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Dear Planning Inspectorate,

***A428 Black Cat to Caxton Gibbet Road Improvement scheme
Planning Ref: TR010044***

***Written Representation from CTC Cambridge (ID: 20028197)
Submission to Deadline 1***

CTC Cambridge is the local member group of Cycling UK. Our primary activity is a local cycling club that organises led rides for members and guests. Our rides take in a wide area of Cambridgeshire and the neighbouring counties and the area that is affected by the A428 scheme is well within our riding range.

We believe that good quality cycling infrastructure should be included as part of all new transport projects in order to comply with the latest Government policies on Active Travel as clearly stated in NPS-NN, RIS2 and the Gear Change documents. It is also essential to encourage more people to change to Active Travel as part of the Government targets for Greenhouse Gas reductions.

We think the Applicant - Highway England (HE) - has failed to address these requirements in their design. The active travel elements of the proposed A428 scheme need to be greatly expanded in order to match the ambition of these Government policies on Active Travel.

In this letter we will discuss this failure by responding to one of the NMU questions asked by the Examining Authority.

REF: Q1.11.6.1: Providing opportunities for NMUs

To what extent does the Proposed Development comply with the NPS NN paragraphs 3.3, 3.17, 5.205 and 5.216, and any other relevant policies, which relate to providing opportunities for walking and mitigating impacts for non-motorised users?

To what extent have pre-existing severance issues, within the extent of the proposed scheme, been addressed as part of the Proposed Development?

We consider that Highways England plans do not comply with NPS NN as referenced in this question. Their plans do not reflect the Government objectives for increased investment in Active Travel.

NPS NN paragraph 3.17 states the following:

3.17 There is a direct role for the national road network to play in helping pedestrians and cyclists. The Government expects applicants to use reasonable endeavours to address the needs of cyclists and pedestrians in the design of new schemes. The Government also expects applicants to identify opportunities to invest in infrastructure in locations where the national road network severs communities and acts as a barrier to cycling and walking, by correcting historic problems, retrofitting the latest solutions and ensuring that it is easy and safe for cyclists to use junctions.

We think that Highways England has failed to comply with most aspects of this NPS-NN requirement:

1. Highway England (HE) has not used "reasonable endeavours" to address the needs of cyclists in the scheme. We have engaged constructively with HE to recommend where new cycle infrastructure is needed. In response, HE have opted to conduct a "1-way" consultation where they present their plans and refuse to consider - sometimes even refuse to discuss - the issues raised by cyclists and other NMU groups. They have made a few minor changes to their plans but have refused to accept the need for more substantial changes.
2. HE has not properly "addressed the needs of cyclists" in their designs. They appear to have designed the NMU infrastructure on the basis of what is easy and cheap to build rather than what is needed. Most of their proposed cycle infrastructure is located along the new sections of access roads or along short sections of realigned roads. It appears that they have decided to add a cycle path to these new sections of road for simplicity and cost, rather than building the cycle paths that are actually needed. They do not propose to create any continuous or connecting cycle routes: their proposed design will simply create these isolated sections of new cycle path. Without more connections and with no continuous cycle routes we think these short sections of cycle paths seriously fail to address the needs of cyclists.
3. HE has not identified any wider "opportunities to invest in infrastructure" where there is severance, nor have they identified any opportunities to correct historic problems despite the obvious historic severance problems caused by the old A428 and the A1.
4. HE has not made any attempt to "retrofit the latest solutions" and indeed they have not even applied the latest design standards to the few sections of new cycle paths that they propose to build. Their designs do not comply with the current requirements specified in LTN 1/20, in particular with regard to the road crossings.
5. HE has not done enough to ensure that it is easy and safe for cyclists to use junctions. The current designs will create several dangerous road crossings and do not do enough to make junctions easy and safe for cyclists to use. The design must comply with the requirements of LTN 1/20 to minimise these risks.

The most glaring example of a dangerous crossing is the proposed cycle crossing over the A1198 north of the new Caxton Gibbet junction. The HE plans use an at-grade uncontrolled crossing in this location in clear breach of the requirements of LTN 1/20. We think an uncontrolled crossing is unacceptable in this location: it will be too dangerous due to multiple lanes of high speed traffic and the expected high volume of traffic. This must be changed to a grade-separated (preferred) or signal controlled crossing.

We are well aware that the wording of NPS-NN paragraph 3.17 is open to a less critical interpretation. But when combined with the more recent Government policies and publications on Active Travel and on Carbon Reduction we consider that the text should be read in line with our interpretation of expecting "reasonable endeavours" to mean that HE should be obliged to create substantially more cycling infrastructure. HE should also be required to create higher quality cycling infrastructure that meets or exceeds the requirements of LTN 1/20 as detailed above.

In summary, we note how the proposed design for the A428 will build a large amount of expensive new road infrastructure for motorized transport but will only build a disappointing few "crumbs" of new infrastructure for cycling and walking. HE has even tried to argue that this is a long planned scheme and hence the latest Government objectives for Active Travel and Carbon reduction do not apply. We strongly disagree: we understand that these new Government objectives must apply to all new projects and hence we think the design needs to be significantly changed to include much more investment in a network of active travel infrastructure. The scheme must be changed to assign a more equitable share of the budget to active travel.

SOME EXAMPLES OF THE MISSED OPPORTUNITIES TO INVEST IN CYCLE INFRASTRUCTURE

Big changes are needed to reflect the current Government Objectives for Active Travel as detailed in RIS2 and the "Gear Change" document. These changes are needed if this scheme is going to create infrastructure that will encourage more active travel journeys. We are seeing a significant increase in people cycling and walking and the Government's own data shows that high quality infrastructure is the best way to support and expand this change in behaviour.

Our list would include the following additions:

1. A complete and continuous NMU route between St Neots and Cambourne. This should be a safe segregated route that links to all the communities in-between. We have suggested that this route could follow the line of the old A428, but only if the path can be a full width high quality path. The path must also be well separated from the main carriageway because the old road will still carry a significant volume of high speed traffic. Other alignments may provide a better route.
2. Grade separated or Signal Controlled Crossings of all roads where it would be required by LTN 1/20. Most obviously this is needed for the A1198 crossing just north of the new Caxton Gibbet junction. But there are also several slip roads that need a LTN 1/20 compliant crossing. And there are legacy junctions on the old A428 that also need improved crossings.

3. A new A1 cycle bridge crossing in the area around Wyboston or Roxton. There are existing footbridges in these locations but these bridges have poor connections and restricted access on one or both sides making them unsuitable to provide the needed East-West cycle route connection. This new A1 cycle crossing needs to be combined with good access from both sides and must connect to convenient crossings of the East Coast railway and of the River Ouse to complete the connection. We think a completely new A1 cycle crossing with good quality access from both sides is needed.
4. A series of cycle improvements on the adjacent road network to mitigate the impact of the expected increase in traffic volumes. Changes are needed along the A1198 and the B1040 as detailed in our original letter.

DESIGNATED FUNDS IS NOT AN ACCEPTABLE WAY TO FUND THE MISSING CYCLE INFRASTRUCTURE.

HE has stated that further cycling infrastructure can be provided separately from the main scheme using Designated Funds. We think this is not an acceptable or reasonable statement because the funding that is available via Designated Funds is too small and cannot realistically provide the scale of work that is needed.

Imagine if the situation was reversed and that cycling infrastructure was fully funded but the road design and construction was excluded on the basis that it could be funded using "Disingenuous Funds" – a national fund for road building that was split three ways – shared with railways and with airports – and also spread thinly over the whole country. And it required matched funding from the local authorities. An expensive new road would never be built on that basis. For the same reason, large scale NMU "roads" will never be built unless they are fully funded as part of the core scheme.

The road scheme as currently proposed has a budget of approximately £500m. We argue that cycling infrastructure should receive at least 5% of this budget – i.e. a minimum of £25m.

We estimate that all of the cycling infrastructure as detailed above could be provided within that nominal budget. But it cannot realistically be postponed and/or delegated to the designated fund scheme for several reasons.

- Most obviously the scale of cycling infrastructure that is needed is too large to be funded using designated funds: the designated fund scheme is a national scheme that can only deliver relatively small improvements to the active travel networks. The scheme funding is spread too thinly and has insufficient funds to deliver major pieces of active travel infrastructure as explained in Annex A.
- Moreover the designated funds scheme requires matched funding from local authorities and a requirement for them to provide a significant portion of the funding for a scheme of this magnitude is not affordable by the cash-strapped local authorities.
- On top of all this, it is also much more expensive to add this scale of active travel infrastructure later as part of a separate project due to the difficulties of the land acquisition that will be required without having the benefit of the land purchase powers that are available for the core scheme.

- And it is surely more cost effective to build the active travel elements at the same time (perhaps using the same contractor for some of the work).

For all these reasons we argue that most –if not all – of the active travel infrastructure work must be included within the core scheme.

We accept that Designated Funds could have a limited “top-up” role – they could be used to fund a range of smaller schemes; for example to fund improvements along other roads to mitigate the impact of increased traffic volumes as detailed in our original letter to HE.

In summary, we think that the HE proposals to delegate cycling infrastructure to “Designated Funds” is effectively killing any chance of creating a lasting legacy of high quality cycling infrastructure. We hope that the Planning Inspectorate will ask HE to revise their plans to add most of the missing cycling infrastructure for the reasons stated in this letter.

As a country, we do not have the time for more delay in making these changes. We need to inject much more urgency into our transition to more sustainable transport. HE, as an agency of the Government, must change their designs and start to deliver on the Governments stated ambition for a significant “Gear Shift” in support for Active Travel and for Greenhouse Gas reduction.

Yours faithfully

Rupert Goodings
Cycle Campaigning Officer
CTC Cambridge

ANNEX: Analysis of Designated Funds

This Annex gives our understanding the funding that is available via Designated Funds. While we accept that Designated Funds have a role to play, they cannot provide an adequate replacement for the significant elements of NMU infrastructure that are either missing or badly designed in the core scheme.

The Designated Funds are described in RIS2.

This is a National Fund (covering the whole country) and RIS2 defines four separate Designated Fund activities as follows:

Environment and Wellbeing	£345m
Users and Communities	£169m
Innovation and Modernisation	£216m
Safety and Congestion	£140m

Cycling Infrastructure is included the "Users and Communities" Fund. Assuming that the money is shared fairly across the country (e.g. on a per-capita basis) Cambridgeshire will receive approximately 1.3% of the total fund (Cambridgeshire has a population of approx. 0.85 million out of 67 million). So Cambridgeshire can expect to receive approx. £2m per year (1.3% of £169m) from the Users and Communities fund.

And even this sum of £2m is not all available for cycling infrastructure. The Users and Communities fund is expected to fund a range of activities. To quote from RIS2:

Users and Communities fund: *A fund for helping the SRN to provide a good service for all users and improve multi-modal connectivity. It includes: further cycle-proofing of the network; providing better facilities for pedestrians; support for buses and other transport sharing initiatives; integrating the SRN with other transport networks; improvements to lorry parking and other roadside facilities; and innovative mechanisms to deliver and improve information for road users and communities near to or impacted by the SRN. It also covers delivering small- scale, impactful, regeneration of built-up areas to restore social cohesion when routes are detrunked.*

So we can expect less than 50% of the total for further cycle infrastructure. In short, there is less than 1 million pounds, which is less than 10% of the needed budget. This will only fund a handful of small schemes and cannot fund the major infrastructure that is needed.