



Stapleford Parish Council

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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