use is made of the existing requirement and agreement as part of Trumpington Meadows, to use the accommodation bridge north of M11 J11 as part of a new cycle link. A link and improvement to it, such as an off-road blacktop surfaced link to both Haslingfield and Harston could provide a good cycling alternative for those who currently drive. Such links must be considered as any part of these developments and included in any modelling exercise.

#### **SUMMARY**

The cycleway outside the Botanic Garden is in the dooring zone, in contravention of national policy on this. Work needs to be done to remodel the Royal Cambridge Hotel junction using S106/CIL monies. The accommodation bridge on M11 J11, needs to be improved as part of a new cycle route for this site and into the city.

#### Section: 3 - Spatial Strategy, Option 13: Broad Location 4 - Land West of Hauxton Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29804#d29804

Representation ID: 15230 Support/Object: Object

It is crucial if any of these sites are further developed that best use is made of the existing requirement and agreement as part of Trumpington Meadows, to use the accommodation bridge north of M11 J11 as part of a new cycle link. A link and improvement to it, such as an off-road blacktop surfaced link to both Haslingfield and Harston could provide a good cycling alternative for those who currently drive. Such links must be considered as any part of these developments and included in any modelling exercise. As with Option 12, the inadequate shared-use path (both for cyclists and pedestrians) from Trumpington to Cambridge needs to be removed and replaced with proper facility to Dutch standards in both directions. Any development here would need to have all the routes integrated with those being built for Trumpington Meadows.

#### **SUMMARY**

It is crucial that best use is made of the existing requirement and agreement as part of Trumpington Meadows, to use the accommodation bridge north of M11 J11 as part of a new cycle link. A link and improvement to it, such as an off-road blacktop surfaced link to both

Haslingfield and Harston could provide a good cycling alternative for those who currently drive. As with Option 12, the inadequate shared-use path (both for cyclists and pedestrians) from Trumpington to Cambridge needs to be removed and replaced with a proper facility to Dutch standards in both directions.

#### Section: 3 - Spatial Strategy, Option 14: Broad Location 5 - Land South of Addenbrooke's Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29806#d29806

Representation ID: 15231 Support/Object: Object

The current awkward and poor provision alongside Shelford Road must be replaced with full Dutch style provision if cycling is to be encouraged, with links to the Busway.

#### Section: 3 - Spatial Strategy, Option 15: Broad Location 6 - Land South of Addenbrooke's and Southwest of Babraham Road and Shelford Road

Representation ID: 15232 Support/Object: Object

Since this is a very busy route for many coming to the hospital or to work in the city, good, Dutch style routes need to be created into the city.

#### Section: 3 - Spatial Strategy, Option 16: Broad Location 7 - Land between Babraham Road and Fulbourn Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29810#d29810

Representation ID: 15233 Support/Object: Object

Since this is a very busy route for many coming to the hospital or to work in the city, good, Dutch style routes need to be created into the city. Routes to and from Cherry Hinton must be improved with the traffic calming, which puts those on bikes in conflict with cars rather than aiding their journey, removed from the High Street.

Lime Kiln Road is one of the most unpleasant roads for cycling in Cambridge - would need to be improved with sensitive Dutch style provision.

### Section: 3 - Spatial Strategy, Option 17: Broad Location 8 - Land East of Gazelle Way

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29812#d29812

Representation ID: 15234 Support/Object: Object

Since this is a very busy route for many coming to the hospital or to work in the city, good, Dutch style routes need to be created into the city. Routes to and from Cherry Hinton must be improved with the traffic calming, which puts those on bikes in conflict with cars rather than aiding their journey, removed from the High Street.

Lime Kiln Road is one of the most unpleasant roads for cycling in Cambridge - would need to be improved with sensitive Dutch style provision.

#### Section: 3 - Spatial Strategy, Option 18: Broad Location 9 - Land at Fen Ditton

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29814#d29814

Representation ID: 15235 Support/Object: Object

Horningsea Cycleway junction with A14 slip road needs to be given cycle priority - the scheme is incomplete. Signalled crossings on both sides of the A14 junction are needed. This was in the original plans but abandoned when money ran out.

Since this is a very busy route for many coming to the city, good, Dutch style routes need to be created into the city.

### Section: 3 - Spatial Strategy, Option 19: Broad Location 10 - Land betweeen Huntingdon Road and Histon Road

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29816#d29816

Representation ID: 15236 Support/Object: Object

Huntingdon Road, which has uninviting provision, needs to be upgraded to Dutch standards with two metre wide cycleways the minimum acceptable standard. The dangerous Girton Corner must be redesigned, with traffic signals, in favour of cyclists whose lives are more at risk here.

#### Section: 3 - Spatial Strategy, 3.66

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31517#d31517

Representation ID: 15249 Support/Object: Support

We do not take any view on the principle of the developments outlined in Options 10-19.

The comments we have submitted are comments in the event that any development should be taken forward for further consideration.

#### Section: 4 - Strategic Spatial Options, Question 4.26

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29917#d29917

Representation ID: 15203 Support/Object: Support

Yes.

#### Section: 4 - Strategic Spatial Options, Question 4.27

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29918#d29918

Representation ID: 15204 Support/Object: Object

All car parking needs to be removed from Station Road, to facilitate the free movement of traffic, including pedestrians and those on bicycles. Improvement to cycle parking facilities is both vital and urgent, and funding must be found for an extension to the proposed new cycle park, to ensure that it genuinely meets the needs of those using the station area. We would favour a 20mph speed limit in the area. The route of the Chisholm Trail must be safeguarded, as must land for links to other existing and proposed cycle routes.

#### Section: 4 - Strategic Spatial Options, Question 4.29

Representation ID: 15205 Support/Object: Support

Yes.

#### Section: 4 - Strategic Spatial Options, Question 4.30

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29924#d29924

Representation ID: 15206 Support/Object: Object

See comments below (4.35)

#### Section: 4 - Strategic Spatial Options, Question 4.32

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29932#d29932

Representation ID: 15207 Support/Object: Support

Yes.

#### Section: 4 - Strategic Spatial Options, Question 4.35

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29935#d29935

Representation ID: 15208 Support/Object: Object

Transport routes to and around the Addenbrooke's site, particularly for those on bicycles - staff, visitors and patients - need urgent attention. There are many factors which hinder access by bicycle, including discontinuities in cycle routes to the area, lack of crossings, and crucially, totally inadequate cycle parking. Cycle parking needs to be provided at every building, so that staff, patients and visitors can park at their destination. We have commented elsewhere on the City's cycle parking standards which need improving.

#### Section: 4 - Strategic Spatial Options, Question 4.37

Representation ID: 15209 Support/Object: Support

Yes.

#### Section: 4 - Strategic Spatial Options, Question 4.38

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29942#d29942

Representation ID: 15210 Support/Object: Object

The North West Cambridge site needs to be designed to encourage very high levels of cycling (certainly over 40%), through the provision of a network of high-quality, well-built, wide cycle routes - see our comments in the transport section - and ample cycle parking. The junctions on Huntingdon Road, need improvement, avoiding large splays, to make them safe and easy to use by cyclists; we recommend taking a look at Dutch-style junction designs. Cycle routes to and from the area from the city centre need improvement.

#### Section: 4 - Strategic Spatial Options, 4.55

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29946#d29946

Representation ID: 15211 Support/Object: Support

Cambridge Cycling Campaign would like to see further improvements of access by cycle to the site. See comments below (4.41).

#### Section: 4 - Strategic Spatial Options, Question 4.40

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29953#d29953

Representation ID: 15212 Support/Object: Support

Yes.

#### Section: 4 - Strategic Spatial Options, Question 4.41

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29954#d29954

Representation ID: 15213 Support/Object: Object

The cycle routes along Madingley Road should be upgraded to Dutch standards (see our comments in the transport section) and the recent (and distinctly half-completed) scheme finished to a higher standard. Improvements are needed at the the west end of the Coton Path (at the junction with J J Thomson Road) and the dogleg at the eastern (city end) should be removed. Plans for further development must include provision for high-quality cycle routes and adequate cycle parking.

#### Section: 4 - Strategic Spatial Options, 4.64

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29962#d29962

Representation ID: 15214 Support/Object: Object

Cambridge Cycling Campaign does not have a view on the CamToo project. If these proposals are to be taken forward they would need to be considered in the context of the Chisholm Trail, the new station and other cycle routes.

#### Section: 4 - Strategic Spatial Options, Question 4.44

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29969#d29969

Representation ID: 15215 Support/Object: Object

Plans for the creation of the new station and the development of the area around it must incorporate excellent cycle routes, including links to the city centre via the Chisholm Trail, possibly with a new pedestrian and cycle bridge across the river, and new routes to Waterbeach and other nearby places. Ample cycle parking must be provided at the station before any trains start using it. The route into Cambridge along Milton Road has junctions which are difficult for cyclists and would benefit from being reconstructed with segregated, wide, high-quality cycle paths.

#### Section: 4 - Strategic Spatial Options, Question 4.50

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29983#d29983

Representation ID: 15216 Support/Object: Support

Yes.

#### Section: 4 - Strategic Spatial Options, Question 4.52

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d29985#d29985

Representation ID: 15217 Support/Object: Support

It is not within Cambridge Cycling Campaign's remit to comment on the relative merits of the three options. If it is proposed to build on the land at any point in the future, any development would need to be designed for very high cycling rates (50% or more of all journeys to and from the development) in order to avoid exacerbating the existing traffic congestion on

Newmarket Road. Any development should fund the complete reconstruction of Newmarket Road with high-quality cycle provision, as outlined in our publication Cycling Vision 2016.

#### Section: 5 - Opportunity Areas, Question 5.6

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30016#d30016

Representation ID: 15093 Support/Object: Support

Yes, this is an important part of cycle routes between Newnham and Newmarket Road which

badly need improving.

#### Section: 5 - Opportunity Areas, Question 5.7

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30017#d30017

Representation ID: 15094 Support/Object: Support

Cambridge Cycling Campaign generally supports the proposals in the Supplementary Planning Document, including filling in the roundabout and reclaiming the road space for other uses thereby increasing permeability.

This area is part of the cycle route from Newnham to Newmarket Road and requires high-quality provision including continuous cycle lanes at least 2m wide. For Newmarket Road and the wide parts of East Road anything narrower would be completely unacceptable. The Coldham's Lane junction needs remodelling to be more cycle- and pedestrian-friendly. It is vital that S106 moneys are actually used for the Eastern Gate Development Brief.

#### Section: 5 - Opportunity Areas, Question 5.9

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30028#d30028

Representation ID: 15096 Support/Object: Support

The Hyde Park Corner and Lensfield Road junctions are on the important cycle route from Newnham to Newmarket Road and badly need redesigning to make them safer and more cycle-friendly.

#### Section: 5 - Opportunity Areas, Question 5.10

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30029#d30029

Representation ID: 15099 Support/Object: Support

We support the principle of streetscape improvements here, as the area is currently very cardominated and has a run-down feeling. Junction improvements are needed, particularly at the Catholic Church and at Cherry Hinton Road, and the cycle lanes could be upgraded further. A connection for cycles from the Guided Busway up to Hills Road Bridge is needed. Much more cycle parking must be provided and car parking should be removed from Station Road. Guard-railing should be removed. There is scope to provide access from Rustat Road to the station, especially the island platform.

#### Section: 5 - Opportunity Areas, Question 5.12

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30041#d30041

Representation ID: 15101 Support/Object: Support

Yes

#### **Section: 5 - Opportunity Areas, Question 5.13**

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30042#d30042

Representation ID: 15103 Support/Object: Object

Existing cycle routes must be maintained, and developed and new cycle routes constructed where areas are opened up. Access on foot and by bicycle from the Mill Road area needs improving. The speed limit on Coldham's Lane (from the railway bridge near Sainsbury's to Cherry Hinton) needs reducing to 30mph and provision for cycling improved. Any new recreational use must not interfere with existing routes and plenty of cycle parking must be provided, especially where new recreational facilities are created.

If the area round the Lakes is opened up, access should be car-free, except at the northern side.

# Section: 6 - Sustainable Development, Climate Change, Water & Flooding, Option 41 - Innovative and Sustainable Communities

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30048#d30048

Representation ID: 14703 Support/Object: Support

In respect of transport we agree that it is important to reduce carbon emissions. Cycling can play an important part of that so we want to see levels reach 40% of all journeys city wide.

We also request that more cycling officer posts are put in place (at least two full time equivalent posts.) They are a key factor in enforcement and promotion of cycling in Cambridge.

# Section: 8 - Conserving and Enhancing the Historic & Natural Environment, Option 88 - Light pollution policy

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d30511#d30511

Representation ID: 14704 Support/Object: Support

All cycle routes in urban areas should be lit with normal street lighting. Across green spaces we would also want routes lit but appreciate there needs to be sensitivity to the surroundings and to local residents. The low level lighting installed at the Leisure Park are of a type we would want to see as they light the path but not the surrounding area, which means there is less light pollution than there would be with the usual type of lamppost. LED solar cats eyes, however, can cause dazzling and do not light the path but are sometimes useful. The narrow width of many paths can cause unnecessary conflict so a formalisation of the widths is called for and attention paid to sweeping paths and maintenance of the shrubbery nearby so that the full width of the path may be used. White lines along the edge of paths, and at the side, can also be very helpful.

#### **SUMMARY**

All cycle routes in urban areas should be lit with normal street lighting. Across green spaces we would also want routes lit, preferably with low level lights such as those at the Leisure Park. The narrow width of many paths can cause unnecessary conflict so a formalisation of the widths is called for and attention paid to sweeping paths and maintenance of the shrubbery nearby so that the full width of the path may be used. White lines along the edge of paths, and at the side, can also be very helpful.

# Section: 10 - Building a Strong and Competitive Economy, Option 143 - Continued development and redevelopment of the Universey of Cambridge's Faculty sites

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31038#d31038

Representation ID: 14705 Support/Object: Object

Continued development and redevelopment of the University of Cambridge's Faculty sites has resulted in a variable quality of cycle parking provision and poor routes through and to departments. We want to see the 2005 consultant report on cycle parking in the central sites implemented before any further changes are put in place. We understand the current policy is that each new car parking space at West Cambridge must be matched by removal of the same number of spaces in the city centre and we strongly wish to see this retained. Cycling must be encouraged and it is incumbent on large employers like the University to take a lead in this area. The bollard closure on Silver Street, which has reduced traffic on Trumpington

Street, means that cycle flows between Mill Lane and Pembroke Street should be favoured. We want to see the priorities here reversed to reflect the significant number of users who are on bikes. Removing the gate onto Coe Fen, by providing a cattle grid of a suitable width such as those near New Bit, would be one practical step towards making this route more attractive.

Any development on the Old Press/Mill Lane site must be car-free but with high levels of secure cycle parking.

#### **SUMMARY**

Continued development the University of Cambridge's sites has resulted in a variable quality of cycle parking provision. We want to see the 2005 consultant report on cycle parking implemented before any further changes are put in place. We understand the current policy is that each new car parking space at West Cambridge must be matched by removal of the same number of spaces in the city centre and we strongly wish to see this retained. We also want to see the priorities reversed at the Trumpington Road/Pembroke Street junction to favour cycles.

# Section: 10 - Building a Strong and Competitive Economy, Option 149 - Speculative student hostel accommodation - limited to Anglia Ruskin University and the University of Cambridge

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31085#d31085

Representation ID: 14706 Support/Object: Object

It needs to be clear that car parking is only for disabled students and those with mobility problems. The wording here could potentially allow more car parking than the city can sustain. Cycle parking must of a high standard and quantity.

# Section: 10 - Building a Strong and Competitive Economy, Option 150 - Speculative student hostel accommodation - widened to include other established educational institutions

 $\underline{http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163\&docelemid=d31086\#d31086}$ 

Representation ID: 14707 Support/Object: Object

Currently, some schools and colleges (i.e. those under County Council control) are not subject to the cycle parking standards in the Local Plan. This situation must change. Except for disabled spaces, car parking should not be provided.

### Section: 10 - Building a Strong and Competitive Economy, Option 162 - Visitor attractions policy

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31174#d31174

Representation ID: 14708 Support/Object: Object

Cycle parking standards must also be applied to temporary visitor attractions. In Cambridge, a cycling city, we must be at the forefront of encouraging people to cycle to these events. Better arrangements are also needed when contractors unload on open space. Closure of off - road cycle routes is not treated with the same seriousness as motorists would expect when a road is closed. Where closures, or part-closures, are unavoidable, these should be announced in advance and polite signage put up.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.1

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31348#d31348

Representation ID: 14937 Support/Object: Object

We support this principle.

However, despite much positive work by dedicated individuals, there is too much complacency about cycling levels in Cambridge. People continue to cycle despite often poor infrastructure or poor development decisions. With tens of thousands of people moving into the new developments who are unfamiliar with Cambridge's cycling culture, overall levels of cycling will fall, unless stronger polices to favour cycling are in place.

22% is high for UK, but is well below the level achieved in genuinely cycle-friendly cities such as those in many places in the Netherlands. Cambridge should be aiming for 40% of trips by cycle.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.2

 $\underline{http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163\&docelemid=d31349\#d3149\#d31349\#d3149\%d3144\%d3149\%d3144\%d3149\%d3149\%d3140\%d3140\%d3149\%d3140\%d3140\%d3140\%d3140\%d344\%d344\%d3144\%0404$ 

Representation ID: 14945 Support/Object: Object

We support this principle. However, in practice the internal arrangements for delivery need review.

The need for an internal advocate for cycling and walking within the City Council is greater than ever. The existing 0.6 officer is clearly overwhelmed, and we have seen no indications that the planning department is suddenly more cycle-friendly.

We believe 2 Cycling Officer posts should be the minimum for the City Council if the aspirations in the Local Plan are to be approached. Far more active scrutiny and pro-active improvement of every planning application, particularly large applications, are needed, to help avoid future congestion.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.3

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31350#d31350

Representation ID: 14942 Support/Object: Object

Agree with this principle. Infrastructure must go in first as it affects travel patterns as people move in.

The 2006 Local Plan stated in paragraph 8.14 that paths should be in place by first occupation. However, in practice this does not always happen and so should be given much more robust emphasis in the new Local Plan.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Option 182 - Timely provision of infrastructure

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31352#d31352

Representation ID: 14949 Support/Object: Object

Agree strongly with this principle, but in practice the equivalent existing policy has still led to poor quality infrastructure in terms of walking and cycling.

Cambridge should be aiming for 40% of trips by cycle. The level of housing growth in and around the city is such that any other policy will lead to even further levels of congestion.

With the right development policies to require developers to provide genuinely high-quality cycling infrastructure that 'sells itself', 40% is achievable.

The headline requirement that we think it essential that the Local Plan adopts, as a major new policy, is that new developments must be planned to Dutch standards of provision for cycling and walking.

Dutch-quality infrastructure can be defined as follows:

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i) A network of properly-segregated cycleways that are more convenient than the road, with space properly allocated to enable this. These are not shared with pedestrians; retain priority at junctions (so they are safe and quick); are wide (2-3m wide, usually on both sides of the road); are continuous (i.e. fully joined-up); are properly surfaced with proper foundations. Major roundabouts should have tight geometries and a separate cycle ring.

- ii) For minor, residential streets: 20mph speed limit, avoiding long uninterrupted stretches, home-zone feeling.
- iii) Good quality, secure cycle parking which is above all convenient is also provided at residential areas and at all destination points.

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In other words, the kind of infrastructure that actively encourages new people to cycle rather than use the car, and which existing confident cyclists would not hesitate to use.

#### SUMMARY

- Agree strongly with this principle, but in practice the equivalent existing policy has still led to poor quality infrastructure in terms of walking and cycling.
- 22% by bike is far too low. Cambridge should be aiming for 40% of trips by cycle. Any other policy will lead to substantial congestion given the scale of housing growth.
- The headline requirement that we think it essential that the Local Plan adopts, as a major new policy, is that new developments must be planned to Dutch standards of provision for cycling and walking.
- Gallery and definition of Dutch-style infrastructure at: http://www.cyclestreets.net/galleries/212/

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Key Facts

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31353#d31353

Representation ID: 14956 Support/Object: Object

We are pleased that 26% cycling rate for work has been achieved, but this should go much further.

As noted above in our response to 12.1, the level of cycling is too low compared with what could be achieved. In particular, new developments should be designed to ensure a larger proportion of travel for work journeys by bicycle than 26% and a reduction from 41% for work journeys by car. Otherwise vehicle traffic will make the city roads even more congested than at present.

# **Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.6**

 $\underline{http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163\&docelemid=d31486\#d31486}$ 

Representation ID: 14957 Support/Object: Support Informative: We will be responding to the County's consultation. We will be making the point that only cycling can facilitate high levels of housing growth in a compact city, if high levels of congestion are to be avoided.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.8

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31359#d31359

Representation ID: 14960 Support/Object: Support

Strongly support this. Cycling certainly offers huge benefits for health, social inclusion, and economic efficiency of the city. Cycling must be seen as a priority for transport infrastructure.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Option 183 - Promote non-car modes of travel

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31362#d31362

Representation ID: 14968 Support/Object: Object

Support this in principle.

- Strongly prefer this option. It is the only policy, if the high levels of housing growth proposed for the city go ahead, that would prevent unacceptable levels of congestion, accidents, noise, and even greater demands for car parking.
- There should be a high-profile target of 40% levels of cycling for all trips in Cambridge. Every new development must be required to facilitate even higher levels of cycling. Higher standards than are presently required of developers are needed.
- 'Promote' in the title should read 'Favouring and promoting'. On-road space for cycling and cycle parking must be actively favoured if it is to be the chosen mode of transport by new residents and existing non-cyclists.
- Point 2 (giving priority and maximising convenience for walking and cycling): we feel that, in practice, the existing policy has not been strong enough and needs to be more robust. There have been cases where developments have been permitted that involve inconvenient/inadequate cycle parking or very car-orientated junctions.
- Point 2 (safeguarded land): In respect of this point, the Chisholm Trail must be afforded high levels of protection against all development proposals in the area around it.
- Point 5 (space for servicing vehicles): Future policy must avoid the kind of situation on Mill Road where proposed foodstore developments, involving new unloading from large lorries stopped on Mill Road, were difficult to resist going ahead. Point 6:

- Low design speed intentions need to be backed up by physical infrastructure that is self-enforcing, rather than assuming that signs will be enough
- Designed specifically to accommodate and create cycle routes, i.e. new main roads have Dutch-standards of cycle provision
- Direct cut-through routes for cyclists are needed alongside a less direct main road network. This is in line with the Manual for Streets concept of filtered permeability.

#### **SUMMARY**

Support in principle. But needs to be much stronger.

- New developments should require Dutch-quality levels of infrastructure as we define in Option 182, to avoid congestion from tens of thousands of new residences. See http://www.cyclestreets.net/galleries/212/
- High-profile target needed of 40% levels of cycling for all trips in Cambridge.
- On-road space for cycling (not poor-quality shared-use) must be actively favoured, even if short-term congestion results before people shift to cycling.
- The Chisholm Trail must be afforded high levels of protection against development proposals.
- Servicing vehicles: Policy must prevent cases of new large lorry unloading from blocking roads like Mill Road etc.

# Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.1

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31364#d31364

Representation ID: 14963 Support/Object: Support

Yes, but it should go further than current policy, as we note in detail for Option 183.

# **Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.2**

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31365#d31365

Representation ID: 14977 Support/Object: Object

#### **OBJECT**

As we note above, the policy should go further, principally with the requirement that:

- New developments should require Dutch-quality levels of infrastructure as we define in Option 182, to avoid congestion from tens of thousands of new residences. See http://www.cyclestreets.net/galleries/212/
- High-profile target needed of 40% levels of cycling for all trips in Cambridge.

Both of these require specific, strong policies.

#### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.3

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31366#d31366

Representation ID: 14971 Support/Object: Object

As we note above, the policy should go further, principally with the requirement that:

- New developments should require Dutch-quality levels of infrastructure as we define in Option 182, to avoid congestion from tens of thousands of new residences. See http://www.cyclestreets.net/galleries/212/
- High-profile target needed of 40% levels of cycling for all trips in Cambridge.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Option 184 - appropriate infrastructure

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31369#d31369

Representation ID: 14984 Support/Object: Object

Support in principle. However:

- The use of "where possible" will need clarification.
- We welcome the requirement that cycle (and public transport) infrastructure must be in place prior to occupation of houses. Without this, people will move into a development and may form potentially car-wedded travel patterns that result in increased congestion into the long term.
- We welcome the statement regarding safeguarding of land, particularly in relation to the proposed Chisholm Trail.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Option 185 - Low emission vehicle infrastructure

Representation ID: 14989 Support/Object: Object

No comment either way on this, other than to support car club and car-sharing spaces.

We note that the bicycle is the ultimate low-emission vehicle, much more so than electric vehicles which simply shift the emissions away from the roadside to power-stations.

#### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.5

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31373#d31373

Representation ID: 14990 Support/Object: Support

Car club spaces should have cycle parking adjacent to them. This increases the coverage area.

# **Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.13**

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31376#d31376

Representation ID: 14993 Support/Object: Support

We agree with these statements. In general we want to see lower levels of car use, and thus lower levels of car parking but recognise that if set too low, this can result in flyparking which leads to a poor pedestrian environment and reduces the safety of cycling.

# Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.14

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31377#d31377

Representation ID: 14994 Support/Object: Support

Moreover, wasting extremely valuable land on relatively unproductive uses such as car parking, rather than facilitating higher densities of development and creating a better

standard of public realm, should be avoided in a city such as Cambridge which is quite small and compact, surrounded by green belt and having no land, except brownfield sites, available for development.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Option 186 - Maintain the current level of provision

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31380#d31380

Representation ID: 14997 Support/Object: Support

- On balance, we feel the current policy is about right. In general we want to see lower levels of car use, and thus lower levels of car parking but recognise that if set too low, this can result in flyparking which leads to a poor pedestrian environment and reduces the safety of cycling.
- More incentives needed to use other modes
- Location of car parking is more important. Developments should not be permitting on-street car parking, i.e. should be within the development.

# Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Option 187 - New residential parking standards

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31381#d31381

Representation ID: 14999 Support/Object: Object

We have no comments/view on this other than to state:

- We are against higher levels of car parking being permitted. It would completely wreck other policies designed to reduce incentives to use the car and thus lead to congestion around the City.
- The claim made by some that reducing car parking does not affect living patterns is untrue; the fact is that a three-car family would not choose to live in (say) Petersfield because there is not space to park this many vehicles.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.7

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31384#d31384

Representation ID: 15000 Support/Object: Support Yes.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.8

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31385#d31385

Representation ID: 15003 Support/Object: Support

186 - maintain current balance.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.9

Representation ID: 15005 Support/Object: Object

Delay of adoption is a problem, e.g. St Matthew's Gardens development problem: problem of people moving in but lack of enforcement leads to forming parking or car-ownership habits that become harder to change as time moves on.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.11

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31393#d31393

Representation ID: 15007 Support/Object: Support

Yes.

- We support car-free developments and whichever policy is adopted should encourage these.
- City living is ideal for this scenario; example of Petersfield vs Arbury shows that people will choose where to live based on car parking availability
- Car-free developments should avoid the wasting of space for car parking so in fact could help lower housing costs.
- Car Club spaces should be incorporated into such developments, however, as these make development more viable.

- Need space for visitors and deliveries, otherwise these block walking/cycling routes and green space / the public realm.

# **Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.19**

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31398#d31398

Representation ID: 15011 Support/Object: Support

Support these principles strongly but the same policy has still led to shortcomings as this paragraph notes.

- There is a desperate shortage of cycle parking all around the City. (The problem is not just confined to the city centre.)
- Levels of theft are 10% of all reported crime across the whole County, which is an abysmal indictment on the state of cycle parking around the City.
- A third cycle park in the City Centre is desperately needed. Post Office Terrace may be one possible site.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.20

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31399#d31399

Representation ID: 15015 Support/Object: Support

- Strongly agree there are clear problems. If not fixed, levels of cycling will drop.
- The current guidance on the balance between (i) high-security (but less convenient) cycle parking (e.g. in basements) and (ii) convenient, near-entranceway, outside cycle parking is not in practice effective. We believe the balance should be towards convenient, secure Sheffield stands on-street, at a rate of 75% high-convenience stands vs 25% highest-security.
- The recent decision to allow basement cycle parking down a ramp and subject to traffic lights for the CB1 development was in clear breach of the Local Plan standards. Future applications must avoid this.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, 12.21

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31400#d31400

Representation ID: 15017 Support/Object: Object

We disagree with an implied view here that cycle parking is somehow unsightly. Good-quality, convenient cycle parking enhances, not detracts, from the quality of the development. There are many examples around the UK and Europe showing how high-quality cycle parking actively enhances the architectural quality of a development, and so the Local Plan wording should be in a positive light to encourage this.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.15

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31405#d31405

Representation ID: 15020 Support/Object: Support

Yes.

The current cycle parking standards, despite imperfections, have been absolutely instrumental in achieving the provision of cycle parking in new developments and ensuring that developers are not permitted to get away with poor-quality provision that fails to encourage cycles to be parked.

In passing, we have noted a trend for developers to refer to cycle parking as 'cycle storage'. We would ask that planners actively request developers to cease using such a term during pre-application discussions. Cycle parking is intended to provide easy access to a bicycle, rather than have cycles left unused.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.16

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31406#d31406

Representation ID: 15027 Support/Object: Object

Yes, there are many ways in which the policy could be improved:

- Generally, speaking, there have been significant problems with lack of application of the Standards. The new Local Plan should particularly ensure that policy here is robust.
- As we argued strongly in 2006, the Local Plan's policy on high-capacity stands is highly defective. The use of "can be used" means that a developer with no real space constraints could use as many as they wish. High-capacity stands are harder to use. New developments should never permit these. Only in very difficult situations involving modification of an existing city-centre or compact premises should these be considered acceptable.
- Completely new developments should be strictly to highest standards (no "where possible" statement) these are a clean sheet of paper so there is little excuse for poorer provision.

- Cycle parking at the South Cambs boundary area should be same as City standards. This is an area where liaison with colleagues in South Cambs is needed during development of the two Local Plans.
- As suggested, the policy should actively require cycle parking to be closer than car parking.
- Where terraced shops or houses are being redeveloped without a change to the external footprint, i.e. strictly where it would be impossible to make new space, a commuted payment should be required, and this used to add cycle parking nearby at the expense of a car parking space. Additionally, imaginative architectural internal solutions needed.
- Hospital requirement should not be "on merit". The situation at Addenbrooke's is absolutely intolerable.
- Enforcement against mis-installation is needed, e.g. St Andrew's Church Hall.
- People shouldn't be expected to use lifts to access cycle parking is totally non-conducive to short journeys (or longer) by bike
- New academies and free schools must install cycle parking up to the highest possible standards. If they carry out alterations the City's standards must apply.
- Government buildings, such as courts, are not subject to any standards. Such public buildings must be required to provide adequate cycle parking to the City's standards.

#### **SUMMARY**

- Application of standards needs improvement.
- The current Local Plan policy on high-capacity stands is highly defective. The use of "can be used" means that a developer with no real space constraints could use as many as they wish. New developments should never permit these.
- Completely new developments should be strictly to highest standards (no "where possible")
- Cycle parking at the South Cambs boundary area should be same as City standards.
- Hospital requirement should not be "on merit". The situation at Addenbrooke's is absolutely intolerable.
- New academies/free-schools, and government buildings, such as courts, should become subject to any standards

Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Option 193 - development only where the impact on the network is able to be mitigated against

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31414#d31414

Representation ID: 15032 Support/Object: Object

- Provision of Dutch-quality cycle infrastructure (see our comments on Option 182) would go a very long way in avoiding the creation of congestion should become a requirement of new developments.
- Congestion definition needs to include cycles: e.g. a toucan crossing supposedly increases congestion under the current definition. Shouldn't allow a developer to avoid cycle provision on the basis that it creates (car) congestion.
- Some existing off-road cycleway provision, such as the cycle paths across commons and cycle/pedestrian bridges across the Cambridge already suffer cycle/pedestrian congestion at certain times of the day; developments should contribute to mitigation.

## Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.18

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31416#d31416

Representation ID: 15036 Support/Object: Support

Yes, but needs to go further.

## Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.19

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31417#d31417

Representation ID: 15038 Support/Object: Object

Yes, see our comments under Option 193.

And additionally we again emphasise that:

- New developments should require Dutch-quality levels of infrastructure as we define in Option 182, to avoid congestion from tens of thousands of new residences. See http://www.cyclestreets.net/galleries/212/
- High-profile target needed of 40% levels of cycling for all trips in Cambridge.

## Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.21

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31423#d31423

Representation ID: 15039 Support/Object: Support - We welcome modal target concept. Without it, every developer will argue that their development will not affect travel patterns significantly.

## **Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.22**

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31424#d31424

Representation ID: 15040 Support/Object: Object

- City should require conditions that create 40% (continental) levels of cycling around the city, starting with large new developments. The current level of 22% is poor compared to what should be achievable.
- A 40% target means that every new development will need to achieve at least this level, through the active preference of cycle provision over motor traffic flow.
- So we prefer option 194 over 195.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.23

Representation ID: 15041 Support/Object: Object

Need specific targets for cycling and each mode.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.26

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31435#d31435

Representation ID: 15042 Support/Object: Object

- Option 196 not 197 is needed.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.27

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31436#d31436

Representation ID: 15044 Support/Object: Object

- A Travel Plan must not be seen as a replacement for actual infrastructure to create the conditions for high levels of sustainable travel. For instance, the Lion Yard extension saw the cycle parking requirement waived on the basis of creation of a Travel Plan; if there is poor cycle parking then in practice people won't cycle.
- We are highly sceptical about the current Travel Plan situation. We would like to see more evidence that developers are treating these seriously, despite this being a very useful tool if properly and actively enforced.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.38

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31464#d31464

Representation ID: 15045 Support/Object: Support

- Yes. We support the concept of CIL/S106, and it is important to ensure that policies are robust so that they cannot be challenged by developers.
- We do not accept the view of some that such funds constitute a 'bribe'. New developments usually generate traffic and other problems, which create costs to existing users; it is not acceptable for a developer to offload these externalities onto the taxpayer, and so the CIL/S106 payments ensure that these costs are properly accounted for.
- We note the continual cuts in central government funding for transport may mean that these funds could soon be the only source of significant amounts of money for transport.
- There is a real need to keep Area Corridor Plans updated. The plans now are becoming so out-of-date that we are concerned that they could become open to legal challenge.

#### **SUMMARY**

- Yes. We support the concept of CIL/S106, and it is important to ensure that policies are robust so that they cannot be challenged by developers.
- We do not accept the view of some that such funds constitute a 'bribe'. New developments usually generate traffic and other problems, which create costs to existing users; it is not acceptable for a developer to offload these externalities onto the taxpayer, and so the CIL/S106 payments ensure that these costs are properly accounted for.
- There is a real need to keep Area Corridor Plans updated.

### Section: 12 - Promoting and Delivering Sustainable Transport and Infrastructure, Question 12.39

http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=163&docelemid=d31482#d31482

Representation ID: 15047 Support/Object: Object

There is currently a massive democratic deficit with regards to how S106 moneys are spent. For instance, the Arbury Park development resulted in very regressive changes to King's Hedges Road that had no democratic input. By contrast, the Traffic Management Area Joint Committee can easily spend half an hour on discussing a relatively small matter such as single parking space, and it only reaches that committee because the funding is from public funds. There is a high-priority need to ensure both publicly- and privately- funded changes which affect the public highway are subject to the same levels of democratic scrutiny.