

FEN DITTON PARISH COUNCIL

Cambridgeshire County Council Planning Department
SH1311, Shire Hall
Castle Hill
Cambridge
CB3 0AP

6 October 2016

Attention: Case Officer Elizabeth Verdegem

Dear Sirs,

Response to: **Planning application ref:** C/5007/16/CC – Phase 1 of the Chisholm Trail

We refer to the above planning application of 18 August 2016 and submit the comments of Fen Ditton Parish Council (FDPC) to support our recommendation on the above consultation. FDPC's response is presented below in 2 parts:

-Part 1 shows our overall objections in principle to the proposed route section from Newmarket Road across Fen Ditton Meadows to the towpath on the left (northern) bank towpath along the River Cam. However, we recognize that the current proposal is less intrusive than previous proposals and will be supported by some residents of Fen Ditton.

-Part 2 shows our objections and other comments relating to the details presented in the application and supporting documents with a focus on the alignment, design details and the usage modelling. We have indicated some points where our objections could be overcome by attaching suitable Conditions if Planning Permission were to be granted. We would welcome the opportunity to discuss with you those areas where the application requires clarification or has omissions.

Overall, we draw on points made for the consultation on the Chisholm Trail by letter of 26 November 2015 and response to the Chesterton Bridge application C/5005/16/CC of 16 August 2016. We wish to highlight the absence of a proposed section around Mill Road & Railway Line near Cambridge Station which we suggest should be a priority.

May we take this opportunity to thank you for the invitations to the earlier consultation meetings extended to FDPC and residents.

Yours faithfully,

Sarah Smart;
Parish Clerk
pp, Fen Ditton Parish Council
email: clerk@fenditton-pc.org.uk

FEN DITTON PARISH COUNCIL

Part 1 – FDPC Objection to Proposed Siting on Ditton Meadows

- 1) FDPC recognizes the importance of Ditton Meadows and Stourbridge Common as water meadows forming the green, River Cam Corridor and notes that Ditton Meadows and Stourbridge Common are part of a conservation area and a City Wildlife Site/ Protected Open Space. Approximately one third of Ditton Meadows lies within the parish of Fen Ditton and designated Conservation Area. The whole of Ditton Meadows facing east from under the Victorian iron railway provides a backdrop to views of this ancient village characterised by curve of the river, riverside graded properties, the tower of St Mary's, traditional farm outbuildings and mature native trees. With the exception of two iron kissing gates all foot bridges, stock fencing and gates are timber in keeping with the conservation status and character of the meadows. The relationship of Ditton Meadows to Fen Ditton on this east side of Cambridge is as Grantchester Meadows is to Grantchester village to the west of Cambridge. The tranquillity, rural aspect, grazing cattle and sustained ecological management of the meadows under the Natural England's Higher Level Stewardship Scheme: "The meadows have been grazed by cattle for centuries and traditional grazing management continues today" all adds to its character and charm.
- 2) The meadows downstream of the railway bridge form a tranquil area used by picnickers and walkers and the views towards Cambridge across the meadows from the village are of high importance to the community.
- 3) FDPC has a policy of objecting to development on the meadows downstream of the railway bridge. Our previously submitted objections include responses to:
 - a. planning application C/5005/16/CC of 16 August 2016 for the proposed cycle/pedestrian Chesterton Bridge
 - b. preliminary consultations on a new cycle/pedestrian bridge linking Abbey and Chesterton (July 2014)
 - c. the Transport Strategy for Cambridge and South Cambridgeshire (September 2013);
 - d. aspects of Planning Application C/05001/13/CC – erection of station building etc., land at Chesterton Sidings (Science Park Station) (September 2013);
 - e. the alignment of the Millennium Cycleway in the late 1990s
 - f. proposals to build a road bridge in the 1980s/90s
- 4) Whilst recognizing that, by staying close to the railway line, the proposed route across the Meadow and River Cam is less intrusive than alternatives crossing the more open areas, FDPC objects, in line with our policy, to the proposal since it will further reduce the rural aspect of the Meadows and there will be a reduction in the quality of the views across the Meadows.
- 5) FDPC notes that the original feasibility level study was scoped to exclude any new crossing or improvements in the river reach from the layby next to the former Pike and Eel Pub up to the Green Dragon Bridge. This is a significant omission of possibly viable options. We suggest that if an option such as this is feasible, possibly on a skew with a ramp into the layby area next to the former Pike and Eel it might allow for conjunctive use with Green Dragon and would be

FEN DITTON PARISH COUNCIL

particularly useful to bank parties following rowing crews up and downstream during training and the city and university ‘bumps’ races. In contrast, a bridge site east of railway would be of limited use to bank parties due to the need to pass under the railway and then negotiate the access ramps. We acknowledge that a site east of the railway would be of use to spectators and others on the day of the Cambridge Regatta since this is end of the Long Reach course.;

- 6) We conclude that there is a risk that there is a greater need to develop a route that better serves the dominant north-south trend for journeys across the river **west** of the railway. We have suggested that the link from Cambridge Station northwards under Mill Road towards Coldhams Lane described in the 2015 Consultation will be a major improvement in this regard and FDPC would welcome confirmation that this link is planned for a Phase 2 and any information as to what is delaying its implementation. The current Phase 1 proposal is restricted to a link **east** of the railway which rather assumes that Abbey, Fen Ditton and, eventually, Wing will themselves generate the extra journeys to justify the cost and environmental damage. We also consider that a link east of the railway is unlikely to attract any users from west of Green Dragon (see our detailed comments below on the usage modelling).
- 7) FDPC consider that, given the high overall scheme cost, it is important to get the alignment and siting right especially if there are funds and compulsory purchase powers available. This requires a thorough review so that the right site and the right sizing is identified and the project is not seen to be wasteful of public funds.
- 8) FDPC suggests the overall value of the proposed Chisholm Trail and new bridge to Fen Ditton residents is likely to be small since the incremental time saving is small for the probably few persons cycling to the new station, Science Park or Cambridge Regional College. We acknowledge that the time saving will be more significant for the, probably, even fewer pedestrians. There will be marginal gains for journeys by residents linking along or across Newmarket Road.
- 9) FDPC is concerned that there will be an increase in parking problems in the village as an in-combination effect from the Chisholm Trail and new station under construction since we believe some users will choose to drive as close as possible to the Meadow before cycling or walking to the new station or into Cambridge. Such an impact or effect has been omitted from the planning documents for either project. We therefore request an undertaking or assurance that the County Council will support Fen Ditton or impose a Condition for mitigation of such parking problems if they arise in future.
- 10) To summarise, FDPC objects in principle to this application since:
 - a. potential alternatives and their capacity to meet the dominant north –south demand have not been investigated;
 - b. the expected cost of the scheme is such that review of the proposed route is needed to identify the right site and the right size so that the project is not seen to be wasteful of public funds; and
 - c. the direct effect on Fen Ditton will be a further reduction of the rural aspect of the Meadows; a reduction in the quality of the views across the Meadows due to the trail itself and the proposed bridge over the River Cam and an increase in car parking problems.

FEN DITTON PARISH COUNCIL

Part 2 – FDPC detailed comments on the Planning Application

1) Planning Statement

- a. Para 2.7. FDPC is concerned about the emphasis generally given to the short link connecting the proposed southern approach ramp to the existing Millennium Cycleway since we consider this will be mainly used by pedestrians particularly if our objections to and alternative proposals for the designs of the “Tee junction” at the base of the approach ramp and, further south east, the crossing and new connection to the Mildenhall railway embankment are both taken into account.
- b. Para 2.8. FDPC welcomes the proposed connection of the Chisholm Trail to Ditton Walk and the Millennium Cycleway along the Mildenhall railway embankment because of the greater numbers of cyclists with a desire line connecting to the south and south east rather than connecting along the towpath. The facility to then use the proposed underpass and avoid having to use the lights to cross Newmarket Road is especially welcome.
- c. Para 3.5. FDPC notes that the proposals to improve and widen the existing wooden walkway under the railway are said to be included although these not shown on the Drawings or described in the Design and Access statement (see our para 2c.) Clarification is requested or a Condition to resolve this should be imposed.
- d. Para 5.14 FDPC welcomes the use of low level lighting and requests that the proposed avoidance of high level lighting is enforced through a Condition if the planning permission is granted.

2) Design and Access Statement

- a. Map 1 and Section 1a and 1b. FDPC notes that a site visit by one of our councillors confirms the indication from historic air photography (see Google Earth and others) that there appears to have been some poaching of the margins of the River Cam in the area of the proposed bridge. Map 1 suggests there is no attempt proposed to restore the river bank to its former alignment. Restoration would allow the bridge to be shortened (thus reducing the cost and mass of the structure) and the dogleg in the Cycleway to be largely removed. In parallel, FDPC suggest the existing land drainage ditch along the railway embankment toe should be resited east of the Chisholm Trail connection to the Millennium Cycleway to simplify Section 1 a and 1b. This would reduce the width of earthwork at level 4.6mAOD and associated need for compensatory flood storage and also remove the need for a fence (Map Item 7) and, possibly, an access gate / cattle barrier (Map Item 6) at the start of the path. We suggest that the majority of cyclists would travel north south along the Chisholm Trail with very few wishing to join at the southern approach ramp and almost none of whom would link to the west under the railway. Some cyclists from the east would stay on the Mildenhall Railway bank to access the northern limb of Chisholm rather than the slightly shorter but more

FEN DITTON PARISH COUNCIL

tortuous route to the river bank and back again. This would allow the length of path shown on Sections 1a and 1b (Item 6) at 3m width to be reduced in width to match or be smaller than the existing Millennium Cycleway with a further cost saving.

- b. FDPC suggest that a paved width of around 2 or possibly 2.5 m on the section linking the tow path to the approach ramp should be the upper limit since there will be grass berms at grade on both edges acting as a buffer strip and, as described above, this link will not be the main approach to the bridge. The Millennium Cycleway is a good example of how this is a practical measure. Furthermore, it will be very odd indeed to have a new 3m path teeing off at this point from the 2m wide Millennium Cycleway on Ditton Meadow along which the dominant usage will remain east-west under the railway. We object to wider paths since there is an increased tendency for them to be used by motor vehicles, motor cycles and quad bikes. We think the deterrence effect of smaller widths is required since enforcement is ineffective.
- c. Map 1 Item 5 refers to the Bridge Application to which we have responded. We note however that the scope for the wooden walkway is ambiguous with no detailed plans provided in either application. We suggest a Condition is applied on both applications to resolve this and introduce the design changes for our proposed relocation of the ditch and realignment of the approach to the wooden walkway. We would welcome any widening of the wooden walkway that can be achieved.
- d. Map 2 shows how the cycle way ties into the bridge approach ramp with a complex Tee junction that does not honour the north –south desire line. FDPC again suggest the existing land drainage ditch along the railway embankment toe should be resited east of the Chisholm Trail and cycle way to join the towpath since it would remove the need for a new culvert, deter cattle from straying onto the path obviating the need for a fence; facilitate a straightened alignment between Chisholm and the approach ramp which will be the dominant desire line and allow vegetation in the ditch to form a screen and be maintained from the field itself. Our proposed change might also facilitate the translocation of water voles by allowing all the new watercourse alignment to be built first and allow the possibility of a new pond area to be included east of the alignment without the need for the crossdrain and sluice shown as Section 2b Item 1. Continuing further south, a culvert at the head of the drainage ditch might also be avoidable since, as stated in Para 1 a) of our response to the Bridge Application, the ditch does not normally connect to the watercourse draining Coldhams Common. Map 2 Items 7 and 9 descriptors may be based on the false assumption that the ditch labelled Coldhams Brook is the active watercourse draining Coldhams Common whereas as has been elsewhere described (Water Framework Assessment Section 2.4), the main flow passes under the existing railway. If a connection is needed to carry flood overflows, an extension near to point 4) on Map 3 would remove the need for any boundary fence.

FEN DITTON PARISH COUNCIL

- e. Map 3. The crossing/junction at point 9) does not honour the dominant east-west desire line for cyclists wishing to use the proposed Newmarket Road Underpass or, as we suggest, some of those from the east who wish to link to the north of the river. The junction should be re-designed and some prediction made of the number of users on each arm of the crossing.
- f. Maps 1, 2, 3 and 5. FDPC suggest above that the Chisholm Trail is not separated by a fence from the meadow but rather by the ditch. We draw attention to the absence of a proposed fence on the Coldhams Common section (Maps 3 and 5) and the Visual Design Statement which includes a further example of a fence free cycle path from Lincoln.
- g. Map 6- Notes. FDPC note that the discussion of links is for information only. However, we question the emphasis that has been given to 'other links' within the traffic forecasts and would welcome confirmation of the status of later phases of the Chisholm Trail within the model and within the City Deal.

3) Ecological Impact Assessment

- a. Table 3.1 FDPC disagrees that "Coldham's Brook" can be considered to qualify 'as an unmodified chalk stream' since this is merely a local land drain on the floodplain. If in fact the table was intended to refer to the Cherry Hinton Brook it is still inaccurate since this carries considerable runoff from the built environment and areas of superficial gravels and former gravel workings. The WFD assessment notes the existence of a 'Heavily Modified Water Body'.
- b. Table 3.4. FDPC notes that there does not appear to have been any investigation of the conchology present nor explanation of what 'Coldhams Ditch East' refers to. FDPC also considers that a wider spatial scope needs to be considered for otters since they have been reported in the general area and we, elsewhere, propose that consideration is given to developing a pond on the realigned ditch named as Coldhams Brook which might then enhance the habitat for otters.
- c. FDPC has been informed that there are invasive plant species in the area. Himalayan Balsam is flowering in the area of railway embankment. FDPC recommends a Condition that management of constructions works shall prevent the spread of Himalayan Balsam from the railway embankment to other areas of the Meadows.
- d. FDPC considers that the whole issue of cattle grazing is not given sufficient weight in the design and the EIA. We suggest that the proposed realignment of the ditch labelled Coldham's Brook is continued further south nearer to its existing termination point so that cattle are kept off the main north-south cycle path and approach ramps and any poaching of the margins of the ditch will tend to be on the side away from the cycle path. The west bank of the ditch could then develop a riparian vegetation since it would be ungrazed. Our proposal would avoid the need for a fence to keep cattle off the cycle path.

FEN DITTON PARISH COUNCIL

- e. FDPC suggests the EIA should give greater consideration to the wider context of the River Cam corridor. Our policy recognizes the importance of the corridor and we consider that the EIA does not give sufficient weight to the fragmentation resulting from this proposal.
- 4) Landscape Character Area – Figure 1. This map omits the Fen Ditton Ancient Village Core and Conservation Area which extends across around 1/3 of Ditton Meadows. In contrast the Chesterton Conservation Area is shown although it is further and lacks a direct sight line to the proposed bridge. FDPC considers it a significant omission that the conservation area of Fen Ditton has been omitted from the Landscape Character Areas and that no assessment has been undertaken of the impact of the proposed development on the character of this conservation area and setting of this historical village and graded buildings, including St Mary’s (Grade II) in the Landscape and Visual Impact Assessment (LVIA). This omission is despite the quotation in the LVIA that
- “Policy 4/11 – Conservation Areas “Developments within, or which affect the setting of or impact on views into and out of Conservation Areas, will only permitted if:
- a. They retain buildings, spaces, gardens, trees, hedges, boundaries and other site features which contribute positively to the character or appearance of the area; and
 - b. A new or intensified use will not lead to traffic generation or other impacts which would adversely affect the Area’s character.”
- It is of note a statement in the report follows this planning policy “There are no Listed Buildings within close proximity to the scheme.”

FDPC consider that the relationship of the whole of Ditton Meadows to the setting of Fen Ditton Village and conservation area is such that this Policy statement has not been upheld and the impact on the Village and setting within Ditton Meadows should have been fully considered and in turn be shown to have informed the design.

- 5) Bridge Demand Forecast Report of June 2016
- a. FDPC is very concerned about the analysis and reporting of the forecast demand since this is used to underpin the justification and cost of the scheme and may lead to over-design and excessive cost of some scheme elements such as path widths. We are concerned that some of the assumptions must be flawed. We suggest that the model study is updated to reflect concerns raised by FDPC and others.
 - b. We understand from the way the report is written that the shift from ‘Base Case’ also assumes Chesterton Station becomes operational since the station is not listed in the Future Developments and is obviously not included in the observed data used for calibration. The June model report does not discuss journeys abstracted from other routes across the River Cam nor the dis-utility of the northern approach ramp at the bridge. If the

FEN DITTON PARISH COUNCIL

model is the same as for the C/5005/16/CC application, our previous comments would apply.

- c. The report does not appear to include a Chisholm Trail west of the Railway and north of the existing station as a future development despite FDPC's hope this would be included in Phase 1 or at least a Phase 2.
- d. The report does not appear to include a future Addenbrookes station as a future development. This would have a material impact on the number on users of the Trail in all three sections. FDPC request that this sensitivity be tested.
- e. The June 2016 report contains different numbers for future cycle use, modal shift and the results of the sensitivity tests than the May report presented to support the Bridge application without any clear explanation or suggestion that a comparison of the reports has been considered or whether the same set of model runs has been used but different results derived.
- f. The results of the sensitivity tests in Table 4-4 show a huge difference between the variance for the middle and northern sections e.g. 267 (middle) and 1930 (north) are can be calculated for [Base Case minus Scenario 1] despite the number of predicted cyclists in the Base Case being of similar magnitude at 4119 and 5130 respectively and so the % uncertainties are 6.5% and 37.6%. There is no explanation given or suggestion that this type of comparison has been considered or the implications of such a large uncertainty for the northern section.
- g. We are concerned that the model over estimates journeys abstracted from Green Dragon since FDPC has noted previously that our observations suggest very few cyclists using Green Dragon Bridge connect to the eastbound Millennium Cycleway.
- h. FDPC is concerned that the dis-utility of the proposed bridge's southern and northern approaches and the wooden walkway under the railway has not been explicitly included in the model as a time penalty and suggests this may be one source of error.
- i. FDPC is concerned that the various travel to work surveys conducted in 2014 and 2015 are not mentioned in Section 2.2 which instead refers to 2011 census data. The 2014 Travel to Work Survey concluded that 2189 respondents (35% of workforce) across 19 organisations in the Science Park Area (the TP+ Area) made **21.57%** of weekday journeys by bicycle. However, the Application states on page 27 that a factor of **35%** was applied to journeys to work at the proposed Northern Fringe East development. It is extraordinary that there is no discussion of these data to verify the model inputs or discussion of the 35% factor noting that this gives rise to 1890 (76%) of the 2489 predicted extra trips before modal shift is then added.
- j. FDPC also notes that a review of survey data for Green Dragon Bridge for the period 18 Mar 2012 to 4 Mar 2013 concludes that around 1000 bicycle trips per day were counted at Green Dragon bridge in both directions. Table 2.2 gives a figure of 2500 trips and it is again notable that there is

FEN DITTON PARISH COUNCIL

no discussion of these data to verify the model inputs nor discussion of the seasonality of cycle usage.

- k. FDPC is also concerned that the future model case does not reflect the 2014 and 2015 cycle usage but uses higher percentages for travel to work simply because they have been quoted in previous predictions. In addition, the future cases may assume that bridge users will choose the nearest station whereas the timetables may give more choices at the existing Station and thus draw in more cyclists.
- l. The Figure in Appendix F does not appear to show the planned development of the Chisholm Trail west of the Railway and north of the existing station nor a good connection between Chisholm and Ditton Walk although the latter is included in this application. If these links were also absent in the “with Chisholm Trail” case, the overall predictions of future use will be affected.

6) WFD Compliance

a) FDPC suggest the confusion over the flowing and non-flowing watercourses is resolved between different sections of the application. However, the suggestion in Section 2.4 of the WfD report that the invert of the drainage ditch across Ditton Meadows be lowered so it can carry perennial flow should not be adopted without thorough scrutiny. The existing fauna and flora are adapted to the current flow regime and the proposal would drastically alter the status quo. Furthermore, the sediment transport and flow across the channel in Stourbridge Common would be affected. We believe our proposals for realigning the ditch without lowering the invert and, possibly, creating a pond, would be equally compliant and enhance the aquatic environment.