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I am writing on behalf of Marks & Spencer (M&S) regarding your current Making Connections 2022 consultation, specifically to express concern about the proposal to introduce a charge for motorists to drive within Cambridge on weekdays.

At M&S, we understand the importance of operating sustainably. We were the first major retailer to become carbon neutral in 2012 and we have pledged to become a net zero business across all our operations by 2040. As an own-brand retailer, we also have greater control over our supply chain, ensuring how we do business is as sustainable as possible.

We know reducing emissions from transport is important and we support the work of the British Retail Consortium's Climate Roadmap in driving net zero in our own operations. This includes the setting of a clear direction to accelerate deployment of zero carbon HGVs for the UK market, including significant research and development investment in solutions and infrastructure; and further measures to support near-term HGV emissions reductions. We would be keen to see the Government accelerate the roll-out of charging points for e-HGVs; this will remove barriers for electrification of truck fleets.

At the store level we offer all our colleagues the chance to take part in our Cycle to Work scheme work scheme which allows them to obtain commuter bikes, spreading the cost over twelve months.

At the same time, we are also acutely aware of how the wider retail industry has been affected over the past few years and how footfall in high streets across the country remains lower than pre-pandemic levels. We are in a prolonged inflationary environment after two very difficult pandemic years for retailers and customers. Cost price increases in our food business are severe and expected to continue given the pressures on labour, energy and other input costs in our supply base which in Food is predominantly UK-based.

Despite the inflationary challenges we have committed to delivering value for our customers for example by freezing our school wear prices, keeping 2022 prices at the same level as 2021 and investing a further in our Remarksable range, reducing prices for key basket staples. Any increase cost however makes this more difficult and results in pressures on customers. It is within this context we are concerned by the current proposals.

You may be aware that there are five M&S stores within the proposed Travel Zone – as well as three smaller stores operated by franchise partners, we also trade from our M&S Cambridge store on Sidney Street and an M&S Simply Food store at the Beehive Centre. We currently make around 50 deliveries per week in total to these stores – with a large number comprising the necessary daily fresh food deliveries to ensure we have a reliable supply of fresh products for our customers.

At our city centre store on Sidney Street, we are only permitted to make deliveries to the store between the hours of 7am and 7pm, and we are also subject to delivery restrictions at our Foodhall store at the Beehive Centre. Under the charging framework proposed by the County Council, we have calculated that the annual cost to M&S could be up to £140,000.

This represents an extraordinary rise in the cost of doing business as a retailer in Cambridge city centre. The Small Business Chronicle reports that across the industry, grocery store profit margins are on average between just 1 and 3 per cent. Taking this as an example, the additional sales required by a grocery retailer to offset such a significant cost would be in the millions of pounds. (Please note – this information is commercially confidential and should not be shared without prior discussion).

Without a plan to ensure the long-term future of the city centre, the implications for employment and revenue across the local retail sector could be significant. I am sure you will agree that a vibrant city centre is essential to drive prosperity and wellbeing for Cambridge residents and visitors alike, and that ensuring that our city centres remain easily accessible and competitive with other retail destinations is central to ensuring a long term, sustainable future for high street retailers serving their local communities.

In particular, many shoppers at our Beehive Foodhall currently drive as you would expect customers to do when doing their main grocery shop, so the impact on the area surrounding the immediate city centre would also be keenly felt by M&S and our customers. And we are also acutely aware that we serve a wide catchment area of many customers from rural areas and those who are older or disabled who depend on their car.

The same impacts would also be felt by our colleagues who travel into the city to work. Our Sidney Street store already faces significant challenges recruiting colleagues and this is primarily related to how challenging it is for people to get to work in Cambridge city centre. Whilst improvements to public transport services would always be welcomed by all, there is a real risk that removing the ability for people to travel to work by car from surrounding villages where bus services are infrequent and unreliable will make this problem markedly worse.

We hope that the County Council will reflect carefully before deciding how to proceed and consider the significant impact on retailers in Cambridge, particularly those that are required to make regular deliveries to ensure city centre residents have access to fresh food provision. If you would like to discuss our position further, please do not hesitate to contact me.

Tom Nicholson

Regional Communications Manager

Greater Cambridge Partnership,
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By email to: consultations@greatercambridge.org.uk

Representations made by Marshall Group Properties to the GCP 'Making Connections'

Marshall Group Properties (MGP), as part of the wider Marshall Group, is promoting the Cambridge Airport site for redevelopment. Known as 'Cambridge East', the proposal is for an extraordinary new urban quarter for Cambridge.

The redevelopment is predicated on the relocation of the Marshall Aerospace business to an alternative location. Marshall has secured an Option Agreement with Cranfield University for a site at Cranfield Airport in Central Bedfordshire and following announcement of the site as its preferred location, has now submitted an Outline Planning Application to facilitate the relocation of the Military Aerospace business to the site.

This firm commitment has allowed the airport site to be identified in the Greater Cambridge Preferred Options version of the emerging Local Plan as being suitable for 7,000 homes and 9,000 jobs. The appropriate quantum of, and balance between, homes and jobs is being considered further by both Marshall and the Greater Cambridge Planning Service.

The inclusion of Cambridge East in the Preferred Options version of the Local Plan reflects the acknowledgement that that the site can deliver thousands of new homes and jobs little more than three kilometres from central Cambridge. The delivery of homes and jobs in this location ensures that from a transport perspective travel patterns are inherently more sustainable than the same homes or jobs located elsewhere. Active travel, genuine low car living, complete, compact, and connected neighbourhoods, sustainable last mile logistics, integrated strategic green and active corridors and a smarter choices programme will all form part of our design and transport philosophy.

MGP has a clear objective to maximise the potential of the site to deliver the most sustainable development possible and therefore has a significant interest in improved sustainable access to and from the east of the city and beyond. MGP also recognises the important role that the land holdings owned by Marshall could play in delivering transformative transport infrastructure, which may in part be enabled through the development of Cambridge East, including the solutions identified as part of the emerging Eastern Access Projects.

Marshall Group Properties Ltd

The Airport, Cambridge, CB5 8RX. T +44 (0)1223 373737 marshallgroup.co.uk/property
Registered Office: Airport House, The Airport, Cambridge CB5 8RY, England. Registration Number: 2051458

Marshall is already therefore working closely with the Greater Cambridge Partnership (GCP) to ensure that the improvements identified by the Eastern Access Project which rely on Airport land continue to be progressed for the benefit of Cambridge East and communities to the east of Cambridge more generally. However, this response only addresses the current consultation – ‘Making Connections’.

We understand that the key proposals that sit under the banner of ‘Making Connections’ are as follows:

- Transforming the bus network: From as early as mid-2023, the GCP is proposing to transform the bus network through more services to more locations and with cheaper fares for passengers.
- Investing in other sustainable travel schemes: Alongside the bus network, the GCP will also invest in new sustainable travel schemes, such as better walking and cycling links.
- Creating a Sustainable Travel Zone: A ‘Sustainable Travel Zone’ will be created which will include a ‘road user charge’ for private vehicles who choose to drive within the zone between 7am and 7pm on weekdays.

It is advised that the money raised through the road user charge would be used to fund improvements to the bus network and the other sustainable travel schemes.

Should the proposals go ahead as currently being consulted upon, the STZ would be fully operational in 2027/28. However, and importantly, prior to this date, the bus improvements would be introduced which would include £1 flat fares for single journeys in the Cambridge bus zone, and £2 fares in the wider area.

As a result of the charge and the transformation of the bus and active travel networks, it is forecast that there would be a 50% reduction of traffic in Cambridge.

MGP Response

In general terms, **MGP welcome and support the wider debate on how to ensure a more sustainable future for Cambridge.** We consider that the scheme intentions align with our aspirations for the Cambridge East site in that sustainable modes of transport must be delivered, and that growth must not be predicated by an equivalent growth in car trips. The recent withdrawal of a number of important local bus services demonstrates the precarious funding environment that local public transport finds itself in and **we welcome the prospect of an alternative locally-led funding model.**

MGP also acknowledges that Cambridgeshire County Council, Cambridge City Council and South Cambridgeshire District Council have all declared a Climate Emergency. Declaring a Climate Emergency makes it a requirement to take action to drastically reduce carbon emissions and makes the councils accountable for delivering the requirements of its Climate Emergency Declaration. In the case of Cambridge City Council, the obligation is to reach Net Zero by 2030. These declarations and the associated obligations mean **radical changes to transport policy are needed and are, conditionally, justified.**

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In addition to the Climate Emergencies called by numerous relevant local authorities, the Cambridgeshire and Peterborough Combined Authority (CPCA) have also established the Independent Commission on Climate to provide authoritative recommendations on the options available to Cambridgeshire and Peterborough to decarbonise the economy, mitigate and adapt to the impacts of climate change. The Independent Commission on Climate published its full report in October 2021 and was clear that changing transport behaviours in the region, in part due to our emissions being well above the national average, is an essential aspect of any decarbonisation strategy. This is therefore again consistent with the aims of Making Connections. Aligned with the need to reach Net Zero, MGP is committed to ensuring that Cambridge East is genuinely sustainable, and this will cover all aspects of the development and how it can use and replenish resources. In transport terms, inclusive accessibility through planned spatial proximity (i.e. distribution of uses), the provision of sustainable physical mobility, and high levels of digital connectivity will be planned for. MGP's vision for the Cambridge East site is one where residents, visitors and employees are able to walk, cycle or use public transport because they are the most convenient and preferred choice of mode of transport, considering all metrics and compared to the use of the private car. **It is clear that this vision aligns with the outcomes sought through the 'Making Connections' proposals.**

MGP consider that Making Connections also highlights the value, and inherent sustainable credentials, of city or city fringe development where genuine modal choices already exist for the future community. **Growth must be focussed in these areas where alternatives to car-based travel exist if car-based transport is to be penalised. The alternatives to car-based travel at Cambridge East will be plentiful.**

Specific comments

Whilst MGP are supportive, in principle, of the 'Making Connections' proposals there are some matters of detail that we wish to highlight for further consideration as the scheme evolves.

1. Bus Improvements

MGP strongly supports the objective of improving or transforming bus services. Buses should form the backbone of the local public transport network and have a particular importance for those living beyond the city who are less able to walk or cycle to many services and facilities.

MGP **supports the proposal that improvements to bus provision, as well as other measures to encourage walking and cycling, are delivered ahead of the introduction of any Sustainable Travel Zone**, such that communities are aware of their alternative travel choices and can establish alternative travel patterns as a result of the improved provision rather than as a response to a charge.

For buses to become a genuine option for people being encouraged to give up driving into the city then they must be frequent, reliable, and affordable. Affordability must also be in the context of the proposed road user charge where a family using a bus to travel into the city must not feel financially incentivised to drive because the cumulative associated costs of a return bus journey for a family of 4 or 5 are significantly more than the costs of driving a car.

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To enable bus services to be as attractive as possible, last mile connectivity to services and in particular the higher frequency routes is important. Walking, cycle paths, and cycle parking that allow people to access services must be an essential part of a bus improvement strategy.

Whilst the Making Connections must not prejudge any future planning status of Cambridge Airport, we stress **the need for early network planning to appreciate the scale and opportunity at Cambridge East and plan for it accordingly**. We have long promoted the value of orbital connections that link the east side of the city to the south and the Cambridge Biomedical Campus and we also see value in connectivity to the Northern Fringe. The Outer Circular service reflects much of this thinking but can, in time, be altered to utilise and serve the Cambridge East site directly. We would also suggest that connectivity from Fen Ditton to the Northern Fringe (possibly via or alongside the A14) would allow access between Cambridge East and the other major opportunity area and Cambridge North station. This, in combination, would complete the Outer Circular Service.

A further bus connection that MGP have promoted is a service from the site to a new eastern access into Cambridge Railway station at the western end of Davy Road. The new eastern access to the station could be delivered in conjunction with the East West Railway Company's proposals for a new island platform at Cambridge Station which is needed for rail capacity reasons. We would strongly support Making Connections acknowledging this potential.

MGP see Cambridge East delivering an extraordinary new urban quarter for Cambridge, based on low car living and a highly sustainable transport strategy. **MGP will therefore want confidence that bus service frequency, routing and infrastructure is being planned to support the potential growth and demands from Cambridge East**. In doing so, Cambridge East in return has the potential to dramatically improve connectivity to the east of the city and to rural hinterlands beyond.

For bus services to be attractive to all parts of the community, **we would support a bus specification being developed**. This should cover safety, accessibility, and emissions but, importantly from a perception perspective, could also provide an illustration of the quality of bus that could be expected. We note the recent commitment by Go-Ahead to use the Irizar e-mobility ie-tram electric buses for TfL route 358 and suggest that similar vehicle types that improve the experience of bus passengers would be helpful in achieving broader support. We support a role for Demand Responsive Transport (DRT) services to supplement the fixed route services. DRT services are rarely viable without subsidy but can provide an important complementary service for more remote rural locations and the ability to subsidise such services through revenues raised by the STZ presents an opportunity for the expansion of such services.

2. Walking, Cycling and Public Space

Walking, cycling, and wheeling will be at the heart of Cambridge East. **MGP therefore strongly supports the use of monies to invest in further improved walking and cycling routes as part of Making Connections**. Cambridge is incredibly fortunate to already have a culture of walking and cycling and the potential to enhance this and further expand the culture to more rural communities and market towns must also be a key objective of the proposals.

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Sensibly located cycle parking that accounts for all cycle types and lockers for electric bike batteries should be part of the walking and cycling strategy.

In the vicinity of Cambridge East, there are a suite of existing and potential connections, and we would strongly recommend a co-ordinated approach to infrastructure design to ensure optimal outcomes for the city and wider area. The Cambridge East movement strategy is based around the principles of low car walkable neighbourhoods, which are underpinned by modal filters, and street hierarchies consistent with the recent Road Hierarchies Consultation. These design approaches and thinking in combination represent a positive and complementary set of arrangements to enhance walking, cycling and public spaces.

Further to this, the airport site itself is a significant barrier to movement on the east side of the city. Through the provision of a permeable street network and a proposed strategic green corridor linking the east to west, the removal of this major barrier allows existing communities to be linked through both physical and social infrastructure.

3. Sustainable Travel Zone Charging

MGP conditionally supports alternative revenue generation and investment models for the enhancement and improvement of sustainable transport. However, any charging regime must be equitable, reasonable, and well evidenced. How that is achieved will be complex and we welcome continued debate around exemptions for particular groups within our community.

However, **we also support the widening of the equity debate to appreciate that there are significant parts of our community who cannot afford cars or who are not permitted to drive.** Whilst there are undoubtedly some groups who depend on car access, there are also many others who will benefit from a reduction in traffic, and an increase in public transport, walking and cycling provision and associated improvements to air quality and road safety.

As charging is new to Cambridge it is critical that the impacts on potential development opportunities are explored and understood by developers, especially given ongoing economic uncertainties. We want to see 'good growth' but will want to see the necessary economic analysis published as part of further consultations to understand what the proposals will potentially do to the appetite for investment in the city. Unintended consequences must be appreciated, and the implication of the charge must not result in less sustainable, more rural locations becoming more attractive for development and thereby undermining the ability to raise revenue through the charge and an increase in traffic volumes in more rural areas. This from a climate and carbon perspective is the least favourable of outcomes. A key aspect of the potential in Cambridge East is the ability for residents to locate close to jobs and businesses to benefit from agglomeration. In keeping with the Cambridge and Peterborough Independent Economic Review (CPIER), anything that may encourage businesses to locate outside the city should be avoided as it may well see many unique businesses leaving the UK altogether rather than just the city.

We note that the proposed charges indicate only the 'potential' to explore a discount for zero emissions vehicles. We would prefer to see a stronger commitment to actively encouraging use of zero emission vehicles for business purposes. We are aware of the growth in use of short range

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zero emission vehicles for business purposes and we would not wish to see businesses discouraged from locating to Cambridge East where charges may apply despite investment in 100% electric, low impact vehicles.

Summary

In principle, MGP supports the aims of the GCP's 'Making Connections' and recognises the positive outcomes that could be delivered within the Greater Cambridge area. In an area that understands the environmental challenges that must be addressed we are pleased that far reaching proposals are being consulted upon. There is clear synergy between the objectives of both projects, but MGP would wish to be assured that these far-reaching proposals do not have negative impacts on viability, investor confidence in the city, and above all the proposals must stand up to scrutiny against the tests of equitability that are required of such schemes.

Whilst we support the principle of the proposals for the investment that it can bring to sustainable transport, we consider that **Cambridge East remains one of the most sustainable large-scale sites in the area. Even without the successful implementation of the scheme as proposed, Cambridge East would still result in significantly more sustainable travel patterns compared to other potential locations. The fundamentals of the site remain unaffected by these proposals.**

We are keen to contribute positively to the 'Making Connections' proposals and hope that we can discuss the emerging proposals with you going forward and as our planning status becomes more certain.

Yours sincerely,



Richard Howe MBE
Managing Director
Marshall Group Properties Ltd

Meldreth, Shepreth and Foxtton Rail User Group: Response to Making Connections consultation

The MSF RUG supports the Making Connections principle of encouraging and facilitating a shift to public and active travel for local journeys to and from Cambridge.

However, Making Connections proposals largely ignore the small station local rail network and opportunities therein for modal shift away from private car transport and the quest for local travel culture change.

Access to Foxtton Station has been developed as part of the proposed Foxtton Travel Hub, but access to Shepreth and Meldreth Stations has been light touch and confined to limited active travel links.

Active travel links to Meldreth, Shepreth and Foxtton Stations:

Active travel links to the three stations are being developed by the Melbourn Greenway scheme but only from the alignment of the Greenway route itself. Active travel links to rail stations are needed also from communities to the west of the Greenway route, such as Barrington to Shepreth Station, Whaddon and Kneesworth to Meldreth Station, and Meldreth to Shepreth Station for those requiring access to a step-free station.

Bus links to stations:

A regular bus link service to Meldreth, Shepreth and Foxtton Stations, as part of the new proposed bus network, providing regular drop-off and pick-up synchronized with train services, is essential and would:

- provide more equitable access to local rail services
- support the recovery of rail ridership post-pandemic, and in so doing contribute to the restoration of off-peak half-hourly services
- reduce car dependency and contribute to lessening of congestion, better air quality and safer streets more conducive to active travel

Accessibility at stations:

Meldreth Station currently has no step-free access across the platforms, thus excluding those with mobility impairment. As the most significant station of the three stations in terms of footfall and ticket office services, accessibility improvements should be on the radar of all efforts to improve public transport take-up in Greater Cambridge area.

'Meldreth Shepreth and Foxtton Stations: A Local Rail Improvement Plan,' published by the Meldreth Shepreth and Foxtton Community Rail Partnership in 2020, sets out a detailed audit of improvements needed for active travel connections to, and access improvements at these stations, to make local rail travel accessible to all, and has previously been shared with the GCP.

<https://meldrethsheprethfoxttonrail.org.uk/wp-content/uploads/2020/06/MSFCRP-Local-Rail-Improvement-Plan-May-2020.pdf>

Susan van de Ven

Chair, Meldreth, Shepreth and Foxtton Rail User Group

23 December 2022

Rachel Stopard, Chief Executive
Greater Cambridge Partnership
Sh1317, Shire Hall, Cambridge CB3 0AP

16 December 2022

Dear Rachel,

We would like to thank you for recently presenting to our team about the Greater Cambridge Partnership 'Making Connections' plans. We also welcome the opportunity to comment on the plans on behalf of our community of employees. After soliciting their feedback, while many will also submit individual responses to your survey, we would also like to share with you our collective response.

Microsoft is committed to enabling a more sustainable future and in 2020 we published detailed plans about our commitments [Environmental Sustainability | Microsoft CSR](#). We therefore support your goal to make Cambridge a sustainable travel zone. However, after reviewing the proposal in more detail, and reflecting on your presentation, we do have some general questions that we welcome your response to:

1. Could additional options for last mile coverage be considered at hubs such as P&R? e.g. electric scooters and electric bikes for hire, secure parking and charging for these, connecting infrastructure such as footbridges and underpasses.
2. Could more information on the decisions around the time span and physical boundary for the STZ be provided? Employees noted the following as of particular concern:
 - a. The inclusion of Addenbrookes
 - b. The inclusion of commuter hubs such as the Science Park
 - c. The charge being applied to people travelling out of Cambridge.
3. Has the impact on business in the city centre been thoroughly considered? Employees noted the potential for this to impact delivery of supplies and e.g. takeaways from food outlets in a way that may be detrimental.
4. School runs are noted as a particular contributor to congestion. Can more be done to target this and provide safe and sustainable alternatives e.g. better child-friendly cycling infrastructure, cycle infrastructure that can accommodate trailers over longer commutes across the city.
5. Has the impact on those with lower incomes, both in city e.g. Orchard Park/North Arbury, and commuting into it, been fully considered? Is there more data on which user groups will benefit or struggle with the proposed changes?

We also have a very active community of researchers and research design engineers, a subset of who, would be willing to lend data construction and analysis support to your project, should you wish to explore additional insights from the data that you have collected and could collect.

I very much look forward to hearing from you.

Your sincerely,



Dr Ant Rowstron,
VP and Deputy Director, Microsoft Research Cambridge
Siân Lindley, Future of Works Theme Lead, Rachel Howard, Director Business Management and Operations

To whom it may concern

Please find below comments raised by Milton Parish Council:

1. Better bus service must precede the STZ introduction
2. Buses will need to be going to a variety of destinations – not just the city centre and Addenbrooke's
3. Trips to Addenbrooke's site for emergencies, medical appointments or visiting in-patients should not incur a charge.
4. Exemptions and concessions will be essential
5. Exemptions for people who cannot use public transport or cycle, through health conditions/hours of work/not just based on Blue Badge eligibility which is not responsive enough
6. Cambridge North Station is close to the A14 and the route to it from the North should not be in the STZ
7. Voluntary car schemes and taxis (catering for those unable to use public transport) should be exempt.
8. Our residents on Fen Road Chesterton would be unable to use their cars without crossing the STZ area (in common with City residents). They are some of the most poorly housed and vulnerable people in the area. The nearest bus is currently ½ mile away (Fen Estate) and taxis refuse to cross the railway.
9. Care should be taken not to encourage people working at the Science Park to park in Milton, indeed to stop those who do it now.
10. People working at the Science Park, if they have parking allocated, and approaching from the North, are not contributing to congestion in Cambridge and should not be charged.
11. Cambridge's edge of town retail parks were developed for car drivers (Newmarket Road, Kings Hedges Road) but will be costly to reach.
12. The congestion charge should only apply to a central area of Cambridge City and exclude Addenbrooke's Hospital, Milton Science Park and Cambridge North Station

Kind regards.

Sarah Corder

Clerk to Milton Parish Council

**Greater Cambridge Partnership
Making Connections 2022 survey**

Response by the Motorcycle Action Group

2022 12 09

Introduction

The Motorcycle Action Group (MAG) is the leading riders' rights organisation in the UK. MAG membership consists of over 8,000 full members and 150,000 affiliates and associates. MAG is a founder member of the Federation of European Motorcycle Associations (FEMA).

The views of members on this particular subject have been gathered by discussion and debate within MAG's membership and engagement and discussion with the wider riding community, other organisations and the industry.

Bus Improvements

MAG fully supports improved and extended bus services. We do not comment on specific plans for achieving bus improvements beyond any specific impact that plans may have on motorcyclists.

Motorcyclists benefit from reduced congestion just as all other road users.

We were particularly disappointed that the Cambridge trial for motorcycle access in bus lanes ended in a decision not to continue with the policy. The trial combined both motorcycle and EV access. We felt that the decision was taken purely on the merits and basis of the electric vehicle access. Thus, the wrong decision was made for motorcycles, and we would urge the decision for motorcycle access to be re-visited.

Cycling, walking and other improvements

MAG is supportive of the principle of the schemes proposed but would urge that the range of schemes on offer is reconsidered. Modal shift from cars to motorcycles can be shown to reduce air pollutant and CO2 emissions as well as reducing congestion and reducing spatial requirements for parking, whilst being a relatively cheap and accessible transport choice. As such we promote motorcycling as a sustainable transport mode and would urge the GCP to include projects that will encourage modal shift from cars to motorcycles.

Projects could include bus lane access, increased secure parking and active promotion of the benefits of switching from car to motorcycle.

MAG is not supportive of the premise stated in the survey that “These improvements would only be possible with lower traffic levels and funding created by the proposed Sustainable Travel Zone.” We take the position that the benefits of the proposals will be enjoyed by all and the funding costs should therefore be borne fairly by all. Placing the funding burden purely on motorised transport users is unfair and regressive, particularly in the case of motorcycles which should be included as a sustainable transport mode receiving promotional policy, not restrictions and additional taxation.

We would also urge the GCP to reconsider segregation of road space within the STZ if it is to go ahead. If policy can successfully reduce car use and redress the balance of vehicle classes in the zone, there must be a case for a reduction in the need for segregation. MAG promotes the design of road space that is safe and fit for all road users. Roads should be a shared space for all wheeled traffic and the premise of segregation is only necessary due to poor road design choices, speed differentials and congestion. Segregation of road space has increasingly reduced road space available for motorcyclists. Motorcyclists are a vulnerable road user group and should not be forced into closer proximity of larger vehicles. The principle of separation is applied for cycling, but entirely ignored for motorcyclists. MAG does not accept this relative lack of consideration for the needs of one VRU group compared to the other VRU groups.

Sustainable Travel Zone

As discussed above, MAG is opposed to the premise of the proposed Sustainable Travel Zone. The designation is used purely to form a bounded area in which motorised transport becomes a revenue source. The proposals for improving sustainable transport, which should include motorcycling, are not predicated on a defined area, but can and should be applied throughout the GCP area.

Despite the name, this is a congestion charging zone, and if the GCP feel the need to impose it, the principles should in our view match those of the London Congestion Charging Zone, which exempts motorcycles from any charge. This is a logical outcome because on all measures of success, motorcycles contribute to solving congestion and related issues of air quality and CO2 emissions.

MAG has produced two reports covering air quality and carbon emissions from motorcycles. We would urge the GCP to fully review the evidence contained in these reports that back the above claims on air quality and CO2 emissions benefits derived from modal shift from cars to motorcycles.

Air Quality:

https://wiki.mag-uk.org/images/c/cf/Promoting_Modal_Shift_to_PTWs_August_2018_%282%29.pdf

CO2 emissions:

https://wiki.mag-uk.org/images/3/39/Motorcycle_Carbon_Emissions_v1.pdf


For the congestion-busting benefits of modal shift from cars to motorcycles, we would also urge GCP to review the below modelling study which showed a 10% modal shift from cars to motorcycles produces a 40% reduction in congestion.

https://wiki.mag-uk.org/images/1/15/TM_Leuven_Report.pdf

MAG has obtained evidence that reveals the thought process used to justify the proposed charges for motorcycles in the STZ. We would like to specifically address this evidence.

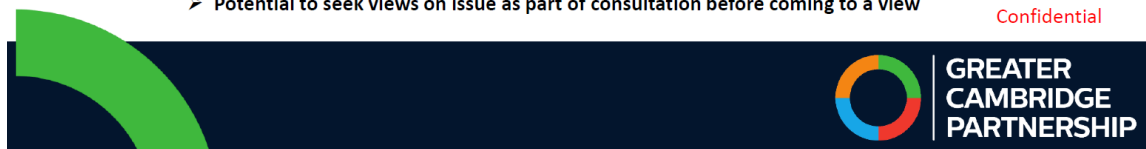
Firstly, the below slide was delivered in presentations to councillors and decision makers:

Powered two-wheelers – motorbikes and mopeds

Options	Pro's	Con's	Recommendation
No charge, 100% discount	<ul style="list-style-type: none"> • Simplicity of administration • Take up less road/parking than a car so consistent with congestion reduction policy • Discount can be reviewed over time if proliferation occurs 	<ul style="list-style-type: none"> • Lack of £ disincentive may encourage uptake as people switch from car • Inherently less safe mode; incompatible with pedal cycles 	
£3 charge	<ul style="list-style-type: none"> • £ disincentive may act as a deterrent to potential proliferation concerns • Lower charge is aligned with principle that they create less congestion 	<ul style="list-style-type: none"> • Rear-plate images are harder to accurately capture – lower charge may not recoup potential increase in scheme costs 	
£5 charge	<ul style="list-style-type: none"> • Strong deterrent to proliferation / safety concerns • Higher charge will help towards any additional cost of system 	<ul style="list-style-type: none"> • Could attract criticism as motorbikes don't cause as much congestion, so £5 seen as excessive 	

➤ Potential to seek views on issue as part of consultation before coming to a view

Confidential



The slide lists Pro's and Con's for various charge levels of no charge, £3 and £5

For no charge:

Under Pro's we see:

1. **Simplicity of administration** – we agree
2. **Take up less road/parking than a car so consistent with congestion reduction policy** – we agree
3. **Discount can be reviewed over time if proliferation occurs** – We disagree with this statement being classed as a pro. The use of the term proliferation betrays bias and is illogical. Why would you need to review the proliferation of a mode that is accepted at point 1 as consistent with congestion reduction policy?

Under Con's we see:

1. **Lack of £ disincentive may encourage uptake as people switch from car** – We disagree strongly – modal shift from car to motorcycle is a pro as already established by point 1 in Pro's
2. **Inherently less safe mode, incompatible with pedal cycles** – Again we strongly disagree. The casualty statistics for motorcycles in an urban environment are exactly the same if not slightly lower than for pedal cycles (see data presented below). Furthermore, incompatibility with cycles is a biased opinion that refuses to accept the role of poor road design.

We would contend that there are many pro's that have been ignored, including that no charge will help to maintain the accessibility and affordability of a beneficial transport mode, modal shift to motorcycles is consistent with air quality improvements, modal shift to motorcycles will improve CO2 emissions, greater prevalence of motorcycles will likely improve motorcycle safety as clearly demonstrated by TfL's analysis of the impacts of the London Congestion Charging Zone (see below)

We see absolutely no genuine evidence of a Con for no charge.

For £3 charge:

Under Pro's we see:

1. **£ disincentive may act as deterrent to proliferation concerns** – we strongly disagree with the premise that 'proliferation' is a problem
2. **Lower charge is aligned with principle that they create less congestion** – we agree – indeed this makes our point that 'proliferation' is a pro

Under Con's we see:

1. **Rear-plate images are harder to accurately capture – lower charge may not recoup potential increase in scheme costs** – We strongly disagree. Firstly, the suggestion that rear plates are harder to capture is baseless. If it were true, then why is it not listed as a Con for the £5 charge? Secondly if there really is an increased cost to capture rear plates that cannot be recouped, then it should be listed as a net pro for no charge.

Again, we see a bias in failure to list the following con's for the £3 charge: reduced charge differential is not consistent with congestion reduction policy, not consistent with air quality improvements and not consistent with CO2 reduction policy.

For £5 charge:

Under Pro's we see:

1. **Strong deterrent to proliferation/safety concerns** – We strongly disagree. As previously discussed the 'proliferation' argument is biased and factually unfounded. The safety concerns are entirely unfounded (see below)
2. **Higher charge will help towards any additional cost of system** – We disagree. As previously discussed we do not believe there is any evidence to support the claim around rear plates, and the cost if it does exist should not be incurred since the proposal to charge motorcycles is illogical.

Under Con's we see:

1. **Could attract criticism as motorbikes don't cause as much congestion, so £5 seen as excessive** – We agree any charge is excessive and counterproductive in terms of all stated goals with the exception of revenue generation.

Again, we see a bias in failure to list the following con's for the £5 charge: reduced charge differential is not consistent with congestion reduction policy, not consistent with air quality improvements and not consistent with CO2 reduction policy.

Overall this slide shows a completely illogical and internally inconsistent understanding of motorcycles and the role they play in helping to achieve the aims of the overall policy. This exposes the justification of applying STZ charges to motorcycles as nothing more than a revenue generation scheme unfairly placing a burden of cost on a road user group that should be promoted under the policy. What is more, the revenue generation potential from a tiny minority transport mode is unlikely to have a noticeable effect on the overall viability of the scheme.

We re-state at this point that we do not support the congestion charging model to unfairly and regressively fund a benefit that is delivered equally to all citizens.

We would also like to refer to the Technical Note: Discounts, Exemptions, Reimbursements and Charge Levels dated 26th August 2022 ([https://wiki.mag-uk.org/images/d/d4/FOI_Response - 1948095 - 160922 GCP Making Connections Discounts Exemptions and Charge levels Technical Note Accessible redacted.pdf](https://wiki.mag-uk.org/images/d/d4/FOI_Response_-_1948095_-_160922_GCP_Making_Connections_Discounts_Exemptions_and_Charge_levels_Technical_Note_Accessible_redacted.pdf))

This document concludes (p19) in its overall assessment of motorised two-wheeled vehicles (motorbikes and mopeds) registered with DVLA: “No discount or exemption: no significant impact on congestion reduction, sustainable travel or air quality and safety benefits”

Aside from being poorly worded the conclusion is entirely factually inaccurate as demonstrated by the evidence supplied in this response.

We also note that the Cambridge City Council 2022 Air Quality Annual Status Report specifically refers to “projects across the city to improve infrastructure enabling a modal shift away from private cars to alternative modes of transport.” This does not state any need for modal shift away from motorcycles, so we must assume that modal shift from cars to motorcycles entirely aligns with the stated policy of the City Council.

Safety

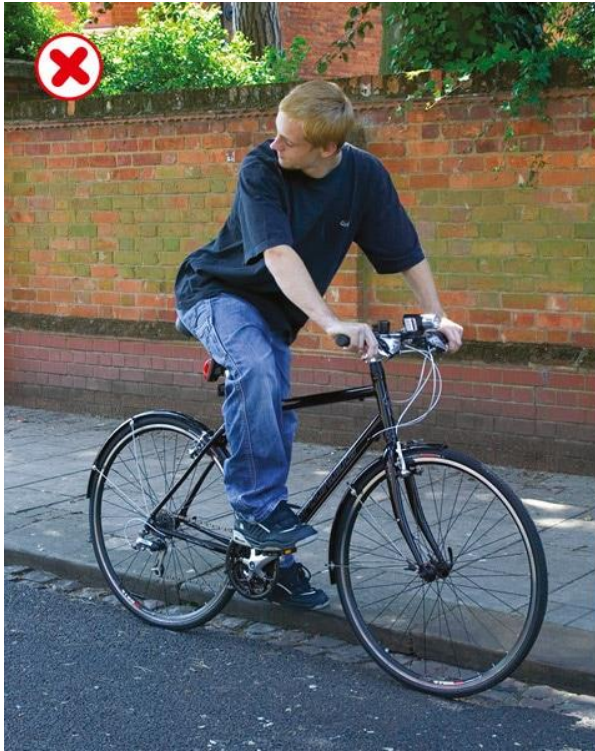
In a meeting with Greater Cambridge Partnership's Transport Director, Peter Blake, and Director of City Access, Lynne Miles, it was revealed to representatives of MAG that the basis of safety arguments about motorcycling in the above evidence and reports was merely headline DfT data for motorcycle fatality rates. This is an extremely ineffective and misleading representation of the facts around road safety of motorcycles within the area of the proposed STZ.

The STZ is unquestionably an urban area, so we have researched the road safety statistics on urban roads in Cambridgeshire for the last five years (2017 – 2021). The full data set is appended to this response, and is drawn directly from public domain STATS 19 data freely available via the DfT website.

Our research shows that over the five-year period there were a total of 5 pedal cycle fatalities, and 250 serious injuries on urban roads. By comparison there were 2 fatalities and 78 serious injuries for motorcyclists. So motorcycling casualties are around one third of motorcycling casualties on urban roads in Cambridgeshire.

We naturally have to look closely at the numbers of trips and miles travelled to compensate for the popularity of the modes. Sadly, it is not possible to get vehicle miles data down to the local transport level, but looking at traffic count data it would suggest that the ratio is about 3:1 cycling to motorcycling in Cambridgeshire. It is therefore entirely unreasonable to say that motorcycling is inherently more dangerous than cycling as in broad terms the casualty rates are equal in an urban environment.

In the wider context it is entirely accurate to say that motorcycle casualty severity is higher for motorcycling than cycling, and this of course is due to speed, but in the urban environment we would argue that motorcycling may be slightly safer than cycling as the legal requirement for crash helmets and expectation and uptake of full protective riding gear is far higher for motorcyclists than for cyclists. Compare the images below from the Highway Code. In a RTC at 20mph which rider is most likely to suffer the higher severity injury?



If the statistical evidence shows a higher KSI rate for motorcyclists than cyclists in an urban environment it is almost certainly going to be down to the lack of consideration to the principle of separation applied to motorcyclists compared to cyclists. Motorcyclists are not afforded access to bus lanes, advanced stop lines or cycle lanes, and are thus far more exposed to cars vans and lorries than cyclists.

With regard to the incompatibility argument, statistics released by the DfT show that motorcyclists were the other vehicle causing harm in 16 out of 904 other road user fatalities.

<https://www.gov.uk/government/statistics/reported-road-casualties-great-britain-road-user-risk-2021/reported-road-casualties-great-britain-road-user-risk-2021-data> (Chart 4: Other road users killed by vehicle or road user in collision (where known), Great Britain 2021)

Thus, motorcycles are likely to account for just 1.77% of all cycling fatalities where another vehicle was involved. If we apply this to the figures for Cambridgeshire and assume that all cyclist fatalities are caused by other vehicles, a motorcycle is likely to be involved in one cyclist fatality every 56 years. Of course, STATS 19 shows that there are a significant number of cycling fatalities occurring in single vehicle incidents, so the motorcycle incompatibility factor is more likely a once in a century event in Cambridge.

Finally, we would also like to refer to research carried out by TfL on the impact of the London Congestion Charging Zone.

In January 2005 a TfL Central London Congestion Charging Scheme impact monitoring report stated:

“The numbers of powered two-wheelers and pedal cycles involved in accidents have decreased, by 8 percent and 7 percent respectively, despite a combined increase of 15 percent in numbers of these entering the zone since charging. Similarly, there has been a decrease in the number of pedestrian casualties involved in accidents.”

<https://content.tfl.gov.uk/impacts-monitoring-report-january-2005.pdf>

The full Third Annual Report published later in 2005 confirmed:

“Most noticeable was the decrease in the involvement of pedal cycles and powered two-wheelers despite the significant increase in the numbers of these observed in traffic counts. Further analysis indicates that the reduction in involvement of powered two-wheelers and chargeable vehicles (including cars, lorries and vans) after the introduction of the scheme was significantly greater within the charging zone than across the rest of London.”

<https://content.tfl.gov.uk/central-london-congestion-charging-impacts-monitoring-third-annual-report.pdf>

Conclusion

We contend that there is no evidence base whatsoever to justify the charging of motorcycles to enter the proposed Sustainable Travel Zone. MAG is opposed in principle to the introduction of the revenue generation scheme described as the Sustainable Travel Zone, but should GCP decide to proceed with the proposal, then the only logical outcome is for motorcycles to be exempt from all charges.

MAG believes that modal shift from cars to motorcycles should be positively promoted in the overall sustainable transport policies adopted by GCP and are willing and able to help GCP formulate sensible policies to achieve this.

Moulton Parish Council supports any measures which will improve connectivity between West Suffolk and Cambridge and between communities in these areas.

In particular we support the proposed hourly route from Mildenhall to Cambridge via Moulton and Newmarket. We have a very erratic bus service from Moulton and some of our residents struggle to access buses at the times they need them. A reliable hourly service will be a vast improvement. At the moment there are no buses from Moulton before 9.35am making it difficult for people to get to work, school or college other than by car.

We all need to be thinking about sustainability and reducing our carbon footprint and the only way to do this is to create a transport system which is quick, reliable and easy to use so that people will reduce their reliance on cars.

Moulton Parish Council also supports the promotion of safe traffic free cycling and walking routes, provided that they are maintained.

Car clubs or schemes like zipcars are also a good idea, particularly for people living in urban areas who may not need a car all the time.

Charging for people to drive into Cambridge will be something people will need to adjust to, but provided the exemptions listed are applied fairly, in principle it seems like a good way to fund the improvements.

Kind regards

Joanne Kirk

Clerk to Moulton Parish Council

Tel: 07880 686069

To: Greater Cambridge Partnership & Cambridgeshire
County Council

Date: 19 December 2022

Circulation:

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National Farmers' Union Comments: Greater Cambridgeshire Partnership & Cambridgeshire County Council Making Connections consultation

The NFU represents 55,000 members across England and Wales. In addition, we have 20,000 NFU Countryside members with an interest in farming and rural life. The NFU would like to make the following comments with regards to the Greater Cambridge Partnership and Cambridgeshire County Council's Making Connections consultation. A number of NFU members farm in the vicinity of Cambridge and their businesses will be affected by the proposals.

The consultation includes 3 proposals and the NFU makes representation on behalf of its members regarding point 3 in particular. The proposal involves the creation of a Sustainable Travel Zone and vehicles would pay to drive in the Zone. The charge would be phased in over a period of time, starting in either 2027 or 2028. It would be in place from 7am to 7pm, with one £5 charge per day for cars, motorbikes and mopeds, and a £50 charge for larger vehicles including HGVs.

Question 8 – comments on the proposal to introduce a Sustainable Travel Zone.

The NFU acknowledges that transport solutions are required for Cambridge. It is a growing city and its occupants and users need a viable, safe, and usable long term solution for moving in and out, as well as across the city. The NFU also acknowledges that the proposals refer to rural people requiring timely access to Cambridge for work and services.

The introduction of the Zone should not be to the detriment of existing businesses which cannot adapt their practices, or function, to accommodate changes in policy. This includes the agricultural and horticultural sectors which are based inside or straddle the proposed Zone. Our members have productive agricultural land, access points and yards, and this proposal could compromise their business by adding cost and inconvenience.

The consultation (page 15) shows potential corridors for cycling and walking connections. Whilst the corridors could provide a solution, some coincide with agricultural areas e.g. E Trumpington Road and K Histon Busway south – Histon. Access to agricultural property needs to be maintained and factored into detailed proposals. The NFU would welcome further details.

Question 11 – comments on the proposed zone and its boundary

The consultation (page 17) refers to the proposals remaining subject to review and further development. The NFU seeks further clarification on the boundary as the current black line straddles a number of agricultural businesses meaning they cannot access fields, gateways, tracks and property without travelling in and out of the zone.

The proposal includes a significant block of productive land east of Grantchester and north of Trumpington which currently lies in the proposed zone. The NFU asks for further consideration of the

The voice of British farming

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Department Name/NFU Consultation Response/April '19/draft



boundary by moving the black line further east to run parallel with the A1309 from Trumpington to the city centre.

NIAB is a centre of excellence for the agricultural sector in the UK. It disseminates knowledge and provides training and development for the wider agricultural sector, as well as playing a national role in supporting research for food security. By falling within the proposed congestion charge zone, the cost of delivering this service and the uptake of this information exchange to benefit food production and security will be affected.

NIAB and the University of Cambridge Plant Science Departments have collaborated to create the Crop Science Centre. This has seen significant investment in new buildings and employment (60 University staff on site), all of which could be sited in the proposed zone. The additional travel charges will inevitably see key research staff looking for alternative employment detracting from the benefits this collaboration will see in the development of more efficient crop production through genetic improvement.

In the north, the boundary runs along the Whitehouse Lane access track to the NIAB farm complex. This will affect all farm, research, development and technical staff (circa 130 staff members) working from the Cambridge HQ and farm sites.

With over 2000 agricultural machinery movements along Whitehouse Lane a year to service $\frac{3}{4}$ of NIAB's field-based research trials and commercial farming operation work, NIAB will be faced with a significant increase in operational costs which will seriously affect the viability of their operation.

Collections and deliveries from/to NIAB's farm and unique Seed Handling Unit, which processes agricultural seed from across the UK under a statutory government contract, will now carry additional cost. Approximately 60 HGV movements for the farming operation, 700 LGV and HGV movements delivering and collecting material from the Seed Handling Unit, and 1000 deliveries and collection to their research and development facilities at Lawrence Weaver Road, will all now have additional charges waived against them.

The NFU asks for further consideration of this northern boundary.

Question 12 – comments on the proposed hours of operation of the Sustainable Travel Zone

The NFU acknowledges the proposed hours of operation are for a 12 hour period and not for 24 hours. Agricultural related traffic needs to operate between 7am and 7pm and therefore would be affected by these proposals. Many agricultural operations are time critical and subject to a short window to action. It is not possible to re-schedule the work for outside the Zone's operating hours, including access for managing livestock and combine harvesting.

Delivery of farm inputs as well as the collecting of produce must be permitted between 7am and 7pm. The operations are often linked to a wider supply chain e.g. when grain is collected from farm to deliver to Felixstowe to fill boats for export. There can be multiple collections of grain on a single day to fulfil a consignment which attract a charge per vehicle used.

Question 14 – comments on the principle of phasing in the Sustainable Travel Zone charge?

The NFU believes the phased introduction of the charge should not commence until an exemption for the agricultural and horticultural industry is agreed, designed and operating satisfactorily.

Question 15 – comments on the proposed charge levels?

Staff travelling from outside the Zone to get to work inside the Zone will be penalised. The competitive and specialist work of the sector means staff for agriculture, horticulture and related research is hard to source and keep. This charge will be seen as a negative point and employers have concerns as to the potential impact on staff if this charge was introduced.

Due to the cost of housing in Cambridge almost all of NIAB's staff members live some way from their place of employment and, because of the sector we operate in, it means that our working patterns are very varied and often influenced by the weather which means that using public transport to get to work is not feasible, even with a subsidised and improved public transport system. Travelling by car is the only realistic option for them and the charge will mean NIAB staff are then at least £1200 a year worse off.

Delivery of farm inputs and collection of produce are delivered/collected by all forms of transport including HGVs which could add £50 + VAT to the delivery costs. These costs could make transport costs unrealistic when compared to the price received for the final goods.

Question 16 – comments on proposed discounts, exemptions and reimbursements?

The consultation (page 20) lists the details of proposed discounts and exemptions from the charges. Those vehicles associated with the primary production of food, including motorised lawnmowers, should receive an exemption from the charge.

Those vehicles, including HGVs and vans, delivering inputs, collecting produce and providing a related business service, including agricultural and horticultural research, should receive a reimbursement from the charge.

Family, and those living in property associated with farm businesses as a result of their employment, should be considered for an exemption as they, by default, need to live or access agricultural and horticultural property in the Zone.

Question 18 – any changes to the proposals or additional measure that would help enhance or address impacts on you/your business/your organisation and the way you travel.

All agricultural and horticultural related vehicles, including motorised lawnmowers, should receive an exemption from the charge.

Question 19 – comments on whether the proposals positively or negatively affect or impact any person/s or group/s

The NFU believes the proposals will have a negative impact on farmers, horticulturalists, industry researchers, their suppliers and service providers from accessing agricultural and horticultural property. These businesses cannot relocate due to the nature of their business involving land, related specialist buildings and the provision of water.

Hannah Padfield
NFU County Adviser, Cambridgeshire

Contact Cathy Whitaker, Town Clerk at: Townclerk@newmarket.gov.uk

Submission in response to the “Making Connections” consultation as approved by Newmarket Town Council on Monday 19 December 2022, Agenda Item 13.

Preface: Newmarket Town Council welcomes and supports an ambitious and holistic approach as considered in the “Making Connections” proposals, particularly for improvements to transport links along the corridor through Newmarket to Bury St Edmunds and including surrounding villages. Such an ambitious scheme inevitably raises issues including viability, timescale, affordability, prioritisation and our submission reflects our views on some of these, but overall the principles appear to be a positive step in the right direction.

Essential inclusion of Newmarket and Bury St Edmunds: We are pleased to see that the area under consideration includes and recognises the significance of the connectivity required along the Newmarket / Bury St Edmunds corridor and surrounding villages. We would like to see joint working with Suffolk County Council particularly in the light of the Suffolk potential devolution deal which would hopefully provide additional funding for transport.

Necessary improvements to current bus services: Given the trauma of the recent withdrawal of bus services 10, 11 and 12 we support necessary improvements to the hastily introduced replacement bus services as outlined in the proposals to provide increased frequency, longer operational hours (including Sundays) and cheaper fares. **As the current (CPCA) bus contracts and funding are only secured until April 2023 we urge authorities to extend these whether the Making Connections proposals proceed or not.**

Park and Ride, We support the proposals to expand the park and ride spaces and the extension of the operating hours of the buses that link the car parks to the City Centre enabling them to be used in the evening.

Hubs, DRT supported: We support use of hubs and the development of Demand Responsive Transport (DRT) particularly to improve links to Newmarket and surrounding towns and access for rural areas to essential services, education, employment and leisure.

Re-instatement and improvements of railway links: Noting that the Cambridge South railway station is included in the map another railway connection of benefit would be re-instatement of the Snailwell and Dullingham Loops to re-connect Newmarket to Ely (and now Soham) by railway. Also Newmarket station car park is inadequate and leads on on-street parking so could this be better developed as a transport hub (noting that some previous railway buildings and the parking area adjoining the site are currently in commercial use).

Franchising of service operation: We feel it is essential that services are protected from the potential risk of key company dependence such as Stagecoach operating commercially rather than reliance on them maintaining required services.

Whilst congestion and environmental impact undoubtedly needs radical proposals for improvements we have listed below some of the reservations, comments, questions raised by our Councillors regarding the Making Connections proposals, but we would emphasise that significant improvements to transport services are needed regardless of any eventual scheme that may or may not be approved or implemented.

Timing of implementation: How realistic is the timing of the proposals? It is essential to have the improvements and infrastructure in place before any prospect of charging. Would these improvements in

themselves reduce congestion sufficiently and the increased bus usage enable bus companies to operate overall commercially (or at a reduced level of subsidy) and thereby reduce the need for or level of Zone charging?

Funding: If there are cost overruns in constructing new routes and setting up then how will these be met? If not all the routes can be improved how will they be prioritised? Will that compromise the overall scheme itself? Are there alternative / additional funding sources such as CPCA (direct funding or a transport precept), Suffolk County devolved agreement, Government or Commercial for elements of the scheme such as the Government for cycling improvements, income generated from solar panel coverage of car parks and other assets as per current pilot at Babraham Road Park and Ride.

Scheme running costs and charges: The proposals are promulgated and dependent on the Zone charges so if this scheme is more successful at discouraging travel in the Zone then income reduces so how would any shortfall be met as this presumably could mean reduced services and / or increased charges? Charging could be seen as the thin edge of a wedge (such as Dartford Crossing now £2.50 previously £1, M6 Toll now £7.80 originally £2.50, etc) so we would suggest capping the £2 fares and any Zone charges at least in the medium-term and review the business case.

Other financial impacts: Have these been factored in e.g. reduced vehicles will reduce parking requirements so presumably reduced income to Cambridge City Council with financial impact on Council tax payers?

Heavy reliance on buses and bus running times: Will operators have sufficient buses and drivers (which seems to be an issue even currently) and is 5am to 1am realistic / necessary / reliable / cost-effective? Will the services be operated commercially / under franchise or a mix? (see our comments regarding single operator dependency).

Zone hours/other measures: 7am to 7pm charging seems excessive particularly where vehicles have limited or no option other than to enter the Zone so surely congestion could be reduced by also using other measures such as staggering school hours, specifying time slots for deliveries.

Zone discounts / residents: The Zone is a large area so it may not be convenient or practicable for residents, disadvantaged, disabled or others identified in the Equalities Impact assessment (including due to weather, journey time, carrying loads) for someone to walk, bike or even use a bus so if someone is travelling just in this area should that not be recognised with appropriate discount / exemption? Or something like a residents' annual pass? This is perhaps a significant issue with Addenbrookes included in the Zone and schools particularly along Hills Road.

Impact on and responses from workers / shoppers / visitors: One would expect there to be justifiable apprehension from shops, businesses, etc although maybe the scheme would make it more attractive for those to come to the City? Could further pedestrianisation be incorporated into the scheme? How is support or otherwise for the scheme measured / factored in? If support is insufficient then how could the proposals be modified with a view to still improving services, i.e. a plan B?

Electric vehicles: It is not clear in these proposals how increasing number of electric vehicles will be accommodated in future planning within the area or at Park and Ride sites.



Clerk: Christine Griffin

Waterloo House,
High Street, Newport,
Essex, CB11 3PG

21st December 2022.

Consultation on Cambridge Congestion Zone

Email : consultations@greatercambridge.org.uk

Dear Sirs,

We are writing to object to the Cambridge Congestion Zone.

A large number of our residents from the Uttlesford area travel to Cambridge and in particular to Addenbrookes, the Royal Papworth and Rosie hospitals. We are seriously concerned because many people attending hospital are unwell and are unable to use the bus. This will have a serious impact on their wellbeing and could lead to missed appointments.

There is no evidence that people attending these hospitals from outside Cambridge cause a significant congestion problem and we oppose the proposed congestion zone most strongly.

We trust you will take our views into consideration when you determine this matter.

Yours faithfully

Christine Griffin
Parish Clerk
For and on behalf of Newport Parish Council.

FAO: GCP

Greater Cambridge Partnership

consultations@greatercambridge.org.uk

By email only

Our Ref: IF/GCP/MK2022

Your Ref:

Contact: Edward Leigh

Tel: 01462 474 368

E-mail: edward.leigh@north-herts.gov.uk

23 December 2022

Dear GCP,

Re: Making Connections Sustainable Travel Zone consultation 2022

North Herts Council (NHDC) recognises that the *Making Connections* plan is an important response to challenges of climate change, economic and population growth, public health and social inequality. The plan will also have a direct impact on many North Hertfordshire residents who travel into Cambridge and South Cambridgeshire for work, education, shopping, leisure, sports, culture and more besides.

North Herts Council (NHDC), like all the constituent councils of the Greater Cambridge Partnership, has declared a climate emergency. We recognise that these declarations must be translated into bold, swift and effective action to reduce carbon emissions from transport. We further recognise that better public transport and safer provision for active travel will contribute to improving public health and reducing social inequality in the wider region.

Therefore, NHDC applauds the ambition and boldness of the *Making Connections* plan, and is very supportive of the broad objectives set out in the consultation, to greatly enhance bus services in the Cambridge region, and to introduce a form of road user charging for motor vehicles to drive in Cambridge, with the twin aim of reducing congestion, which will benefit people who travel by bus and those who need to drive, and also raising a revenue, which will be hypothecated to support enhanced bus services and reduced fares, and to invest in active travel infrastructure in the Greater Cambridge region.

In this response, the *Making Connections* consultation brochure is referred to as “the Brochure”, and the interactive *Proposed Future Bus Network* is referred to as “the Map”.

Timescales

The *Making Connections* consultation sets out a highly ambitious timetable for the phasing in of the enhanced bus services, reduced fares and STZ charging. NHDC is fully supportive of this, but questions how realistic it is, given the amount of work yet to be completed before most of the proposals can be implemented.

The Strategic Outline Case (SOC) indicates that all project risks are either amber or red (Table 5-7, reproduced below in Figure 2). Arguably, more of these should be flagged as red. For instance, within Risk ID 4, there are some crucial areas identified elsewhere in the report as needing to be explored further in the Outline Business Case. Most notable is the uncertain legal basis for subsidising all fares through an Enhanced Partnership Agreement, as covered in §4.4.16 (“the legal basis for doing so required further definition and will be explored through the development of the proposed OBC”) and §4.5.29 (“the question of compatibility with the Subsidy Control Act, 2022, can be explored in the next OBC stage”).

Furthermore, the SOC states in §4.5.26, “It may be reasonable to assume a total of 2 years from giving notice to make an EP [Enhanced Partnership] to starting to deliver fares and service enhancements.”

1. Should Risk ID 2 also be red, given that the *Making Connections* plan requires a reorganisation of bus routes within Cambridge City Centre, for which there is not yet an agreed plan? This need is identified in Table 5-1 of the SOC: “The Making Connections programme is likely to require a review of this network to accommodate additional buses. The expansion of the bus depot and station/stop network will thus need to occur alongside the delivery of the overall Making Connections programme to achieve the desired level of service.”
2. The SOC indicates in Table 5-6 that the Stage 4 Full Business Case (the third and final Investment Decision Point) may be presented for approval in summer 2024. Which bodies will need to approve that (out of the GCP, Cambridgeshire County Council, the Cambridgeshire and Peterborough Combined Authority and the Department for Transport)?
3. When does GCP currently estimate is the earliest that an EP can be made that covers the *Making Connections* plan for subsidised flat fares, free bus transfers, automated fare capping and revised bus services on, or competing with, commercially viable routes?
4. Is this timescale compatible with introducing £1/£2 fares (which require an EP Scheme to be in place) from early 2024, as indicated on the timeline in the Brochure (see Figure 1)?
5. Is this timetable compatible with making a road user charging order in time to phase in the STZ charge from 2025 (see Figure 1)?
6. How is GCP mitigating the risks of the timetable for either the EP or the STZ charge slipping or diverging?

TIMELINE

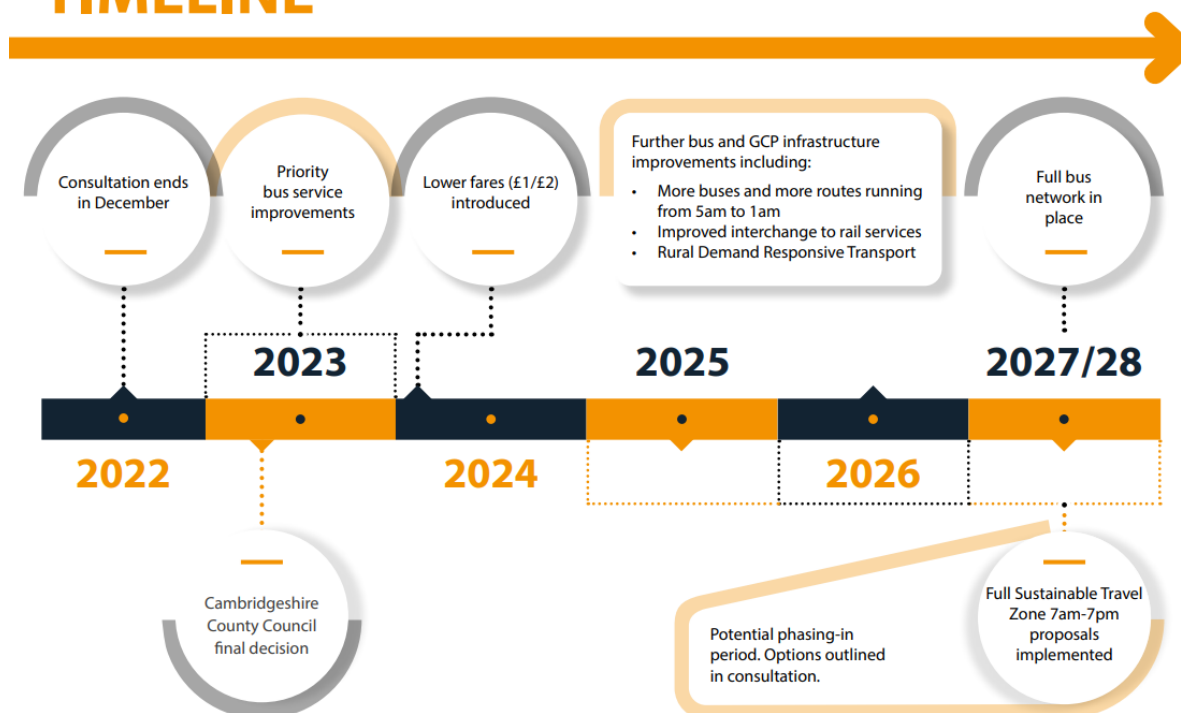


Figure 1: Timeline show in the Brochure

Table 5-7 – Project risks

Risk ID	Risk	Risk Consequence	Current Assessment	Mitigation Measures
1	Complex governance means lack of clarity amongst GCP partners	One or more elements of the programme is delayed that could lead to a requirement to delay start of the sustainable travel zone charging scheme	Amber	<p>Governance workstream is to set out path to sign off and ensure all parties agree.</p> <p>Clarity on decision making and actions required by one or more parties.</p> <p>Stakeholder strategy to seek to ensure parties are engaged across their organisations.</p> <p>Comprehensive suite of discounts and exemptions</p>

Risk ID	Risk	Risk Consequence	Current Assessment	Mitigation Measures
2	Scheme dependent on other projects	Delivery of Making Connections is delayed until other projects are delivered e.g. Waterbeach, CSET	Amber	<p>The business case needs to consider the benefits of the scheme in isolation.</p> <p>Consider alternative bus measures as interim solutions in the event of a delay to wider GCP infrastructure.</p> <p>Consider 'ramping' up of any charge to relate to completion and opening of wider infrastructure projects.</p>
3	Legal Challenges - e.g. Judicial Review	Delay to scheme or cancellation	Red	<p>Early engagement of legal advisors, robust check and challenge on all aspects of the project to ensure it is robust and able to withstand scrutiny.</p> <p>Workshop to identify potential sources of legal challenge. Good practice statutory consultation informed by EQIA, SDI and IIA.</p>
4	Delay of delivery of bus network improvements / Bus offer is not sufficiently attractive and/or believed to be deliverable	Acceptability of Making Connections package is not high enough by stakeholder, the public or politicians	Amber	<p>Early strategy work to shape delivery model, programme and options in franchised or enhanced partnerships.</p> <p>Explore how measures are delivered, not just what measures are needed</p> <p>Develop clear and simple comms on the bus offer - What and When.</p> <p>Bus integration working group</p> <p>Closer working with CPCA and bus operators</p>

Figure 2: Making Connections project risks from the Strategic Outline Case

Bus services

There are some areas of the bus service proposals where NHDC asks GCP to provide greater clarity.

7. **Priority improvements:** Which are the “priority improvements to the bus network” that will be introduced “from mid-2023”?
8. **Bus services from Royston:** the Map indicates that there will be two buses/hour from Royston to the Cambridge Biomedical Campus and Cambridge, but does not indicate the operating hours. Residents will want more detail on the service hours and frequency to judge if this will meet their travel needs.
9. **Bus services between West Cambridge and Trumpington P&R:** the Map appears to show that there will be frequent direct services between Trumpington P&R and West Cambridge, and potentially also Eddington and the Cambridge Regional College. There would be significant journey time savings for people travelling in from the A10 from Royston if they could connect with these services at either the South West Travel Hub or Trumpington P&R rather than at the Biomedical Campus or city centre.
10. **Bus services from Bassingbourn:** the Map shows conflicting routing patterns for services from Guilden Morden. Will these run directly to Royston or via Melbourn? Kneesworth needs to be added to the Map.



Figure 3: Main map showing proposed future bus routes

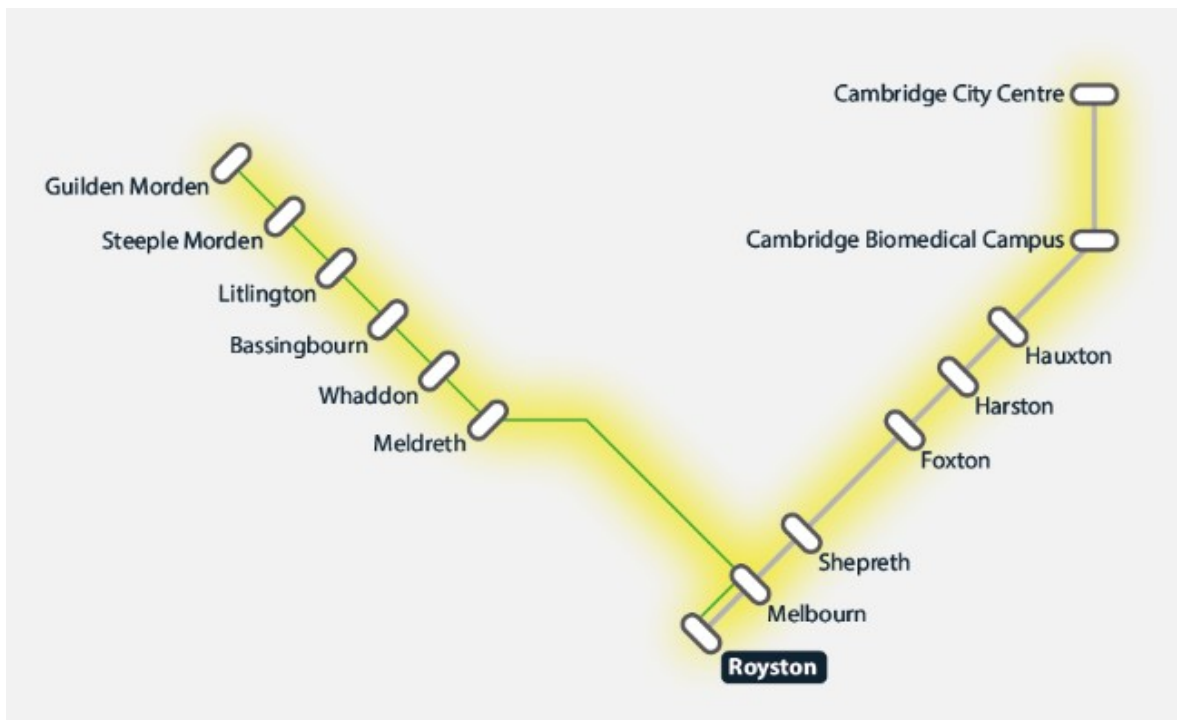


Figure 4: Detailed map of the part of the proposed future bus network that includes Royston

11. **Cross-boundary fares:** The Strategic Outline Case does not yet set a boundary for the Enhanced Partnership Plan, but the maps show Royston (in Hertfordshire) as being included. What discussions has GCP had to date with the Intalink Partnership about this?
12. **Bus transfers:** Although the consultation documents, including the SOC, do not mention bus transfers (interchanging between services to complete a single trip), communication from GCP via Twitter indicated that tickets will include free transfers and that this is independent of daily fare capping. How will this work in practice for bus users?
13. Will a bus fare permit a passenger to transfer at different locations? For instance, would a bus ticket to a railway station (e.g. Royston) include a free transfer to a bus at another railway station (e.g. Cambridge North)?
14. **Fare capping:** This is not mentioned in the SOC, even though this is a significant benefit to bus users, but very complex to implement (touched on the §4.5.29 of the SOC, where it refers to the “compensation mechanism”). Has a mechanism been worked out? Have operators agreed to it in principle? When does GCP expect to be able to introduce this?
15. How will fare capping work in practice for bus users? The Brochure mentions, “as in London”, so will all fares be charged at the end of the day by a body similar to Transport for London?
16. **Rail–bus transfers:** The consultation documents do not mention rail–bus transfers, which offer the potential for faster and more reliable journey times to many destinations than could be achieved by bus alone. For instance, Bassingbourn to

the Science Park could be relatively quick by bus to Royston station, train to Cambridge North station, and then bus.

17. **PlusBus:** PlusBus currently offers a degree of integration of rail and bus fares at a rate (£3.80 for an adult day fare) that can be cheaper than buying separate train and bus tickets. However, the geographical coverage of Plus Bus for Cambridge stations is limited (see Figure 5); there is no PlusBus arrangement in Royston; and PlusBus does not provide timetable synchronisation or any assistance or compensation in the case of missed connections. How will PlusBus be adapted to fit the *Making Connections* plan?

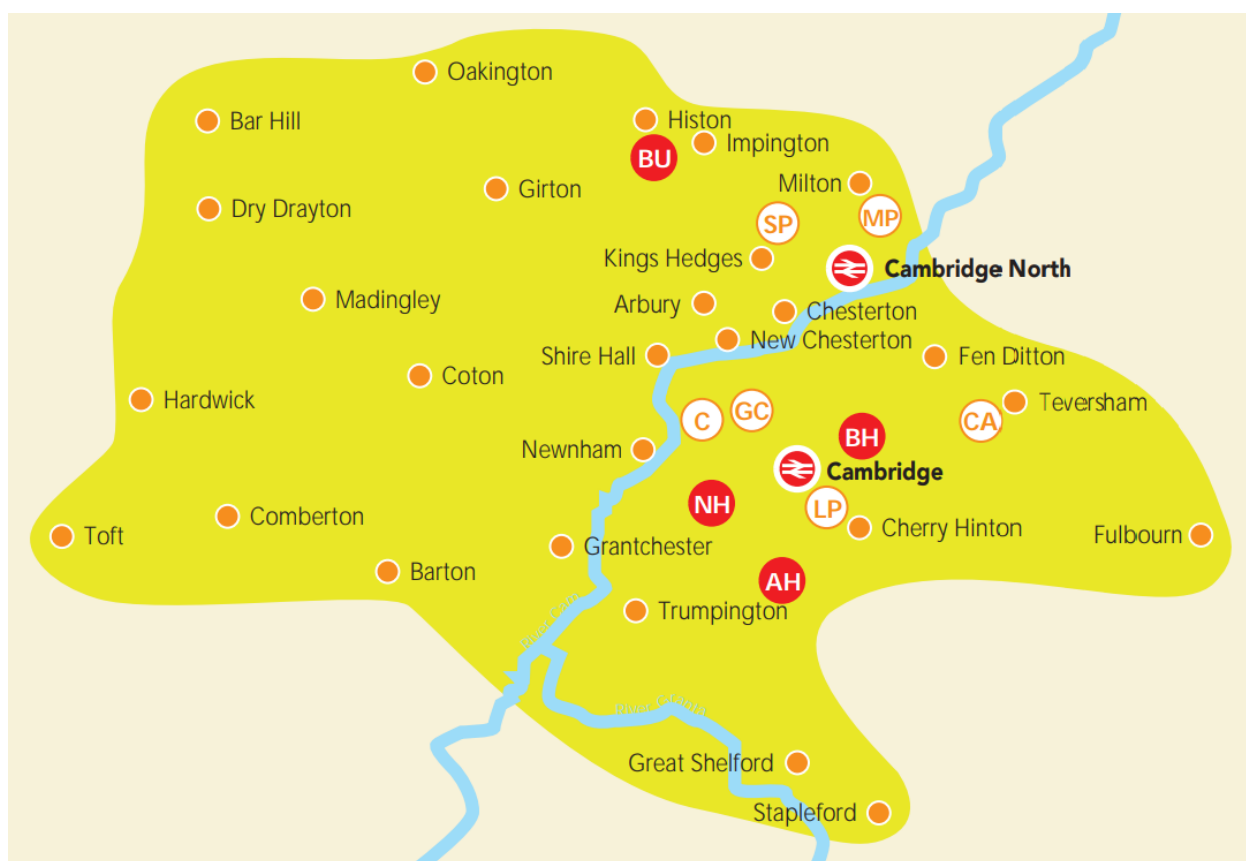


Figure 5: PlusBus zone for Cambridge stations

Active Travel

18. **Active travel budget:** What proportion of the net revenue from the STZ will be invested in active travel?
19. **Planned schemes:** Is there a programme of active travel schemes that will be funded from the STZ?
20. Four active travel schemes of particular interest to North Herts that require funding (from Cambridgeshire and Hertfordshire) are:
- Melbourn Greenway bridge over the A505 at the A10 roundabout

- Grade-separated crossing of the A505 at the A1198 roundabout (improving access to Royston from the South Cambs villages of Bassingbourn, Kneesworth and Whaddon)
 - Cycleway between Ashwell village and Ashwell & Morden railway station.
 - Cycleway between Bassingbourn/Littlington and west Royston, avoiding at-grade crossings of the A505 and railway line.
21. Is GCP open to including these in its active travel programme?

Sustainable Travel Zone

22. **Reimbursements for hospital outpatients:** The Brochure states that, based on clinical need, certain NHS patients travelling to Addenbrooke's and other hospitals on the Cambridge Biomedical Campus would be eligible for a reimbursement of the STZ charge. What discussions has GCP had with the NHS about the administration burden of assessing and certifying clinical need?
23. How will the Patient Transport Service and other community transport services be accommodated without creating a significant administrative burden on the volunteers who provide these services?
24. More generally, how will a family member, friend, volunteer or taxi driver demonstrate that they are eligible for a reimbursement for carrying a qualifying patient?
25. **Discounts for people on low incomes:** The Brochure states that a 25–100% discount on the STZ charge is proposed for “people on low incomes.” How will GCP assess the income of a North Herts resident and certify their eligibility for a discount?
26. **Exemption for Blue Badge holders:** The Brochure states that notes that a 100% discount on the STZ charge is proposed for two vehicles nominated by a Blue Badge holder. How will this be administered for people who may struggle to use technology to scan and upload documents? What steps will GCP take to guard against fraud?

Suggestions

NHDC would like GCP to consider the following suggestions:

27. **Public transport east of Royston:** the Map shows a rural service running between Foxton Travel Hub and Duxford/Whittlesford, but this is not detailed anywhere.
28. A significant gap in the local transport network is the lack of a bus service east of Royston along the A505, connecting the town and its railway station on the King's Cross/St Pancras line with the Imperial War Museum at Duxford (a major employment area as well as a leisure/tourist destination), Whittlesford Parkway station (for connections to Stansted Airport, London Liverpool Street and other destinations on the West Anglia line), the Wellcome Genome Campus, Granta Park and the Babraham Institute. Will GCP instead consider providing a bus service linking these locations?

29. **Ashwell & Morden station:** the main Map shows a bus service from Guilden Morden travelling via Ashwell & Morden railway station en route to Royston (see Figure 3). According to Google Maps, the detour via Ashwell & Morden adds between 8 and 10 minutes to the fastest drive time at around 8:15am on a Wednesday.
30. Would a small extension to the HertsLynx zone, funded by GCP, provide a better solution for Guilden Morden and Steeple Morden to access Ashwell & Morden station? This would then allow the Guilden Morden scheduled service to run more directly, and therefore more quickly, to Royston.
31. **South Cambs villages north of Royston:** The more detailed map shows a different route via Whaddon, Meldreth and Melbourn (see Figure 4). According to Google Maps, the detour via Ashwell & Morden adds between 12 and 15 minutes to the fastest drive time at around 8:15am on a Wednesday.
32. Would GCP consider proposing a different design of services to link Royston with nearby villages?

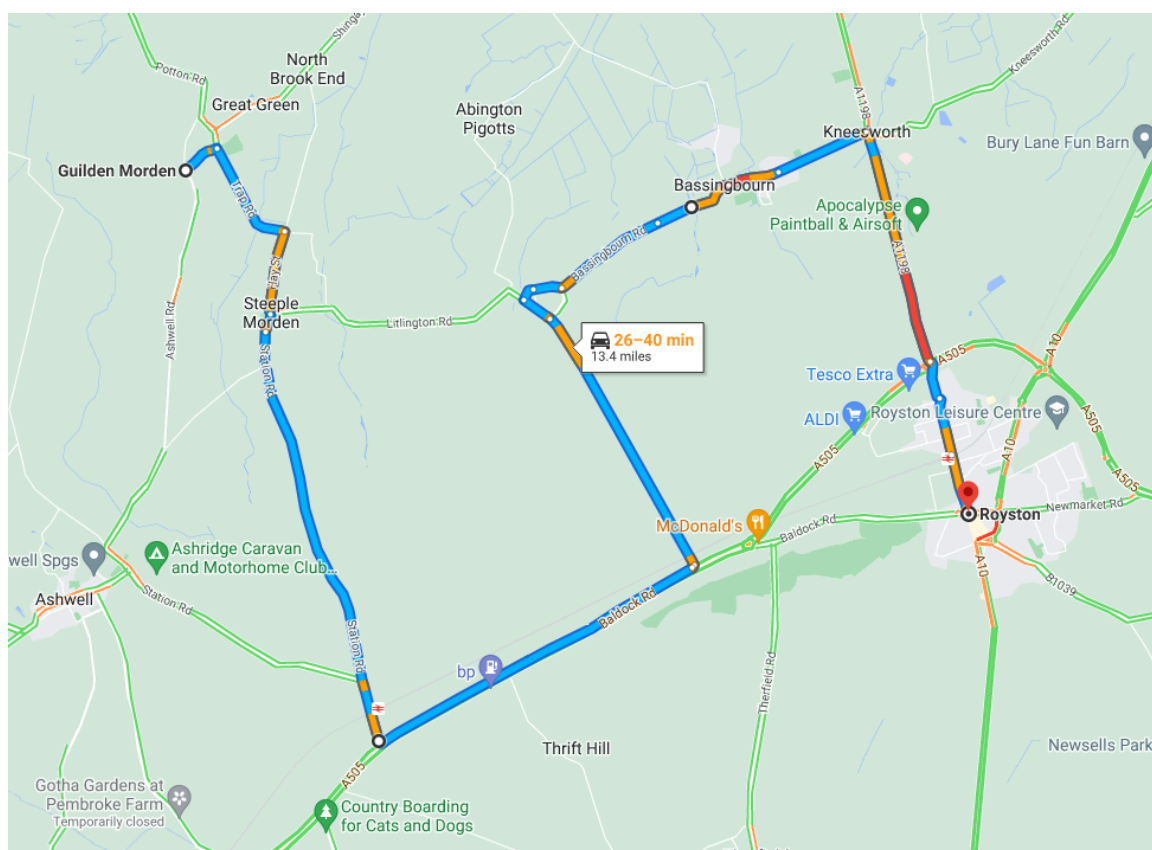


Figure 6: One of two possible bus routes from Steeple Morden to Royston, proposed in Making Connections, showing the estimated 26–40 minute drive time, leaving at 08:15am.

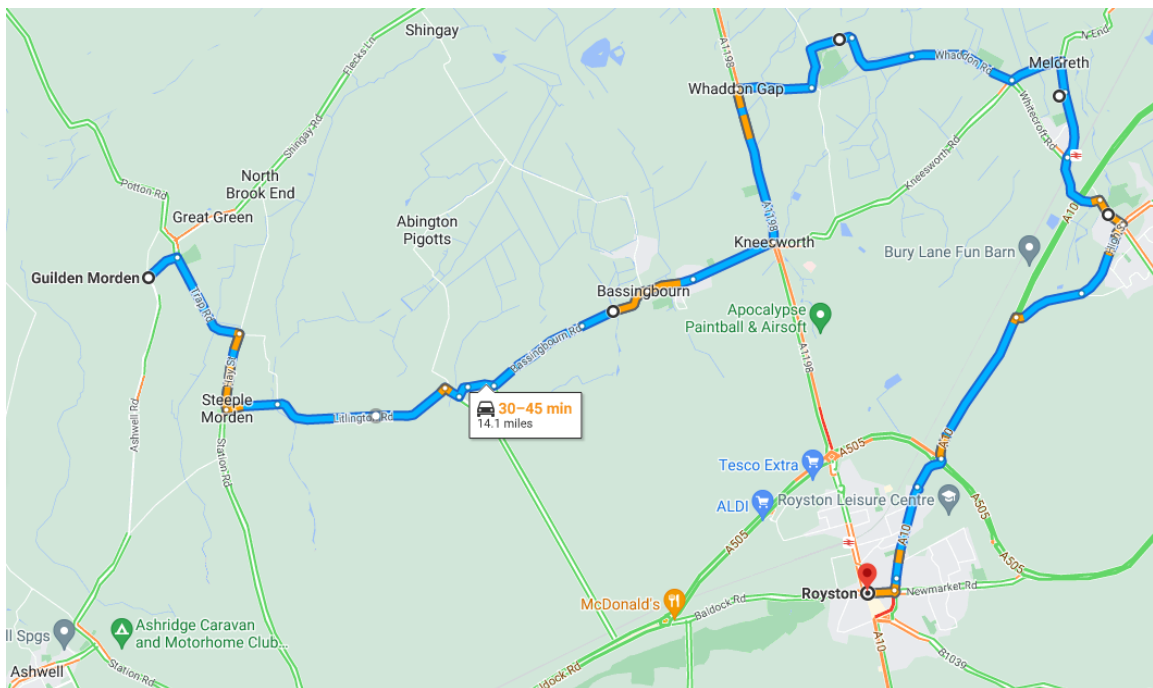


Figure 7: The second of two possible bus routes from Steeple Morden to Royston, proposed in *Making Connections*, showing the estimated 30–45 minute drive time, leaving at 08:15am.

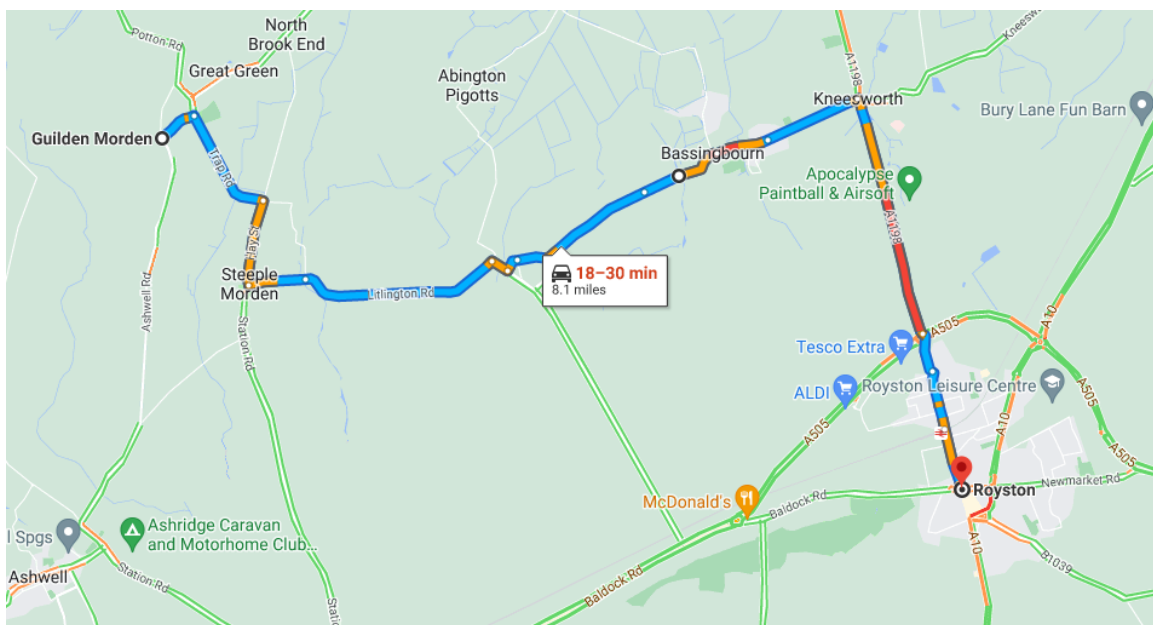


Figure 8: Potential more direct bus route from Steeple Morden to Royston, showing the estimated 18–30 minute drive time, leaving at 08:15am.

33. **Workplace Parking Levy:** A Workplace Parking Levy (WPL) was consulted on as an option in the 2021 *Making Connections* consultation. However, it was paired with increasing parking charges in car parks and on-street by an unspecified amount, which is likely to have put people off who might otherwise have supported a WPL.
34. [Leicester City Council](#) has consulted on introducing a WPL. Notably, the [business case](#) identified one of the benefits compared with a road user charge is that a WPL can be introduced more quickly (see Figure 10).

35. Oxfordshire County Council is also progressing introduction of a WPL in Oxford as part of its [Central Oxfordshire Travel Plan](#).
36. There is a strong argument that businesses should contribute more financially towards investment in local transport and housing, both of which benefit businesses by enlarging their geographical reach and catchment population from which to draw the most talented employees.
37. A WPL is one of the few mechanisms available to local government to tax local businesses. The legislation also ringfences the revenue for investment in transport (as does a road user charging scheme).
38. A WPL does not face the complexity of arguments about equality as, in the first place, it is only large employers who would be liable to pay. It is much easier for the local authority to negotiate with employers to agree exemptions, discounts and rebates than it is to agree the same with all the individuals who live or travel into Cambridge.
39. Although it is understood that a WPL by itself would not raise the target of £60m/year, nor necessarily reduce traffic in the city by the target of 10–15% on 2011 levels, it would moderate traffic growth; it would generate a useful revenue to support a modest expansion of bus services; it would be much quicker to implement than the proposed STZ; and it would face less risk of political support being withdrawn before it is implemented.
40. A WPL does not by itself resolve the congestion problems in Cambridge (which are somewhat different to what they were pre-COVID). However, there are interventions available to manage congestion and prioritise buses, which would be quicker to implement than the STZ. These include:
 - **Traffic filters.** These are now being introduced in [Oxford](#) to “reduce traffic levels across the city”, thereby reducing congestion on key bus routes. Traffic filters were previously considered by GCP (proposed as “peak time control points”) and met strong local resistance. However, the principle was strongly supported by the GCP Citizens’ Assembly (see Figure 9).
 - **Residents Parking Zones:** eliminating free parking everywhere in the city forces people to consider alternatives. It is hard for buses to compete with driving when parking is free.
 - **[Inbound Flow Control](#):** a combination of gating and metering on radial roads at the city edges can enable buses to bypass most congestion, reducing bus journey times and improving reliability.
41. In short, a WPL plus complementary interventions could be a stepping stone to an STZ, providing a revenue sooner and mitigating the delivery risks associated with the STZ.
42. **Explore other ways to tax businesses:** Most of the benefits of improved public transport and reduced congestion accrue to businesses, by reducing costs of doing

business and widening the catchment pool for employment. Therefore, it is both fair and rational for businesses to pay for improved public transport.

43. This is a well-established principle, applied in London for Crossrail (through a 2p [business rates supplement](#)) and many continental European cities.

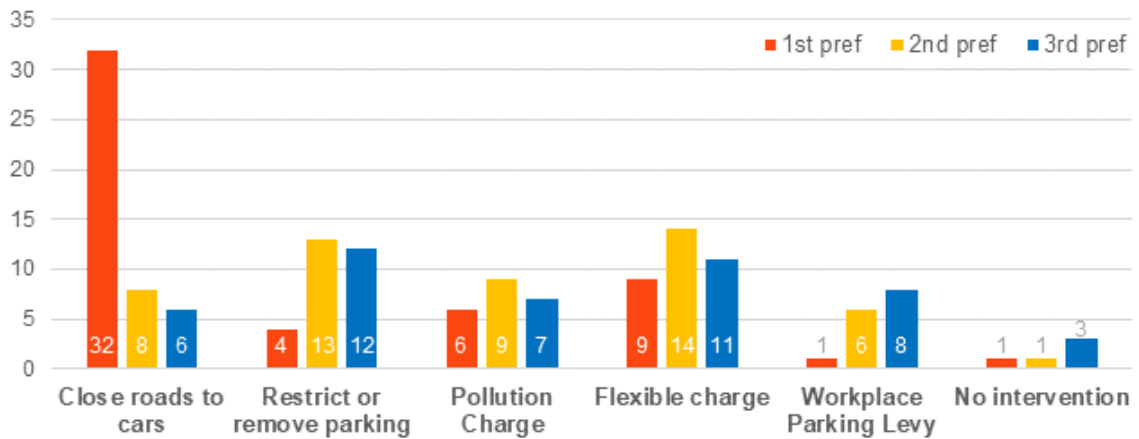


Figure 9: Votes cast by the GCP Citizens' Assembly in response to the question, "What would be your preferred way of reducing congestion and creating road space for improved public and active transport in Greater Cambridge?"

Table 1: Summary assessment of local charging options against Critical Success Factors

Critical Success Factors	No Local Charge	RUC	WPL
Alignment with Council and national priorities			
Contribution to a package of measures to reduce carbon emissions, improve health and AQ and manage congestion	Slower progress towards objectives	Faster progress, probably most funds generated so greatest contribution	Faster progress, though probably not as much as RUC
Fits with Council priorities	Does not fulfil ambitious vision	Meets some priorities but could work against others e.g. Fair City	Meets a majority of stated priorities
Finance and ease of implementation			
Flexibility in the treatment of different circumstances	Smaller programme so less flexible	Considerable flexibility in legislation	Considerable flexibility in legislation
Minimise technological risks	Smaller programme so less risk	Requires significant investment in new technology	Does not require significant investment in technology
Financially efficient	Significant opportunities missed because of lack of local match funding	Provides greater revenue stream but likely high operational costs	Provides a good revenue stream and likely low operational costs
Meets LTP timescales	Very unlikely to meet stretch targets within timescales	Will help to meet targets but will take longer to implement than WPL leaving funding gap	Will help to meet targets and can be delivered to immediately follow on from TCF in 2023/24
Stakeholder impacts			
General acceptability	Alternatives not available to general public	More difficult to be made acceptable to general public	Difficult but can be made acceptable (Nottingham example)

Figure 10: Extract from the Business Case for the Leicester Workplace Parking Levy (WPL)

Concluding remarks

NHDC looks forward to receiving clarifications on the points raised in our response to the consultation, and would welcome the opportunity to be included in any workshops or ongoing engagement with the project.

Yours faithfully,



Ian Fullstone
Service Director, Regulatory

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Eilish Midlane
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Royal Papworth Hospital
NHS Foundation Trust

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23 December 2022

FAO: Greater Cambridge Partnership
Making Connections – A City Access Public
Consultation

Dear Sir or Madam,

**Consultation response to 'Making Connections – A City Access Public Consultation'
on behalf of Royal Papworth Hospital NHS Foundation Trust**

I am writing to you in response to the GCP Making Connections 2022 Public Consultation, to feed back on behalf of our staff, patients and visitors to Royal Papworth Hospital which is located on the Cambridge Biomedical Campus (CBC) and therefore just inside the proposed Sustainable Travel Zone (STZ).

In the consultation documents it states that 121 deaths in Cambridge in 2020 were from air pollution. As the UK's leading heart and lung hospital, we are all too aware of the impact of poor air quality on people's cardiovascular and respiratory health and interventions to improve this are welcomed.

Encouraging people to be active also has profoundly positive benefits on public health and therefore on the NHS, with a healthier population placing less of a burden on the health system. There are also benefits to the environment; the climate emergency is a health emergency. When we moved to the CBC in 2019 we developed a Travel and Transport Plan that encouraged staff to look at all of the options for travelling to work. We have very limited parking onsite for staff with only 450 spaces for 2100 staff. The option to park onsite is therefore only available to clinical staff working 12 hour shifts and on-call staff who are required to return to site immediately to deal with emergency situations. As an organisation we have been pro-active in encouraging and supporting staff to use public transport options, use the park and rise systems and, where appropriate walk or cycle to work. Therefore the proposals to improve the bus network and the safety and ease of travelling by foot and bike are welcomed.



However, recruitment and retention is the biggest challenge facing our organisation and we are extremely concerned about the potential impact of the specific proposal to introduce a charge for travel into and within the STZ to negatively impact on this. In advance of our move to the CBC we experienced a significant loss of staff who decided that the additional travel time and cost negatively impacted on their ability and/or desire to work at Royal Papworth. Whilst for some staff the changes proposed will reduce travel time and cost the perception of many staff, particularly those living outside Cambridge, is that their travel time/ease/costs will be negatively impacted. We know from experience that this perception will lead staff to look for work in other healthcare organisations that do not have a charge. This perception will also negatively impact our ability to recruit staff particularly for roles on lower pay bands. There are specific staff groups that are expressing the most concern, these are:

- staff who have mobility issues that our Occupational Health Service recommend are permitted to park onsite.
- staff with caring responsibilities that mean they have to make a number of journeys on their way to and from work eg leaving children to nurseries and school.

We have been very proactive in communicating with staff regarding the full extent of the proposals including inviting representatives from the GCP to visit the hospital and speak with staff. We have encouraged them to take time to read all of the proposals and participate in the consultation process. We have surveyed staff on these proposals in order to understand their views. Approximately 25% of all our staff replied to a survey and out of those that responded 85% said that if a road user charge were introduced it would affect their decision to work on the CBC. Losing staff on this scale would clearly be an existential threat to the organisation.

As a national and regional specialist centre we have patients and their families who have to travel to us for treatment. These patients can be in the hospital for long periods of time necessitating their families and friends to make regular long journeys to visit them. For those patients travelling for shorter treatments/appointments many have mobility restrictions and/or are immunosuppressed and therefore public transport is not an option they can utilise. The information regarding exemptions is welcomed however these would need to be easy to utilise for the people covered and not require them to pay and claim reimbursement as this will place a financial burden on them.

To be most helpful, we have laid out the feedback we have received from our staff and patients against the main themes of the feedback we have received:.

Bus services

As a specialist, regional hospital attracting the very best staff in cardiovascular and respiratory medicine, our people come from a wide geographical area to work at Royal Papworth Hospital: as far north as Bourne (Peterborough), Bedford in the west, St Albans to the south, and Bury St Edmunds to the east. For these people, bus travel is not an option and nor are their routes included in the proposals.



Staff who live closer, for example near Royston and Saffron Walden, who have said they would like to get the bus are put off from doing so because of the infrequency and unreliability of the service. Their concern is that if the current timetable is not being delivered as it should, is the delivery of a more ambitious network of more routes, higher frequency services and increased rural services be delivered, especially considering a lack of drivers realistic.

Staff who live in St Ives and have access to the Guided Busway – which for the most part is already separated from road traffic – say 'it takes too long to get from St Ives to Cambridge (in some cases two hours [on the bus]) which is normally a 25-minute drive (40 mins in heavy traffic).

With many national services, we have patients and visitors who come to our hospital from across the country and for them bus travel is simply not an option. Here is what they said:

'Like many I travel to Papworth for regular post transplant appointments. Visits already cost me significantly as it is a 4-hour drive. Fuel is at least £70.00 a trip plus parking and often an overnight stay for [an] 8am appointment. My only driving within the proposed boundary is from J11 of the M11 along Addenbrooke's Way to the hospital. Using buses is not appropriate time wise and infection wise.'

'I've driven from London to Royal Papworth 150 times in last 7 months for nothing I could call more than essential visiting for me, my family and my wife who was critically ill like lots in there. It's already obviously cost many thousands in fuel and parking, there is no congestion going from the M11 to Papworth so a congestion charge can only be called another road user tax there.'

Cycling, walking and other improvements

Many of our staff live outside the city, using the Park and Rides (P&R) at Trumpington and Babraham before walking, cycling or getting the bus to the hospital. We actively promote these methods of travel where it is possible for sustainability and health reasons, though it should be noted that a bus does not currently serve our hospital from Babraham which limits uptake. For some staff, they would enter the STZ for a very brief period merely to access the P&Rs.

Since we moved to the CBC in 2019, we have also experienced that the P&R sites are vulnerable to catalytic converter thefts, bike thefts and safety is also regularly cited by our staff as a key concern, particularly in the winter months. The cycle/walking paths to both P&Rs are poorly lit, hedges often overgrown meaning cyclists and pedestrians collide, and during the recent snow, the routes were not gritted and therefore dangerous. This has led to a lack of confidence in the maintenance, security and priority given to the cycle and pedestrian paths currently available causes concern that an extended route would suffer the same lack of attention.

Sustainable travel zone

As previously highlighted, 85% of our 484 staff surveyed said that a congestion charge would make them look for work away from the Cambridge Biomedical Campus. This would be



terminal for our already stretched workforce and mean we would find it challenging to continue providing excellent, specialist care for patients with heart or lung disease. An example of the feedback from our staff to the survey is as follows:

'What concerns me is the ability to sustain an already lengthy/costly commute in addition to daily charges. It would unlikely be possible to continue working at RPH which would have a hugely negative impact on my life.'

'I need to drop off my two daughters in two different settings in Cambridge. I cannot imagine being able to use my car in order to drop them off and get to work on time.'

'The cost, I'm already paying out on high fuel prices and car parking, on minimum wage. I don't know how they expect us who do not earn much as it is, to afford this, what with the cost of living increase. This is also unfair along with car parking fees to expect the sick and their relatives to fork out the cost, at a very vulnerable time. It is not just RPH, this will have a massive impact on CUH too.'

'People on a low pay scale will no longer be able to work in Cambridge anymore, thus affecting patient safety, due to staff shortages.'

'Money is already being squeezed with the cost-of-living crisis. This is unaffordable to the average NHS worker. I also ride my motorcycle to work which really helps my mental health. To charge me to ride my motorcycle to work is outrageous. Especially as motorcycles actually ease congestion.'

'The safety aspect of leaving the hospital late at night and catching public transport. Park and ride sites not big enough. If you are on a late shift, they can be full when you arrive to park. Also, the fact that coming to work via the M11 means that I barely touch 'Cambridge' before arriving at the hospital.'

'I will no longer be able to afford to do my job. This won't just be myself; this will be many of my colleagues. Cost of living in Cambridge (parking etc) is getting ridiculous. With the congestion charge on top, it's becoming unaffordable to work in Cambridge, let alone live.'

Charge levels and discounts, exemptions and reimbursements

While it is encouraging to see that 'NHS staff using a vehicle to carry certain items', 'NHS and other emergency services staff responding to an emergency when on call', patients with 'a compromised immune system', patients requiring 'regular therapy or assessments' and patients needing 'regular surgical intervention' are listed in the reimbursements, more detail is required. Specifically:

- How 'regular' will be defined
- The position of NHS staff returning to site in an emergency when on-call to perform life-saving work
- The impact on visitors to patients who can be in the hospital for very long periods of time and for whom regular visitors are an important part of their psychological support



- How the reimbursement system will work

If the reimbursement system requires staff to undertake additional administration or pay charges and reclaim them this will be a burden on them and impact negatively on their perception of working on the CBC. For patients, this would create added anxiety at what is already one of the most stressful times in their lives.


One patient told us:

'I am unable to use buses because I don't feel safe with a compromised immune system. There is a proposal that people with a compromised immune system can apply for a refund, but this will involve lots of forms I imagine and be difficult to complete. I have an almost 400-mile round trip.'

In summary whilst there are many aspects of the proposals that would have a positive impact on staff and our patients we are extremely concerned regarding the potential negative impact on recruitment and retention.

If you have any questions or would like to discuss any points raised in this response, please do not hesitate to contact me.

Yours faithfully



Eilish Midlane
Chief Executive Officer

Dear Sirs,

I write as Secretary of the Royston and District Motorcycle Club.

One of the key objectives of the Club is to raise money for local charities and to this end in 2022 we donated over £11000 principally to the East Anglian Air Ambulance and Blood Runner Scheme. In addition the Club supports the Distinguished Gentlemen's Ride (a charity that benefits men's health charities) and the Addenbrookes Christmas toy run.

On behalf of the Club I wish raise the following points in opposition to the inclusion of motorcycles and mopeds in the charging schedule for the proposed scheme in Cambridge:

- 1: Given their size and manoeuvrability motorcycles must be considered as part of the solution to transport issues in Cambridge and not part of the problem.
- 2: The fuel consumption of most motorcycles is considerably lower than other powered vehicles resulting in fewer harmful emissions.
- 3: Given the size and weight of all motorcycles the non exhaust emissions (the particles released from tyre wear, brake pads and road surface degradation) are considerably lower than other powered vehicles.
- 4: All new motorcycles must comply with noise legislation
- 5: Public transport, no matter how extensive the network coverage, will never be as flexible as the demands of the independent traveller.
- 6: There is a concern that the cost of administering the scheme will result in rapid increases in charges.
- 7: The inclusion of Addenbrookes within the zone discriminates against all those using the hospital. Using a motorcycle to visit the site actually reduces congestion and relieves pressure on overstretched car parking resources.
- 8: Given that two of the events mentioned in the introduction will enter the proposed charge area does that mean in future participants will have to pay the charge to raise money for charity?
- 9: It cannot go without saying that the reasons quoted in the FAQs section of your website (and your words are ' Motorbikes and mopeds, although smaller than cars, will still be charged £5 as they raise potential risks in terms of safety, noise and conflicts with cyclists') reflect an out-dated stereotype and can be construed as an insult to modern day motorcyclists. More importantly none of the points raised actually impact on congestion which, after all, is what the charge seeks to address.

Yours faithfully

Guy Moody

Secretary, Royston and District Motorcycle Club



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Our reference 41762/177/1061/1061

Your reference Proposed Sustainable Travel Zone

Date 22 December 2022

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

By Special Delivery and Email:
consultations@greatercambridge.org.uk

Dear Sirs

PROPOSED SUSTAINABLE TRAVEL ZONE OBJECTION BY SABA PARK SERVICES UK LIMITED

We are instructed by our client, Saba Park Services Limited, regarding the proposed Sustainable Travel Zone ("STZ").

Our client understands that the intention of the STZ is to provide funding to improve the bus network within the city and wider Cambridgeshire area, and also to reduce congestion and tackle climate change. However, our client has strong objections to the STZ as currently proposed for the reasons below.

Our client has also suggested amendments to the STZ which would address these concerns without removing the wider benefits of the STZ.

1 AFFECTED PERSONS

1.1 As currently proposed, the STZ will impose a charge on any person attending Addenbrookes Hospital, either as a member of staff including Doctors, Nurses and Support Staff, or patients seeking medical care and their visitors. It is not considered that it is necessary or justifiable for these people to be charged under the STZ and it is noted that several local Councillors have shared similarly strong feelings against this aspect of the proposal.

2 ACCESSIBILITY

2.1 It is suggested by STZ supporters that the STZ is intended to improve accessibility within the city by reducing the number of private hire vehicles and improving the bus services offered. There is, however, no evidence that this will increase accessibility of Addenbrookes Hospital itself to patients who, as a result of their medical conditions, are unable to utilise the bus services to access the hospital.

3 COSTS

3.1 In addition to the above, the costs involved would also be extremely detrimental to the staff of Addenbrookes Hospital, including support staff, Doctors and Nurses who will

be needed to provide urgent care to the patients. Staff members would likely be attending Addenbrookes Hospital throughout the week and would be charged £25 a week under the current proposals, with no opportunity to reroute their journey and avoid the STZ.

- 3.2 The costs would also be detrimental to a number of patients, in particular the elderly who would not have a steady income from employment. If the STZ was introduced as currently proposed it is likely that these patients may delay vital trips to the hospital to avoid the STZ charge or bus fares and suffer severe health implications as a result.

4 **TIMINGS**

- 4.1 It is also noted that the STZ as currently proposed would operate to charge vehicles between 07:00 and 19:00 on weekdays. Our client contends that this is the period of highest demand for their services and the use of Addenbrookes Hospital. This further evidences the negative impact that would be caused for patients, staff and visitors to the hospital if the STZ was implemented in this current form.

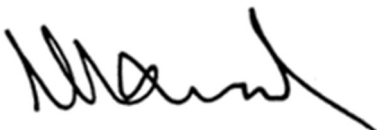
5 **REQUESTED AMENDMENTS**

- 5.1 As a result of the above, our client objects to the STZ as currently proposed and would request that either of the following amendments are applied.
- 5.2 Firstly, our client requests that Addenbrookes Hospital Campus and its immediate vicinity is not included within the STZ, nor should the route from the M11 to Addenbrookes Hospital be included (Hauxton Road, Addenbrookes Road and Dame Mary Archer Way).
- 5.3 Our client considers that this is a suitable variation to the STZ as the charge would still apply to the wider Cambridgeshire area, but people travelling to Addenbrookes Hospital for any reason would not be affected.
- 5.4 Alternatively, as it is appreciated that certain groups can be made exempt from paying the charge, it is requested that those who have used the parking at Addenbrookes Hospital are made an exempt group. Practically this would allow users of the above mentioned roads to still be charged unless they could evidence they had visited Addenbrookes Hospital itself. The result of this is that those road users would not receive an additional charge for visiting the hospital to provide or receive care, but the charge would still apply to other road users and thus assist with the funding of the improved bus network.

Thank you for taking the time to consider our objections. We hope that you agree with our suggested amendments to improve the proposed STZ and hope to hear from you in due course.

Any queries in relation to anything in this letter should be addressed to Mark Howard of Michelmores LLP.

Yours sincerely



MARK HOWARD - PARTNER

MICHELMORES LLP or Signed for and on behalf of Michelmores LLP
Email: mark.howard@michelmores.com
Direct Dial: +44 (0) 1392 687621

Dear Greater Cambridge Partnership

SERV (Service by Emergency Response Volunteers) Suffolk and Cambridgeshire, also known as the Bloodrunners, is a charity which provides an essential service to our local NHS Hospitals, Air Ambulance Services, Human Donated Milk Banks, hospices, pharmacies and vulnerable patients by transporting urgently needed blood, blood products, patient samples, donated human breast milk, medicine and medical equipment. We have approximately 150 volunteer motorcyclists and car drivers, who give their time and mostly use their own vehicles free of charge, to deliver items to where they need to be within hours. We receive no government funding, our costs being met by donations from members of the public, local businesses, charitable grants and awards. There are no paid staff. Our service not only delivers vital products but also saves the NHS the money which they would otherwise have to spend on alternative services such as taxis or couriers.

Our service involves frequent visits to the Addenbrooke's site, picking up blood and blood products from the NHS Blood and Transport service or delivering samples to Addenbrookes Haematology for analysis. We also deliver milk from donors to the Rosie milk bank and collect milk for delivery to the neonatal departments at hospitals in Suffolk and Cambridgeshire. Since the start of the covid-19 emergency our service has operated 24 hours a day, 7 days a week, and we would expect our volunteers to visit Addenbrooke's site several times during the day on weekdays and weekends.

While we support the objectives of the Sustainable Travel Zone described in your 'Making Connections' document, we are concerned that the road user charge will severely impact our service. Our volunteers already pay for the fuel they use to deliver our services – we don't feel we could also expect them to pay the road user charge. However, if the charity paid the charge on their behalf this would be a significant additional sum for us to find each year.

In your document you say that you are considering a reimbursement scheme to include 'NHS staff using a vehicle to carry certain items (such as equipment, controlled drugs, patient notes or clinical specimens, blood or breast milk)'. Extending this to include partner organisations such as our charity would mean that our volunteers could continue to provide our service completely free of charge to the NHS.

I have copied in our Trustees who are responsible for Operations and Policy Legislation together with my counterpart at Norfolk Bloodbikes. Norfolk Bloodbikes offer the same service delivering and collecting daily from the Addenbrookes site and therefore would also be impacted.

We hope that you will give favourable consideration to our charity when putting together your final proposals for the Sustainable Travel Zone charge and would welcome the opportunity to comment further at that stage.

Yours sincerely

Mrs Cindy Dickerson

Chairman for SERV Suffolk & Cambridgeshire

Dear Sir/Madam

Below, I represent the views of a groups of Parkside CC students (Years 7 – 10) who attend a weekly Social Action Group at our school. One of our students did some research on the proposals and she stimulated a discussion on the proposed Sustainable Travel Zone in a recent meeting. It was agreed that I would draft a response on behalf of the group. I am sharing this with the Headteacher and will also share it with the Social Action Group.

The group generally supported the principles of the proposed scheme both in relation to reducing the amount of car journeys in Cambridge and improving the frequency and affordability of bus journeys. Some people expressed concern at the negative impact it might have on poorer members of society so there was support for the proposed introduction of discounts for those on low incomes. The view was also put forward that some essential vehicle users (such as builders) should be exempt from the charge.

Kind regards

D Cowley

Peter Blake
Transport Director
Greater Cambridge Partnership
By Email to peter.blake@cambridgeshire.gov.uk

21st December 2022

Dear Peter,

Ref: Making Connections - City Sustainability Zone

I am writing to give our support to the GCP proposals for a City Sustainability Zone. We believe this is a significant step in enabling modal shift whilst also rebalancing the benefits of bus travel over passenger cars. We also recognise the significant benefits this proposal can bring to improvements in the City's air quality, and our upcoming introduction of 30 new Electric Buses, due delivery in March, only goes to demonstrate our commitment as we move to decarbonise our bus fleet

We are also trying to do our bit by encouraging our customers and employees to participate in the consultation and have fitted stickers to bus windows to enable customers to use the GCP QR code to gain access to the online survey.



We have asked our staff to participate in the survey as we are keen to secure exceptions for all people who work on Public Transport. We believe it's vital those who are involved in the daily operation of providing public transport services should be exempt from the charging scheme, as we don't want such a scheme to be a barrier to employment to the very people responsible for delivering those improvements in buses we all recognise is so important.

continued

We are acutely aware of the current cost of living crisis, and our recent fares review, we believe, still gives some of the best value fares across the region. In my letter to you of the 14 December, I shared with you our current travel costs per day across the region, where you can have a day's travel for less than a Cappuccino!

Travel zones price per day:

	DayRider	Flexi 5	Flexi 10	7 Day MegaRider	28 Day MegaRider	MegaRider Xtra
Town Zone	Price Per Day					
Adult	£4.50	£3.40	£3.00	£2.57	£2.25	£2.25
Youth	£3.20	£2.40	£2.10	£1.86	£1.61	
Plus Zone	Price Per Day					
Adult	£7.00	£5.40	£4.75	£4.00	£3.50	£3.50
Youth	£5.00	£3.90	£3.40	£2.86	£2.50	
East Zone	Price Per Day					
Adult	£16.50	£13.20	£11.55	£6.43	£5.57	£5.57
Youth	£11.50	£9.20	£8.05	£4.57	£4.00	
Where to buy?	On Bus & App 	App 	App 	On Bus, App & Web 	Web & App 	Web 

I wish GCP every success with this proposal, and if you feel Stagecoach can support the GCP to further enhance the value of this proposal, please do not hesitate to contact me .

May I take this opportunity to wish you and your team at the GCP a very Merry Christmas, and we look forward to working with you in the New Year

Yours sincerely



Darren Roe
Managing Director



Stapleford Parish Council

CLERK Belinda Irons

14 Crawley End, Chrishall, Nr Royston, Herts, SG8 8QL

M:07840 668048 e-mail – clerk@staplefordparishcouncil.gov.uk

Greater Cambridge Partnership
PO Box 1493
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contactus@greatercambridge.org.uk

22nd December 2022

Dear Sirs

STAPLEFORD PARISH COUNCIL RESPONSE TO THE 'MAKING CONNECTIONS' CONSULTATION

Introduction:

Below is a summary of Stapleford Parish Council's responses to the Making Connections consultation. We have not found the questionnaire format capable of capturing the Parish Council's comments on such a complex set of proposals. The way that it is set out does not permit us to object and explain our position properly, and there are parts which we are concerned will skew responses towards a predetermined answer. Insufficient evidence is supplied by GCP to substantiate many of its proposals.

Q1 *To what extent do you support or oppose the proposals for bus improvements and fare reductions? (strongly support / support / don't know / oppose/ strongly oppose)*

A1 Oppose.

We agree that a good quality of life should be achievable in the absence of a car. However, GCP's bus-based plans lack credibility in transforming Cambridge's public transport. There is no evidence that more buses create modal shift. They are an out-dated attempt at a short-term fix for a complex solution and will divert attention and funds away from what is really required: a sustainable, modern, efficient, interconnected, multi-modal transport system connecting people and places and delivering them to their destination in a timely and reliable manner.

Stapleford Parish Council supports the aims of Cambridge Connect's vision for light rail to improve public transport in the region. According to research by Cambridge Connect (as submitted in its Aug 2022 supplementary submission to its 2021 response to the Cambridge and Peterborough Combined Authority Local Transport and Connectivity Plan), modal shift can only be achieved with an entirely 'freestanding' infrastructure such as trams/trains/light rail. GCP's desired 15% reduction in traffic from its 2011 baseline is insufficient in the context of a climate emergency and cannot be achieved with buses. Many cities in Europe with light rail/trams already achieve 30% of people using public transport. In contrast, much of GCP's plans merely kick the metaphoric can down the road, both temporarily and geographically, by (a) failing to provide a long-term solution and (b) encouraging people to ignore their local bus services and instead to drive private vehicles to 2,000-space car parks to connect to a Park and Ride.

Cheaper fares (irrespective of public transport mode) and a transformed public transport service are the only way that people will transfer away from the convenience and comfort of private cars. Yet, the GCP's proposed strategy builds busways that *bypass* where people live and denude existing bus services. For example, the City 7 bus from Saffron Walden, which currently serves the population of Sawston, Stapleford and Great Shelford, is now proposed to be diverted onto the planned Cambridge South East Transport (CSET) busway. Who will walk the 1 mile to get to their nearest busway stop? The bus will re-join the congestion in Cambridge once the busway runs out, so there will be no improvement in timekeeping and reliability. Such a flaw is the result of the GCP's proposals being designed to promote the relentless economic growth of Cambridge rather than to support population wellbeing.

Q2 Do you have any comments on the proposals for:

- Cheaper fares?
- More routes?
- Fast, high frequency services?
- Longer operating hours?
- Increased rural services?
- Simpler ticketing?
- Zero emission bus services?

A2 We do not support proposals for a bus-based public transport system, so no comment.

Q3 *Are there any additional improvements to bus services that would be needed for you to use bus services for more of your journeys? If so, what are they? Or if you are a non-bus user, what would encourage you to use the bus?*

A3 We do not need to support wider proposals for a bus-based public transport system to comment on this question. For Stapleford residents to use the local bus service would require a reliable service every 10 minutes (which was previously available several years ago) and much reduced journey times by investing in bus priority improvements, including bus lanes and priority at intersections.

Other desired improvements to bus services are summarised in Sections 4 and 8 of Smarter Cambridge Transport's submission to the House of Commons Transport Committee, 2017 (www.smartertransport.uk/smarter-cambridge-transport-urban-congestion-enquiry/) .

Q4 *The bus improvements are proposed to start immediately after a decision in summer 2023 and ramp up over the following 4-5 years. What bus improvements would you want to see delivered first? (select up to 3)*

A4 Bus improvements are required that have nothing to do with the GCP's bus-based public transport strategy and we answer this question in this light: cheaper fares; more routes; fast, high frequency services.

Q5 *To what extent would you support or oppose the franchising of the local bus network by the Mayor and the Cambridgeshire and Peterborough Combined Authority?*

A5 Oppose.

Three main reasons: (a) we do not have confidence in the Mayor or Combined Authority being able to deliver this kind of complex project, given their lack of proven track record, and the current multiple and unnecessary layers of bureaucracy at local government level (b) there is currently no proven or cost-effective means of introducing franchising (c) the costs of financing and managing the scheme on an ongoing basis – and hence the risks – will be substantial.

Q6 *To what extent do you support or oppose additional improvements to walking and cycling, accessibility and public spaces?*

A6 We strongly support investment in sustainable travel schemes but do not agree that they would only be possible with lower traffic levels and funding created by the proposed Sustainable Travel Zone.

Q7 *If a Sustainable Travel Zone was introduced, are there any other improvements you would like to see funded?*

A7 We do not support the proposals as set out by GCP to generate revenue through congestion charging, so no comment.

Q8 *Do you have any comments on the proposal to introduce a Sustainable Travel Zone?*

A8 It greatly concerns us that the GCP has the authority to impose such a detrimental tax upon residents, given that it is proposed by a Board which is opaque and has never submitted itself to the electorate. Putting in place a new unitary authority with directly elected representatives who have submitted their policies to the electorate is the only way forward.

Charging is being introduced here as a revenue generating tool to pay for local economic growth. Residents who were never asked whether they support this growth agenda and are not benefitting from it are being asked to pay for it in yet another tax. Far simpler charging schemes could be used, such as work place parking levies, with specific work places targeted.

Nottingham's work place levy, for example, has been operating successfully for 10 years and

has raised around £9m in taxes per year. Income from this approach would be far easier to model than an indiscriminate charging system which operates over a lengthy period every weekday and taxes everyone, whether they're travelling into or out of the zone, and has multiple opt-outs (which will be expensive to manage and difficult to model).

Q9 *The proposals to improve buses, walking and cycling set out in the consultation brochure are only possible if we have a means to fund improvements. A Sustainable Travel Zone would provide this by charging vehicles to drive in the Zone at certain times and by reducing traffic levels. To what extent do you support or oppose the introduction of a Sustainable Travel Zone to fund improvements to bus services, walking and cycling?*

A9 Oppose.

Q10 *If you do not support the introduction of a Sustainable Travel Zone to fund improvements to bus services, walking and cycling, what alternative funding proposals would you propose to tackle the challenges faced by Greater Cambridge?*

A10 A complex problem cannot be resolved with a 'one size fits all' solution. A range of financing models are more likely to be sustainable over the long term and reduce financial risks. For example, as stated previously, far simpler charging schemes could be used, such as work place parking levies, with specific work places targeted. Nottingham's work place levy, for example, has been operating successfully for 10 years and has raised around £9m in taxes per year. Income from this approach would be far easier to model than an indiscriminate charging system which operates over a lengthy period every week day and taxes everyone, whether they're travelling into or out of the zone, and has multiple opt-outs (which will be expensive to manage and difficult to model).

Businesses and developers benefitting from economic growth should also make a bigger contribution towards financing transport infrastructure through business rates. Parking charges for residents in areas with good public transport routes could be investigated.

Q11 *Do you have any feedback on the proposed Zone and its boundary?*

A11 The proposed charging zone is far too large, made so out of necessity to generate income, whereas traffic congestion arises from the convergence of vehicles on Cambridge city centre. Ironically, given how the GCP's proposals are dominated by travel for employment purposes, the sheer size of the proposed charging zone significantly increases the number of people travelling for non-work purposes who will be penalised. Here, we must emphasise the role of women, who do the majority of household management (e.g. food shopping trips), caregiving and school-related trips (ref. 'Invisible Women: Exposing Data Bias in a World Designed for Men' by Caroline Criado Perez).

From our local perspective, it is also entirely unreasonable to charge a resident of Stapleford to drive to their local supermarket (e.g. Waitrose, Trumpington, or Sainsbury's on Coldhams Lane) for a large shop, which is impossible to do by bus, on foot or by bike. The Cambridge economy, particularly small and local businesses, will suffer as residents will go to Royston or Saffron

Walden to shop instead, thereby actually *increasing* the number of miles travelled by car whilst simultaneously reducing residents' quality of life.

We are also deeply concerned by proposals to include Addenbrooke's Hospital and related medical facilities within the charging zone. The bureaucracy involved in determining who should/should not be exempt from charging based on medical need will increase tensions between medical providers and patients, and take up valuable time which should be more productively spent addressing healthcare needs. There is a very real concern that patients, particularly those requiring multiple appointments, could be put off seeking treatment and bereft of visitors during in-patient stays.

The proximity of Stapleford to the boundary of the STZ means that our village's roads will be congested by parked cars during the working week, because people will drive close to the edge of the zone and access public transport from there. Our narrow, 20mph, poorly lit and often unmarked residential routes are utterly inappropriate for this purpose and are already under strain from a lack of communal parking in the area and on-road parking for Shelford Station. Should the STZ come into force, extensive parking restrictions will be needed in all areas to protect our rural character, residents' safety and quality of life, and reduce noise and particulate pollution.

The main routes through the village are also used as a rat run between the A1301 and A1307, presenting safety and capacity issues. Additional traffic resulting from attempts to avoid a congestion charge will exacerbate these problems and substantially erode residents' quality of life and – ironically, given the subject of this consultation – make it more dangerous for residents them to use sustainable means to travel around their own village.

Q12 *Do you have any comments on the proposed hours of operation of the Sustainable Travel Zone?*

A12 Why include quiet parts of the working week yet exclude busier parts of the weekend from the scheme? One of the aims should be to smooth traffic flow and reduce peaks.

Q13 *To what extent would you support or oppose the principle of phasing in the Sustainable Travel Zone charge?*

A13 Don't know. There are very real dangers of phasing in the scheme, although in the absence of any upfront monies it's not possible to see any alternative. With multiple risks associated with its implementation, phasing in raises the very real possibility that we're left with a half-finished, inefficient scheme which benefits no one.

Q14 *Do you have any comments on the suggested phasing approach?*

A14 No.

Q15 *Do you have any comments on the proposed charge levels?*

A15 The charges will be punitive to people in lower paid jobs who do not have the flexibility to vary their working hours or work from home. Employees of larger companies may have STZ

charges covered by their employer, something which smaller businesses, public sector organisations and voluntary groups will not be able to offer.

Q16 *Do you have any comments on the proposed discounts, exemptions, and reimbursements?*

A16 The number and range of potential exemptions will significantly increase the bureaucracy and costs of administering the system.

We are unclear about why taxis (fulfilling certain criteria) are proposed to be exempt from the charge. Key routes within the centre of the city are frequently filled with waiting taxis and Ubers, and make a significant contribution to congestion and particulate pollution.

Q17 *Do you have any other comments on the proposed discounts, exemptions and reimbursements?*

A17 No.

Q18 *Taking into account the improvements suggested above, are there any changes to the proposals or additional measures that would help enhance or address impacts on you / your business / your organisation and the way you travel?*

A18 No comment.

Q19 *GCP has a duty to ensure that their work promotes equality and does not discriminate or disproportionately affect or impact people or groups with protected characteristics under the Equality Act 2010, such as younger or older people, or those with disabilities.*

Please comment if you feel any of the proposals would either positively or negatively affect or impact on any such person/s or group/s.

A19 We appreciate that the Equality Impact Assessment (EIA) is an evolving document. However, we contend that the EIA presented thus far is not as sophisticated as the comparatively advanced nature of the GCP's proposals merit. Our concerns include, but are far from limited to:

- a good proportion of the EIA data is from pre-pandemic times so is unlikely to reflect the status quo
- much of the analysis does not adequately reflect the *lived* experiences of many people or groups with protected characteristics. For STZ plans to have advanced to their current stage, and to be informed by the GCP that there is 'no Plan B', surely requires more than a largely qualitative assessment of their impact
- the number of people or groups with protected characteristics described as experiencing a 'neutral effect' from the proposed changes is concerning. We understand the phrase 'neutral effect' to mean that the cumulative effects of an alternative scenario are expected to be no different than they had been under past, present, and reasonably foreseeable future actions. In other words, these people's/groups' wellbeing will not have been improved even though they will contribute towards, and be inconvenienced by, a congestion charge. By GCP's own findings, the following people or groups with protected characteristics are expected to experience a neutral effect – i.e. a net zero

benefit – from the proposed changes: children (0-15yrs) travelling to special educational needs schools; young people (16-24) travelling to special educational needs schools; older (65+) blue badge holders unable to travel on public transport; disabled people with limited mobility who need a car or are reliant on taxis or private hire vehicles; the Gypsy and Traveller Community; women who are more reliant on cars to make specific journeys that cannot be made via alternative modes; pregnant people

- women (who comprise the significant majority of care givers, pregnant people, the older population, food shoppers, do most school-related trips and experience most public transport-related safety concerns) are disproportionately either neutrally or negatively affected by the GCP's plans. Men, by contrast, overwhelmingly incur beneficial effects
- we consider that older, less mobile people who do not qualify for a discount will be disproportionately disadvantaged by the GCP's plans. Indeed, the GCP's own EIA recognises that they will experience an adverse effect. Access to buses will be denied to them because the bus stops are typically located too far from their homes and buses will not necessarily take them to exactly where they want to go. There is a very real danger that villages, like Stapleford, will have significant older populations who become isolated at home because they simply cannot afford £5/day to maintain their independence, health (by accessing medical facilities and a range of good quality foods) and social networks.

Stapleford Parish Council agrees that a good quality of life should be achievable in the absence of a car. However, GCP's bus-based plans lack credibility in transforming Cambridge's public transport. There is no evidence that more buses create modal shift. They are an out-dated attempt at a short-term fix for a multifaceted problem and will divert attention and funds away from what is really required: a sustainable, modern, efficient, interconnected, multi-modal transport system connecting people and places and delivering them to their destination in a timely and reliable manner.

We look forward to further opportunities to debate the issues and the production of a more convincing set of proposals in due course.

Yours faithfully,

Stapleford Parish Council

Dear GCP

A response from Stow-cum-Quy Parish Council to the GCP 'Making Connections 22' consultation

Our parish recognises the importance of the 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. The amount of the charge is far too large and £5 a day to drive in the outskirts of the city is extortionate.

We also acknowledge the GCP's proposed investment in cycling schemes. We are very pleased about the soon to be Swaffham Greenway, which will provide the much needed safe "missing link" between the end of Quy Mill driveway and the new Quy to Lode cycle way. However, we share the disappointment felt by our neighbouring villages, the Wilbrahams, that there are no plans at present to extend these into the smaller rural villages. The roads from Great Wilbraham to Quy, Fulbourn and 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 (and even with one for most residents) we consider that the proposal that the main access to public transport for the residents of the Wilbrahams should be by bicycle is simply impractical. It is worth noting that the same applies to our residents in Stow-cum-Quy and other neighbouring villages, who need to access Chapel Dental, our nearest NHS dentist in Great Wilbraham; also those of our residents with children who attend First Steps Day Nursery and Great Wilbraham Primary School.

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 proposals for Quy are not significantly better than the pre COVID service. It is also difficult to see how the proposals could result in reduced traffic through Quy. In the mornings traffic through Quy to Cambridge is routinely backed up all the way through the village. This is mostly commuter traffic from villages further to the East. The two changes that could make a significant difference here would be relocating the Newmarket Road P&R to north of the A14 on the Newmarket Road and improving the rural bus service during peak travel hours to be much more frequent so that it becomes a more attractive proposition than driving. We note also there are no plans for direct services between Quy and Wilbraham, which as mentioned in the above paragraph on cycling does cut off Quy residents from accessing, by public transport, the Dentists, the nursery and the primary school.

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 Quy and be fully integrated in the wider Cambridge community for work, education, leisure, social or essential service activities without a car.
- The congestion charging zone is too large an area for a £5 a day charge.
- At present there is no connection between Fulbourn, Great Wilbraham and Quy, despite this being the main connection to the dentists and nursery for our residents
- Quy experiences large commuter traffic flows, congestion on our roads and associated pollution from cars travelling from B1102 villages through Quy to 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 Quy 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, in a convenient and practical way.

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

Yours sincerely

Matt Eaton
Chairman Stow cum Quy Parish Council