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Dear Dallas

CCC/22/072/FUL | Proposed realignment of A1307 / Haverhill Road junction; construction of new active travel routes; and an at-grade unsignalised crossing point for active travel users; and turning modifications between Haverhill Road and Wandlebury Country Park; associated lighting, engineering, and landscape works.

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

Cambridge Past, Present & Future has considered this application and **objects** on three grounds:

- The proposed changes to the two road junctions adjacent to Wandlebury would be unsafe, creating a risk of serious injury or increased accidents.**
- The proposed lighting scheme is excessive and in association with signage would cause unnecessary harm to the high-quality landscape of the Gog Magog Hills, contrary to Local Plan Policy NH/2 (protecting and enhancing landscape character).**

iii. **Negative impact on biodiversity contrary to Local Plan Policy NH/4**

If the application were to be granted, then we also ask that a planning condition is included which would prevent this scheme from being started until a final decision is made on the construction of the Cambridge South East Busway.

Below we have set out these arguments in more detail, as well as providing some additional comments.

1. The proposed changes to the two road junctions adjacent to Wandlebury would be unsafe

Paragraph 111 of the NPPF says that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

The two junctions adjacent to the Wandlebury Estate provide access to the Country Park (which receives over 30,000 vehicle visits per year from visitors, ie 60,000 vehicles uses of the junction), 11 residential properties and the head quarters of a charity with 13 employees and many regular volunteers. In addition, there are vehicle movements from delivery vehicles serving the country park, charity and residents. In summary, this is a junction that is in very regular use throughout the day and year and which can become very busy during peak visiting periods such as bank holidays. As owners of the estate, we feel that we have a responsibility for the safety of visitors, staff, volunteers and the residents (many of whom are elderly).

As a result, CambridgePPF appointed an **independent road safety consultant** to review the proposals for the two junctions adjacent to Wandlebury to help us understand the implications for those who use the junctions. We have attached their report as part of our response, **the report highlights significant safety concerns regarding vehicles making u-turns on the brow of a hill (with a blind-spot) and exiting the Country Park junction close to the brow of a hill**. In order to improve safety of the scheme the report recommends:

- That the reduced speed limit is reviewed, and some form of physical installation is provided to reduce traffic speeds.
- That the restriction on movements at the access to Wandlebury Country Park is removed from the scheme – there seems little benefit from this proposal other than increasing the number of movements having to be made at the northern central gap which has limited visibility due to the hill top and other issues mentioned in the report.
- That the cycleway across the entrance to Wandlebury Country Park includes Give Way signs and lines for cyclists, rather than motor vehicles due to the difficult layout.

In summary, this scheme, as set out, would worsen road safety at the two junctions at Wandlebury, potentially putting lives at risk. The scheme would only be safe if it included a physical means of slowing vehicles to the new speed limit of 40mph, unfortunately it does not. This could be achieved by installing a speed camera, however the applicant is unable to do this (another agency would need to agree and install the camera). We understand that the criteria for installing a camera is that there is evidence of speed related accidents, as there is currently no evidence for this at the two Wandlebury junctions a camera is unlikely to be installed.

In light of the attached report highlighting safety concerns, we would question whether anyone suffering an accident at the two Wandlebury junctions, as a result of the changes proposed, would be entitled to sue the applicant or the consenting authority (both are County Council) – and thus whether this scheme can proceed in its current form.

In order for the scheme to be approved it **must** include a planning condition that a speed camera is installed as part of the scheme, as a requirement to ensure safety. Alternatively, the application should be withdrawn or refused, and a revised scheme submitted that could address the safety issues without the need for a speed camera. We would be happy to work with the applicant to achieve either outcome.

2. The proposed lighting scheme is excessive and in association with signage would cause unnecessary harm to the high-quality landscape of the Gog Magog Hills, contrary to Local Plan Policy NH/2.

The proposed road realignment lies in an important area in landscape terms and ecologically. Within 1km of the scheme are Country Parks, Scheduled Ancient Monuments, a County Wildlife Site, SSSI and a Local Nature Reserve.

The A1307 crosses the Gog Magog Hills landscape character area, an area of chalk hills, which affords attractive views over Cambridge but is also visible from parts of the city and surrounding areas. The most recent landscape character assessment has been carried out by Chris Blandford Associates to inform the next Greater Cambridge Local Plan, their 2021 report "[Greater Cambridge Landscape Assessment](#)" describes the Gog Magog Hills landscape area as having a strong "strength of character" and being in "good landscape condition" (p31) and states that the landscape management objectives are to "conserve" and "enhance" (p32).

The report describes the Gog Magog Hills (p143-146) as:

- *"The wooded summit of Wandlebury is a memorable feature which contributes to the character of the landscape and enriches the setting of Cambridge."*
- *"There are elevated panoramic views towards Cambridge, in which the southern edge of Cambridge is strongly apparent, and long distance views towards Ely from Wandlebury Country Park. These views give this Landscape Character Area a strong connection with the city of Cambridge and a strong sense of place. On lower ground views towards wooded horizons are visually enclosed, or framed by rolling landform and deciduous woodland."*

The report goes on to set out principles for managing positive landscape change (p33):

- *"As the local planning authorities, the Councils should use the relevant character information to assist in the development management process. Development assessed as having potential to have a significant adverse effect on valued characteristics may be a candidate for refusal or require planning conditions that ensure important features/qualities are not diminished"*
- *"Avoid a standardised "anywhere" approach to design by using the relevant character information to inform the process of negotiation between planning officers and developers, to support appropriate high-quality design and place making. The Councils should be proactive in helping developers better understand how their proposals can be designed to reflect and enhance local landscape character. For example, officers may use the relevant character information to highlight to developers the characteristic features of the landscape, villages and townscape that should be considered for enhancement, restoration or conservation etc, and identify specific criteria and landscape considerations that a development proposal should take account of prior to approval and subsequently be assessed against"*
- *"The Councils should consider the cumulative effects of small-scale development and incremental change on landscape character. Incremental changes can gradually erode landscape character and local distinctiveness if the wider context of a development or land management initiative is not considered."*

The report also sets out specific landscape guidelines for the Gog Magog Hills (p145):

- *"Ensure development enhances existing landscape features and is in keeping with the open, rural character"*

Although a main arterial route in and out of Cambridge, the A1307 has no street lighting and minimal road signage in this location, protecting this landscape character of the Gog Magog hills. Application CCC/22/072/FUL proposes to introduce 26 lighting columns into this landscape (there are currently none):

- 9 lighting columns on the north-east side of A1307
- 11 lighting columns on the south-west side of A1307
- 6 lighting columns on Haverhill Road.

The submitted plans provide no indication of road signs needed to support the revised layout.

The street lighting, white lining and signage will diminish the distinctiveness of the landscape contrary to Local Plan policy NH/2 (protecting and enhancing landscape character) and contrary to the advice provided by Chris Blandford Associates to the Greater Cambridge Shared Planning Service.

We are particularly disappointed that the applicants' photo montage has been provided in such a way as to try and downplay the visual impacts of the scheme. Firstly, the lighting columns on the northern side of the road are not shown, and secondly an aspect has been chosen which draws the viewers eyes to a seemingly large area of grass verge (which is in fact very small).

We have analysed the accident data for the junction to understand whether lighting could be a contributing factor to safety at this junction. This data is taken from Cambridgeshire County Council (accidents 2018-2021) and from Department for Transport/Police STATS19:

	Date	Day/Night	Seriousness	Involving cyclist
1	02/06/2021	Day	?	Cyclist
2	28/11/2020	Night (rain)	Slight	Cyclist
3	19/01/2020	Day	Serious	
4	02/08/2019	Day	Fatal	
5	09/06/2019	Day	Slight	Cyclist
6	25/10/2018	Day	Slight	Cyclist
7	16/10/2018	Day	Slight	Cyclist
8	13/08/2018	Night	Serious	
9	14/06/2018	Day	Serious	
10	15/05/2018	Day	Slight	
11	01/09/2016	Day	Slight	
12	19/11/2015	Day	Slight	
13	08/11/2015	Day	Slight	
14	08/05/2015	Day	Slight	Cyclist
15	04/09/2014	Day	Serious	Cyclist
16	15/10/2013	Day	Slight	Cyclist
17	05/09/2013	Day	Serious	Cyclist
18	17/06/2013	Day	Slight	Cyclist
19	11/12/2012	Night (fog/damp)	Slight	
20	22/11/2011	Night (rain)	Serious	
21	27/04/2011	Day	Slight	Cyclist
22	10/03/2010	Day	Slight	
23	05/08/2008	Day	Slight	
24	25/04/2006	Day	Slight	
25	29/10/2005	Day	Slight	

It can be seen that of the 25 accidents, only 3 were not during daylight. Out of those 3, two of them occurred when there were wet/damp/fog conditions and therefore these may have been greater factors rather than lighting. Therefore, there would appear to be very little evidence that lighting is a contributing factor to accidents at this junction. Further to this, the scheme proposes reducing the speed limit and making the junction safer by re-aligning it; meaning that safety would be improved by other means, thus further

lessening the requirement for such an excessive lighting scheme. In short, the harm that would be caused to the landscape and biodiversity by excessive lighting is not justified.

The application should be refused (or withdrawn and a new lighting scheme proposed which is more appropriate to the sensitive and locally important landscape setting).

3. Negative impact on biodiversity contrary to Local Plan Policy NH/4

The Cambridgeshire Green Infrastructure Strategy (2011) identifies Wandlebury/Gog Magog as an important gateway to the chalklands south of Cambridge and highlights opportunities for improving landscapes, enhancing biodiversity, enjoying heritage and getting out into the countryside. The Strategy, which supports the Adopted Local Plan policies, provides an overarching strategy for Cambridgeshire which highlights existing natural green space and opportunities for creating, linking, and improving it. It identifies the Gog Magog Countryside Area as one of only two major ecological networks offering excellent opportunities to improve the biodiversity of the area. Wandlebury Country Park and the Magog Downs are highlighted as multi-functional sites offering informal recreation as well as wildlife and habitat conservation.

The Gog Magog Hills are a priority landscape as identified in the Cambridge Nature Network (this in itself is identified as one of six landscape scale areas for nature recovery with Cambridgeshire). This landscape has been chosen because of its unique ecological and geographic features, and its intrinsic value to the identity and natural heritage of the Cambridgeshire landscape. The Gog Magog hills are important for its open chalk grasslands and woodlands.

The area of this application is one of the most important habitat areas in the Cambridge environs, comprising several sites which are of national or county level importance, which together create one of the largest blocks of good quality habitat around Cambridge. Unsurprisingly these habitats support good populations of wildlife, including bats and invertebrates, and Wandlebury is of county level importance for its bat population and the Gog Magog Hills are important for invertebrate populations – both of these can be negatively affected by light pollution and so this should have been a major consideration in the development of this scheme.

Local Plan Policy NH/4 (Biodiversity) aims to conserve or enhance biodiversity. The policy specifies that new development must aim to maintain, enhance, restore or add to biodiversity. Priority for habitat creation should be given to sites which assist in delivering the Cambridgeshire Green Infrastructure Strategy.

Application CCC/22/072/FUL Appendix F of the Environmental Report on Ecology relates to 2018 data and is therefore 4 years old. It was prepared in relation to the larger phase 1 Cambridge South East Transport Study and not the road realignment being proposed through this application. Therefore, given that much of the evidence doesn't take into account these proposals it is not possible to determine the impact on the development.

We support the response of the County Biodiversity Team who:

- raise the issue that there has been no bat survey work to determine the importance of the crossing point over the A1307 at Haverhill Road/ Gog Farmshop;
- Consider that the lighting scheme has not successfully reduced the light spill to an acceptable level to mitigate the impact on bats; and
- Are concerned over inaccurate and missing ecological evidence for a number of issues including Wandlebury County Wildlife Site.

In addition, we would also highlight the negative impacts of the lighting on invertebrate populations, especially given that the lighting would spill directly onto Magog Down, whose invertebrate assemblage is of county level importance (Kirby, "Magog Down Invertebrate Survey 2018").

In its current form, the application should be refused. We would welcome it to be withdrawn and the lighting proposals reconsidered. This would benefit both biodiversity and landscape.

Planning Condition in relation to Cambridge South East Busway

A significant infrastructure scheme is being planned for this area to provide traffic free routes for buses. One of the options is to provide an in-bound bus lane alongside the A1307. This would go straight through the scheme proposed in application CCC/22/072/FUL and would require the scheme to be reconsidered, including whether a subway crossing may be preferable for active travel users.

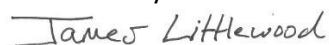
At the current time, the preferred option for the traffic free route is a bus road through the countryside close to Stapleford village, and this would not affect application CCC/22/072/FUL. However, if that scheme does not proceed (due to failing to gain planning permission or lack of funds) then it is almost certain that an in-bound bus lane alongside the A1307 would be constructed instead, which would go straight through the scheme proposed in application CCC/22/072/FUL. Therefore, it would be premature (and financially irresponsible) to implement the realignment of A1307 / Haverhill Road junction until it is known which bus option will proceed. Therefore, if the committee is minded to approve this application, we ask you to insist on a planning condition preventing construction from starting until it is known which bus option will proceed.

Other comments

- We note that 44% of accidents at the Haverhill Road Junction/Gog Farm Shop are cycle accidents involving cycles crossing the entrance to the farm shop and that the scheme design does little to address this problem.

I trust that you will take our comments into consideration.

Yours sincerely



James Littlewood
Chief Executive