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Cambridge City Council



Cambridge Cycling Campaign

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Cambridge Local Plan consultation

This document lists the responses we submitted online at
<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171>

Section One: About Cambridge

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&chapter=2#d32824>

OBJECT

Cambridge Cycling Campaign welcomes the opportunity to comment, but is very disappointed that this current draft, which is the first time the text has been published, will not be subject to local determination prior to being forwarded for submission.

In our view, this is unsound and against the principles of localism, as locally-specific issues such as levels of cycling and cycle parking, will be judged in the national context by an inspector rather than local context by local Councillors.

We ask that Councillors take the opportunity to determine heavily-debated points, amend the draft, and only then forward with the consultation comments.

Section Two: The Spatial Strategy, Strategic Objectives

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&chapter=3#d32827>

SUPPORT

Cambridge Cycling Campaign strongly supports Objective 13.

Policy 5: Strategic Transport Infrastructure

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32827#d32834>

OBJECT

We strongly support the principles here.

However, there is a wealth of evidence demonstrating failures by the City Council to require genuinely sustainable transport in new developments, and the County's current plan will not sufficiently tackle the problem. These make the wording here unsound as the level of modal shift is undefined.

For example a 1% increase in cycling above a do-nothing baseline would be "securing modal shift" and "and the greater use of more sustainable forms of transport".

Fundamentally, the plan must "require" greater pedestrian and cycle priority rather than merely "promoting" it. Otherwise, public funds will later have to be expended.

Add wording:

Cambridge aims to lead the UK in the number of trips by bicycle, with 40-45% of trips, matching the level achieved in leading continental cities, in order to maintain the continued economic and social health of the city. The level of housing growth will not be achievable otherwise, with the existing street network already subject to congestion before 18,502 houses are built in Cambridge and its fringes. Proposed developments must demonstrate that trips they generate will be to at least this level.

We wish to appear in person on this section. "A national inspector is unlikely to be very familiar with issues relating to high levels of cycling and the infrastructure challenges that this brings. This section is a key issue for us, and so we would strongly welcome the opportunity to argue our case in discussion. We did so at the previous Inquiry for the 2006 Local Plan and this was, we believe, found to be useful."

Policy 17: Southern Fringe Areas of Major Change

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32868#d32868>

OBJECT

The Southern Fringe developments already are showing examples of poor-quality provision for cycling, which will result in people driving instead and therefore increased congestion.

"be fully permeated by pedestrian and cycle routes" is insufficient. These should be explicitly high-quality and provide a better experience than driving.

The current wording unfairly creates a weaker requirement than the other areas in this section.

Change "be fully permeated by pedestrian and cycle routes" to "be fully permeated by high-quality pedestrian and cycle routes which are more attractive than equivalent routes for driving"

Policy 21: Mitcham's Corner Opportunity Area

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&chapter=4&docelemid=d32875#d32875>

OBJECT

Strongly support the principle here. The inclusion of Mitcham's Corner as an OA is a huge step forward.

However, the wording must be tightened up to make explicit the removal of the gyratory. The recent student workshop demonstrated very clear consensus that the problems here will not be solved if the current street layout remains in place.

The current wording appears to shy away from this, with section (a) could be interpreted as retaining the gyratory, which is incompatible with the rest of the section.

Add new bullet point (a):

a) Will alter the road layout by removing the gyratory system and reverting the area to its traditional crossroads arrangement.

Policy 22: Eastern Gate Opportunity Area

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32875#d32876>

SUPPORT

Strongly support the principle of removing the current racetrack in the form of the roundabout and the inhospitable underpass. These relics of 1970s design must be removed urgently.

However, there is little evidence yet that section 106 funds from new developments in this area are being saved towards the EGOA.

[We take no view on the Howard Mallet Centre issue which other objectors have raised.]

Policy 23: Mill Road Opportunity Area

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32876#d32877>

OBJECT

Support the principles here.

The Mill Road Depot site should be explicitly defined as a car-free development, with only disabled parking, car club spaces, and a delivery area permitted. Residents should be required to sign a covenant not to own a car. The development should reserve space for the Chisholm Trail (cycle/walking path alongside the railway, recognised elsewhere in this Plan).

This site is probably the most suitable for car-free living anywhere in Cambridge, with local amenities, jobs, etc., all locally available and with public transport connections.

Add text:

In respect of the Mill Road Depot site, any development proposals here must require car-free development, with only disabled parking, car club spaces, and a delivery area permitted. Residents should be required to sign a covenant not to own a car. The development should reserve space for the Chisholm Trail (cycle/walking path alongside the railway, recognised elsewhere in this Plan).

Policy 24: Cambridge Railway Station, Hills Road Corridor to the City Centre Opportunity Area

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32877#d32878>

OBJECT

This section fails adequately to recognise that this area is a major cycle route.

The text needs to mention this.

Add text at end:

Any changes in these must enhance cycle provision, recognising that this area of the city forms an area of high cycling demand.

Old Press/Mill Lane Opportunity Area

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32878#d32879>

OBJECT

Support the principle of streetscape improvements here.

However, this paragraph omits the fact that the Pembroke Street / Mill Lane route is a heavily-used cycle route which needs to be enhanced.

Add new bullet point:

- Must remodel the junction of Mill Lane and Trumpington Street so that the heavily-used cycle crossing from Pembroke Street to Mill Lane is enhanced.

Policy 27: Carbon Reduction, Community Energy Networks, Sustainable Design and Construction and Water Use

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32881#d32881>

OBJECT

The definition of carbon reduction, or zero carbon development, in this section, fails to include any reference to transport. This is not sound.

Under the current wording, a development with access exclusively by car but with zero-carbon housing design would be considered low-carbon, which is clearly incorrect.

Add reference to sustainable transport and the need for high levels of cycling.

Policy 34: Light Pollution Control

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32888#d32888>

OBJECT

Omits reference to cycle routes through green areas.

Where cycle routes through green areas in new developments are defined, they must be lit. However, this must use only lighting which is subtle, localised, and does not create light pollution.

Add text:

Where cycle routes through green areas in new developments are defined, they must be lit. However, this must use only lighting which is subtle, localised, and does not create light pollution.

Policy 56: Creating Successful Places

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&chapter=8#d32910>

OBJECT

The phrase "not allowing vehicular traffic to dominate" is insufficient. Cambridge will only cope with large housing growth if high levels of cycling are actively catered for.

Add to end of bullet point b:

“and actively encourage high levels of cycling”

Policy 80: Supporting Sustainable Access to Development

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32934#d32934>

OBJECT

Strongly support the principles.

However, the wording is too weak and will not solve the scale of congestion created from new housing. Levels of 40-45% of trips by bicycle should be a clear policy aim.

Also, the previous Local Plan's policy on lorry deliveries has been omitted, which is a clear and unsound omission. The previous policy has been relied on many times in the past by the City Council and has been crucial to avoiding proposals like new 41-minute lorry deliveries on Mill Road.

One section is badly worded.

We are pleased to see the Chisholm Trail specifically marked out for protection.

Make changes as follows:

1) Add at end of second sentence: "In particular, as a city with a strong cycling culture, which helps reduce congestion, Cambridge aims to see 40-45% of trips by bicycle."

2) Add paragraph, copied from 8.21 of the 2006 Local Plan: "Any development that will require regular loading or servicing must

avoid causing illegal or dangerous parking, by providing appropriate off-street facilities."

3) One section is badly-worded: "giving priority to these modes where there is conflict with cars;" In the case of new developments, there will not be existing conflict with cars. The wording should therefore be: "giving priority to these modes where there is, or would be, conflict with cars;"

4) After "it is designed to give high priority to the needs of pedestrians and cyclists, including their safety;" add: "Cycle provision (e.g. width of cycle paths) shall go further [than] national standards, reflecting the high levels of cycling in Cambridge)."

We hope the Inspector will hold a full Inquiry session on this section, and we strongly wish to give evidence, to help ensure the Council's wording is stronger and gives a clear and helpful steer to developers.

We wish to appear in person on this section. "A national inspector is unlikely to be very familiar with issues relating to high levels of cycling and the infrastructure challenges that this brings. This section is a key issue for us, and so we would strongly welcome the opportunity to argue our case in discussion. We did so at the previous Inquiry for the 2006 Local Plan and this was, we believe, found to be useful."

Policy 81: Mitigating the Transport Impact of Development

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32935#d32935>

OBJECT

Support the principle.

A more robust approach is needed on Travel Plans. At present, it appears that some of these are basically written documents that are ignored in practice. In particular, Travel Plans must never be seen as an alternative to actual infrastructure that a developer should be providing. For instance, the Lion Yard extension planning application did not require the developer to increase cycle parking (despite the Cycle Parking Standards requiring this), yet at the same time it implemented a travel plan that would clearly create the demand for it.

Change "a travel plan" to "a travel plan (which should not be seen as an alternative to the provision of actual infrastructure, but complement it)"

Policy 82: Parking Management

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32936#d32936>

OBJECT

We are extremely concerned about several aspects of the cycle parking aspect of this policy (which contains several loopholes), and ask those considering the plan to scrutinise this closely. Historical deficiencies must be addressed. Key principles must be put in the main text and not delegated to other sections or external documents.

We gave evidence at the previous Local Plan Inquiry, and the problems outlined in the evidence were not addressed, but have been shown to be problematic.

We note concerns in Appendix L in more detail.

Strongly support the principles here, including limiting car parking levels, since that reduces congestion.

In addition to the changes we propose in Appendix L:

Add paragraph:

With respect to cycle parking, the following principles apply:

- Details of cycle parking layout and quantity must be provided as part of development proposals, not left until a later stage.

- Cycle parking must be located at least, if not more, conveniently than any car parking. Cycle parking should be designed to be secure but primarily with convenience in mind. In larger new developments, a split of around 75% convenient secure cycle parking (e.g. near main exit) and 25% high-security cycle parking (e.g. in a cage on a ground-floor basement) should be considered best-practice.

- High-density cycle parking, or double-stacker cycle parking will only be permitted in new developments in areas of extremely high density such as the city centre; this form of provision will not be accepted for new-build except in exceptional circumstances.

- In general, large amounts of cycle parking in a basement will be considered inconvenient. Furthermore, cycle parking must never be situated two levels below the ground floor of a development.

We wish to appear in person on this section. "A national inspector is unlikely to be very familiar with issues relating to high levels of cycling and the infrastructure challenges that this brings. This section is a key issue for us, and so we would strongly welcome the opportunity to argue our case in discussion. We did so at the previous Inquiry for the 2006 Local Plan and this was, we believe, found to be useful."

Policy 85: Infrastructure Delivery, Planning Obligations and the Community Infrastructure Levy

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&docelemid=d32939#d32939>

OBJECT

Two clear deficiencies here which make the proposals unsound:

- There is no mention whatsoever of public consultation over details of S106 / CIL agreements. There is clear evidence of unsuitable infrastructure being provided following negotiation in private between a developer and the Council without any public scrutiny. Where changes to public realm are proposed, these should be subject to public agreement in Committee, exactly the same as publicly-funded changes are.

- This section must be strengthened to make clear that infrastructure must be in place from the start of the development, not the end. There is clear evidence of previous problems.

Add:

"Where changes to public realm are proposed, public consultation will take place, and these will be subject to agreement by elected representatives in public."

And add:

"Key transport infrastructure (including cycling/walking routes and cycle parking) must be in place from the start of the development, or at least at the same time that roads are built."

Appendix H: Shopfront Design Guide

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&chapter=18&docelemid=d32852#d32852>

OBJECT

Fails to mention the illegal stopping that inevitably occurs when cashpoints (ATMs) are added to shops directly on major arterial roads. These should be placed inside, to avoid passing traffic blocking such roads. Expecting the problems of poor design to be dealt with through enforcement is bad policy.

Add paragraph:

"Where cashpoints (ATMs) are added to shops directly on major arterial roads, these should be placed inside, to avoid passing traffic blocking such roads."

Appendix I: Open Space and Recreation Standards

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&chapter=19#d32853>

OBJECT

This section fails to recognise that many open spaces in Cambridge have a clear transport function, with high levels of walking and cycling very common.

This is a significant and unsound omission.

Add new bullet point (c) and renumber thereafter:

"Is the site heavily-used for transport purposes, namely walking and cycling?"

and add criteria text in the following section.

Appendix L: Car and Cycle Parking Requirements

<http://cambridge.jdi-consult.net/ldf/readdoc.php?docid=171&chapter=22#d32856>

OBJECT

We are extremely concerned about several aspects of the cycle parking aspect of this policy (which contains several loopholes), and ask those considering the plan to scrutinise this closely. Historical deficiencies must be addressed.

Sections L16 onwards are disorganised, with inconsistencies between the residential and non-residential sections, creating clear and unsound loopholes. For instance, "be at least as convenient as the car parking provided." applies to both residential and non-residential. Likewise, there is nothing governing use of double-stacking stands in residential developments but there is in non-residential developments.

This whole section needs serious clarification and reordering.

The following changes should be made:

- Add a clear heading "Cycle parking", where the section on cycle parking begins.
- Move almost all text that is not in the table sections to the start, so that these are a clear set of principles that apply to all types of cycle parking. Specifically these are: L.16 bullet point 3, L.17 bullet points 1,2,4,5, L.18, L.19. Retain the remaining paragraphs under their respective headings, being specific to those headings.
- In the section on residential cycle parking, the text fails to recognise that a 1-bedroom flat could still have 2 people: standards are insufficient. Average 1.5 spaces across the

development needed. So add text "1.5 spaces per 1-bedroom flat on average across the development". Then change next sentence to "1 space per bedroom for 2 or 3 bedroom dwellings".

- Add "unavoidably" in "where cycle parking provision is located in the back garden" to "where cycle parking provision is unavoidably located in the back garden".

In the new main heading section, add:

"- Details of cycle parking layout and quantity must be provided as part of development proposals, not left until a later stage.

- Cycle parking must be located at least, if not more, conveniently than any car parking. Cycle parking should be designed to be secure but primarily with convenience in mind. In larger new developments, a split of around 75% convenient secure cycle parking (e.g. near main exit) and 25% high-security cycle parking (e.g. in a cage on a ground-floor basement) should be considered best-practice.

- High-density cycle parking, or double-stacker cycle parking will only be permitted in new developments in areas of extremely high density such as the city centre; this form of provision will not be accepted for new-build except in exceptional circumstances.

- In general, large amounts of cycle parking in a basement will be considered inconvenient. Furthermore, cycle parking must never be situated two levels below the ground floor of a development."

Appendix 1, on high-density cycle parking, is entirely missing, despite being referenced in the text. We are concerned in particular that there needs to be clear guidance on avoiding over-dense cycle parking.

We hope the Inspector will hold a full Inquiry session on this section, and we strongly wish to give evidence, to help ensure the Council's wording is watertight and gives a clear and helpful steer to developers.

We wish to appear in person on this section. "A national inspector is unlikely to be very familiar with issues relating to high levels of cycling and the infrastructure challenges that this brings. This section is a key issue for us, and so we would strongly welcome the opportunity to argue our case in discussion. We did so at the previous Inquiry for the 2006 Local Plan and this was, we believe, found to be useful ; see notes about Inspector at: <http://www.camcycle.org.uk/resources/cycleparking/standards/city.html> "

Yours sincerely,
on behalf of Cambridge Cycling Campaign,

Martin Lucas-Smith
Chair