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FULBOURN PARISH COUNCIL

Fulbourn Parish Council



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22nd December 2022

GCP – Making Connections 2022

Fulbourn Parish Council objects to the current GCP ‘Making Connections 22’ Consultation proposals for the following reasons.

- Both Addenbrooke’s Hospital and Papworth Hospital are in the proposed zone. This will massively impact on staff, people arriving for appointments or visiting as they will also have to pay for car parking. Many people attending Addenbrooke’s and Papworth Hospitals for appointments are already sick and/or frail and cannot use public transport or cycle.
- Small businesses will lose out and may close if footfall drops.
- People who are physically or mentally disabled will be discriminated against as many are not able to use a bus or cycle.
- Teachers, nurses, doctors, cleaners etc are often on shifts and public bus services may not fit in with their hours of work.
- People who live in the Congestion Charge Zone will have to pay to leave their property even when exiting the zone.
- Fulbourn village may suffer hugely from further traffic and parking if cars are driven to Fulbourn and parked up while the owners catch a bus or ride into Cambridge.
- The report indicates that those on low pay would potentially be eligible for a discount but the proposals do not say who would qualify.
- There are currently not enough bus drivers to operate a full service so it is doubtful that there will be sufficient drivers to drive the proposed extra buses.
- Fulbourn PC does not believe that the Park and Ride sites have the capacity to deal with the modal shift that is predicted in the report.
- If hauliers are to be charged £50 to enter or exit the City between 7am-7pm, it is likely they will change their hours of delivery to be outside these hours. This will mean heavy goods vehicles driving through the surrounding villages at unsociable times and inevitably any extra costs will be passed on to the consumer.

Yours faithfully

PJ Newman

Mrs P Newman

Clerk

GDPR - Please see our website for all Policy Documents including the Data Privacy Notice at www.fulbournpc.org

Greater Cambridge Partnership
consultations@greatercambridge.org.uk

21 December 2022

Thank you for the opportunity to respond to the 'Making connections' consultation. Girton College, Cambridge, wishes to note the following points:-

Bus improvements

We strongly support improvements to bus services. Longer operating hours are desperately needed and not solely to reduce congestion and pollution. Lack of public transport hampers access to facilities that only exist in the city centre and this increases deprivation. Lack of public transport jeopardises the safety of those who are forced to wait for long periods in the dark, or walk in the dark, because there are no buses when they are needed.

Although just outside the boundary of Cambridge City as a political/administrative district, we urge that Girton (both College and village) be included within the £1 single fare zone for as many fare categories as possible. The consultation brochure says, "special tickets for families, children and others would be introduced" and we urge that these include tickets for students / young people.

In addition to the bus improvements listed we also suggest:

- improved bus reliability, with a commitment to getting people home at no extra cost to them if the non-arrival of a scheduled bus leaves them stranded
- improved bus stops, including bus shelters and Real Time Passenger Information at ALL stops
- a commitment to using Real Time Passenger Information on ALL buses
- audio and visual announcements of stops on board ALL buses
- better route training for ALL bus drivers so that they are able to help novice bus users identify the route and stop they need.

As a Cambridge College, there is no doubt that many of our students would feel safer when cycling if there were fewer cars on the road and would benefit from improvements to infrastructure for cyclists and pedestrians. There is appetite among our students for bus travel. There is support among the students for the environmental benefits of the proposals. Additionally, our ability to recruit casual/agency staff is hampered by a lack of evening bus services. We would prioritise bus improvements as follows:

1. Longer operating hours
2. Increased rural services
3. More routes

However, we note that the timing of Stagecoach's decision to reduce its bus provision for commercial reasons, and its subsequent announcement of price increases, has made it harder to convince people that increasing bus provision is even possible. To build trust in the provision, it will

be necessary to run the improved services at their full level successfully and reliably for an extended period of time. **We therefore have serious concerns about the phasing proposals**, which would see some elements of charging introduced (from 2025 onwards) before the bus improvements are fully in place in 2027.

Cycling, walking and other improvements

We strongly support improvements to cycling and walking, particularly:

- More cycling and walking connections in the city
- Extending the fully segregated rural cycleway network (the Greenways)
- Making the city more accessible for people with disabilities and those with mobility needs
- More secure cycle parking
- Additional funding for maintenance and improvements to footways and cycleways. In particular, we support ensuring that walking and cycling routes are properly lit.

Sustainable Travel Zone: administration

We have **concerns about the administration of a Sustainable Travel Zone**. The proposed scheme not only needs to be administered effectively but also to be seen to be administered effectively. Staffing and technology are essential to this. Past experience, such as on the Cambridge Biomedical Campus, shows that aspirations are not always matched by infrastructure. We have concerns about the reliance on the congestion charge as the main source of funding beyond the initial phases. If a significant modal shift takes place, will enough income be generated to cover all the costs? What methods are envisaged to ensure proper scrutiny, transparency, value for money and accountability?

Furthermore, nothing should be dependent on the end-user (i.e., the person being charged) having online access or being technologically adept, whether in order to pay or to receive a reimbursement or to give evidence of an exemption. This is barely addressed in the Equality Impact Assessment, which simply notes that “Older people may not have access to the internet or are digitally excluded” but does not acknowledge that the same might apply to low-income families. Any system put in place for collecting payments and administering discounts, exemptions and reimbursements needs to be simple for the ‘end user’ but is massively complex. For example: how will information from the NHS about who is eligible for a discount/exemption/reimbursement be fed in? How will those on low incomes be expected to provide evidence of their status if they can’t afford mobile data or postage stamps? What Data Protection safeguards are envisaged for the mass of data that will be needed? These issues need to be made clear.

Sustainable Travel Zone: design

We have **concerns about the proposed boundary of the Sustainable Travel Zone**. Girton College, Cambridge, is a Higher Education Institution based on two sites, one within the proposed Zone and one outside. Operationally, this will place both financial and administrative burdens on us.

Our main site lies just outside the STZ and includes car parking. The costs of putting in a car park barrier are estimated at £10,000. We would also have to consider paying for other measures, such

as increases in security staff and CCTV, to protect the site from illegal parking. Additionally, if there is large scale on-street parking in the vicinity of Girton Corner, those cycling through the junction will be put at risk by the increased number of cars turning off. We strongly feel that the risk of “informal park and ride behaviours” is downplayed in the technical notes; monitoring and enforcement will be required, alongside a package of reimbursement to those whom it affects financially.

Although our main site is outside the STZ, our subsidiary site on Eddington is within in. Some employees travel between the two for work purposes, sometimes in work vehicles and sometimes in personal vehicles; all such use would incur the congestion charge. The current proposals suggest that minivans and LGVs operated by charities and not-for-profit organisations would have an exemption; there is no guarantee that would apply to us specifically, despite our charitable status. Some employees need to travel into the city centre for work purposes, e.g., to access other parts of the University or to support students visiting Addenbrooke's. If making such a journey, their liability for the congestion charge is for work purposes. We already make a trade-off between staff time and transport costs. As an example: if a member of staff needs to travel into the city centre for a 1-hour meeting by bus, they are absent for about 2.5 hours; the transport costs to us as the employer are minimal to nil but the staff time is high. If we as the employer pay for taxis to and from the meeting, the transport costs will be higher but the staff time costs lower. This trade-off will be replicated more frequently if fewer employees drive to work, with consequences for productivity.

We strongly support the proposal that Girton College's main site is outside the STZ. Many of our staff working on the main site commute from outlying villages and travel no further towards the city centre; they are not contributing to city centre congestion. Our recommendation would be to change the boundary slightly so that the new Eddington district lies outside the Zone. Many of its residents will be commuting into the city centre; if they drive, they would be liable for the congestion charge whether or not Eddington itself is in the Zone. However, many of those who service Eddington commute from outlying villages and travel no further towards the city centre; they are not contributing to city centre congestion either.

We see from the technical notes that there is a suggestion to make Thornton Close a no-through road. We assume this in fact refers to Thornton Road and is to reduce rat-running. However, it needs to remain open for access for residents and their visitors (carers, plumbers, food deliveries, etc.). If fewer people are driving, they are more reliant on grocery deliveries, etc. There also needs to be access to Girton village and to the main site of Girton College.

We support the exclusion of the Park & Ride sites from the STZ and the proposals to increase their capacity.

Sustainable Travel Zone: charge levels

We have **concerns about the scale of the charges**. We are a Real Living Wage employer, with many part-time employees working shifts that begin and end within the proposed congestion charge timings. Recruitment and retention of hospitality workers is already a serious challenge. Some of our staff work 4 hours per day, 5 days per week, in roles that cannot be done from home, with many doing a school/nursery run before and after work, and some being carers for elderly dependents. With no option but to drive to multiple locations within a tight timeframe, the

proposed charge would impact their own direct working costs to the point where the wage would effectively fall well below the RLW. As many of the workers in this category (i.e., those juggling part-time work with caring responsibilities) are women, to what extent would the congestion charge have a greater impact on women workers than on men? What research has been done in terms of potential social impact and exclusion of part-time (mostly women) workers on the local economy? A part-time worker might not be eligible for a low-income exemption from the congestion charge but the introduction of the charge would affect them disproportionately more than full-time workers, to the extent that it might no longer be cost effective for them to continue working at all. These concerns are not fully addressed in section 7.8 of the Equality Impact Assessment.

There is a contradiction between the proposed charge of £10 per day for vehicles over 9 seats, which is explicitly said to include school minibuses, and the exemption proposed for minibuses and LGVs used by charities and not-for-profit groups. This needs clarification. Many educational establishments, including Girton College, are registered with the Charity Commission. One of the causes of the morning rush hour congestion is the “school run”. Instead of penalising schools for running minibuses, they should be incentivised to run shuttle services to/from locations such as Park and Ride sites.

These charges risk harming small independent businesses while favouring large nationwide ones. Taking food deliveries as an example: we consolidate orders to minimise deliveries but this still involves several deliveries a day from different local suppliers. Though outside the zone, Girton College purchases food via a consortium of colleges all within the zone, so any delivery cost increases would also affect consortium prices for us. The larger national companies can presumably better absorb the cost, meaning smaller local suppliers (butcher, green grocer, baker, cheese supplier) would not be able to field competitive prices. What can be done to mitigate this? Suggestions might include exemptions for local suppliers delivering within the zone, to discourage switching to major national suppliers with higher mileage, or financial support for local businesses to switch to more sustainable modes of transport.

Although there does not seem to be an obvious way to exclude the hospitals (Addenbrooke’s, Royal Papworth) on the Cambridge Biomedical Campus from the exclusion zone, we would seek further reassurance about ways to prevent penalising patients, their carers and visitors, and the medical staff who look after them. Being ill (rather than being disabled or having a long-term health condition) is not a protected characteristic and has therefore not been included in the Equality Impact Assessment.

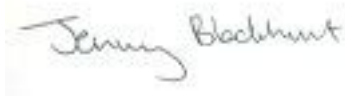
Furthermore, if someone is too ill, weak or disabled to travel to a medical appointment on public transport, they are also too ill, weak or disabled to travel on public transport for other purposes. Section 8.2.5 of the Equality Impact Assessment notes that the congestion charge could have an adverse impact on those with limited mobility and those whose disabilities are not physical; we recommend they should be exempt on the same basis as blue badge holders.

Other areas with congestion zone offer discounts or a number of days’ free travel to those who live within the zone. We recommended that similar schemes are offered to those who live within the proposed STZ.

We support the proposed discounts for hackney carriages, private hire vehicles and registered car club vehicles.

Conclusion

Even with new bus routes and extended hours, and increased provision for cyclists, not everyone will be enticed out of their cars. There is little appetite for bus travel if the service is less frequent than 'turn up and go', if it means catching more than one bus to complete a straight-forward journey or if needing to make a zig-zag journey, e.g., completing the school run and getting to work within a narrow time-frame. Therefore, as an employer, we have concerns on behalf of our staff. Although many of our staff live in outlying villages and could therefore reach our main site without entering the STZ, this is not true of all. Some live and drive from within the STZ and would therefore have to switch their mode of travel or pay the charge (unless personally eligible for an exemption or a discount) to reach our main site. Some are jointly employed by us and by city centre employers; they would therefore have to switch their mode of travel or pay the charge (unless personally eligible for an exemption or a discount). We feel the proposals would negatively impact those juggling part-time work with caring responsibilities, i.e., predominantly women, and these concerns are not fully addressed in section 7.8 of the Equality Impact Assessment. We recommend that any decision about the timing of the introduction of the congestion charge should depend on the easing of the current cost of living crisis. It will be necessary to run the improved bus services at their full level successfully and reliably for an extended period of time, before trust in the provision can be built, and decisions about the timing should also take account of this; the longer we wait for a demonstrably reliable service, the longer the GCP should wait before introducing any charges.



Jenny Blackhurst, MCLIP
Librarian and Fellow
jkh25@cam.ac.uk
On behalf of Girton College, Cambridge

To whom it may concern

We, Girton Parish Council, write to raise concerns about the current proposal for congestion charging in Cambridge, including the Sustainable Travel Zone. Comments to be included in the public consultation that closes at midday today, Friday 23 December. The below comments were approved by Council at our meeting of Full Council on 14th December, under Agenda item 22/202.5.

Radical action is indeed required to tackle congestion in and around Cambridge, something which affects our residents travelling into the city, and does sometimes spill out to within our village. Moving as much transport away from the private vehicle towards more sustainable and socially responsible forms as possible is vital.

For an STZ to be a success it requires an excellent public transport network to already be in place. Public transport in and around Cambridge is currently slow, expensive, unreliable, and almost entirely focused on a single mode - buses.

The promise of lowered bus fares and a more reliable service are very much welcomed, but the proof of the pudding is in the eating, and it is not yet clear the level of service that we could expect our residents to receive. We would want to see more robust evidence of a coherent plan for providing public transport for the whole of Girton. Following the significant withdrawal of Stagecoach services across the county much of the village is without a bus service after 6pm, which is an hour before the end of the proposed charging period for the STZ. Without assurance that residents will not be stuck in a transport limbo in the early evening we remain deeply concerned.

The STZ proposal as it stands mostly follows the boundary between Cambridge and Girton, but a significant segment of the new Eddington development within the parish will be within the zone whilst the remainder is outside.

Firstly, this will result in a two-tier parish, with different residents having different costs in being able to use a private vehicle. Secondly, being on the edge of this zone risks our streets on the outside turning into an informal park and ride. There is already anecdotal evidence that Thornton Road and Whitehouse Lane in particular are already used in this manner, leading to overly busy streets and hazardous conditions for pedestrians, cyclists, and other vulnerable road users. This is in spite of the Maddingley Road Park & Ride site being only a few minutes drive from these locations.

In addition, accessing the Park & Ride and, in particular, the M11 by car without passing through the STZ would mean taking a very circuitous route, creating additional vehicle emissions for trips that would have negligible impact on traffic within Cambridge

We are also disappointed that the excellent proposal of a circular public transport service only skirts Girton, missing an opportunity for more comprehensive links

between the “necklace villages” that form a critical part of the Greater Cambridge conurbation. The focus on a single mode of public transport is also disappointing, depriving the region of the flexibility that can be offered to a forwards-looking area by multimodal transport.

Lastly, the provision of a Greenway cycling network for Girton as proposed looks very unambitious. In the map provided it only follows the main road through the village from Huntingdon Road through to Oakington and the spur along Gatehouse Road linking to Histon. There are already some modest facilities along this route, entirely following the roads. Opportunities have been identified for safer, more welcoming off-road routes which we would hope could be explored as a better alternative, including more direct routes linking the village to its neighbours.

We look forward to your response to our comments.

Yours sincerely

Yvonne Murray

Girton Parish Clerk on behalf of Girton Parish Council

Our Ref: 022_HH4160142_DK Issue 2

22 December 2022

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Dear Making Connections Team

Making Connections 2022 Consultation Response

Further to the consultation request for the above, I would like to make the following comments on behalf of Granta Park and their owners Biomed Realty and TWI (The Welding Institute).

We have reviewed the Making Connections proposals including the improved bus services, improved walking and cycling routes and the proposed Sustainable Travel Zone.

Granta Park are fully supportive of the best measures possible to improve the quality and reliability of journeys to and from Granta Park: particularly important to the Park is the provision of the best possible sustainable transport options and the shortest journey times. Current traffic congestion is a barrier to the growth of business and the improvements set out within the Making Connections proposals would offer a significant improvement in:

- a) Reduced congestion, noise and pollution on the A1307 and potentially the A505;
- b) Improved frequent and cheap bus services to and from Granta Park;
- c) Improved journey experience for existing Granta Park users; and
- d) Greater employment opportunities because better transport links to the Park will encourage more investment from businesses wishing to expand or locate to Granta Park.

Bus Proposals

The 2021 Annual Travel Survey has identified that 13.5% of Granta Park employees used the staff commuter bus and 2.2% used the public bus. In total 53.6% of the staff travel by private car and so there is a significant potential for encouraging more staff to travel by public transport to the site.

Similarly, the survey asked staff members where they lived. This identified that the following proportion of respondents lived in postcodes within Cambridge or abutting the A1307 and would potentially utilise any future sustainable transport improvements along these routes.

Origin / Destination Postcode	Percentage of Respondents	Potential Number of Staff
To / from Linton (CB21)	6%	216
To / from Cambridge (CB1, CB2, CB3, CB4, and CB5)	30%	1,080
Total	36%	3,600

- Structural Engineering
- Civil Engineering
- Transport & Highways
- Geomatics - Land Survey
- Building Surveying

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Consequently, Biomed Realty/TWI strongly support the proposed bus improvements and fare reductions as they consider that the improved bus services will be a beneficial provision for staff particularly when combined with the Sustainable Travel Zone as an encouragement.

It is likely that many Granta Park staff who live in Cambridge already use the commuter bus and therefore the provision of a more frequent bus service is likely to be extremely popular. Granta Park have been operating their staff bus between Granta Park and Cambridge Railway Station and Whittlesford Parkway railway station for a number of years and this service is incredibly popular due to the direct, frequent, bus routes during the AM and PM peak periods and the cheaper fares (£1.50 per journey). It is therefore considered that the provision of improved services at a low cost is vital to encouraging people to transfer to non-car travel modes.

Many of the tenant companies within Granta Park operate internationally and therefore staff can work late into the evenings and very early mornings to undertake meetings with colleagues in other countries. Similarly, staff have been asking for lunch time commuter bus services to accommodate people who work part time. Therefore, the extension of the bus operating hours to the suggested 5am to 1am on weekdays would be extremely beneficial to staff.

Similarly, Granta Park is only served by bus route 13 and the commuter staff bus, whilst many of Granta Park employees travel to the Park from a wide area. Therefore extending the improved bus services to the surrounding towns and villages will significantly increase the bus catchment for the Park and will provide a significant benefit to both Granta Park employees and traffic congestion along the A1307 and the A505.

We also consider that the option to buy a single bus ticket is a good idea as it will allow Granta Park employees to utilise different sustainable travel modes each day; for example they could arrive at the Park by car sharing or by bicycle and undertake their return journey by bus.

We note that the bus services will likely be franchised out and Granta Park are neutral on this approach. We consider that the provision of a viable frequent, service will be the most important factor and therefore franchising the service is likely to be a successful approach if the main timetabling and routing decisions are removed from the bus companies to an overarching body. Consequently, we consider that this approach would be agreeable to Granta Park.

Granta Park Bus Link

With regards the proposed bus services, we note that the 'Making Connections Map Book' identifies that a twice per hour bus service will be provided between Granta Park and the new Babraham Travel Hub, however, no further details are provided. Consequently, we would be grateful if the following could be confirmed:

- a) Who will operate this bus service?
- b) Will it be funded by the Sustainable Travel Zone charges?
- c) Has any consideration been given to the bus type i.e. will it be a full sized public bus service or a reduced mini-bus link potentially running at a higher frequency?
- d) Will the bus link operate at the same times as the main bus routes or will it only be in operation during work hours?
- e) Would the bus require access to the Granta Park site or will it remain on the public highway network?

Granta Park strongly approves the provision of this bus link as the Travel Hub can be considered as outside of an acceptable walking distance to employees who have difficulty walking and so such a facility is considered to be an excellent and much needed addition to the proposals.

We consider, however, that a bus service every 10-15 minutes during the peak hours would be more attractive to Granta Park staff and would more likely attract them away from their private car. This is to reduce their waiting time at the Travel Hub and therefore reduce their total commuting journey times. A twice hourly service would be suitable for outside of the peak hours.

Due to the distance between the Travel Hub and Cambridge, less confident cyclists may wish to split their journey between a bus to the Travel Hub and then finishing their journey to Granta Park by bicycle. We would recommend that consideration is given to allowing bicycles on the buses between Cambridge and the Travel Hub.

Walking and Cycling Network

The out of town location of Granta Park has meant that it has been difficult to encourage staff to walk and cycle to the Park. However, the 2021 Travel Survey showed that 8.1% cycled and 2.7% walked. Granta Park is benefiting from both the Linton Greenway proposals and the proposed CSET Travel Hub at Babraham. We consider that the proposed new / improved walking /cycling routes associated with these proposals will be a significant benefit to Granta Park employees.

Whilst the Park may be too far for staff to walk from Cambridge, the proposed route along the new public transport link will provide an excellent cycling route.

Sustainable Travel Zone

Granta Park is located outside of the Sustainable Travel Zone but we agree with the boundaries being proposed. We accept that significant interventions need to be introduced to encourage people to move away from private car use and we agree that this approach is liable to have a long term dramatic impact on private car use. The proposals will impact Granta Park staff who live within Cambridge and to the north of the City. However, the proposed significant improvements to bus links between the City and Granta Park are welcome in order to give staff a frequent and cheap alternative.

We do have concerns, however, that the Sustainable Travel Zone may increase car use on surrounding routes as drivers either re-route to avoid the charging zone or divert from their existing journey to access the new Travel Hub. Therefore there is the strong potential that traffic flows on the A1307, the A505 and junctions in the vicinity of Granta Park will increase causing increased congestion outside of the City and so further sustainable transport measures may be required to mitigate this potential impact. We therefore request confirmation that this has been fully considered and assessed.

Similarly, the proposals currently indicate that the existing Granta Park commuter bus would be subject to the congestion charge levy of £50 per day as it is operated by private coaches. We consider that this measure is counter-intuitive as the buses were introduced to alleviate the pressure of private car travel within Cambridge and applying this levy would increase the running costs of the buses. This would therefore lead to the ticket prices increasing thereby resulting in fewer staff members using the commuter bus. We note, however, that there are exemptions to the scheme and so we would request that either the Granta Park commuter bus is included within the exemptions or the levy on buses / coaches is reconsidered.

Conclusion

In the event that the proposals being consulted on are taken forward, we request that Granta Park are kept informed and we would welcome positive dialogue during the development of the proposals. We also consider that opportunities should be explored at an early stage to ensure that safe and convenient links are provided between the Travel Hub and Granta Park, in order to make maximum use of the benefits the improved infrastructure would bring to the area.

I hope that this letter adequately explains the reasons for Granta Park's strong support for the Making Connections proposals. If you would like further information or to discuss elements of the strategy with us, please do not hesitate to call.

Yours faithfully



David Kemp
Associate Director

17th November 2022

By email: consultations@greatercambridge.org.uk

Greater Cambridge Partnership
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CB3 0AP

Dear Sirs

Making Connections Consultation Response

Below, you will find our initial responses to the Making Connections consultation, recognising that the questionnaire format is not appropriate for a body such as a parish council and being unable to gain sufficiently appropriate advice on how best to constitute our response, we have provided a summary document.

We have experience of our responses to preliminary consultations being used at a later date to substantiate detailed proposals and would not like to see that repeated.

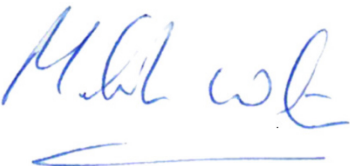
Can we suggest that in future, consultation clearly considers the range of audiences and clarifies how the responses will be analysed and applied to inform future decision making?

John Hutton's 2008 Code of Practice

(https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/100807/file47158.pdf) and the Consultation principles

(<https://www.gov.uk/government/publications/consultation-principles-guidance>) remain the best guidance available for meaningful public consultation.

Yours faithfully



Malcolm Watson
Chairman

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From: Great Shelford Parish Council

Making Connections Consultation Response

Introduction

Great Shelford Parish is one of the many villages communities that border Cambridge. The villages have historically supplied the city with resources, physical and human, and provided a complementary environment to support the commercial and educational focus of the city. The interdependence of these localities is accepted as contributory to the success of the local economy, and to establishing the global recognition of the region's educational and intellectual status.

'Town, gown and country' are fundamental to the local identity – and mutual respect and co-existence is a long-established strength.

The economy of the area has flourished, fuelled by these relationships and interdependencies, and working together on a modern agenda to reduce carbon emissions and improve the lives of those who live in our locality is essential. As a result of this, responsible and appropriate economic development will evolve... just as it has over many, many centuries.

A key challenge for our locality is improving the transport network and the 'Making Connections' consultation seeks to explore the value of introducing a range of transport initiatives across a very wide 'city' footprint.

We fully support initiatives to encourage modal shift and accept that some may have to be radical – where this is the case, they have to offer more carrot than stick and cannot be expected to be self-financing from the offset. Behavioural change will need investment, and this investment should be financed by those who benefit from the economic growth of the locality, not subsidised by those who have already contributed to the area's sustainability.

We would advocate front loading investment in public transport and accommodating blue badge holders and vulnerable transport users, and accept that if we want to create space for buses and cycles, then we have to take some space away from cars and just make people think twice before they grab their car keys, however it is critical that the Cambridge electorate are on board and supportive of change – and we fear that some of these proposals lack detail and/or seek to achieve too much too soon.

We note that one of the stated aims of the scheme is to reduce air pollution. We support this but believe that there will be some organic progress on this as the ban on the sale of ICE vehicles comes nearer and electric cars get cheaper. A fair and full analysis of objectives and predicted results of each proposal is necessary to achieve public trust and support.

This first stage of the Making Connections consultation lacks detail, and our immediate request is that GCP explain how this consultation itself, will be used to inform future planning. Obviously, responses to a broad-brush consultation cannot be used at a future date to substantiate detailed plans, and GCP should explain the purpose, remit and anticipated application of survey results.

Our Response

Three key areas are outlined in the consultation and our response is detailed below.

1. Transforming the bus network: From as early as mid-2023, we're proposing to change the bus network through more services to more locations, with cheaper fares set at £1/£2.
2. Investing in other sustainable travel schemes: Alongside the bus network, we are proposing to invest in new sustainable travel schemes, such as better walking and cycling links.

3. **Creating a Sustainable Travel Zone:** We are proposing the introduction of a Sustainable Travel Zone in the form of a road user charge on behalf of Cambridgeshire County Council. Vehicles would be charged for driving within the zone between 7am and 7pm on weekdays, and money raised would fund improvements to the bus network and other sustainable travel schemes. The Zone would be fully operational in 2027/28 but only once the first bus improvements are introduced.

1) Transforming the bus network

Without engaging fully with our parishioners, we feel that the majority would welcome a greatly improved bus network, provided by a large number of small, electric bus routes. Low cost, short journeys should provide access and egress to key transport nodes, enabling travel to/through and around the city from neighbouring villages and communities. However, buses are not the answer in full and a mixed provision should be the objective.

Any scheme based on the assumption that busses are a panacea for transport problems is flawed.

- They don't go everywhere. In Cambridge, we have a radial model, which means you will need to take at least two busses to get to most places unless targeting the City Centre.
- They are slow, because they need to stop which leads to productivity impacts.
- You can't take large or heavy items with you.
- They aren't as reliable as a private car.
- Many people don't live within easy walking distance of a bus stop.
- Many groups have characteristics that preclude or reduce the ability to use a bus.

2) Investing in other sustainable travel schemes

We know our community support the establishment of sustainable travel schemes, such as better walking and cycling links, and advocate the reduction of carbon emissions within residential areas. We welcome consideration of a wide and direct network of 'greenways'.

We advocate the establishment of safe footpaths, pleasurable village environments and safe cycling routes that encourage NMU activity.

We suggest that the local authorities need to look favourably on all initiatives that support and encourage modal shift and improve the quality of life for communities, urban, village and rural.

Consideration needs to be given for the use of bikes on our roads, including cargo bikes. Road surfaces need to be improved, cycling interchanges made safe and the transitions from cycle path to road upgraded. The overall objective has to be, to make it a pleasure to be on a bike.

Whilst not entirely within your powers, we suggest that collaborative work needs to be undertaken with local police authorities to reduce bike crime which impacts on individuals, the economy and disincentivises bike usage in our city. Consideration also needs to be given to the management of the resultant abandonment of stolen bikes, many of which take up long-term space in bike parking racks, reducing capacity for others.

We realise that bike usage should be encouraged but also that this cannot be championed as a complete solution. Weather, physical ability, carrier capability and time/productivity outcomes all impact on the viability of bike usage as do safe storage, bike crime and safe road usage.

3) Creating a Sustainable Travel Zone

We believe that our parishioners fully recognise the need to reduce carbon emissions within the city and surrounds, and that opinions will vary from full support for a wide STZ, to abject opposition to the

scheme. Whilst there may be overall health and environmental improvements for all, arising from the reduction of individual car journeys, that detail is yet to be outlined. However, the obvious and practical downfalls of the scheme proposed can be envisaged and are outlined below.

The rest of our response relates specifically to consideration of the proposed STZ scheme. Without clear guidance, we have grouped our comments under a number of broad-brush headings.

3.1 Disruption and expense for our residents arising from the proposed scheme.

Our residents travel into the proposed Sustainable Travel Zone (STZ) to engage with the amenities and cultural offerings of the city and to reach their local supermarkets such as Waitrose in Trumpington or Sainsbury's in Coldhams Lane, and stores such as B&Q, Homebase, PC World and others along Newmarket Road. These trips often involve bulky and/or heavy purchases and are difficult or impossible to make by public transport.

Restricting access will severely impact the quality of life for Great Shelford residents and should they start to 'opt out' this could adversely affect retail, hospitality and sporting economies. There is a risk that the GDP of Cambridge and Cambridgeshire will be significantly reduced as a result of a reduced footfall.

Great Shelford residents may be tempted to seek alternative destinations such as Bar Hill, Royston and Saffron Walden, which will have the perverse effect of increasing their car-miles travelled, and may jeopardise the viability of some retail categories within the STZ.

There are concerns that living on our parish will be seen as less attractive due to the 'lifestyle tax' and the restrictions on moving around. As a result, it may be harder for employers in Cambridgeshire to attract and retain talent. Many people living in our parish are business owners, directors and investors in the local economy and anything that adds to problems in recruitment may impact on their commitment to operating businesses in this area.

There are obvious concerns regarding 'chargeable' access to Addenbrooke's Hospital and other key health facilities in the zone, which might discourage people from getting required treatment, or from visiting in patients.

We suggest that the STZ should start with a smaller perimeter and if necessary be expanded in stages after evaluation of the effects of each change. The evaluation should not be dictated by income generated, but rather by analysis on the long-term sustainability of a mixed economy.

3.2 Displacement of traffic

The inclusion of Long Road in the STZ, and the promised tighter enforcement of the restrictions on Addenbrooke's Road, will aggravate the existing inadequacies of orbital routes south of the city and increase pressure on Granhams Road, Hinton Way, Woollards Lane, High Street and Church Street in Great Shelford. Church Street, in particular, which is used as a transit route to the A10, the B1368 and a range of settlements to the south-west of Cambridge, already has saturation and safety issues. These roads simply cannot sustain increased usage due to domestic and commercial vehicles seeking to evade the congestion charge.

We also have concerns that our locality will be used as a car park for people who want to get as close to the border as possible.

We strongly object to any proposal liable to increase traffic along these routes. This same concern applies to all borders of the proposed STZ, where communities will suffer the same consequences of traffic displacement.

3.3 Inadequacy of bus services

Comparison of the maps on pages 9 and 10 of the consultation's map book shows a degradation of the citi 7 service through Great Shelford because of diverting services from Saffron Walden via the proposed CSET route. The proposed stop on that alignment is too far from our village centre to be of any use to the majority of residents, and cannot be considered as a replacement for the six stops served by the citi 7 along the A1301 within our parish. We have previously suggested that some citi 7 buses should run to Francis Crick Avenue and then along the existing guided busway into central Cambridge, giving us a more direct and faster route into town.

Given that the GCP say significant improvements will be made to the bus network before the STZ is introduced, starting next year, we would want to see how, even if CSET goes ahead, you envisage improving public transport in Great Shelford before CSET is implemented. Electric buses serving a variety of routes are essential.

3.4 Discounts, Exemptions and Reimbursements

While we appreciate the spirit of the proposals on page 20 of the consultation brochure, and the commitments on page 23, we are concerned at the bureaucratic load and the degree of disclosure they will impose. Care workers and NHS staff will need not only to apply for their own reimbursements, but also to assess and certify patients and their carers who may qualify for reimbursement: a distraction from their primary (and essential) roles. Similarly, the suggested tapered discount for people on low incomes seems likely to impose a further administrative burden on employers and benefit offices as well as the low-income earners themselves.

In the interest of our residents with health or income issues we urge the GCP to make any procedures for partial or full exemption as simple as possible.

If modal shift is the goal – than incentives rather than penalisation is required.

We would be interested in your reaction to our comments and would welcome further discussion with the GCP on your Making Connections proposals and indeed on other travel and transport matters affecting Great Shelford.

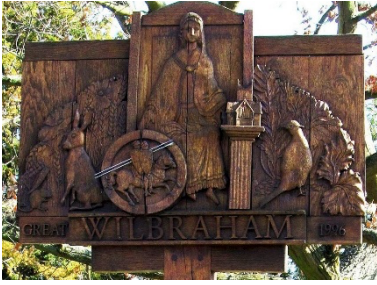
Thank you.



Malcolm Watson

Chairman

Great Shelford Parish Council



GREAT WILBRAHAM PARISH COUNCIL
Chairman: Dr Hilary Burton. Clerk: Mrs Sam Chambers-Turner
41 Stow Road
Stow-Cum-Quy
CB25 9AD
Tel: 07369248998
Email: clerkGW@wilbrahams.co.uk

22nd December 2022

To the Greater Cambridge Partnership

A response from Great Wilbraham Parish Council to the GCP 'Making Connections 22' consultation

Our parish recognises the importance of the Greater Cambridge Partnership (GCP) proposals in attempting to provide a solution to the problems of congestion and pollution in and around Cambridge City – whilst at the same time addressing the environmental need to reduce car usage. We note your three main proposed transportation changes:

1. Transforming the bus network with an explicit proposal for at least hourly services in rural areas
2. Investment in cycling and walking travel schemes
3. Creating a Sustainable Travel Zone with the introduction of road charging.

Many residents in our village have deep concerns about the current plans for congestion charging – and we echo these concerns.

We also acknowledge the GCP's proposed investment in cycling schemes. However, we are informed that there is no intention at present to extend these into the smaller rural villages. The roads from Great Wilbraham to Fulbourn or Bottisham are narrow and extremely busy, including a considerable amount of HGV traffic accessing small industrial units in Fulbourn and elsewhere. Without a dedicated cycle route, we consider the proposal that the main access to public transport for our residents should be by bicycle to hubs in nearby villages is simply impractical.

Notwithstanding the concerns about road charging, we would like to endorse the importance of better bus routes for our villages. The consultation represents a unique opportunity to obtain public transport services for our residents, enabling non car drivers to be more independent and others to reduce their car use, perhaps giving up a second or third family car, thereby cutting costs and helping the environment.

We have looked at the GCP plans for rural bus services and consider that the meagre proposals for an hourly bus route linking Little and Great Wilbraham on a service from Newmarket via Fulbourn and eventually to the Newmarket Road Park and Ride will not meet the travel needs of our residents, (which we outline below) and so are unlikely to be well-used. We would like to discuss the potential of a radical new alternative route tailored more to the travel requirements of our residents and which we believe, following discussions would also be well used and welcomed by residents in our neighbouring villages and along the B1102 route.

This route may be particularly practical in the early years of the CGP programme and before the proposed new P&R and transport hubs are developed.

A possible alternative bus route through the Wilbrahams

We would like to engage constructively with the GCP about the potential for a bus route from the B1102 axis via Bottisham, through the Wilbrahams and Fulbourn and then directly to the Cambridge Biomedical Campus or the Babraham Road Park and Ride site via Shelford Road, Fulbourn, which goes over the Gog Hills (See Fig 1).

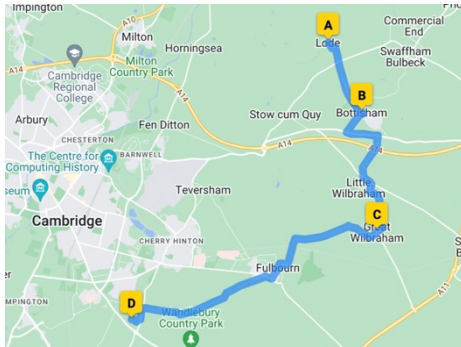


Figure 1 – Potential route for bus linking B1102 axis with Biomedical Campus through Great Wilbraham and Fulbourn

For Great Wilbraham such a service would meet the needs of residents (particularly non car drivers and therefore including many elderly people and all our young people) to access the neighbouring villages of Bottisham and Fulbourn for social activities and essential services including Bottisham Village College, medical, leisure and shopping facilities in Bottisham and Fulbourn. Beyond this it would also enable residents to

directly and quickly reach facilities in the vicinity of the Biomedical Campus including 6th Form Colleges, and other campuses such as Babraham, Abington etc and to access the faster routes to the city centre, Science Park and other centres which would operate via mini hubs in Bottisham and Fulbourn.

Although Great Wilbraham is a relatively small village (600 residents), we believe that such a service would be well used because of the access it would provide for residents to the East along the B1102 axis who commute for work or education purposes to the Biomedical Campus area as well as all those attending Addenbrooke's Hospital for appointments or for visiting. These villages include Bottisham, Quoy, Lode, the Swaffhams and Burwell. Evidence from MVAS data in Great Wilbraham taken in September 2022 shows that around 280 cars pass through Great Wilbraham towards Fulbourn each weekday at peak time (6.00 -10.00) and a total of more than 900 in any one day. The peak traffic is reversed in the evenings. We also know from discussions that this is a preferred route from these villages avoiding congestion in Quoy, Newmarket Road, Cherry Hinton, Robin Hood, Queen Edith's Way and around the Addenbrooke's roundabout.

For Fulbourn residents this route would also provide a convenient direct access to the Biomedical Campus.

Summary

We see this consultation as a major (and possibly unique) opportunity to get new bus routes for our villages to improve travel for our residents and help traffic and environmental issues at the same time.

- At present it is simply not possible to live in Great Wilbraham and be integrated in the wider Cambridge community for work, education, leisure, social or essential service activities without a car.
- At present there is no connection between Fulbourn, Great Wilbraham and Bottisham, despite this being the main connection to secondary schools and essential services for our residents
- Great Wilbraham experiences large commuter traffic flows, congestion on our narrow roads and associated pollution from cars travelling from B1102 villages towards the Biomedical Campus.
- A significant proportion of residents along the B1102 axis commute daily to the Cambridge Biomedical Campus area and a new direct route through Great Wilbraham to the Cambridge Biomedical Campus would be advantageous to their residents.

This response and proposal about a direct route to the Biomedical Campus is supported in general terms by the neighbouring parishes of Little Wilbraham, Fulbourn and Bottisham as well as villages along the B1102, including specifically Quy and Lode. We would very much like to have the opportunity to discuss routes further with the GCP, should the plans for improved bus routes go forward.

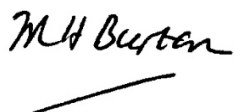
We would also like Great Wilbraham to be considered urgently for funding of cycle routes, connecting it with nearby villages such as Fulbourn and Bottisham and onward to Cambridge or by possible new 'Greenways' through the Swaffhams. The provision of safe cycle routes will ensure a reduction in traffic and a safe and healthy alternative for commuters to access nearby transport hubs and travel to central Cambridge.

Conclusion

We are greatly in favour of improved rural bus routes. However, we ask that before details are finalised, the GCP looks at traffic flows through the Wilbrahams and villages on the B1102 axis and consults with Parish Councils and residents on practical routes. The aim for the future would be to enable people to make the required shift from their cars, and to provide our young and elderly people with a usable public transport service – something that they have not experienced in the last 4 decades. The provision of a safe cycle route is also essential, enabling residents to use active travel options to commute to central Cambridge.

We look forward your response and to participating in further discussions with you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'MH Burton', with a horizontal line underneath it.

Dr Hilary Burton

Chairman Great Wilbraham Parish Council

Dear Sir / Madam,

Further to the recent publication and request for consultation, I write on behalf of Greys of Ely Ltd Coach hire company to register in the strongest possible terms my concerns regard the intention to charge coaches to enter Cambridge from 2025.

The "MC Brochure V25" which has been released, clearly states, on page 7, that the challenge faced is the "climate emergency", however the intention to unilaterally charge coaches is totally opposed this mission statement; especially as there is the intention to charge zero emission coaches. In addition to this, it is widely recognised that coaches take at least a miles worth of traffic off our roads, when compared to car usage. I would point out that a Euro VI coach produces less PM10 and NoX than a Euro VI Ford Fiesta, and this does not even consider these values in relation to levels by person / passenger. Many businesses of varying sizes, within the proposed zone, already have green travel schemes in place, provided by coaches, which would be hugely impacted by the Councils charging plans which also goes against the mission statement.

Furthermore, I would like to query how the council would envisage the provision of home to school travel for Cambridgeshire County Council funded routes to operate? Even with an improved bus network, it would not be able to cope with peak commuter travel at the same time as home to school travel. If school travel is still to be provided by private sector coaches, it is cross purposes for Council funded transport to then be charged to enter Cambridge. If it would be the intention to allow these vehicles to be exempt, how would this then be monitored if the vehicle, having dropped at school within the zone, then goes onto a private client within the zone?

Finally, I would draw the council's attention to the feasibility of correctly enforcing the charging, as all Buses and Coaches are registered for Taxation purposes, on the V5 registration documents, as 'Bus'. This would mean it would not be possible to use ANPR technology (as used in other dedicated Clean Air Zone cities, such as London, Bristol, Bath etc) to determine charging.

Whilst the plans to improve the local bus network to help support the transition of car users is a bold and worthy aspiration, which should be supported. It cannot be a "one size fits all" approach to other road users outside of the target demographic and scope of the original concept i.e, reduce the number of cars to reduce congestion in the city.

Please be as forward thinking and brave and allow Coaches to be part of the solution, not viewed as part of the problem. If you look at the past 2 years, when Covid struck it was coaches who repatriated travellers home safely. Now amid nationwide rail strikes, it is coaches that are called upon to provide the much need rail replacement to enable rail users to still use congestion reducing means of travel. I struggle to see how adding £50 per vehicle per day onto to such solutions, can be

seen as helping congestion and environmental issues identified by the Greater Cambridge Partnership.

Kind regards,

Richard Grey

Managing Director



Haddenham Parish Council

serving the villages of Haddenham and Aldreth

Clerk: Mrs Victoria Taylor
Telephone: 01353 749919
Email: clerk@haddenham-pc.gov.uk
Website: www.haddenham-pc.gov.uk

61 Cherry Orchard
Haddenham
Ely
Cambs CB6 3UF

15th November 2022

Greater Cambridge Partnership
PO Box 1493
Mandela House
Cambridge
United Kingdom
Cambridge
CB3 0AP

Dear Sir/Madam,

Haddenham Parish Council, along with many local electors, has serious concerns around the proposed Cambridge Congestion Charge.

A large number of our parishioners work within the proposed zone and this additional charge to drive to work will have serious consequences for households already struggling with a cost of living crisis. Public transport into Cambridge from rural areas of East Cambridgeshire is incredibly limited and often not available at all. With the current levels of service, most people living in these areas rely on their cars to get to work. The Congestion Charge is therefore understandably of great concern to many of our parishioners.

The inclusion of Cambridge Biomedical Campus together with Addenbrookes and Papworth hospitals would be incredibly harsh on the NHS staff when they are already paying to park their vehicles at their place of work. These essential workers should not be penalised for needing to travel into Cambridge on a daily basis for work.

The Congestion Charge appears to have been embedded into a generic survey on wider public transport matters such as buses. It is the Parish Council's belief that a major and far-reaching proposal such as this should be the subject of its own separate county-wide referendum.

The Parish Council also notes that this significant proposal was not included within mandates from any of the political parties at the relatively recent county elections.

Haddenham Parish Council therefore strongly opposes any such Congestion Charge.

Yours faithfully,

Victoria Taylor
Parish Clerk

Cc
Cllr Anna Bailey, Leader of East Cambridgeshire District Council
County Cllr Daniel Schumann, Soham South & Haddenham Ward

Dear Greater Cambridge Partnership,

Thank you for the opportunity to make representations on the proposals set out in the Making Connections 2022 consultation.

I respond on behalf of my client, Hallam Land Management Limited ('HLM'), with particular reference to the proposed Travel Hub / Park and Ride facility at Scotland Farm, west of Cambridge.

HLM fully endorse reference to Scotland Farm in the Making Connections Consultation Brochure (page 13) and supporting Map Book (page 2), which recognises the role the Travel Hub / Park and Ride facility will have in supporting the delivery of a transformational access strategy for Cambridge and the wider bus network in Cambridgeshire.

HLM are working with the landowner, PX Farms Ltd, who owns the land on which the new Travel Hub / Park and Ride facility and active travel path to Dry Drayton are proposed, as well as a much wider tract of land to the north of the A428. HLM continue to fully support delivery of the new Travel Hub / Park and Ride facility at Scotland Farm, and are engaging positively with the Greater Cambridge Partnership through the Cambourne to Cambridge Better Public Transport and Active Travel Project, as well as Cambridgeshire and Peterborough Combined Authority's Local Transport and Connectivity Plan to facilitate delivery.

We look forward to being able to consider the responses made to your consultation.

Kind Regards,

Reiss



Healthwatch Cambridgeshire and Peterborough

Making Connections: Our response

Healthwatch Cambridgeshire and Peterborough warmly welcomes the proposals to create healthier communities by developing better public transport across Cambridgeshire. Sustainable, affordable and accessible public transport would make a tremendous difference to people's lives. We hear many stories of how difficult and expensive it is for people to reach health and care appointments, in both hospitals and in the community.

It is pleasing to see that consideration has been given to the needs of people who travel to Addenbrookes hospital. We would like to make some observation and comment about difficulties we can foresee and areas that need further exploration.

The range of people accessing Addenbrooke's services

There are a huge number of people visiting the hospital every day for treatment, diagnostic tests, consultations, visiting and volunteering. We question how the exemption system will identify the full range of these people and ensure that they are not disadvantaged. Visitors are, in many instances, essential care givers and these people would be difficult to track for exemption.

Administrative burden of exemption

The cost of assessing every trip of every person visiting the hospital would be prohibitively expensive; costing more than the scheme raises. We suggest it is fairer and simpler to draw the boundary of the zone around a smaller central city area.

Involve wheelchair users and people with disabilities in the design of buses and stops

By involving people in the design of buses and methods of transfer, you can be confident that final designs meet people's needs. Our Healthwatch would be happy to facilitate that co-design process.

Accessible bus information

Bus timetables need to be available to people in hard copy at bus stops and in formats they can understand. Libraries are good places to maintain stocks of large print and easy read timetables. Bus information should not just be available online.

Not everyone can cycle

Please bear in mind that many people cannot cycle for a variety of reasons. Health, age, fitness and confidence all have a role to play in being safe riding a bicycle. Buying and maintaining bicycles can be very expensive.

We hope our comments are informative and look forward to hearing about the next stage of the proposed development. Our Healthwatch is very supportive of plans that will realise a sustainable travel system for all.

Sandie Smith, CEO
Healthwatch Cambridgeshire and Peterborough
December 2022

Healthy Air Coalition response to the Greater Cambridge Partnership Making Connections consultation

The Healthy Air Coalition (HAC) is a coalition of over 20 leading health, environment and transport charities committed to raising awareness of the health, societal and economic consequences of air pollution. We are calling on local, regional and national governments to deliver bold measures that will tackle air pollution and protect public health across the whole of the UK.

We know that air pollution is the greatest environmental threat to human health. There is no safe level to breathe in; we need to be doing all we can to reduce levels of toxic air in every community across the country. Air pollution has been linked with up to 36,000 premature deaths every year in the UK and was attributed to 121 deaths in Cambridge alone in 2020.

It is for this reason that we support the ambition set out by the Greater Cambridge Partnership to improve public transport, walking and cycling, and reduce traffic levels across Greater Cambridge. These should not only bring down air pollution but should also help to reduce congestion and carbon emissions across the city. Reducing overall traffic levels across the country is essential for reducing levels of the most harmful air pollutants: nitrogen dioxide (NO₂) – a harmful gas – and fine particulate matter (PM_{2.5}) – tiny particles of dust and dirt that get deep into the lungs and into the bloodstream.

Clean Air Zones (CAZs) are one of the few tried and tested ways of quickly reducing air pollution from road transport. They have had a measurable impact everywhere that they've been introduced, whether that's the Ultra Low Emission Zone in London or CAZs in cities like Portsmouth, Birmingham and Bath. We therefore welcome the commitment to a Sustainable Travel Zone to reduce the number of vehicles that enter the centre of Cambridge. However, we note that there are some aspects of the proposed Sustainable Travel Zone that seem weaker than CAZs, including the fact that CAZs operate 24/7, unlike the proposed Sustainable Travel Zone which will only be operational between 7am and 7pm on weekdays.

We understand that exemptions and sunset clauses may be needed to help some drivers, such as those on low incomes, adjust to the new measures. We would, however, encourage the Greater Cambridge Partnership to focus on ensuring that residents and businesses, particularly people on low incomes and SMEs, are supported to transition to less polluting vehicles, such as electric cars and vans, e-bikes or cargo bikes, and cleaner alternatives, such as mobility credits, shared mobility options and public transport season tickets, and can also increase walking and cycling.

We also understand the need to give residents and businesses proper notice of these changes but would urge the Greater Cambridge Partnership to consider bringing the zone in earlier than 2027/28. We cannot wait to tackle toxic air pollution; waiting until 2027/28 could mean failing to prevent another 600 premature deaths as a result of air pollution in Cambridge.

Greater Cambridge Partnership – Making Connections 2022
Consultation
Formal response
on behalf of
Histon & Impington Parish Council

Mrs C O'Brien
Clerk to the Council
Parish Office
New Road
Impington
Cambridge
CB24 9LU

22nd December 2022

Histon & Impington (H&I) Parish Council resolved to delegate to its Land Assets & Infrastructure committee the response to the Making Connections 2022 consultation. The committee took the view that it would not adopt a position unequivocally for or against the Sustainable Travel Zone proposals but would use its response to the consultation as an opportunity to air all the issues, particularly as they impact residents of Histon and Impington.

Our view was that there are plenty of opportunities for individuals on either side, who live within the parish to make their respective views known through the consultation. Our job is to ensure that a well-rounded airing of issues is collated on behalf of the whole community. It is the best we can do in these circumstances and we may miss some issues as we will obviously not have the wisdom of the entire crowd. However, it is a reasonable attempt, and we hope that it is of some use to you as you formulate the next iteration of these proposals. The views of the entire Council were sought, and these have been summarised in the attached SWOT analyses.

The issues that are of particular relevance to Histon and Impington are as follows:

- The proposals chime with a key part of the H&I Neighbourhood Plan which is to encourage the use of public transport and active travel. We hope reductions in road traffic will encourage cycling and walking to and from local schools.
- We welcome the opportunities that the proposals would provide for investment in active travel in H&I. However, we are concerned that no detailed proposals for achieving this are presented in the consultation.
- The implementation of a charge may prompt some businesses to leave the City but in turn this may increase demand for commercial properties on the periphery of the zone, such as on Vision Park and the High Street in Histon which have a number of vacant properties.
- The level of initial consultation activity in Histon and Impington was disappointing, given its key location on the edge of the proposed zone, with little or nothing by way of leafleting and only latterly a public event.
- Our location on the very periphery of the zone creates a risk of increased traffic and fly parking, particularly around the Station Road / Guided Busway junction, which is already a point where the Citi 8 and Busway services cross and passengers can interchange. We would expect car commuters to drive to this point and use the village to access city bound buses. Consequently, it will be essential for the scheme to provide the traffic regulations and fund Civil Parking Enforcement staff, so as to avoid residents parking charges for those deployed to the village, to help manage that parking.
- The current proposals only provide for increased bus frequencies on the guided busway. It is essential that the future service overcomes the persistent problem of city-bound buses on this route being full by the time they arrive at the Impington stop. Currently much of the southbound service is inaccessible at peak times from the Impington stop. We also want to see an increase in the frequency of the Citi 8 service, particularly at peak times, as 74% of the village is within 400m of a Citi8 bus stop, with just 12% within 400m of the guideway stop.

Opportunities
Worsening congestion will ultimately reinforce the case for action.
Could allow for better ideas to come forward as a result of more consultation

Weaknesses
Devisive congestion charge -through the disproportionate impact on small businesses
Poorly thought through and inadequate exemptions
shopping trip to Aldi or churches across the A14
Poor messaging
No leaflets to outer villages
Relies on being effective, but not too effective
No clarity on multi bus trips
No commitment to the franchise model
Bus frequency increase only on Guideway and problems with these buses being full when reaching village during morning rush hour. Only 12%of village is within 400m of the Guideway
Lack of clarity on loation of bus tops on proposed new route to and from Cottenham on B1049
Risk of increased traffic and fly parking - people using village to access city buses. No mention of increased parking regulations and enforcement to protect residents.
Blue badge does not capture all disabled groups
Two exemptions may not cover paid and unpaid carers making multiple visits
Paying a charge may foster entitlement in drivers over cyclists and pedestrians
Bus services are monopolised by one provider
No indication of which will be the principal groups that would pay the charge. Will they be Addenbrooke workers and the most poorly paid who cannot afford to live in the city?
No clear indication on how much this scheme will cost to administer
Exemptions for social workers and care workers but it is not clear if volunteers for charities (e.g. those doing voluntary home/support visits for organisations such as Help the Aged or Mencap would be exempt)
Threats
Not ready to go active travel schemes
No increase in Citi8; but 74% of the village is within 400m of a Citi8 bus stop
required CPE staff
Increased demand could overwhelm any bus improvements; (see Busway/CRC problem).
Support for boundary villages only after monitoring - not when charge starts
Further expansion of Congestion Charge Area into Histon/Impington
Bus provider not agreeing with added routes, despite extra funding, as still not profitable for them
Bus provider not able to staff extra bus routes and higher frequencies (An issue that is already a problem); resulting in no change to travel times. (see recruitment and retention in Opportunities)
Shops may decrease in City centre pushing travel to other areas further away increasing pollution
Increase in charge with time unknown - noting that London charge has gone up by factor of 4 since launch
Despite extra funding enforcement staff are not increased as the need is not seen (especially when travelling as a family)
effective' above).
Threats to small business who may not be able to pass on costs, particularly in the current cost of living crisis.
Weaknesses
Winds down the clock on timescales within which effective action can be taken
Use of sustainable transport options will not increase, makingeven harder to tackle climate change
Without bus use increasing on some routes, risk of these services being withdrawn

policy change
Status quo continues
Threats
Will deliver congestion that will compromise local economy, health and contribute to climate change
healthcare, leisure opportunities etc. because buses are inadequate and unreliable
Bus services will decline even further



Historic England

Greater Cambridge Partnership
By Email

Direct Dial: 01223 582746

Our ref: PL00791495
16 December 2022

Dear Greater Cambridge Partnership

Ref: Cambridge Making Connections - Second Consultation

Thank you for inviting Historic England to comment on the second consultation regarding the Making Connections programme.

Having reviewed the documentation associated with the project, we do not consider it necessary to make any further comments at this time and would refer you to our previous letter dated 15 December 2021, which sets our general advice on the principles that should be adopted during this programme in order to avoid or minimise any harm to the exceptional significance of Cambridge's historic environment.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk

cc:



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



Horningsea Parish Council Response to GCP STZ Consultation

23 Dec 2023

From: Horningsea Parish Council. clerk@horningsea.net

Fares

Fares should be affordable but they should not be subsidised by a single source of income. It will ultimately lead to a service that cannot sustain itself. If the council want to subsidise a service, it should run the complete service and de-privatise it. This way it can maintain control over the full service costs. There are too many variables in the scheme as proposed to ensure that funding for the service can be guaranteed. Having a single source of funding for the service (the congestion charge) will not guarantee a service in the future.

Routes

The scheme seems focused on getting people into Cambridge. This is not sufficient. People need to be able to enjoy direct routes from their homes to employment centres, services and retail centres. These links have not been put in place. The network shows mainly routes that take people into town from surrounding areas. The scheme is supposed to reduce traffic into the city, however, currently, it adds to the traffic by driving more buses directly into town. The service does not appear to contribute to the reduction of traffic in town.

Surrounding villages

For smaller villages an 'on-demand' service is proposed. This is not a workable solution. For a truly workable scheme, people should not have to wait more than 10 minutes to get on a bus. It should arrive near their departure point and arrive at their destination. If people are to be enticed to leave their cars, the service needs to be quick, regular and available. A phone call to an 'on-demand' service is none of those things. The plan for the new service should not pre-empt routes that are low volume passengers. There is no real way to predict how a service will do until it is put in place. The fact that there is no service through a village like Horningsea does not mean it would not be used by residents there. Nor does it mean that people traveling on the line from Ely to Cambridge would not choose to be on a service that runs through smaller villages. All small villages need to be covered with a regular service. It should cover all villages with a regular service. Horningsea is one such village. There is enough need for people in Waterbeach New Town to go to East Cambridge, Marleigh, Teversham, Fulbourn Tesco, Arm Ltd., Addenbrookes. Send some of the Waterbeach buses through Milton and some through Horningsea. The bus service cannot be the only mode of transport that gets people around town whilst providing a service that keeps people shielded from weather. Many people are not able to walk or cycle. Taxi services and the car are needed for people. These transport modes need to be able to flow around town easily.

Better bus service

Of course a better bus service is needed, always. But not in isolation from other improvements. Improvements that can be rooted in planning rules. The GCP is currently conflating a better bus service with introducing a congestion charge. Better bus services exist in the country and in other countries without the introduction of such a charge. Many of these services are public services. Taking full control of the service is another way of managing cost and efficiency much more closely. Bus routes should not be focused on going into town. There should be circular routes that connect retail centres, employment centres, public services, park and rides. Currently there is no way to get

from one park and ride to another by use of a direct bus service. Nor is there a way that connects up destinations in a circular way. All routes have to go into the centre which will inevitably lead to more congestion.

Roads like Newmarket Road will need much better separated bus lanes. Bus lanes stop and start along new market road leading to buses weaving in and out of regular traffic. This makes both the buses and the cars slower. It also creates dangerous situations for pedestrians and cyclists.

There is one big reason that means that many people do not feel encouraged to use the bus. The journeys that take less than 20 minutes (like North Cambridge to Addenbrookes or Cherry Hinton to Science park) today, will take too longer. This is something that people will not be able to fit into their day. Especially if they must get their children to after school activities or have to fit in alongside other activities.

Cambridge provides a regional hub for surrounding villages and this means that many people have to be able to get into town and travel around town to use the services. Often not actually going into the city centre but simply visiting services on the outskirts. The proposed bus service is not the right mode of transport for carrying equipment and people around. So the question is not: "How do we make a better bus service?". The question is: "How do we make all modes of transport flow better around the city for a better quality of life for the people that live here?".

All angles need to be addressed.

The bus service for Horningsea will be worse than it is already. There is absolutely no information about the 'on demand' responsive service, which is supposed to cover villages in our area to the east of the city.

Even though Horningsea is less than 4 miles from Cambridge, the bus service in Horningsea is only twice a day, and not viable as a means of transport to work. Buses are often cancelled. Some people in the village do depend on it for shopping. Our village is not being offered the bus every 10 minutes service under the GCP Making Connections proposals. People who cannot use a bike haven't got any other option but to drive. We need an improvement on this if we are being made to pay a congestion charge.

A 4 mile journey to reach service is one thing that, on average, is too far for many people to cycle. Then, once they have reached town, they would still need to cover some distance to go around all their destinations (Shops, Pharmacies, Sports, Hospitals, Doctor's Surgeries etc.). So a round trip of 8 miles could now become a 12 mile journey. This is too much for many people to do on a bicycle. So if no regular bus service is available, Horningsea will be cut off.

Franchise model

The proposed franchised model does not guarantee a better service. The London model is not guaranteed to work if applied in Cambridge. For one, there is no equivalent to TfL in Cambridge. This body is a large operating company that would need funding and staffing. Cambridge has no experience with such a thing and setting up a complex body like this is doomed to fail if not undertaken very, very carefully. Additionally, TfL manages much more than bus services. In that sense TfL works because it has created a "critical mass" of services, customers and operators that creates a service that can largely be self-sustained. With lesser used services being supported by more profitable services. Cambridge is too small to achieve this. It has no train or underground services and its taxi service is nowhere near as advanced as London. There is no guarantee that a franchise that serves on part of the city stands a chance to survive if its routes are less occupied. It won't be able to compensate for this diminished revenue because there are not enough routes to help compensate for it in a small scheme like Cambridge. This eventually means that there are only going to be a handful of franchises or franchises will not be able to run. Thus, needing more subsidies from the county and landing the county in debt. A debt that the county will have to serve for years (nay, decades) to come. With the council being in debt already it cannot afford to take on this risk.

Funding

Even when driving into London I do not have to pay a congestion charge until I am right in the very smallest part of the city centre. The ULEZ charge is a much fairer levy than a blanket charge as proposed in Cambridge and considers the amount of strain a vehicle puts on the environment. An improved bus service is something that is definitely required. But not in isolation. Improving a bus service is what people already pay council tax for. A strong focus needs to be placed on making the quality of living in the city and surrounding areas better. Very little is explained about how people will have a higher standard of living. A better standard of living includes the ability to move around the area unencumbered. A newly introduced scheme should focus on better traffic flow, less traffic in critical areas of the city and less stationary traffic. This can be achieved in several ways. Charging people will not create the improvement that the GCP is after. The city will likely still be congested because the infrastructure does not support traffic flow. The proposed bus network does not support removing traffic from the city because the increased number of buses carry the same amount of people into the city. It does not fundamentally change anything. This proposal therefore feels disingenuous. It feels like the GCP is not hoping to achieve a better city environment and infrastructure where people can live their best lives. It feels like a short-term scheme to raise money that will implement a single solution (Bus service) to a very complex problem. This is not a sustainable plan.

Sustainability Zone

The zone is not the right answer to a problem that needs to be (and can be) addressed in different ways. A more holistic approach is required. Focusing on a single, incomplete bus service to solve a complex issue is not going to work. The charge is unlikely to provide sufficient funding and the bus service is going to solely rely on the charge to fund it. It is a risky and dangerous plan that may land the council in years of debt trying to make a service run. Creating a blanket charge for all users of city roads is going to cripple the area's economy. It will disadvantage independent business and people that currently rely on being able to freely move around the area for their income and livelihoods. Denying free access to stations, hospitals, schools, sport facilities, shops, employment centres is ultimately going to make people vote with their feet and choose to take their business to other areas (Newmarket, Ely, Bury St Edmunds etc.). That is just the people who have a choice. What about the people who are in Cambridge city at the moment. They do not have a choice. They have to pay to leave the city. Leaving the city is actually a positive improvement to the situation. Yet the scheme penalises people for this. People cannot even choose to leave in their electric cars because these will also be charged. The scheme holds people to ransom. In addition, the council is planning more residential development (NECAAP, Marleigh etc.) inside the zone. Thus, seemingly only hoping to generate more revenue from STZ charges. The GCP have indicated that if any exemptions were to be introduced, the scheme will not be able to pay for itself. If that is the case, there is no slack in the proposal for any unexpected outcomes and it will have to either be cancelled in the near future (at a great cost for start-up and putting in infrastructure) or it will have to be funded through loans that the council takes out. Taking the council further into debt. The scheme is too costly on residents and it is too risky and costly for the council.

Low Emissions Zone

A ULEZ scheme is more sustainable. Reduce to the catchment area. Exemptions or reductions for residents need to be considered. The current scheme is too blunt and coarse to be successful. Central government funding needs to be found. This is something MPs should be fighting for. If the charge is successful, the only source of income (cars paying for travel in the zone) will be severely diminished. Thus reducing the available funding. The scheme shoots itself in the foot. Alternative schemes should be considered. Having large retail centres in town (Newmarket Road, Beehive) contributes to congestion. These retail parks can be situated near the Park and Rides. Thus avoiding

anybody traveling to these city centre places in the first place. Resident in Cambridge would simply have to take a 'reverse' P&R trip to shop there. [SEP] Build employment centres outside the city.

Size of the Zone

The proposed zone is too large. It includes things like Science Park, Addenbrookes, Cambridge North Station, Arm Ltd. There are no free travel corridors between Park and Rides. How does one get from Newmarket Road P&R to Babraham P&R without incurring a cost. Recently the P&Rs were already full up. People were advised to use alternatives. There weren't any. Typical core work hours are 9am - 5pm. The charge will severely impact people working in the area. Especially those that rely on their vehicle to go to work or run a business. These are the people that keep the local economy running. How is the charge going to pay for the loss in revenue and livelihood of all these companies and individuals? The knock-on effects will be too great. There is no fully encircling ring road around the zone. This makes it almost impossible to for people to quickly make it to the right part of the city when commuting into the zone. All residents of Cambridge will be effected by even driving off their property. This is not acceptable. Targeting core congestion hours would be much better. What does the data say these hours are?

More exemptions/discounts need to be introduced:

1. Residents
2. Key workers
3. Local deliveries (These bundle trips to shops, just like buses do)
4. Low environmental impact vehicles (ULEZ)
6. Elderly people
7. Visits to necessary services (Hospitals, pharmacies etc.)
8. Care givers (Looking after sick, frail or elderly relatives)
9. etc.

Car clubs are a vehicle and should also incur the charge. Car clubs do not reduce travel by car. They just maximise the use of a single vehicle. The amount of journeys is not guaranteed to be reduced.

Place more focus on traffic reduction through taking away destinations (Like large retail parks). Place more focus on separating modes. Dedicated bus lanes are a good thing. So are dedicated cycle paths. Implementation is key here. Sometimes the cyclist needs to be protected and this is not always done well in the current infrastructure (East Road bollards are one example.).

Improved infrastructure

Roads are in a terrible state. Rough road texture, potholes contribute to bad emissions. Better road surface reduces fuel/energy consumption. Focus more on quality of life improvements for people traveling within the zone. No matter what mode they use.

More funds should be allocated to making active travel easier. e.g. Better pavements, pothole repairs, better lighting, bus shelters, more police and enforcement staff

Alternative modes of transport

GCP should consider giving villages an easy scheme to loan electric bikes/trikes which are prohibitively expensive to buy. These services are sparse at the moment and not available in all surrounding villages.

Diversion, Equity and Inclusion (DEI)

In your survey you ask about DEI. You are fundamentally discriminating against people who currently live in Cambridge. They do not have a choice about whether they drive their cars into the zone

because they are already in it. You are effectively trapping them into the scheme. People who live outside the zone do at least have the choice not to enter the zone.
The GCP should also consider that people on lower incomes will be unfairly disadvantaged

By email

Date 21st December 2022.

Dear Ms. Miles,

GCP Making Connections 2022: A City Access Consultation

I write on behalf of Huntingdonshire District Council to express its views in relation to the Making Connections 2022: A City Access Consultation by the Greater Cambridge Partnership (GCP).

At its meeting on 12th December 2022, the Cabinet, on behalf of Huntingdonshire District Council considered the potential impacts of the proposals. We recognise this is a challenging issue, and our residents and businesses have a range of views. This response builds on earlier correspondence submitted to GCP pursuant to the consultation of December 2021.

Tackling climate change and caring for the environment is a key strategic objective of the Council, which is committed to proactively tackling the climate crisis and ecological emergency. We therefore welcome the introduction of measures that have the potential to improve sustainable travel across Cambridgeshire and specifically enhance economic opportunities in Huntingdonshire through improved connectivity.

An improved bus network could significantly reduce air pollution, contribute to carbon reduction targets and facilitate a modal shift in transport usage. A well-designed public transport system that is truly sustainable, affordable, equitable and timely would be transformative for residents and businesses within Huntingdonshire. Express services with faster journey times would be particularly valuable in overcoming immediate barriers to bus use from those otherwise able to access and travel on them already.

We do, however, continue to have concerns with some aspects of the proposals, particularly the impact that they may have upon lower income residents, residents living in rural communities, and businesses who are all - in the immediate term - facing incredibly challenging times, as we live through a cost of living crisis and high inflation against a background of great economic uncertainty.

Our primary areas of concern are outlined below:

- If this proposal proceeds, any Sustainable Travel Zone (STZ) must be truly sustainable for the long term and take account of shifting behaviours in light

of changing work patterns post Covid-19. It is recognised that the city routes will be more profitable, often sustaining rural routes. With that in mind it is essential that the bus pricing must be modelled accordingly with clear evidence that it remains a truly affordable alternative to the car, alongside concrete assurances that rural routes will be maintained for the longer term.

- We remain of the view that the proposed arrangements may penalise residents in villages and more remote parts of the district for whom non-car journeys may involve multiple changes of modes and substantially longer journey times. We recognise the proposed increase in park and ride capacity and site locations, however these would still require significant driving distances by Huntingdonshire residents making use of them to enter the STZ. We urge further exploration of park and ride sites more distant from Cambridge, including within Huntingdonshire, to maximise accessibility to the bus network and enable visitors to the city to complete fewer miles by private transport.
- If the STZ succeeds in achieving the desired mode changes, it is unclear whether and how adequate funding sources will be secured to maintain support for the alternative travel options if the amount of private vehicular traffic significantly declines overall. We would need assurance that the improvements would remain viable over the long term.
- Clarity is needed on how the proposals are connected with other service reviews being undertaken by the Cambridgeshire and Peterborough Combined Authority, in particular the Local Transport and Connectivity Plan and the Transport Strategy Huntingdonshire, as well as the review of the Bus Strategy and its supporting plans.
- The refund strategy associated with visits to the Addenbrooke's/Rosie/Royal Papworth hospital site is unclear, and we are concerned it would be complex to claim. Given the wide catchment area for the hospital trusts operating on the site, and that a large section of our rural residents has no certainty of an affordable and timely travel alternative at this point, they may be disproportionately impacted. In light of this, we urge that a way be found of excluding the hospital site from the geographic area of the STZ. Ensuring all residents have access to healthcare when they most need it is essential. We agree that, with ongoing growth of the hospital site, the status quo (of inadequate parking on the site, inadequate road access to the site, and inadequate park and ride connectivity or public transport alternatives to mitigate the traffic challenges on the site) will not be sustainable either.
- The document makes reference to low income households but fails to define a low income household for the purposes of this strategy. More detail is also required on how the discount would work.

- We remain of the view that clarity is also needed on the relationship between GCP and Cambridgeshire County Council in these proposals, and the funding arrangements for initial improvements and fare reductions prior to introduction of the STZ. We would urge that detail on which party would legitimately/ legally/ practically have the ability to spend revenue improving bus services outside of the GCP area be made available to HDC. This will have significant implications for the provision, and long term maintenance of proposed service upgrades to and within Huntingdonshire.
- The current proposals and attached map book outline an improved bus network with Cambridge at the centre. For many of our residents, our market towns are the centre of their transport needs. Many residents of rural Huntingdonshire must travel to market towns for essential journeys to work, education, Hinchingsbrooke Hospital, and to access council services. However, no routes have been included in the map book that would link, for example, rural residents of western Huntingdonshire to the market town of Huntingdon. We urge further development and would welcome further investment in additional bus routes that link our rural communities across western and northern Huntingdonshire to our market towns, to contribute to the overall user base and viability of the proposals.

It is imperative that the views of residents and businesses across Huntingdonshire are fully considered and visibly addressed in any future iterations of your proposal. We are also using our channels of communication to encourage their participation directly in the consultation in order to help GCP obtain the fullest evidence base reflecting the varied circumstances, needs and opinions of Huntingdonshire residents.

In light of all the above, we seek assurances that GCP has fully considered the impacts of its proposals on all those who travel across the county, to and from the city, and in particular our rural residents for whom access to convenient public transport options is, and is likely to remain for the foreseeable future, unrealistic.

Huntingdonshire District Council also seeks assurance from GCP that they will proactively engage to address the above issues. We would be pleased to work more closely in order to assist in addressing them.

Yours sincerely,



Councillor Sam Wakeford
Executive Councillor for Jobs, Economy and Housing

Our Ref: 22455/AB/IK
Your Ref: n/a
Email: abunn@firstplan.co.uk
Date: 21 December 2022

Greater Cambridge Partnership
PO Box 1493
Mandela House
Cambridge
CB3 0AP

Sent by email only – consultations@greatercambridge.org.uk

Dear Sir / Madam

REPRESENTATIONS TO GCP MAKING CONNECTIONS 2022 CONSULTATION – SUBMITTED ON BEHALF OF JOHN LEWIS & PARTNER AND WAITROSE & PARTNERS

We write on behalf of our clients, John Lewis & Partners (hereon referred to as JLP) and Waitrose & Partners (hereon referred to as Waitrose), in connection with the current consultation which has been published by the Greater Cambridge Partnership. The consultation seeks views on the proposed introduction of a Sustainable Travel Zone (STZ) within Cambridge City Centre and extending across the Greater Cambridge area. The proposed STZ encompasses both the JLP department store in the Grand Arcade in Cambridge City Centre, the Little Waitrose store at Fitzroy Street in Cambridge City Centre, and the Waitrose supermarket at Haxuton Road, Trumpington.

It is proposed that vehicles would be charged for driving within the STZ between 7am and 7pm on weekdays, and the funds raised would facilitate improvements to the bus network and other sustainable travel schemes. It is understood that the STZ would be fully operational in 2027/28, with a gradual introduction starting in 2025 following the introduction of the first bus service improvements. Whilst JLP and Waitrose are broadly supportive of the Council's sustainability objectives and the improvement of bus services across the Greater Cambridge area, the proposed daily charge for using vehicles (including for deliveries) within the STZ provides our clients with cause for concern and risk presenting significant operational challenges for the business, particularly in respect of the company's Waitrose & Partners branch at Trumpington.

Waitrose, Trumpington

Waitrose has been trading from its Trumpington location since October 2000. The store is not within a designated town centre but is situated approximately 150m to the south-west of the southern boundary of Trumpington Local Centre. Therefore, Waitrose clearly supports linked trips to Trumpington centre, further facilitated by the provision of 2 hours free parking in the store's car park. The Trumpington store is the only full-sized Waitrose store within the Greater Cambridge area and is therefore strategically important to the success of the Partnership. As the only full-sized store in the area, Waitrose estimate that approximately 80% of turnover at the store is car-based. This is to be expected given the size of the store and its requirement to meet local residents' weekly and main food shopping needs, which are for the most part met by customers undertaking trolley-based shopping to purchase sufficient products to meet the majority of their weekly or fortnightly shopping needs. These activities cannot be replicated easily with non car-based modes of transport and are an established method of shopping both in Cambridge and across the country as a whole.

Furthermore, the Waitrose store is also the only large supermarket serving the residential communities to the south-west of the city in the Trumpington and Grantchester areas, meaning that residents in these areas are able to undertake both their main/weekly and top-up shopping trips in a sustainable manner, without needing to travel to locations further afield to meet these needs. Our clients do not consider it appropriate that customers should have to pay an additional fee to undertake this necessary activity, which as noted above is a firmly established part of consumer food shopping activity in the country, particularly at this time when household spending is already being significantly challenged.

It is significant to note that, notwithstanding the changes to shopping patterns which have come about as a consequence of the Covid-19 pandemic, a large majority of Waitrose's customers continue to visit their stores in person to undertake main/weekly shopping trips (a trend which is repeated across the grocery sector). The nature of these shopping trips is that more often than not, customers undertaking these type of shopping trips will need to do so by private car in order to transport their shopping home, as the size/volume of goods purchased is too great to travel home by an alternative means of transport. Put simply, it is simply not possible for an individual to undertake a main/weekly shop for a family using public transport, on foot or by bicycle, and it is not considered that the consultation has had sufficient regard to this matter.

Our clients support the principle of the proposed improvements to and extension of the bus network and services across greater Cambridge and the environmental benefits that this will bring to the city. However, this should not be facilitated by unnecessarily burdening those who require a car to undertake their shopping with such a prohibitive charge. Indeed, it is considered that a number of the objectives being sought by the consultation, most specifically to reduce car use across the city, can come forward in their own right, without the need to introduce the STZ. Addressing the barriers which dissuade residents from taking public transport (for example, reducing fares and/or increasing bus connectivity) or active travel (for example, introducing more cycling networks and enhancing streetscapes and walking routes) should be considered as strategic priorities in their own right, and should not be tied to the introduction of the STZ and its associated compromises which this letter identifies.

It is also not considered acceptable that deliveries to the store by Waitrose and suppliers should be required to pay a significant fee (LGVs at up to £10/day, and HGVs up to £50/day, which we assume will be per vehicle), simply in order to support the day to day operations of the store and ensure that local residents can meet their shopping needs sustainably. Such a charge will place a considerable operational burden on the business and its suppliers which is not considered to be reasonable.

John Lewis & Partners, Cambridge City Centre

JLP is an anchor tenant both within the Grand Arcade and to the wider retail offer in Cambridge City Centre, acting as a key attractor of footfall and trade to the City Centre from Cambridge, Cambridgeshire, and the East of England generally. The presence of JLP in Cambridge City Centre therefore facilitates linked trips to other retail, leisure and tourism operators within the centre, supporting its wider vitality and viability. The store is the only John Lewis & Partners in Cambridgeshire and attracts further trade from North Hertfordshire, South Lincolnshire and the western areas of Norfolk and Suffolk, in addition to tourist trade. The Little Waitrose store on Fitzroy Street also plays an important role in contributing to the wider city centre retail offer and supporting linked trips spending.

In respect of the city centre JLP store, it is important to note that a significant proportion of JLP's stock is furniture and bulky household and electrical items, which are readily available for immediate purchase within the store or online via Click & Collect. Click & Collect items can also be routed to the Waitrose store for collection, should this location be more convenient for the customer. It is on this basis that JLP seek to ensure that shoppers with a requirement to access stores by car either to carry goods directly from the store to their cars, or to pick up a click & collect order, should be able to do so without additional financial burden.

The Greater Cambridge Retail and Leisure Study (July 2021) picks up on our client's press releases in relation to the uptake and growth of the Click & Collect service, as follows:

“In the last five years alone, Click & Collect orders have increased more than 50% as customers enjoy the ease and convenience it provides. Currently 57% of all online orders are delivered through this service with 25% of packages collected at John Lewis shops and 75% at Waitrose shops”.

It is therefore clear that there is an exponentially increasing demand for the Click & Collect service and, in the context of larger bulky items; demand for the ability to conveniently collect these items by car from an easily accessible location with directly adjacent or nearby parking. This is clearly reflected in the above statistics.

The Retail and Leisure Study research also indicates that the click and collect market will grow by a further 46% by 2023. Click and collect is specifically identified as an important opportunity for town centres, in terms of its propensity to generate footfall. Indeed, research undertaken as part of the Retail and Leisure Study demonstrated that 39% of consumers make an additional purchase when collecting an item from a store. Thus, the contribution which JLP’s Click & Collect customers are likely make in supporting further purchases and spend elsewhere in Cambridge city centre should not be overlooked.

In Cambridge BID’s most recent monthly footfall report prepared by Springboard (September 2022), it is encouraging to note that footfall, both by day and by week of month is measurably up on 2019 (the last regular year assessed prior to the Covid-19 pandemic). This demonstrates the viability, vitality and resilience of Cambridge following the pandemic and shows good post-covid recovery and consumer confidence in spending. However, the current cost of living crisis is placing significant financial strain on households of varying financial and social status, with the UK at the start of a recession that will undoubtedly have a further detrimental impact on the retail environment and consumer spending and confidence. At a critical time between healthy recovery from the pandemic and a recession ahead, the focus should be firmly centred on retaining the high levels of footfall currently experienced in the City Centre and ensuring that customers can undertake their shopping needs without additional financial burden.

However, our clients are concerned that the proposed charge for the use of private vehicles within the Sustainable Travel Zone of £5 per day will render the Click & Collect service unviable to most shoppers, who will instead opt to order online for home delivery. As noted above, it will also dissuade customers visiting the store who may wish to carry a heavy/bulky item back to their cars. Combined, this has the potential to significantly reduce physical trips to the store and therefore additional purchases made either in JLP and Waitrose stores, or via linked trips to other stores within the centres.

Furthermore, the impact of the proposed charge must also be viewed in tandem with the proposed increase in City Centre parking charges. JLP have made separate representations to this consultation, a copy of which is appended to these representations for reference. It is considered that many of the points raised are also directly relevant to the STZ proposals.

Finally, we wish to be clear that our concerns set out above in respect of the onerous costs to the business in terms of paying up to £50/day per HGV for deliveries are also applicable to the city centre John Lewis store, which is reliant on frequent deliveries both from JLP distribution centres and from a wide range of suppliers given the range of goods sold from the store. Such a charge is considered to be an unnecessary and disproportionate financial burden on businesses such as JLP which are playing an important role in actively supporting the vitality and viability of the city centre.

Other concerns

Whilst it is noted that the STZ would operate on weekdays until 7pm and not at weekends, our clients consider that this would simply create ‘pinch points’ at the end of each day and at weekends as most customers would seek to continue to shop by car outside of the STZ charging periods. These pinch points could simply have the effect of increasing traffic congestion outside the charging periods, particularly immediately before and immediately after the start/end times. Our clients are concerned that around these pinch point times, the Waitrose store in Trumpington would reach physical capacity, and the availability of goods and produce would diminish rapidly. This

in turn would very likely lead to increased waste of fresh produce in Waitrose during the chargeable period, where weekday trade could markedly decrease due to the proposed charge.

In addition, JLP and Waitrose are deeply concerned about the financial impact of the proposed charge on their 450+ Partners employed across the city, many of whom also reside in Cambridge. The additional £5 a day to get to work would place significant financial strain on many Partners, particularly those who work short contracts or do not live within a reasonably commutable distance on foot, by bicycle or on a bus route. Furthermore, as the Waitrose store is only just within the STZ boundary, any staff and customers visiting the store would be required to pay the £5, including those who do not live in the charging zone and do not wish to travel any further into the zone.

As well as affecting current Partners, our clients are concerned that the additional charge may have the additional effect of making recruitment for new Partners more difficult if they know they are required to pay a charge each time they travel to work. The STZ charge would also be coupled with the current economic climate when most are already struggling with the increase in food and energy costs. More broadly, we would consider that the introduction of a daily charge presents risk of widening social exclusion in the city and restricting the ability of some residents to easily and readily use the broad range of retail and other important community facilities and services offered across the city. In particular, it is considered that more careful consideration needs to be given to how residents in older demographic brackets, and those on lower incomes, will be supported in continuing their current patterns of visits if they use their cars.

Conclusions

In conclusion, our clients support the Council's wider sustainability objectives and proposed improvements to the bus network, and the positive impact that reducing congestion generally will have on the greater Cambridge area.

However, this should not be to the detriment of those with a genuine requirement to commute to work or undertake necessary weekly shopping by use of the car, which accounts for the vast majority of customers at our clients' Waitrose & Partners store at Trumpington. It is respectfully considered that the Council should look at alternative ways of promoting more sustainable/active travel in Cambridge which does not have the significant compromises associated with the STZ, both for residents and visitors to the city.

Our clients respectfully request that these comments are duly considered to ensure that trade across the Greater Cambridge area and the financial stability of Partners and customers is not further compromised in the current challenging economic circumstances.

Yours faithfully



ADAM BUNN
Senior Associate

For and on behalf of Firstplan

Cc – Lisa McDonald, John Lewis & Partners
Sara Norfolk, John Lewis & Partners

Appendix 1 – Representations to Cambridge City Council Off-Street Parking Charges Consultation (Firstplan on behalf of John Lewis & Partners)

Our Ref: 22455/AB/ik
Email: abunn@firstplan.co.uk
Date: 09 November 2022

Cambridge City Council Parking Services
PO Box 700
Cambridge
CB1 0JH

Dear Sir/Madam

REPRESENTATIONS TO OFF-STREET PARKING CHARGES 2023-24 CONSULTATION ON BEHALF OF JOHN LEWIS & PARTNERS, THE GRAND ARCADE, 10 DOWNING PLACE, CAMBRIDGE CB2 3DS

We write on behalf of our client, John Lewis & Partners (hereon referred to as JLP), as tenants of the Grand Arcade, in connection with the current consultation which has been published by the Council, which proposes increasing off street car parking charges in Cambridge, as set out in a news release dated 24 October 2022, and reflected on the Council's online consultation portal.

It is understood that the proposals directly affect the Grand Arcade multi-storey, among other car parks in Cambridge City Centre. It is understood that the objective of the measures is to boost the City's night-time economy, whilst enabling increased access to electric vehicle charging points without the requirement to pay for parking. In addition, the consultation proposes an increase in daytime parking rates by an average of 9% for 2023/24. This proposed increase provides our clients with cause for concern.

JLP is an anchor tenant both within the Grand Arcade and to the wider retail offer in Cambridge, acting as a key attractor of footfall and trade to the City Centre from Cambridge, Cambridgeshire, and the East of England generally. The presence of JLP in Cambridge City Centre therefore facilitates linked trips to other retail, leisure and tourism operators within the centre, supporting its wider vitality and viability. The store is the only John Lewis & Partners in Cambridgeshire and attracts further trade from North Hertfordshire, South Lincolnshire and the western areas of Norfolk and Suffolk, in addition to tourist trade.

Whilst JLP is broadly supportive of the Council's initiatives to increase usage of electric vehicles and the City's well-established Park and Ride service, this should not be facilitated by increasing the off street parking charges, which are already set to a high level and a significant expense for both JLP's customers and Partners. A significant proportion of JLP's stock is furniture and bulky household and electrical items, which are readily available within the store or via click and collect. As such, there is an inherent requirement for customers to be able to access parking readily and viably from the store to transport such purchases home, which would not be possible via Park and Ride. The ability to transport goods home on the day of purchase further negates the requirement for an additional trip by a delivery vehicle to deliver items at a later date. It is on this basis that JLP seek to ensure that shoppers with a genuine requirement for parking are able to do so without additional financial burden.

The Council will note that USS Ltd (the owner of the Grand Arcade) has previously submitted detailed representations expressing concerns regarding the scale of parking charges in Cambridge City Centre. In representations to the November 2019 consultation, which proposed an increase in parking charges from 1st April 2020 limited to CPI, USS brought the following key considerations to the Council's attention:


- The impact on Grand Arcade's retailer sales since the introduction of the congestion charge has been -6% during the week and -7% at the weekend;
- High parking charges was the most frequently referenced comment in the Grand Arcade's annual Retailer Satisfaction Surveys and these are detrimentally impacting Cambridge's reputation as a retail location, reducing interest from incoming operators;
- High parking charges impact on the workforce, making it difficult to recruit and retain staff. Public transport does not always represent a viable alternative means of commuting when, for example, the Park and Ride buses do not operate on Boxing Day, the busiest retail day of the year.

In Cambridge BID's most recent monthly footfall report prepared by Springboard (September 2022), it is encouraging to note that footfall, both by day and by week of month is measurably up on 2019 (the last regular year assessed prior to the Covid-19 pandemic). This demonstrates the viability, vitality and resilience of Cambridge following the pandemic and shows good post-covid recovery and consumer confidence in spending. However, the current cost of living crisis is placing significant financial strain on households of varying financial and social status, with the UK at the start of a recession that will undoubtedly have a further detrimental impact on the retail environment and consumer spending and confidence.

At a critical time between healthy recovery from the pandemic and a recession ahead, the Council's focus should be firmly centred on retaining the high levels of footfall currently experienced in the City Centre. Further increases to car parking charges will undoubtedly discourage many shoppers from driving into Cambridge. Our client is concerned that the proposed increases in parking charges may mean that many customers will simply opt to shop/order online for convenience/financial reasons, resulting in a tangible drop in footfall, loss of in-store trade and in turn, loss of trade for other retail and leisure operators supported by linked trips from JLP's customers.

In conclusion, JLP supports the Council's wider sustainability objectives seeking to promote increased public transport usage and electric vehicle charging infrastructure. However, this should not be to the detriment of those with a genuine requirement to park in the city centre in an existing car park. JLP respectfully requests that these comments are duly considered to ensure that Cambridge City Centre's viability is not further compromised in the current challenging economic circumstances.

Yours faithfully



ADAM BUNN
Senior Associate

Greater Cambridge Partnership
PO Box 1493
Mandela House
4 Regent Street
Cambridge
CB2 1BY

To whom it may concern,

Sustainable travel zone and congestion charge

As a business at the heart of Cambridge City Centre we are concerned by the proposal to introduce a congestion charge for travelling in to, out of and around the city and the impact this could have on us as a Charitable trust.

Whilst we believe that most of our customers do not travel by car due to our central location and the expense of the parking, there are bound to be a minority that do. This could be personal choice, or because of the time of day that they visit, but importantly this could be due to access issues i.e. an injury or disability. Having had a few very turbulent years due to covid, the loss of a minority of customers would still hurt us financially. We are also concerned that the charge could lead to a general decrease in footfall in the city. For example, if local businesses decide to relocate, we could certainly lose customers that use our facilities at lunch time or after work.

Another major concern we have is the problems the charge could bring us in terms of retaining and recruiting staff which is already proving to be challenging in recent times. At the moment, roughly half of our staff walk or cycle to work as they live close enough for this to be feasible. The other half travel from other areas of the county/local counties, up to 34 miles away. We already provide staff with parking at significant cost and we could not absorb an extra £5 a day to subsidise a congestion charge as well. Our staff also work shifts and finish late at night (4pm - 11pm so they would be charged on the way in). If they were to get a bus soon after 11pm, would this be safe to do so? Will there be safety measures at the bus stops and on the buses themselves to deter criminal behaviour? What about when staff reach their more rural locations and must walk to their houses from the local bus stop?



When we are looking to recruit new staff, the charge is certain to put people off accepting a job in the city centre unless they live close by. Why would anyone accept a job with us over another employer that sits just outside of the congestion zone?

It has been suggested that people on low incomes could get an exemption and/or a discount, would this include people on the National Living Wage? If so, how would this be monitored? It sounds like a lot of administrative work to keep on top of.

I attended a consultation session at the Guildhall on 17th November 2022 and was disappointed by the lack of representation from either the GCP or the County Council. A lot of facts and figures were being given by the people that were there (I believe mainly event planners), but when challenged on where they had come from, they didn't know, 'that's just what they'd been told'. The lack of plan B was also a concern.

As I mentioned at the beginning of this letter, we are a Charitable Trust that has been part of the Cambridge landscape for many years serving the local community. Would the GCP consider an exemption/discount for staff of a Charitable Trust? I believe a further consultation may be run in the new year for businesses that will be affected by the charge, and I would of course be interested in engaging in this.

Yours faithfully



Donna Cowell
Company Secretary

For and on behalf of Kelsey Kerridge Sports Centre





Living Streets
2 America Square
London
EC3N 2LU

22 December, 2022

Dear Sir / Madam

Making Connections consultation

We are Living Streets, the UK charity for everyday walking.

We want a nation where walking is the natural choice for everyday local journeys.

I am writing to confirm our support for the introduction of a Sustainable Travel Zone in Cambridge, in the form of a road user charge, to fund improvements to bus services, walking and cycling.

Here is a summary of our points of interest, outlining why we support the proposals:

1. Investment is key to encouraging active travel

Local communities are already seeing the benefits from the fairer investment in active travel that we have seen from government and local authorities in recent years. However, with continuing pressures on public finances, we believe local and national decision makers need to look at new ways of investing to enable people to switch to walking, wheeling and more sustainable modes of transport.

Greater Cambridge is leading the way on active travel with plans to transform the area's bus network and invest in sustainable travel infrastructure to encourage more walking, wheeling and cycling.

We would like to see Cambridge set the direction for the nation, to encourage more towns and cities to take bold measures such as these to enable the creation of streets that are designed around people rather than cars and to reduce the motor traffic that generates so many harmful emissions.

2. Economic costs of congestion

There is no doubt that congestion costs the economy. In 2019, British people wasted 115 hours in congestion, costing the country £6.9 billion, an average of £894 per driver.

We note Greater Cambridge Partnership (GCP) estimates that congestion in Greater Cambridge is among the worst in the UK and that high traffic levels on Cambridge roads mean journeys by car and bus are slow and unreliable, leading to more emissions, pollution and car-dominated public spaces.

America House, 2 America Square, London EC3N 2LU
020 7377 4900 info@livingstreets.org.uk livingstreets.org.uk

We welcome the Sustainable Travel Zone proposals designed to tackle the challenges of congestion, poor air quality and high carbon emissions, as well as address the fact that for many journeys there is currently no viable alternative to the car.

Pound for pound, investing in active travel makes most sense. Shifting investment from cars to more sustainable modes of transport delivers a high return on investment (at least £4.50 for every £1 invested), just by cutting congestion.

3. Supporting growth

GCP estimates that by 2031 the population of Cambridge is forecast to grow by 28%, with an expected 44,000 more jobs and 33,500 more homes.

If new housing developments are to support local economic growth, they need to be supported by strong walking, cycling and public transport provision. The proposals for a Sustainable Transport Zone will help to rejuvenate the Cambridge area, improve its public spaces and make the city more accessible for all.

With the cost of living crisis increasing, walking is the most inclusive form of active travel for many as it is free. We support these measures proposed in Cambridge encourage people out of their cars and make it easier for everyone to walk more.

4. Health benefits of active travel

We note GCP's estimates that the Sustainable Travel Zone would deliver a 50% reduction in traffic, resulting in more space and cleaner air to enable 60,000 more walking and cycling journeys every day. We believe this will have a positive impact on the health of the region's population, where currently 62% of adults are classed as overweight or obese.

Walking increases life expectancy and decreases the likelihood of developing long term health conditions. Adults are recommended to be active for 150 minutes a week to stay fit and healthy but many of us don't achieve this. With supporting infrastructure in place in Greater Cambridge, it will make it easier for people to choose to swap short car journeys for a walk and to fit more exercise into their days. It's already been calculated that the health benefits of increased walking and cycling could save the NHS £17 billion over a 20-year period (2012-31).

5. Bold leadership

GCP estimates that the creation of a Sustainable Travel Zone would provide at least £50m a year to re-invest in the region's transport.

We believe this can create a step-change in how regions pay for public transport and active travel improvements. For us, it's important the proposals go ahead to enable more regions to be bold in finding new ways to pay for active travel investment to combat congestion and emissions.

I would be very happy to discuss any of the above points in more detail if you would like to arrange a meeting.

Yours faithfully

Stephen Edwards
Chief Executive, Living Streets

Cambridge Sustainable Travel Zone

December 2022

Summary

- Logistics UK supports the objective to reduce congestion and emissions in Cambridge and to fund improvements to bus services, walking and cycling.
- Where charges are applied, they should be considered in the context of the availability of alternative vehicles or travel options, as well as the economic and social value of the trip.
- The proposed zone covers a very large area and is therefore going to have a significant detrimental impact on logistics companies servicing businesses and residents across the city, particularly if high charge levels are applied to HGVs and vans.
- Logistics UK is strongly opposed to the targeting of HGVs in the phasing in proposals.
- Logistics UK is strongly opposed to the proposed daily charge levels of £50 for HGVs and £10 for vans.

About Logistics UK

Logistics UK is one of Britain's largest business groups and the only one providing a voice for the entirety of the UK's logistics sector. Our role, on behalf of over 20,000 members, is to enhance the safety, efficiency and sustainability of freight movement throughout the supply chain, across all transport modes. Logistics UK members operate over 200,000 goods vehicles - almost half the UK fleet - and some one million liveried vans. In addition, they consign over 90 per cent of the freight moved by rail and over 70 per cent of sea and air freight.

We seek to ensure that our industry can continue to supply businesses and consumers with the goods they require every day whilst reducing any social impacts – including carbon dioxide emissions and air pollution. The logistics industry wishes to play a positive role in helping reduce emissions.

Logistics UK's policy positions are determined by the members of its Councils. Over 300 managers and leaders from across road freight attend Logistics UK's Freight Councils throughout the UK three times a year. These Policy Councils meet in 13 locations across the UK. Nominated members are then able to participate in the UK-level Road Council where our policy positions on road issues are ratified. There are also Air, Rail and Water Councils that all members can join, as well as Shippers Council for logistics customers and a Strategic Council to address long-term issues.

About the Logistics industry

The logistics industry plays an indispensable role servicing our towns and cities, supplying communities and supporting local economies. To enable the industry to operate as efficiently as possible, logistics must be considered part of the UK's essential infrastructure, with appropriate local and national policies and regulatory frameworks in place to support its crucial role.

The impact of logistics operations in urban areas can be minimised through careful consideration of road space reallocation, supportive urban planning and appropriate steps to enable future vehicle and mobility technologies.

There is an inherent transport cost in everything we buy. As the UK recovers from the global pandemic, we are now faced with a cost-of-living crisis. According to Logistics UK's Manager's Guide to Distribution Costs, total vehicle operating costs increased by 16.7% for the first six months to July 2022. While rising fuel costs is a key element of this, vehicle maintenance has risen by 7.5% and overheads 12.3%. The Office for National Statistics (ONS) estimates that the Consumer Prices Index (CPI) rose to 11.1% in October and in the view of Logistics UK, the current economic climate is placing an unsustainable burden on industry, particularly among the small businesses.

Supporting an efficient supply chain and minimising unnecessary regulatory barriers is essential in keeping the cost of goods and services as competitive as possible for Cambridge's residents, businesses and visitors.

Response to consultation

Proposal to introduce a Sustainable Travel Zone

Logistics UK supports the objective to reduce congestion and emissions in Cambridge and to fund improvements to bus services, walking and cycling. But where charges are applied, they should be considered in the context of the availability of alternative vehicles or travel options, as well as the economic and social value of the trip. Whilst most private car users could consider switching to public transport, walking and cycling, essential freight deliveries have few alternatives to using HGVs and vans.

Congestion causes significant inefficiencies in the logistics sector in terms of delivery times and operating costs, and it also contributes to further CO₂ emissions through tailpipe emissions as vehicle engines idle whilst in traffic. According to INRIX 2021 Global Traffic Scorecard¹, Cambridge was the second most congested city in the UK after London. Drivers in Cambridge lost on average 75 hours per year due to congestion equating to £618 per driver with a total cost of congestion in Cambridge of £11 million.

Congestion is predominantly caused by passenger cars: In the year ending September 2022, 239.8 billion vehicle miles (bvm) were driven by cars, compared to 59.5 bvm for vans and 17.9 bvm for lorries². Given the economic importance of road freight traffic, the Greater Cambridge Partnership should focus on keeping road freight moving.

Feedback on the proposed Zone and its boundary

The proposed zone covers a very large area and is therefore going to have a significant detrimental impact on logistics companies servicing businesses and residents across the city, particularly if high charge levels are applied to HGVs and vans.

The other consideration is ensuring that drivers who are forced to enter the zone, either due to planned diversions, such as roadworks, or as a result of unplanned diversions, such as road traffic collisions, are not required to pay the charge. The preference would be for cameras to be switched off on diversion locations, so PCNs are not issued in the first place. And where a PCN is issued to a vehicle on a diversion route, there needs to be an easy process for the PCN to be cancelled.

Hours of operation of the Sustainable Travel Zone

The proposed 7am to 7pm hours of operation of the zone provides few realistic alternatives for deliveries and servicing activity. Greater access for deliveries to be made at night when the roads are quieter through the relaxation of night-time delivery restrictions, such as planning conditions, is one potential option. Enabling goods vehicles to spend less time in congestion will significantly increase their efficiency and reduce emissions. However, this needs to be balanced with the needs of local residents, especially in areas with low ambient noise levels. Additionally, many businesses will require deliveries during normal business hours and residents will not want to receive home deliveries late at night or early in the morning.

Phasing in the Sustainable Travel Zone charge

Logistics UK is strongly opposed to the targeting of HGVs in the phasing in proposals. As explained above, commercial vehicles have fewer alternative options to private cars, and introducing charges for HGVs first will have a significant impact on the cost of servicing Cambridge's residents and businesses. Congestion is predominantly caused by passenger cars, so HGVs will be charged without seeing any benefits from reduced congestion.

Proposed charge levels

Logistics UK is strongly opposed to the proposed charge levels for HGVs and vans. It is proposed that vans will be charged £10 a day, double the charge for cars, whilst HGVs will face a £50 daily charge, which is five times the charge for vans and ten times the charge for cars. It is a very simplistic approach to apply significantly higher daily charge levels for commercial vehicles. They need to be viewed in the context of the substantial economic and social benefits they deliver. With the average profit of a haulier around 1 or 2%, £50 a day for an HGV will make many deliveries

¹ <https://inrix.com/scorecard>

² <https://www.gov.uk/government/statistics/provisional-road-traffic-estimates-great-britain-october-2021-to-september-2022/provisional-road-traffic-estimates-great-britain-october-2021-to-september-2022>

economically unviable. Either the costs will be passed onto the customer, reducing the economic competitiveness of Cambridge as a city, or some delivery companies may choose to not service Cambridge at all.

Whilst the consultation document notes the potential to explore a 50% discount for zero emission vehicles, this is an unrealistic option for most logistics operators, particularly those operating HGVs, where zero emission technology is still at the early stages of development and is many years away from being market-ready and at comparable costs to Euro VI HGVs.

Logistics UK members are committed to reducing carbon emissions and achieving net zero. Whilst the take up of zero-emission Light Goods Vehicles is growing, van operators wishing to switch to zero emission vehicles are facing lengthy lead times of approximately 18 months to two years. And there are significant challenges in terms of recharging infrastructure, both for publicly accessible charge points and dedicated charging at depots.

For larger goods vehicles, the shift to zero tailpipe emission vehicles is more challenging. The Government has pledged that by 2035, new HGVs weighing 26 tonnes and under must be zero emission at the tailpipe, with new HGVs over 26 tonnes having until 2040 to be zero emission at the tailpipe to be eligible for sale. At the end of 2021, there were just 507 licensed ultra-low emission HGVs. According to Logistics UK's Industry Survey 2021/22, the primary barriers to the take up of alternatively fuelled HGVs are high initial capital costs; limited availability of fuelling options/infrastructure constraints; issues with on-board fuel storage and limited range; number of charging points; and lack of vehicle models available.

Other cities which have introduced Clean Air Zones have not applied charges at all to HGVs and vans which meet the Euro VI/6 emissions standard. Logistics UK calls on the Greater Cambridge Partnership to exempt freight vehicles from all charges and focus on modal switch for private cars. This is the approach that will be taken by Oxfordshire County Council in the implementation of traffic filter trials in Oxford in 2023³.

Proposed discounts, exemptions and reimbursements

Whilst Logistics UK welcomes the inclusion of breakdown vehicles in the list of exemptions, the exemption must not be restricted to Taxation Class Recovery Trucks. Trucks are often used where vehicle recovery is required. However, the priority should be to fix and/or recover where possible using a van. Doing so will allow a faster service, reducing congestion without having to call in another vehicle resource, wasting time and creating further emissions. Therefore, vans operated by breakdown companies should be included within the exemption.

Conclusion

Logistics UK has serious concerns about some of the measures proposed in this consultation, particularly the exponential charges under consideration for vans and HGVs, which we believe will have a detrimental impact on Cambridge's residents and businesses. However, we welcome the engagement by the Greater Cambridge Partnership team who participated in a webinar with Logistics UK members in December 2022 to present the plans and hear their feedback. We look forward to continuing to engage and help shape the scheme to ensure it delivers its intended benefits without the unintended consequences to essential logistics activity.

Natalie Chapman
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³ <https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/traffic-filters>