

Technical Note 03A: Review of CTMP July 2025 Update (v12)

Project: Owlstone Croft: Cambridge Planning Ref. 22/02066/FUL
Subject: Review of Construction Traffic Management Plan July 2025 Update
Client: South Newnham Neighbourhood Forum
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This Technical Note is based on Technical Note 03 that reviewed Version 08 of the CTMP. The full text of the Technical Note 03 is reproduced below. An updated version 12 has now been submitted. Where additional information is now available, previous comments are struck through and further comments in red are added.

The ‘independent consultant report’ (although not a *report* as such but a series of emails) that is referenced in the Officers’ Report and which became available on the Cambridge Planning Portal on 21 July has been taken into account in the comments below.

The Author

1. The author is Bruce Bamber, Director of Railton TPC Ltd. who has worked for 35 years in the transport planning industry. He has dealt with the transport and access arrangements for a wide range of development types from local to strategic scale and has been involved with numerous transport studies for public and private sector clients. He has given evidence at informal hearings and public inquiries, participated in Local Plan Inquiries and at a DCO Hearing. He is a Chartered Member of the Institution of Highways and Transportation and has a Master’s Degree in Transport from Imperial College, London.

Introduction

2. This Technical Note (03) supplements Technical Note 02 (now also Technical Note 03), Review of CTMP May 2025 Update (KMC Transport Planning) and deals with a further version (v.8) (now v. 12) of the Construction Traffic Management Plan (CTMP) dated June (July) 2025. Below are set out outstanding concerns comprising a combination of those issues that have not been addressed in the latest revision and further issues that relate to the new information that has been submitted.
3. This Technical Note has been prepared on behalf of South Newnham Neighbourhood Forum.

HGV Movements (concerns remain)

4. Table 3 of the latest CTMP indicates 14 peak months of HGV movement. The previous version identified 11 months of peak HGV movement. The maximum number of HGVs per month has increased from around 275 (550 HGV movements) to around 315 (630 HGV movements) or from an average of 11 per day (22 HGV movements) to 15 per day (30 HGV movements). Table 4 of the CTMP shows that the number of the largest vehicle type (>7.5 tonnes) has increased from around 85 to 95 during piling, from 95 to 160 during substructure construction, from 120 to 150 during superstructure construction and from 120 to 180 during cladding. It is concluded that the latest version of the CTMP identifies a level of HGV impact that is significantly greater than previously anticipated.

Vehicle Tracking

New HGV swept path plans have been submitted but the comments made previously are unchanged

5. New information has been submitted on vehicle swept paths. It is proposed that the largest HGV to access the site would be an 'AS20 Bed' which has a length of 11.9m (see Table 2 of CTMP). The vehicle is a three axle rigid HGV. The swept path information (Appendix C of the CTMP) shows this vehicle travelling extremely close to the inside of the bend of Short Lane. There remains doubt as to whether repeated and long-term use of the lane for HGV access could be achieved without damage being caused to roadside structures and trees.
6. Previous iterations of the tracking of the same vehicle have shown it over-running the footway opposite the Lodge, 'skimming' the front of the Lodge and potentially colliding with the garage on the corner opposite the Lodge. There appears to be doubt that the vehicle is able to safely access the site. Given the number of occasions that this type of vehicle is predicted to access the site, it has not been demonstrated that there is sufficient tolerance in the clearances to reduce the risks of collisions to an acceptable level.

It is noted that the swept paths shown on the Logistics Plan (Appendix E, Entry) show a 10.0m HGV rather than an 11.9m HGV as shown on the swept path drawings. The Logistics Plan also fails to show the area taken up by the front of the vehicle. This is the only source of vehicle tracking that shows the full path of an HGV into the site (the tracking drawing, Appendix C1, does not show the proposed replacement site gates (see below) and shows a vehicle travelling into the welfare and accommodation area). **There is therefore no clear evidence to show that a 10.9m HGV can safely enter the site.** The independent consultant failed to notice this inconsistency.

Paragraph 5.2.4 of the latest CTMP states that the existing iron gates at the entrance to Owlstone Croft will be removed and replaced with temporary construction security gates that will be raised off their hinges by the site team to allow larger construction vehicles to enter and leave the site. This is a highly unorthodox method of ensuring access. It both confirms the highly constrained nature of the site access and demonstrates the need to provide more robust evidence that the types of vehicles expected during construction can safely access the site. The fact that the gates will need to be designed to be easily removed from their hinges raises concerns about the security of the site when the gates are closed.

The independent consultant requested that it be confirmed how the site accommodation and welfare units would be transported onto and off the site. This information has never been provided. The concern is that these structures are large and are likely to require HGVs in excess of the maximum 11.9m vehicle size proposed by the applicant.

7. It is clear that for HGVs to use Short Lane, existing bollards, rocks, trees and vegetation around the inside of the bend would need to be removed. The Arboricultural Statement (Hayden's 05/02/2025) proposes to '*reduce crown to the existing kerb line*' in area H001 (Section 4.3.1 of Arboricultural Statement). Area H001 is identified as the inside of the bend on Short Lane all the way from the southern end of Grantchester Street to Owlstone Road. The works do not comprise 'reducing crowns' but removing trees, shrubs and existing bollards and rocks that are located to improve safety for vulnerable highway users.
8. The latest Cambridge Street and Open Space Officer consultation response (17 February 2025) states, '*Work to tree canopies to allow reasonable clearance over the existing road, as detailed in the AMS are approved. Any additional works required in connection with potential changes to road layout are not approved.*' (emphasis added) The proposal to undertake works around the inside of the bend is therefore not approved.

Width of Access Route (concerns remain)

9. The TTRO plan (KMC drawing KMC24112/002B, Appendix B of the CTMP) identifies the locations of double yellow lines along both sides of Short Lane. A label identifying a red hatched area on the plan bounded on both sides by double yellow lines states '*College's right of access to be maintained*'. Cross-referencing this plan with the swept path drawings suggests that vehicles are assumed to be travelling over the area to the south-west and also to the north of the hatched area designating the college's right of access. The swept path drawings need to be overlaid on the TTRO plan to demonstrate that construction vehicles are able to negotiate the route without encroaching on land beyond that allocated for college access
10. The TTRO plan does not appear to be consistent with the Arboricultural Statement's proposal to clear the vegetation around the inside of the bend on Short Lane since the red hatched area bounded by double yellow lines on the TTRO plan appears to be outside of the verge that contains the trees, shrubs, bollards and rocks.

Impact on Vegetation (concern remain)

11. It has already been explained that the Arboricultural Statement seeks to clear the verge on the inside of the bend along Short Lane leading to a significant change in street environment. Further works are proposed to lift the crowns of trees T016 (outside of bend on Short Lane), T015 (opposite Owlstone Road) and T013 (opposite site access) to 4m to allow the passage of large vehicles. These works will further increase the impact of the proposals on the street environment.

Failure to Clarify Internal Vehicle Circulation

12. ~~The site is extremely constrained. Swept paths of vehicles are only provided on the external highway network and at the site access. No information is provided to indicate where large vehicles can park and turn within the site during the various phases of development. The~~

construction programme originally indicated that for at least 7 months, work would be progressing on all four of the new blocks. No new information has been submitted that might suggest that this would not be the case. It has not been demonstrated that large vehicles would be able to safely park, unload/load and turn within the site during the whole of the construction period.

The latest Logistics Plans show the swept path of a 10.0m HGV entering the site, turning and leaving. No swept paths are provided for an 11.9m HGV that is also expected to access the site.

13. Vehicles are unable to access the on-site storage area (north of the site accommodation and welfare area) without having to reverse over the main pedestrian access route. This is highly unsafe. It appears that it may be impossible for larger vehicles to manoeuvre to or from the storage area. (concern remains)
14. In the absence of information about internal vehicle turning, parking and circulation there is no certainty that large vehicles entering the site would not be forced to reverse over significant distances on the external highway. It needs to be demonstrated that vehicle turning, parking and manoeuvring within the site will not lead to risks to users of the external highway network.

Inadequate System to Manage Deliveries

15. The latest CTMP includes, as Figure 6, a plan showing the proposed use of the Queen's College Sports Ground for contractor parking and for an HGV holding area. There appear a number of concerns over these proposals:
 - The 'Vehicle holding area' does not appear large enough to allow 11.9m rigid HGVs to turn; A new Appendix D3 shows two HGVs accessing and turning within the designated HGV holding area. This shows that it is impossible for other vehicles to enter or leave the car parking area when two HGVs are on site. The HGVs are also shown to be reversing in an area directly outside a pavilion or changing block. This will present a significant risk to pedestrians using the facilities.
 - Even if an HGV is able to turn, it is not shown how many HGVs could be accommodated within the area; (see previous comment)
 - It appears that sports ground staff and visitors would be using areas that would also be used by HGVs accessing the material lay-down area; (concern remains)
 - It appears likely that HGVs would be forced to manoeuvre and reverse in areas that are open to the public; (concern remains)
 - It appears that a cyclist meeting an HGV on the access drive may be put at risk since an HGV takes up almost the full width of the drive; (concern remains) All cyclists, including those using the Fulbrooke Road access would be forced to cross the HGV parking and turning area in order to reach the cycle store;
 - An HGV is unable to undertake the turn into the access drive without colliding with the posts, gate and hedges bounding the access road. A new section (para. 6.1.10) states that large coaches and articulated lorries currently access the site. It is likely that this would become impossible or raise very serious highway safety concerns during the period when the site were being used as a holding area. The applicant is likely to have much less control over the existing movements and is unlikely to be possible to eliminate the risk of existing large vehicles conflicting with construction traffic;

- Photographs have been submitted showing an HGV entering the sports ground. No covering information is available to confirm whether the HGV shown is an 11.9m HGV of the kind that is expected to be accessing the construction site. The photographs confirm that an HGV takes up almost the entire width of the sports ground access road making it impossible to safely pass cyclists;
- The independent consultant, in an email dated 03 July 2025 stated, '*Please can you requests [sic] the tracking speeds be confirmed – it is clearly not appropriate for the tracking of a vehicle entering the Barton Road holding area to do so at low speed*'. This information has not been provided and although photographs have been provided, it is not known how fast the vehicle was moving. The extremely limited clearance on both sides of the HGV suggest that the vehicle was moving very slowly and was therefore blocking the opposing traffic lane on Barton Road for a significant amount of time. The highway safety concern of the consultant has not been overcome;
- Existing larger vehicles that access the sports ground do so under the approved permitted uses for the site (sports facilities). The site does not have planning permission for its use for other purposes; in this case as a staff car park for a building site and as a marshalling station for HGVs unrelated to the sports ground. In order for the sports ground to be permitted to be used in this way, the applicant needs to undertake a robust assessment of the impact of its proposed use. The details that have been submitted provide no evidence that the proposed use would not present unacceptable risks to highway safety.

16. ~~It is concluded that the proposed system for managing the movement of HGVs is deficient since HGVs are unable to use the existing access, it has not been demonstrated that rigid HGVs can turn within the site and the proposed internal configuration will lead to severe risks to vulnerable groups (pedestrians, and cyclists) using the sports ground. It is concluded that the use of the sports ground as a holding area puts pedestrians, cyclists and other users of the sports ground at risk and the operation of the sports ground is likely to be prejudiced by the fact that access to and from the existing car park would be blocked if two HGVs were on site at the same time.~~

Management of HGV Movements (concerns remain)

17. It is proposed to provide two banksmen; one at either end of large vehicles leaving or arriving at the site. The proposal recognises the extreme sensitivity of Short Lane and the access road and the substantial risk posed to vulnerable highway users. The proposal relies on the constant availability of sufficient staff to supervise all large vehicles travelling along this section of the access route. There is no guarantee that this level of staffing will be present during the whole of the construction period (see further comment below).
18. There are no proposals to secure the safety of vulnerable highway users along Grantchester Street. For example, the sheltered accommodation on the eastern side of Grantchester Street (Lammas Court) is located close to a Co-Op store on the western side of the road and elderly residents may be put at risk by the passage of large vehicles moving very close to the edge of the carriageway due to the restricted width of the road and on-street parking.
19. It was and still is proposed to restrict working hours to between 09:30hrs and 14:30hrs Monday to Friday during term times. This is to avoid the beginning and end of the school day. The Newnham Croft Primary School caters for many early years children, many of whom attend for

only half a day. Construction traffic will conflict with the movement of vulnerable highway users around lunchtime when children are arriving and departing. No measures are proposed to mitigate this adverse highway safety impact on the most sensitive of highway users.

The applicant has submitted plans showing temporary diversion routes for vehicles as parts of Grantchester Street are closed to allow utility works. With regard to the site itself, Paragraph 3.1.3 of the CTMP (v.12) states that, '*The demolition works will be undertaken within the school holidays of Newnham Croft Primary School and are anticipated to take 5 weeks to complete*'. Heavy vehicles associated with the demolition works, or subsequent phases of development, will therefore be using the proposed diversions. The routes comprise narrow residential streets with tight corners and on-street parking (Derby Street, Merton Street, Eltisley Avenue, Grantchester Meadows). The routes pass a pharmacy, a cafe and grocery store/post office. The routes are already used by numerous pedestrians and cyclists and will be more intensively used by vulnerable highway users during the road closures. No swept paths have been submitted to show that larger vehicles can safely negotiate the diversion routes.

It is understood that heavy vehicles associated with the proposals are already accessing the site. Not only is this premature given that the CTMP has not been approved, but it is evident that banksmen are not constantly available, forcing HGVs to wait on the highway at the southern end of Grantchester Street. On 15 July, an HGV was observed and filmed becoming stuck while attempting to reverse out on the site. A banksman was present but failed to manage vulnerable highway users moving around the vehicle. Cars following the HGV eventually passed the HGV by mounting the footway. This casts serious doubt on the applicant's ability to eliminate risk to vulnerable highway users through the use of banksmen.

Independent Consultant Report

The Officer Report for this application, that has been available on the Cambridge Planning Committee website for some time, states, at paragraph 1.10 that, '*Following a thorough assessment by officers, the Local Highways Authority and the independent transport consultant, the submission is considered to satisfy the condition requirements imposed by the Planning Inspector*'. Discussions with the consultant did not conclude until 16 July. The officer statement was therefore premature since no conclusion to the discussions with the consultant had been arrived at when the report was written.

It is noted that the independent consultant did not prepare a report to assess the CTMP but entered into a series of emails with the Planning Officer. **There is therefore no thorough and systematic assessment of all the components of the CTMP.** The consultant, in an email dated 07 July 2025 stated, '*Please note that the purpose of my review is to seek to identify all matters that may be raised by third parties or the committee as reasons to question the content of the CTMP and hence delay or prevent its approval.*' **It is clear that the consultant did not 'identify all matters that may be raised by third parties'** since the majority of concerns that have been set out above have not been identified or considered.

It is concluded that little weight can be given to the views of the independent consultant without clear evidence that the consultant considered all elements of construction transport, including the concerns that have been raised by the third parties who are most directly affected by the activities.

Highway Authority's View

The latest response from the Highway Authority states, '*In relationship to the operation of the adopted public highway the version 12 traffic management plan, manages the risks and hazards that are always associated with construction traffic so they should fall within the range of such risks and hazards that users of the adopted public highway would expect to meet when using the same*'. It is not acceptable for the Highway Authority to assume that all risks and hazards fall within a range that highway users would expect, or indeed, that those risks and hazards are acceptable. The Highway Authority has failed to undertake a thorough and professional assessment of the **specific risks** associated with this development and the adequacy of the mitigation measures that have been proposed.

Summary and Conclusion

20. It is concluded that the June 2025 CTMP remains deficient and does not provide a robust basis for safe construction transport operations for the following reasons:

- a. The latest CTMP identifies an increased peak construction period (from 11 months to 14 months) and a significant increase in overall HGV movements (from an average of 275 per month to an average of 315 per month); (**concern remains**)
- b. ~~It appears likely that the proposed arrangements at the Queen's College Sports Ground to manage HGV deliveries, provide an off-site set-down area and accommodate construction workers' vehicles would lead to significant adverse highway safety impacts for those using the sports facilities and may not be feasible since HGVs are unable to turn into the access road within the available space; The use of the sports ground as a holding area puts pedestrians, cyclists and other users of the sports ground at risk and the operation of the sports ground is likely to be prejudiced by the fact that access to and from the existing car park would be blocked if two HGVs were on site at the same time. All cyclists would be forced to cross the HGV parking and manoeuvring area in order to reach the sports ground cycle store;~~

The applicant argues that large vehicles already access the sports ground. It is likely that this would become impossible or raise very serious highway safety concerns during the period when the site were being used as a holding area.

Existing HGV movements accessing the sports ground do so under the existing planning permission for the site. The existing permission does not allow the site to be used as a car park for construction workers, as a lay-down area and as an HGV marshalling site. In order for the sports ground to be permitted to be used in this way, the applicant needs to undertake a robust assessment of the impact of its proposed use. The details that have been submitted provide no evidence that the proposed use would not present unacceptable risks to highway safety for existing site users.

No evidence has been provided to show that an HGV can enter the sports ground access at sufficient speed to avoid presenting a risk to oncoming vehicles on Barton Road.

The applicant now acknowledges that the existing gates at the Owlstone Croft site would need to be replaced with security gates that can be lifted off their hinges to allow the passage of HGVs. This is a highly unorthodox method of maintaining access that raises concerns about the security of the site when the gates are closed. The proposal for such

an unorthodox approach reinforces the need for the applicant to provide more robust evidence that the largest construction vehicles can successfully and safely access the site.

- c. It has not been demonstrated that large vehicles are able to access the site within the available width of Short Lane. Indeed, the latest information in the form of the TTRO plan suggests that access for large vehicles is not possible since the swept paths of large vehicles pass outside of the area designated as '*college's right of access*'; **(concern remains)**
- d. The Arboricultural Statement indicates that it is proposed to clear shrubs, trees, bollards and rocks around the inside of the bend on Short Lane although this verge area is not designated as part of the college's right of access in the TTRO plan; **(concern remains)**
- e. The removal of vegetation, bollards and rocks around the inside of the bend on Short Lane will reduce highway safety as the obstacles currently provide refuge opportunities for vulnerable highway users; **(concern remains)**
- f. The proposed clearance of shrubs and trees around the bend on Short Lane coupled with proposals to lift the crowns of three mature trees will significantly alter the street environment in this sensitive area; **(concern remains)**
- g. The Cambridge Street and Open Space Officer consultation response (17 February 2025) makes it clear that the proposed works on Short Lane (i.e. the clearance of vegetation and obstacles around the inside of the bend) are **not** approved; **(concern remains)**
- h. ~~There appear to be significant problems with vehicle parking, loading/unloading and manoeuvring within the site. Insufficient information is provided to demonstrate that these problems will not lead to adverse highway safety impacts for highway users; The Logistics Plans fail to show the swept paths of 11.9m HGVs, the largest HGV expected to access the site;~~

The independent consultant requested information to show how site accommodation and welfare units would be transported to and from the site. This information has not been provided;

- i. The proposed system to manage deliveries recognises the extreme sensitivity of Short Lane and the access road but relies on an extremely high and consistent level of staffing. No guarantee is provided that the proposed level of vehicle supervision could be maintained throughout the construction period; **(concern remains)**
- j. No measures are proposed to mitigate adverse safety and amenity impacts on vulnerable highway users along Grantchester Street, such as the residents of Lammas Court sheltered accommodation; **(concern remains)**
- k. Working hour restrictions fail to protect vulnerable groups associated with children who arrive at or leave the primary school at lunchtime. **(concern remains)**

The applicant is seeking the closure of parts of Grantchester Street for utility works. The temporary diversion routes are along narrow residential streets with tight corners and on-street parking and pass a cafe, a pharmacy and a grocery store/post office. The applicant intends to use these routes for HGVs associated with demolition or subsequent construction works. No evidence has been provided to demonstrate that the proposed temporary diversions can be used by heavy vehicles without leading to an unacceptable risk to vulnerable highway users.

Construction vehicles have been arriving at the site since 14 July 2025 despite the CTMP not having been approved. Banksman are not always available and there is video evidence of an HGV becoming stuck while attempting to reverse out of the site. A

banksman is seen to be ineffective in preventing pedestrians and cyclists passing close to the vehicle and preventing cars using the footway to pass the stationary HGV. **This reinforces the view that the introduction of significant numbers of large construction vehicles into a highly constrained street environment heavily used by large numbers of vulnerable highway users over a significant length of time presents unacceptable highway risks.**

The Highway Authority has failed to undertake a thorough and professional assessment of the proposed CTMP.

The work undertaken by the independent consultant cannot be considered robust since it comprises a series of emails rather than a thorough and systematic assessment and several of the concerns raised have been ignored.

In summary, most of the concerns that were raised previously remain. It has still not been demonstrated that the Sports Ground can be used safely for construction purposes and the site has no planning permission for such uses. New highway safety concerns are raised in relation to the proposed temporary diversions of heavy vehicles along narrow residential streets. The premature delivery of construction materials to the Owlstone Croft site has demonstrated the inefficacy of the proposed measures to mitigate risk to vulnerable highway users and the inadequacy of the site access arrangements to accommodate construction activities.

In conclusion, it has not been demonstrated that the construction and associated works can be undertaken without an unacceptable risk to vulnerable highway users.