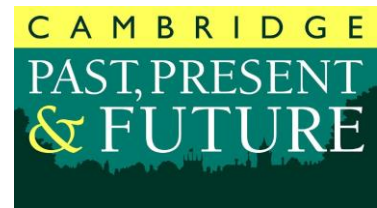


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Dear Jo

Response to consultation on Newmarket Road Improvements 2023

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 the consultation material and has a number of concerns regarding these proposals which we have set out below. Principally these relate to environmental damage and we object to the proposals put forward for the Park & Ride and the verge to the west of Airport Way roundabout:

1. Park and Ride Preferred Site

Our preference remains that the existing P&R should be retained, and compulsory purchased if necessary, because:

- the capacity of the existing site could be increased if the additional car parking spaces were provided through a decked or multi-storey parking system. This was an option that was developed as part of the options appraisal for the Cambridge South West Park & Ride.
- It is a much better location for Park & Cycle. This site is closer to Cambridge and is already well served by a cycle route to the city centre (which can be reached without having to cross the busy Newmarket Road). No new infrastructure is required to facilitate this.
- The site is already well screened, and investment has been made in the infrastructure.
- It doesn't involve building in green belt countryside.

CambridgePPF does not support the principle of building large park and ride car parks in green belt countryside on the edge of the city because:

- Park & Ride encourages car journeys and therefore a new large P&R will result in an increase in carbon emissions. This has been recognised in the planning application for the South West Cambridge P&R. This is not compatible with zero carbon planning.
- Park & Ride competes with public transport (thereby reducing patronage, which in turn reduces service frequency, which in turn reduces patronage, etc). A more environmentally sustainable approach is to support better public and active transport from surrounding areas – as is now proposed by the GCP and Cambridgeshire & Peterborough Combined Authority.
- It can have a detrimental impact on landscape, ecology and heritage, both directly from the building of these facilities and their associated infrastructure (such as lighting), and indirectly by attracting other development (for example, the location of the Milton P&R was used to justify the development of a new police station in the green belt). It is effectively a form of urban sprawl.

If the GCP insists on pressing ahead with a new P&R in the countryside, then our preference is for the site to be located north of the A14 because:

- Commuters would be intercepted earlier in their journey, reducing traffic on the A1303. This principle has already been applied at Milton P&R and the proposed Cambridge South West P&R. The future development of the Cambridge Airport site will significantly increase traffic on this section of road, so P1 does not seem to be future proofed.
- It would be closer to the A14 and would therefore help to keep development within a corridor which already has significant transport infrastructure. In particular site P10 is sandwiched between two roads.
- Site P11 could also serve as a future car park for visitors to the National Trust's Wicken Fen Vision and other future recreational provision in this area, which will result from the Airport development. Site P11 would also be well located for Park & Cycle.

If the GCP insists on pressing ahead with a new P&R inside the A14, then our preference is for site P1 because:

- It is already well screened.
- It is not as close as others to Wilbraham Fen SSSI and associated habitats and wildlife corridors (providing that access to these from the P&R is restricted)
- It is less likely to result in ancillary developments than others (ie further indirect impacts on landscape, ecology, heritage and green belt).

2. Design of Preferred P&R Site P1

In order to enable respondents to make an informed decision it would have been helpful to understand where the junctions into Cambridge East (Airport site) are planned to be located. With Option A, will there still be a junction into Cambridge East as shown in Option B? If this is the case, then having a single junction as proposed in Option B is preferable. If not, then we would draw your attention to the ecological value of the highway verge which would be destroyed by Option B. This verge has a population of Bee Orchids and other meadow species (see also 3.1 below).

Both options do not improve the route for cyclists into the city centre. There is currently an attractive off-road cycle route (Greenway) on the north side of Newmarket Road, which also runs through the existing P&R site, Marleigh development and Ditton Meadows and then, either on to the city centre, or to both rail stations via the Chisholm Trail. To access this route from the proposed P&R site P1, would involve navigating Airport Way roundabout and/or crossing Newmarket Road – or cyclists journeying along Newmarket Road which will always be more dangerous and less attractive than the Greenway.

3. Newmarket Road

3.1 Landscaping near Airport Way roundabout

The highway verge west of Airport Way roundabout is a chalky grassland habitat and has a significant colony of Bee Orchids and other botanical interest – which should be protected and ideally enhanced. It also has a record of Lizard Orchid which is listed on Schedule 8 of the Wildlife and Countryside Act 1981, so receives higher protection than other plant species.

In a previous round of consultation we advised you about the ecological value of this area in the expectation that our information would be used to inform the next phase of the project. It is incredibly disappointing to learn that no ecological surveys have been carried out and to see that your plans are unacceptable from an ecological perspective (eg tree planting, SUDS and increased width of cycle path). **We object to these plans.**

Having corresponded with you on this matter, you have advised us that you will commission ecological surveys and that the plans for this area will be revised to reflect the ecology, but you still refer to avoiding the orchids “wherever possible” rather than “avoiding them”. We question the likely future level of cycle use on this section of path and whether it justifies ecological damage. We believe that a more ecologically friendly solution is to enable active travel users to cross to the northern side of Newmarket Road where they can join the greenway. This would be preferable for a number of reasons. We request that you carry out work to assess this option as part of the next stage of the project – and as part of the ecological mitigation hierarchy, the first step of which is to avoid harm.

As part of the Wild Isles series for BBC, David Attenborough has stated that "Though rich in places Britain as a whole is one of the most nature depleted countries in the world.....Never has there been a more important time to invest in our own wildlife — to try and set an example for the rest of the world and restore our once wild isles for future generations."

3.2 Barnwell Road Roundabout and Elizabeth Way Roundabout

The highway changes to these two roundabouts will result in the removal of mature vegetation from the centre of the junctions. In landscaping terms, this vegetation provides height and screening which visually breaks up what would otherwise be a very large swathe of tarmac, with views along major roads/queuing traffic. The proposals put forward would remove this landscaping and instead create new landscaping around the sides of the junctions. This will improve the sides of the junctions but to the detriment of the central areas of the junctions. This is especially true at Barnwell where the replacement landscaping will have little height. It is therefore questionable whether the changes to the junctions will actually improve the street scene. In order for community groups (like us) to make an informed response to the consultation, you really needed to provide visualisations from a pedestrian’s view of the junctions (before and after). We ask that this is done before any decision is taken. This will allow the community to have a better understanding of the proposals and make informed responses.

The proposals for Elizabeth Way roundabout are a missed opportunity. We understand that Cambridge University School of Architecture uses the Elizabeth Way roundabout as a case study with students, who come up with their own solutions as part of their course. We also understand that Fifth Studio Architects also did some work considering options for the roundabout. The previous work of others could be the basis for exploring options for something more imaginative than covering it with tarmac and planting some trees nearby. We would encourage you to make contact with the University and Fifth Studio to explore this with them.

At Elizabeth Way, there is also embedded carbon in the subway system as well as the loss of mature trees which help alleviate air pollution (new trees would take 30 years to provide similar benefits). Instead, could improvements to the subway provide a solution which is more environmentally friendly and has a better Benefit-Cost-Ratio? As far as we aware, you have not put forward a solution along these lines to compare with your preferred option.

The Elizabeth Way roundabout presents an opportunity to bring together architects, urban designers and the community to use their collective wisdom in a co-design process to achieve something much better than the proposals you have put forward. We would encourage you to not to miss this opportunity.

3.3 Trees

In our response to an earlier consultation, we highlighted the importance of the existing trees along Newmarket Road. We are very supportive of the approach that you have adopted, which is to retain the important trees and only provide new infrastructure where there is space to do so without felling trees.

As you continue to develop your plans and have further information about potential impacts on trees (such as root damage) we encourage you to continue with a “trees first” approach – and also to be transparent with the community about any impacts on trees in order to inform decision making.

3.4 Active travel road crossings

The road crossing strategy that is being pursued on Newmarket Road is confused.

- Part of the rationale for spending £millions on a subway for the Chisholm Trail, and harming the setting of a grade 1 listed building, was that it would avoid traffic (including buses) being held up by signalised crossings. Yet there is now a proposal to install a new signalised crossing near Garlic Row, which is only 150m away from another signalised crossing and 240m from the Chisholm Trail crossing. The Garlic Row crossing is unnecessary and would have the effect of slowing bus journey times. Improving the crossing at the nearby B&Q/Stanley Road junction would provide the best road crossing facilities in this location and minimise impact on bus journey times. If the new crossing opposite Garlic Row has been agreed as part of a planning condition for the student accommodation on the former Honda showroom, then this should be re-negotiated in order for the s106 to fund the crossing improvements at the B&Q junction (thus saving GCP funds for other projects). The Garlic Row crossing would also result in additional unnecessary visual clutter (traffic poles, signage, road markings) which will detract further from the appearance of Newmarket Road – it will also be additional infrastructure that the County Council would have to maintain.
- Having spent £millions on a subway for the Chisholm Trail (in order to enable cycles to move freely and avoid delays to buses) it is now proposed to spend £millions to close the subways at Elizabeth Way roundabout and install at grade crossings (which will hold up cycles and delay buses).

I trust that you will take our comments into consideration.

Yours sincerely

Sarah Nicholas

Principal Planning Officer