

CAMCYCLE



Cambridge Cycling Campaign

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A428 Black Cat to Caxton Gibbet scheme
Planning Inspectorate Reference: TR010044
The Planning Inspectorate
Temple Quay House
Temple Quay
Bristol BS1 6PN

August 31, 2021

Dear Sir or Madam,

Camcycle (Interested Party: 20028132) is a volunteer-led charity with over 1,600 members working for more, better and safer cycling for all ages and abilities in the Cambridge region. We focus on cycling as a mode of sustainable general transportation for everyday purposes. Many of our members transport themselves and their families using a wide variety of cycles, such as cargo cycles, tandems, tricycles, disability-adapted cycles and cycles with trailers.

Our interest in the A428 scheme is to ensure that the five core design principles of Local Transport Note 1/20 are achieved for people cycling, alongside other active travel users. Those design principles are: safety, coherency, comfort, directness and attractiveness. Inclusivity must be integral to all of those principles. Furthermore, the A428 scheme as proposed will significantly increase motor traffic levels in the region, and correspondingly, it will significantly increase air pollution and carbon emissions. In light of the climate emergency, it is absolutely vital that every step be taken to prevent or reduce the increase of carbon emissions, and those steps must include major enhancements enabling and encouraging more people to switch to active travel.

In our representation, we respond to Question 1.11.6.1 from the Examining Authority's written questions, however we use the more descriptive and up-to-date term 'active travel' instead of 'non-motorised'. In our view, active travel users include all non-motorised users, such as pedestrians, cyclists, equestrians, mobility scooter riders and wheelchair users. Our references to active travel routes and users apply equally to non-motorised routes and users.

Question 1.11.6.1: *Providing opportunities for non-motorised users*

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

Connectivity for active travel between St Neots and Cambourne

The A428 project must provide active travel connectivity for the existing and future settlements between St Neots and Cambourne. As currently planned, the A428 project mainly caters for motor vehicle users in that region, with only crumbs for active travel. The proposal includes only a few disconnected segments of active travel pathway at a limited number of places within the scheme. This is unsuitable and does not comply with the government's Gear Change policy (2020), which requires all highway projects to provide active travel infrastructure in compliance with the five principles outlined above.

Furthermore, the proposed development does not comply with the National Policy Statement on National Networks (NPS-NN) paragraphs 3.3, 3.17 and 5.205. These policies require applications for the national road network to play a direct role in helping pedestrians and cyclists, provide evidence that as part of the project they have used reasonable endeavours to address any existing severance issues that act as a barrier to non-motorised users, and show that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes.

National Policy Planning Framework (NPPF) policy 11 requires plans to promote a sustainable pattern of development as well as mitigate climate change. NPPF policies 153 and 154 require plans to mitigate climate change and reduce greenhouse gas emissions.

This application for a new dual carriageway expansion of the A428 does not comply with NPPF policies 11, 153 and 154 because it promotes unsustainable development in the form of sprawling car-centric suburbs, and exacerbates climate change by attracting more car journeys onto the network through induced demand created by the expansion of roadway.

Therefore, to answer question 1.11.6.1(a): the proposed development does not comply with the NPS-NN paragraphs, nor with the Gear Change policy.

At the very least, high-quality active travel connectivity between St Neots, Cambourne and all the settlements between is necessary in order to mitigate against the unsustainable development patterns that will be exacerbated by the new dual carriageway.

The applicants have proposed that active travel connectivity between St Neots and Cambourne could be provided as part of a Designated Funds (DF) project. This is an unacceptable delegation because (a) there is a very limited funding made available for DF projects in general and (b) there is not enough funding for all of the projects that qualify for DF, on the order of merely £2 million for all of Cambridgeshire. Projects under DF are generally viewed as optional add-ons, which is fundamentally at odds with the necessity of providing core active travel connectivity between St Neots, Cambourne and the villages and future developments along the way.

The transition to electric cars will not suffice to make this application sustainable. The current target is for all new cars to be fully zero emissions at the tailpipe by 2035. We have 14 years before we reach that point, plus we can expect that petrol and diesel vehicles will continue to be used well into the 2040s and perhaps past 2050. That leaves at least 25 years of carbon-emitting and polluting vehicles travelling along this new road; a crucial 25 years that will determine just how badly global temperatures will increase. Furthermore, electric cars are heavier (causing more road damage), still get stuck in traffic, require rare earth materials and for now simply shift carbon emissions to a power plant in most cases. The only way to meet governmental climate change targets is to reduce the amount of driving overall, during the next 25 years, and shift to more sustainable modes of transport. That need for reduction of motor vehicle usage is fundamentally incompatible with the creation of a new dual carriageway, especially one that lacks comprehensive, coherent, safe, convenient and fully-accessible active travel connectivity to give people reasonable alternatives to driving.

The distance between St Neots and Cambourne is less than 10 miles: about 45 minutes by electrically-assisted pedal cycle (EAPC). That is less than the distance between St Ives (Cambs) and Cambridge, which are connected by an active travel route alongside the Guided Busway. That route has been an enormous success, attracting far more users than ever expected. This level of popularity occurred even before the rise of EAPCs, which have made it possible for just about anyone to cycle longer distances with ease. The only thing currently preventing people from cycling in the region west of Cambourne is the lack of safe, high-quality and fully-accessible cycling infrastructure.

We accept that active travel connectivity is best provided on a separate alignment from the dual carriageway, because useful active travel routes for general purpose transport should, in compliance with LTN 1/20, follow more direct routes between settled areas. However, even though the active travel route may not follow the same alignment as the dual carriageway, it is the principle that such active travel connectivity will be designed and built that must be established as part of this process. As part of the design of active travel routes: all cycling infrastructure, whether shared or not with other users, must be designed in accordance with Local Transport Note (LTN) 1/20 as specified by Gear Change.

Safe, convenient and fully accessible crossings of busy roads

The A428 project must provide suitably safe and convenient active travel crossings of busy roads and junctions, usable by people of all ages and abilities. As currently planned, the A428 project proposes several hazardous uncontrolled at-grade crossings of roads and junctions forcing people to brave very wide expanses of carriageway and high-volume, high-speed motor traffic. This is unacceptable: these crossings must be redesigned to make them much safer to use, so that they are accessible to everyone, as required by Gear Change and the Equality Act (2010).

NPS-NN paragraph 3.17 requires applicants to invest in infrastructure to reduce barriers to active travel between communities and to ensure that it is easy and safe for cyclists to use junctions. The current application does not provide safe crossings in all cases. In particular, the worst example is the proposed new northern roundabout at the A1198/A428 junction. This roundabout has a crossing of the northern arm that would require active travel users somehow to cross five uncontrolled lanes of fast and busy motor traffic (2 lanes northbound, 3 lanes southbound). It is unacceptable for this to be an uncontrolled crossing; it would be so dangerous, with a high risk of serious injury, that only the bravest or most foolhardy individuals would dare try to use it. In practice, an uncontrolled crossing here would render unusable this key access point for the rest of the proposed active travel infrastructure (what little there is).

It is perfectly possible to design safe crossings for all situations, whether they be at-grade or grade-separated, signalised or uncontrolled, depending upon context. However the project team has made it clear that they will not create high-quality, fully accessible and safe crossings unless they are directed to do so by higher authorities. LTN 1/20 provides the guidance and tools to plan and design safe crossings for cyclists, and the applicants must be required to follow it.

Fair provision of bridges or tunnels crossing existing barriers

The A428 project (a) must not sever existing active travel routes and (b) where structures are planned to be built for the benefit of motorists who need to cross existing barriers, they should also accommodate active travel users who need to cross those same barriers. Question 1.11.6.1(b) asks *“To what extent have pre-existing severance issues, within the extent of the proposed scheme, been addressed as part of the Proposed Development?”* The answer is: not at all.

NPS-NN paragraphs 3.17 and 5.205 require the applicants to address existing severance problems, such as those caused by the A1, the River Great Ouse and the East Coast Main Line. They have not provided any facilities for active travel users to overcome those barriers.

The applicant is already planning to overcome these barriers to motor traffic by designing structures that will carry the dual carriageway over them. The designs for those structures should be modified to incorporate provision that allows active travel users also to cross those barriers, such as with suitably designed active travel side-paths on bridges. Alternatively, separate and better-located structures may be provided for active travel users to overcome those barriers, if that provides more reasonable connectivity to the wider active travel network. It would be wise to coordinate this effort with the East West Rail project, which is also designing infrastructure in the same region, and which will require high-quality walking and cycling routes in order to provide access for stations in the vicinity of St Neots and Cambourne.

Yours sincerely,
On behalf of Camcycle,

Matthew Danish,
Trustee.