

Dear Cllr

I am contacting you on behalf of local charity Cambridge Past, Present & Future in relation to Cambs County Council Planning Committee on 15 June and the application for a 2500 space car park in the green belt countryside at junction 11 of the M11 (CCC-20-040-FUL).

You will note in the officer report that “the conclusion of officers’ remains unchanged.” The conclusion in the previous report, which is not reproduced verbatim in this report, leaves you with more discretion than the current report may lead you to believe: *“It is considered that the proposals in the planning balance **just tips** in the favour of the development and therefore officers recommend that there is a balanced justification to support the development of the South West Travel Hub as proposed in this application.”*

There have been additional reports submitted for this application, which I would like to respond to in greater detail than I will be able during a short public statement during the committee meeting.

Although your task is to decide whether to grant planning permission, you are in effect being asked to decide between two future scenarios for transport in the Cambridge area.

The scenario you are being asked to approve is that people are encouraged and enabled to drive to the edge of Cambridge and then transfer to more sustainable transport. This envisages the majority of people’s journey made by private car. There are already 5 P&R sites on the edge of Cambridge and they have not solved the area’s traffic congestion problems.

The alternative scenario is that people are encouraged and enabled to access sustainable transport closer to where they live. This envisages the majority of people’s journeys into Cambridge made by sustainable transport. Planned investment in rail, bus and cycling infrastructure and bus services is intended to give your constituents more sustainable options to access Cambridge from South Cambridgeshire and beyond.

Cambridge is already well-served by rail: the A10 (south and north of Cambridge) and M11 are served by frequent rail services with numerous local stations. A huge amount of investment is planned to enhance rail access even more. Cambridge South station will provide direct access to the Biomedical Campus, as Cambridge station provides access to CB1 and the city centre, and Cambridge North to the Science Park and other business parks in the north of the city. East West Rail would also give residents of Cambourne, Newmarket, Bury St Edmunds and other towns direct access to Cambridge South and Cambridge stations. Encouraging more people to drive to a Park & Ride on the edge of Cambridge will undermine all that investment.

To put it into perspective, rail currently delivers to Cambridge the equivalent of twenty Trumpington Park & Rides (including the recent extension of the P&R).

The Greater Cambridge Partnership (GCP) is proposing to invest heavily to improve the coverage and quality of bus services from surrounding villages and towns. Again, encouraging more people to drive to a Park & Ride on the edge of Cambridge will undermine that investment.

GCP is also investing in a network of new rural cycleways (‘Greenways’) to give people safer and more convenient access to Cambridge, local railway stations and future travel hubs, served by express bus services. Again, encouraging people to drive to the edge of Cambridge will undermine that investment.

The officers’ report you have received suggests that the alternative to building a P&R is to dual the A10. It ought to be clear to you that this is out-dated transport thinking, wholly incompatible with responding to the climate emergencies declared by Cambridge, South Cambridgeshire and Cambridgeshire County councils.

For these reasons, CambridgePPF believes that the M11 Park & Ride is the wrong scheme in the wrong place. It is a short-term solution that will have a long-term effect of reinforcing current, unsustainable travel behaviours. We encourage you to refuse this application because it will result in building over the green belt countryside to create a giant car park, a new bridge, new junctions and other intrusive infrastructure. Contrary to much of the information presented to you, this is not in any way a “sustainable development”.

## Reason for refusal

There is a strong policy basis for you to refuse this application:

1. This proposal is contrary to national and local green belt policy because it has not demonstrated that a green belt location is needed. As outlined above, there are other ways of addressing the transport problem that do not require a car park in the greenbelt.
2. The solar ports are inappropriate development in the greenbelt and there are no planning grounds for approving them.

## Reasons for deferral

There are also grounds for deferring this application again:

3. There appears to be no modelling of air quality levels in Harston, resulting from the increased traffic queuing caused by the new traffic lights on the A10 to control access to the Park & Ride.
4. The need to model the impact of the P&R on GCP's planned bus service improvements, set out in its City Access Plan, which the GCP Board approved in September 2021, to demonstrate that it will not undermine an already agreed strategic sustainable transport initiative.

## Conditions on any permission granted

It is clear that, at the present time there is no need for an additional car park. If the committee is minded to approve this application then we ask you to impose the following conditions:

5. That development does not proceed until the use of the current P&R returns to a level that justifies the construction of a new car park. In other words, once an agreed trigger point is reached.
6. That the construction of the new P&R is phased, with subsequent phases only allowed to proceed when the level of use justifies expansion, again at an agreed trigger point. The applicant has previously indicated that this could be phased into three sections of 700 spaces each. We would recommend that the unused land is sown with wildflowers in order to provide temporary habitat until they are needed for development.
7. The officer's report recommends that a condition is imposed for the monitoring of visitor numbers at Trumpington Meadows and that if visitor numbers significantly increase, a review of mitigation is undertaken, and remedial actions taken. We strongly support this and ask the committee to insist upon this condition. However, it will be essential that the condition sets out what is considered as significant and what the consequences would be if remedial action is not adequate. This area of the Meadows has very low visitor use and therefore it is highly likely that significant increase will occur based on a % increase.

We would also like to question some of the information provided to you by officers in relation to Climate Change, which helps to highlight that the scheme is not sustainable.

## National Planning Policy Framework (July 2021)

This is the most relevant extract from the NPPF (our highlights):

### Proposals affecting the Green Belt

147. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved **except in very special circumstances**.

148. When considering any planning application, **local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.**

150. Certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These are:

a) mineral extraction;

b) engineering operations;

**c) local transport infrastructure which can demonstrate a requirement for a Green Belt location;**

d) the re-use of buildings provided that the buildings are of permanent and substantial construction;

e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds); and

f) development, including buildings, brought forward under a Community Right to Build Order or Neighbourhood Development Order.

151. **When located in the Green Belt, elements of many renewable energy projects will comprise inappropriate development.** In such cases, **developers will need to demonstrate very special circumstances** if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

## Commentary

Below, we have set out more information on each of these points covered above.

1. This proposal is contrary to national and local green belt policy because it has not demonstrated that a green belt location is needed. The transport planning and modelling has been based on intercepting car journeys on the edge of Cambridge which leads to a conclusion that a large P&R is required. An alternative strategy is to encourage and enable people to access sustainable transport closer to where they live, which would not require a large P&R. That strategy is being pursued by Network Rail, East West Rail and GCP through its City Access and Greenway programmes.

The optioneering process for this scheme demonstrated that a viable option was to provide increased car parking capacity at the existing Trumpington P&R site by creating a multi-storey car park. This is not in the green belt. A decision was made to rule out this option, which would have been compliant with green belt policy, in favour of a green belt location. Reasons have been set out for this decision. One of these is that it was supported during public consultation, however the applicant has previously publicly stated that the results of public consultation do not determine which options are taken forward (they are progressing options elsewhere which were not supported in public consultations). Another reason was that the multi-storey could only deliver another 950 parking spaces, however the pandemic has reduced the demand for P&R and therefore it must be a valid question to ask whether demand could now be met through multi-storey, especially in combination with other sustainable transport initiatives being pursued by the applicant, plus Cambridge South station.

2. In relation to the solar car ports. These are inappropriate development within the green belt and are thus contrary to national planning policy and Local Plan Policy S/4. They do not meet any of the exceptions listed in National Planning Policy Framework paragraph 149 or 150. We acknowledge the applicants' reasoning for wishing to provide renewable energy to offset the carbon emissions that will be generated by this development. However, there is no justification to achieve this through development in the Green Belt, when the applicant could use land beyond the Green Belt for this purpose if they wished. There is no evidence that the applicant has considered other non-greenbelt locations for generating renewable energy. In planning terms, it is irrelevant whether the electricity generated by the solar ports is supplying the site or the national grid. If the committee is minded to approve this application, then it must be on the basis that the solar ports are removed from the scheme because of the negative impact they will have on the openness of the greenbelt and because they are contrary to planning policy. Vegetation will not grow sufficiently high to screen car ports for 15 years. At that point it might be appropriate to reconsider their installation.

3. Air quality modelling for Harston. The officer's assertion that "Building travel hub and Park and Ride sites linked to high quality public transport, which connects businesses and services can reduce private car use and congestion within the city, thereby ensuring ease of movement and maintaining a good quality of life for residents by improving air quality." fails to consider that the scheme could make air quality worse for the residents of Harston. There will be increased congestion on the A10 as another set of traffic lights interrupts the traffic flow north to allow traffic from the M11 enter the car park – this will increase traffic pollution. Has modelling been carried out to assess the increase in air pollution in Harston?

4. Since the M11 P&R was submitted, a proposal has also been put forward by the GCP and the Combined Authority, to significantly improve bus services serving Cambridge and its employment centres. However, P&R competes with such services as it encourages people to drive first and then catch the bus, rather than catch a bus closer to where they live. What modelling has been carried out to estimate the impact of the P&R on the demand for new bus services? What modelling has been carried out to estimate the reduction in demand for P&R spaces as a result of better bus services?

5. The pandemic has led to a permanent change in working practices. Home-working is now established as a preferred option for office-based staff for at least one day a week. This alone will reduce commuting into Cambridge by around 20%. The total provision at Trumpington P&R and the new M11 P&R will be 1,614 + 2,500 = 4,114. A 20% reduction in demand would mean only 3,292 spaces were required in total. That would

mean the M11 P&R requires only 1,678 spaces. What then are the 'very special circumstances' that justify granting consent for a 2,500 space car park?

The analysis of usage of Trumpington P&R runs only to the end of 2021, when occupancy was around 50%. Current data on P&R occupancy shows that demand has risen only slightly since then, peaking at 58% (936 out of 1616 spaces). The report asserts, "it is expected that, gradually over time, the number of users at Trumpington will increase back to full occupancy, with future employment growth still resulting in the need for additional capacity." It goes on to say, "there may be a case for a reduction in spaces. However, calculating this would be based on significant assumptions with little evidence to support them." The lack of evidence of course cuts both ways: the pre-COVID evidence is no more reliable than today's evidence.

We have serious reservations about the modelling used to predict demand and the assumptions behind the modelling. There seems to be little, if any recognition, that Cambridge South Station will enable thousands of people a day to reach the Biomedical Campus directly by train, particularly along the M11 and A10 corridors, which will also be served by this P&R. Furthermore, large new developments proposed in the next Local Plan in north-east and east Cambridge are intended to reduce inward commuting. Finally, the applicant's own proposals to radically improve rural bus services and cycling infrastructure are intended to reduce commuting by car.

### Climate change

Our final point is that the documents from the applicant, and the planning officers report, gloss over the fact that park & rides encourage car travel and that in total, parking spaces will be provided for 3,600 cars. You have to use a car to get to them and the majority of the person's journey will be made by car. It is therefore misleading to claim that they reduce car travel and are somehow a form of sustainable transport. They sustain existing car travel, and generate new trips, some of which are abstracted from public transport. This was seen in particular at Milton Park & Ride, which abstracted passengers from the bus service from Ely. The result, set out in the Environmental Statement is a net increase in carbon emissions:

*8.7.7 ... The impact of this, as per the results of WebTAG Unit A3 chapter 4, is that the Scheme is estimated to cause an increase of 19,344 tCO<sub>2</sub>e in non-traded emissions and a decrease of 389 tCO<sub>2</sub>e in traded emissions over 60 years.*

We need people to get onto public transport closer to home, not encourage them to drive to the edge of Cambridge, which in turn reduces the viability and frequency of rural bus services. When making your decision it is important that you understand this.

There is an overly simplistic calculation that carbon emissions will be reduced by 2.9 tonnes per day by vehicles not driving the 6 miles in and out of Cambridge from the M11 junction. It claims that this is "a key part in CCC's contribution to achieving national Net Zero targets." This of course ignores:

1. The embodied emissions from building the car park and supporting infrastructure.
2. The additional emissions from vehicle diverting away from their most direct route into Cambridge in order to reach the Trumpington P&R.
3. The much greater daily carbon savings that would be achieved if people caught buses from closer to home.
4. The additional carbon emissions from traffic delays on the A10 caused by the traffic lights at the P&R junction, and at the interchange (with many more vehicles passing the northbound exit from the M11 in the AM peak).

The forecast reduction in daily emissions of 2.9 tonnes would imply that the site will only cancel out construction emissions after 16 years. However, the emissions saving will reduce as more and more cars are low- or zero-emission. So, the 'pay-back' will be much longer than 16 years.

The Transport Appraisal Guidance calculations, which the Climate Change and Energy Services team refer to in their response finds that the P&R will lead to a **net increase** in transport emissions of approaching 18,955

tCO<sub>2</sub>e over 60 years, not including emissions from maintenance. Despite this, the report finds no policy basis for recommending refusal and states that the carbon emissions are not significant in the national context.