

Transport and Works Act 1992

**Transport And Works (Applications and Objections Procedure) (England and Wales)
Rules 2006 SI 2006 No 1466**

The Cambourne to Cambridge Order

PINS ref: DPI/E0535/25/1

**CLOSING STATEMENT
ON BEHALF OF CAMBRIDGE CITY COUNCIL AND SOUTH
CAMBRIDGESHIRE DISTRICT COUNCIL**

1. The Councils' position remains, as in Opening, that the Scheme is critically important to the delivery of adopted development plan policy and the future expansion of Cambridge in line with their spatial strategy, demonstrating a strong strategic need for the Scheme. Taking into account the mitigation measures which will be secured through the Order and planning conditions, the relatively low level of residual planning harms is outweighed by this need and by the significant public benefits of the Scheme.
2. Notably, the Councils' case on strategic need has not been challenged by any party to the Inquiry.¹ Furthermore, objectors generally agree with the pressing and compelling need for, at the least, a Scheme to improve public transport between Cambourne and Cambridge, and with the need for such a Scheme to improve journey times and reliability.² In the words of Mr Littlewood – it is largely agreed that “*something has to happen*”.³ There is, therefore, a clear justification for making the Order and granting deemed planning permission for the Scheme, rather than waiting for some hypothetical future solution or letting the perfect be the enemy of the good.

¹ Questions put by Carolyn Postgate to Mr Kelly (Inquiry Day 17 PM) related only to the destinations served by Scheme and whether the CPPF alternative would also satisfy the strategic need.

² XX Treacy (Henderson), Inquiry Day 8 AM; XX Postgate (Henderson), Inquiry Day 8 PM; XX Buckingham (Henderson), Inquiry Day 9 PM; XX Leigh (Cameron KC), Inquiry Day 12 AM; XX Littlewood (Cameron KC), Inquiry Day 14 AM.

³ XX Littlewood (Cameron KC), Inquiry Day 14 AM.

3. As indicated in Opening and confirmed in evidence by Mr Kelly, the Councils' role in this Inquiry has been as local planning authorities responsible for the areas affected by the Scheme, notwithstanding the separate role of the leaders of the Councils as voting members of the GCP Executive Board. The Councils' decision to support the Scheme in this Inquiry process has been taken independently of their involvement on the GCP Executive Board and on the basis of a thorough review of the environmental information supporting the Scheme and extensive discussions with the Applicant regarding mitigation and planning conditions.⁴ Following that review and subject to the agreed planning conditions, the Councils rely on the Applicant's evidence to the Inquiry regarding the acceptability of the environmental impacts of the Scheme.
4. While the Scheme will result in some residual planning harms, in particular to biodiversity and trees, landscape, best and most versatile agricultural land, heritage assets and the Cambridge Green Belt,⁵ noting the limited scale of those harms and the accordence of the Scheme with the Councils' spatial strategy and strategic transport policies,⁶ the Scheme complies with the adopted development plan, read as a whole.⁷ The less than substantial harm caused to heritage assets is outweighed by the significant public benefits that the Scheme will bring. Those benefits also amount to very special circumstances which justify inappropriate development in the Green Belt.
5. With regard to the business case for the Scheme, the Councils do not make any separate case or tender any evidence, but adopt the Applicant's position as presented to the Inquiry. However, the Councils emphasise that the business case, including the benefit-cost ratio as assessed as part of that case, while pointing in favour of the Scheme, is just one factor to take into account when determining whether the Order should be made and deemed planning permission granted for the development comprised therein. Overall, having regard also to the wider context including the drivers for growth and the continuation of the direction of travel in the emerging Greater Cambridge Local Plan for the Councils' longstanding spatial strategy, there is a compelling case for making the Order.

⁴ XIC Kelly, Inquiry Day 17 AM; CD29-12 CCiC and CCC Statement of Common Ground; CD29-13 SCDC and CCC Statement of Common Ground.

⁵ Kelly Proof of Evidence, paras.6.28-6.31, 6.42 and 6.44.

⁶ Kelly Proof of Evidence, paras.6.2-6.10.

⁷ Kelly Proof of Evidence, para.6.48.

Critical growth drivers for the Scheme

6. As explained by Mr Kelly in evidence, there are a number of critical growth drivers for the Scheme which demonstrate why it is a key component of the spatial strategy for Greater Cambridge (both as set out in the adopted Local Plan and in the emerging joint plan for Greater Cambridge).⁸

Infrastructure-led approach

7. An infrastructure-led or infrastructure-first approach underpins the spatial strategy in the adopted and emerging development plans and is key to ensuring the sustainable growth of Cambridge while retaining the aspects that make it so attractive to residents and workers, including its identity as a compact, historic city with a robust Green Belt edge. As agreed by Mr Leigh and Mr Littlewood on behalf of CPPF and CP, this approach aligns with the vision-led approach now mandated by the NPPF. The vision-led approach includes planning patterns of growth with existing and planned transport infrastructure in mind and to ensure a genuine choice of modes for future users of development.⁹ Transport infrastructure, including public transport and active travel provision, should now be deployed proactively through strategic measures such as the Scheme to deliver modal choice and mode share rather than reactively responding to the assessment of transport impacts of development.
8. In Greater Cambridge, the infrastructure-led approach – including the development of transport infrastructure in the Green Belt – is crucial for ensuring the sustainable growth of Cambridge while still retaining the overall openness and permanence of the Cambridge Green Belt by avoiding the need to release Green Belt land for housing development. As Mr Kelly explained, in developing the adopted Local Plans, Green Belt assessments were undertaken to identify whether any further Green Belt could be released without harming Green Belt purposes. The conclusion of that exercise was that there should be no further Green Belt releases but that the next most sustainable option was to concentrate growth in a “constellation” of new settlements beyond the Green Belt and to make them sustainable by ensuring those settlements reach a critical mass and are supported by a radial network

⁸ CD6-02 SCDC Local Plan para.2.20 PDF p.32 and Policies SS/7 and SS/8; CD29-71-2 Emerging Greater Cambridge Local Plan para.2.67 PDF p.70.

⁹ CD8-01 NPPF Chapter 9, especially paras.109-110.

of sustainable transport routes.¹⁰ On behalf of CPPF and CPC Mr Littlewood fairly accepted that without such a strategy of developing new settlements outside the Green Belt, there would be a need for further Green Belt release at the edges of Cambridge. He also accepted that high quality public transport connections from those settlements to services and employment and Cambridge which are capable of supporting long term growth are necessary in order for such a strategy to be sustainable and not overly car dependent.¹¹ That is not a strategy that CPPF and CPC take issue with or say should be changed.¹²

9. An infrastructure-led approach also shapes decisions and behaviour for residents and other users of new development from the very beginning, informing choices about where they live or work and whether they need to own a car to do so. It thereby avoids the need for the more difficult exercise of changing behaviours once people have become accustomed to travelling to or from their place of work or home in a particular way.¹³
10. The adoption of an infrastructure-led approach in Greater Cambridge is evident from and has been informed by the Transport Strategy for Cambridge and South Cambridgeshire (“TSCSC”)¹⁴ which includes at Policy 1 a strategy to provide “*sustainable transport capacity...in and around the city between key employment areas, and to where people live and access services*” through a “*high quality passenger network of bus, guided bus and rail services...and comprehensive pedestrian and cycle networks*”.¹⁵ Policy 3 emphasises that additional travel demand on the constrained transport network of South Cambridgeshire and into Cambridge should be accommodated wholly or in part by passenger transport services on the main radial corridors.¹⁶ The importance of a long-term, comprehensive solution for inbound and outbound services on the Cambourne to Cambridge corridor as part of this strategy is recognised in the supporting text to Policy 8.¹⁷

¹⁰ XIC Kelly, Inquiry Day 17 AM; CD6-02 SCDC Local Plan para.2.17 PDF p.28; CD6-01 Cambridge Local Plan paras.22-2.34 PDF pp.25-28.

¹¹ XX Littlewood (Drabkin-Reiter), Inquiry Day 15 AM.

¹² XX Littlewood (Drabkin-Reiter), Inquiry Day 15 AM.

¹³ XIC Kelly, Inquiry Day 17 PM.

¹⁴ CD7-07; see also CD6-02 SCDC Local Plan para.2.20 PDF p.32.

¹⁵ CD7-07 TSCSC PDF p.13.

¹⁶ CD7-07 TSCSC PDF p.22.

¹⁷ CD7-07 TSCSC PDF pp.35-36.

11. As Mr Kelly explained, the approach taken in the TSCSC in terms of the ambitions for changes to mode share, reducing private car use, transforming bus travel and enhancing public transport along priority corridors remains relevant today.¹⁸ As well as informing adopted development plan policy, this approach has been taken forward in the extant Local Transport and Connectivity Plan 2023 (“LTCP”) produced by the Combined Authority for Cambridgeshire and Peterborough (“CPCA”).¹⁹ For example, the LTCP emphasises the aim of encouraging a *“shift from the private car to public transport thereby reducing car dependency and helping to meet net zero and our target of reducing car mileage by 15%”* and explains that *“buses form a fundamental component of our sustainable transport network for journeys beyond distances people can use active travel, allowing people to access key services, training, and employment opportunities”*.²⁰ The Mayor has committed to delivering the growth envisaged in the Local Plan²¹ and that anticipated by the formation of the Cambridge Growth Company.²² As stated by Mr Kelly and recognised in the LTCP, a transformation in the experience of bus users is required to reduce the level of private car use in the context of that anticipated growth.²³
12. The impact of not taking an infrastructure-led approach, and failing to approve the Scheme in advance of further proposed growth in the Cambourne to Cambridge corridor, is a risk to the ability of Cambridge to grow successfully without increased congestion and carbon emissions, negative effects on employees’ and existing residents’ quality of life and reduced attractiveness of the city to businesses and employers considering whether to invest in Cambridge. If it is not possible to develop a transport-led solution for additional housing, it may be necessary again to explore releasing sites on the edge of Cambridge, with concomitant environmental and Green Belt harm.²⁴

¹⁸ XIC Kelly, Inquiry Day 17 AM.

¹⁹ In response to questions from the Inspectors, Paul Bristow (Mayor of the CPCA) confirmed that there has not yet been any official decision to review the LTCP (Inquiry Day 9 AM). In examination-in-chief he identified congestion charge and road closures as aspects of the LTCP he disagreed with but not the bus strategy or aim to reduce private vehicle use: XIC Bristow, Inquiry Day 9 AM.

²⁰ CD6-09 LTCP PDF p.27.

²¹ XIC Kelly, Inquiry Day 17 AM; XX Bristow (Cameron KC), Inquiry 9 AM.

²² XIC Bristow, Inquiry Day 9 AM stating that *“Peter Freeman is a reality”* and the Greater Cambridge Transport Strategy has to reflect that reality or it will not be a strategy.

²³ XIC Kelly, Inquiry Day 17 AM; CD6-09 LTCP PDF p.27.

²⁴ XIC Kelly, Inquiry Day 17 AM.

Delivering the spatial strategy – enabling housing growth and economic development

13. As well as shaping future growth and behavioural change, the Scheme is also essential for delivering the existing spatial strategy and unlocking development provided for in the adopted Local Plans (including a large proportion of affordable housing), in a context where the opportunity to expand the city further without harm to the Green Belt has been largely exhausted.²⁵ In particular, Local Plan allocations at Cambourne West and Bourn Airfield have been developed having regard to the wider ecosystem of public transport in Cambridge and the opportunity for sustainable connections between where people work and where they have their homes. The Scheme would enable the realisation of these allocations (which have now been granted planning permission) in a sustainable way.²⁶ The assumptions and modelling that underpinned the development of those Local Plan allocations are based on a need (in line with the spatial strategy and objectives of the TSCSC) to drive mode share away from private car use.²⁷ Mr Kelly’s conversations with local developers confirm that the certainty (or lack thereof) of delivery of new transport infrastructure to support residents of those developments is central to their consideration of how quickly they can deliver new homes in accordance with the Plan allocations.
14. It is common ground between the Applicant, the Council, CPPF and Coton Parish Council (“CPC”) that the allocations at Bourn Airfield and Cambourne West are an essential part of the spatial strategy in the SCDC Local Plan and are based on and consistent with the Scheme coming forward, albeit CPPF and CPC argue that the policy requirements can be equally satisfied by alternative public transport improvements along the A1303 corridor.²⁸
15. With regard to Bourn Airfield, the wording of the site allocation and the terms of the planning permission granted in accordance with that allocation show a clear dependency of development on the Scheme. Policy SS/7 of the SCDC Local Plan makes specific reference to requirements for significant improvements to public transport, including the *“provision of high quality bus priority measures or busway on or parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge”* which reflect the need to effect a mode shift deriving from objectives in the TSCSC and the evidence base

²⁵ XIC Kelly, Inquiry Day 17 AM.

²⁶ XIC Kelly, Inquiry Day 17 AM.

²⁷ XIC Kelly, Inquiry Day 17 AM.

²⁸ XX Littlewood (Cameron KC), Inquiry Day 14 AM.

underpinning the SCDC Local Plan.²⁹ The description of development in the planning application refers to the incorporation of part of the wider strategic transport corridor represented by the Scheme, indicating the Scheme's importance to the determination and approval of the application.³⁰

16. As Mr Kelly explained, in the light of strong local opposition, the importance of the Scheme being able to secure a mode shift towards use of public transport was a significant component of the assessment of the planning merits of the application for planning permission at Bourn Airfield and the mitigation of its transport effects. That is reflected in the imposition of Condition 13 on the permission which prevents the occupation of more than 500 dwellings until the Scheme or an equivalent "*scheduled rapid mass transit passenger carrier service*" is delivered. The reason for the condition refers to Policy SS/7 and the need to make significant improvements to public transport infrastructure.³¹ The view of the highway authority when the application was submitted was that no development should take place before the Scheme had been completed, but following significant engagement with the applicant for that permission and its consultants and a number of mitigation measures proposed through the accompanying s.106 agreement, the highway authority's position was revised to a 500-dwelling limit. Acknowledging the concerns of the local community, members of the planning committee rejected a suggestion made in the officer's report that the condition imposing the 500-dwelling limit be subject to a facility to agree to remove or vary that limit with appropriate further evidence.³²
17. Those objecting to the Order have raised the possibility of an application being made pursuant to s.73 of the Town and Country Planning Act 1990 for the variation or removal of condition 13, without providing any evidence that might support such an application or indicates whether such an application would be granted.³³ Whether a s.73 application would be granted would be a matter for the judgment of SCDC when the application was made and would depend on the applicant demonstrating that the condition or the 500-dwelling limit was no longer necessary. Given the reasoning behind the imposition of the condition and the wording of Policy SS/7, as Mr Kelly explained and Mr Leigh agreed,

²⁹ XIC Kelly, Inquiry Day 17 PM; CD6-02 SCDC Local Plan Policy SS/7 Point 8(a) PDF p.86.

³⁰ XIC Kelly, Inquiry Day 17 PM; CD4-06 PDF p.1.

³¹ CD6-04 PDF p.13.

³² XIC Kelly, Inquiry Day 17 PM; CD4-04-17 PDF p.118.

³³ XX Leigh (Drabkin-Reiter), Inquiry Day 12 PM.

it is unlikely that any application to remove the condition would be successful.³⁴ A package of measures is already required by the s.106 agreement accompanying the planning permission to mitigate effects caused by the occupation of the first 500 dwellings. Varying the limit upwards would require a substantial amount of further evidence which would be subject to rigorous examination by the highway authority and local residents and would require the local planning authority to be confident that the environmental and transport effects had been sufficiently quantified and were capable of effective mitigation.³⁵ In the absence of any such evidence being put forward by any party to this Inquiry, any suggestion that the condition could be varied is entirely speculative.

18. The development at Cambourne West also displays a clear dependency on the Scheme. Policy SS/8 of the SCDC Local Plan includes a requirement for “*high quality segregated bus priority measures on the A1303 between its junction with the A428 and Queens Road, Cambridge*” and “*direct, segregated high quality pedestrian and cycle links to west Cambridge, Papworth Everard, Caxton and Bourn*”.³⁶ These requirements were taken forward in the s.106 agreement for Cambourne West, which includes obligations requiring contributions to be provided towards the Scheme at specific trigger points based on the number of units occupied, the delivery of a segregated bus and active travel link between the Bourn Airfield development and Cambourne to enable the Scheme to continue onwards to Cambourne and highway improvement measures to facilitate bus movements within Cambourne and the Cambourne West development.³⁷ That infrastructure is both necessary to deliver successful development at Cambourne West and could not have been taken into account by the local planning authority as a reason for granting planning permission if it were not necessary to make the development acceptable in planning terms pursuant to reg.122 of the Community Infrastructure Regulations 2010 SI 2010 No 948.³⁸
19. Mr Kelly indicated that the obligations were imposed on the basis of the objectives of the (at that time) draft Local Plan and the adopted transport strategy in order to facilitate the

³⁴ XIC Kelly, Inquiry Day 17 PM; XX Leigh (Drabkin-Reiter), Inquiry Day 12 PM.

³⁵ XIC Kelly, Inquiry Day 17 PM.

³⁶ CD6-02 SCDC Local Plan Policy SS/8 Point 12(b) and (c) PDF p.92.

³⁷ CD4-08 PDF pp.80-83. The obligations demonstrate, as Mr Whitton-Spriggs fairly accepted, that it is wrong for CBAG to contend that Cambourne West will be over a mile from the C2C terminus on Sterling Way: XX Whitton-Spriggs (Drabkin-Reiter), Inquiry Day 8 AM.

³⁸ Inspectors’ Questions of Stephen Kelly, Inquiry Day 17 AM; XIC Kelly, Inquiry Day 17 PM.

required higher quality public transport journey into Cambridge from the new settlements, to encourage mode shift, reduce congestion and resolve the particular challenges on the Cambourne to Cambridge corridor. He further explained that when permission for Cambourne West was granted, there was a clear commitment to the Scheme under the City Deal and an expectation that the Scheme would be advanced and implemented in line with the triggers for contributions to the Scheme in the s.106 agreement for Cambourne West.³⁹

Innovation clusters, superconnectivity and supporting research and innovation growth

20. As Mr Kelly explained, Cambridge has an innovation ecosystem which depends on high levels of connectivity to enable “*people-centric*” or in-person encounters to drive economic outcomes. Its success as a leading international centre for science derives from those in-person encounters which include facilitating working relationships between students and early career researchers, Nobel Prize winners, academia and business. That in turn relies on a supply of talent and the ability to accommodate that talent – include more junior academics and professionals – within an easy and reliable commuting distance of the main science hubs and employment centres in Cambridge. For that reason, the approach to assessing the need for development in Cambridge has, uniquely, been to start with an estimate of the need for jobs based on economic growth drivers and to then seek to allocate land for housing to support the forecast number of jobs.⁴⁰
21. The focus on and need to support clusters and in-person encounters is explicitly recognised in the NPPF.⁴¹ It is not, as Professor Booth sought to argue on behalf of CPRE, outdated or obsolete following the Covid-19 pandemic.⁴²
22. Similarly, academic and business floorspace at West Cambridge should not, as some objectors sought to do during the Inquiry, be dismissed as an irrelevant or minor employment location by comparison with, for example, the Cambridge Biomedical Campus or the Science Park in North Cambridge. Following the grant of 400,000sqm of academic and commercial floorspace at West Cambridge it is pegged as a substantial innovation district and was described by Peter Freeman as “*one of the biggest growth*

³⁹ XIC Kelly, Inquiry Day 17 PM.

⁴⁰ XIC Kelly, Day 17 AM.

⁴¹ CD8-01 NPPF para.87(a) PDF p.24.

⁴² XX Booth (Drabkin-Reiter), Inquiry Day 15 PM.

areas for employment” in Cambridge.⁴³ Mr Littlewood accepted that it was likely to become an increasingly important employment location in Cambridge.⁴⁴ The emerging Plan recognises the relationship between the Scheme and the West Cambridge development and envisages that the Scheme will influence further growth at West Cambridge.⁴⁵ The relationship between employment development at West Cambridge and the Scheme is further strengthened by the large increase in housing proposed at Cambourne in the latest version of the emerging Greater Cambridge Local Plan, which in turn increases the potential for employees at West Cambridge to live in the Cambourne to Cambridge corridor using the Scheme to travel to work⁴⁶ and for enterprises developed on the West Cambridge campus to expand into new sites to the west of the City.

Meeting needs of communities and social inclusion

23. The Scheme also plays an important role in supporting social inclusion and reducing inequalities. Mr Kelly explained how the paucity of public transport access in the Cambourne to Cambridge corridor has an adverse impact on opportunities for those who do not own a vehicle through choice or personal circumstances – particularly younger people but also those who are older. In this context, the reliability of journey times into Cambridge is essential, for example, for enabling school and sixth form students from Cambourne to take up work and work experience opportunities in Cambridge. The current unpredictable nature and duration of bus journeys prevents those opportunities from being realised and puts those based in Cambourne at a disadvantage to their counterparts living in Cambridge. Dr Treacy accepted on behalf of CBAG that these were current problems faced by school and sixth form students in Cambourne.⁴⁷ They represent a clear inequality of opportunity for those living in or near to the Cambourne to Cambridge corridor which will only increase as permissions in the area are built out.
24. The Scheme would also facilitate the provision of and access to more affordable housing for those working in Cambridge, again increasing the opportunities for those with more limited means to take advantage of the success and economic growth of Cambridge. While some objectors have objected to the Scheme on the basis that they are opposed to

⁴³ XIC Freeman, Day 3 AM

⁴⁴ XX Littlewood (Drabkin-Reiter), Inquiry Day 15 AM.

⁴⁵ CD29-71-3 Policy S/WC Vision and Identity Point 4, PDF p.137 and para.3.2.44, PDF p.140.

⁴⁶ By contrast with the position taken by Mr Littlewood in CD29-68 at para.3.

⁴⁷ XX Treacy (Drabkin-Reiter), Day 8 AM.

growth generally in the Greater Cambridge area, Ms Buckingham on behalf of Friends of the Cam did recognise that there was an issue with housing affordability in Cambridgeshire and accepted that the enabling of further housing development in the Cambourne to Cambridge corridor would assist with resolving affordability issues.⁴⁸

The Case for Cambridge and ambitions of Government

25. The Scheme is also important to facilitate the supercharged role for Cambridge envisaged by national Government through the establishment of the Cambridge Growth Company (“CGC”), as recognised in the principle that the CGC must “*build upon and go further than the Local Plans in terms of scale, ambition and timescale*”.⁴⁹ As Mr Kelly explained, the emerging Local Plan is anticipated to be the platform for the further growth facilitated by the CGC, who will also be responsible for unblocking stalled sites and ensuring certainty and confidence regarding housing delivery. The national ambitions for Cambridge amplify the need for early investment in and implementation of infrastructure such as the Scheme which will also provide greater certainty and confidence for investors.⁵⁰ In Peter Freeman’s words “*there is no point aiming for growth unless you unblock infrastructure hurdles*” and in doing so you “*prove to local community that their interests are also at heart*”.⁵¹ Furthermore, the unlocking of development at Cambourne West and Bourn Airfield by the Scheme will be a springboard for further development in the western corridor that in turn will be hardwired into the wider city ecosystem through the high quality public transport connection made by the Scheme.⁵²
26. The Scheme would also assist with connectivity for the Oxford-Cambridge Arc of which Cambourne to Cambridge forms the eastern end and which has influenced ambitions for growth at Cambourne, Bourn Airfield and the wider area west of Cambridge.⁵³

The emerging Greater Cambridge Local Plan

27. The latest version of the emerging Greater Cambridge Local Plan was published on 27 October 2025. This is a further regulation 18 version of the emerging Local Plan which has been developed following updated housing and job forecasts and the resolution of

⁴⁸ XX Buckingham (Drabkin-Reiter), Inquiry Day 9 PM.

⁴⁹ CD7-39 PDF p.4.

⁵⁰ XIC Kelly, Inquiry Day 17 AM.

⁵¹ XIC Freeman, Inquiry Day 3 AM.

⁵² XIC Kelly, Inquiry Day 17 AM.

⁵³ Inspectors’ Question of Jo Baker, Inquiry Day 5 AM.

concerns around water capacity through further evidence and the publication of a new Water Resources Management Plan.⁵⁴ While it is currently undergoing a process of democratic approval by the Councils prior to public consultation, Mr Kelly confirmed that he does not anticipate any significant deviations or changes being made by members of the two Councils, and certainly not in relation to the spatial strategy or ambitions for key settlements, before the draft Plan is consulted on over the winter.⁵⁵

28. While the policies of the emerging Plan necessarily carry limited weight due to their early stage of preparation, greater weight can be given to the direction of travel of the Cambridge spatial strategy towards growth in new settlements outside the city's historic core and surrounding Green Belt and connected by high quality public transport corridors. That direction was taken as long ago as the late 1990s and has been continually affirmed in the Councils' development plans since then.⁵⁶ Furthermore, following revised modelling regarding the required ratio of housing to support job forecasts, the housing numbers proposed for Cambridge are closely aligned with those which it would be expected to provide under the standard method (by contrast with previous plans where housing figures were higher than required under national policy in order to support increased ambitions for economic growth). The housing need provided for in the emerging Plan can therefore be considered to reflect the up to date housing requirement for the Greater Cambridge area and should attract greater weight.⁵⁷
29. The emerging Plan also confirms the continued strong protection of the Cambridge Green Belt in planning policy and the reliance on growth in settlements outside the Green Belt, connected by public transport infrastructure through the Green Belt, in order to prevent Green Belt release.⁵⁸ As Mr Kelly confirmed, the emerging Plan does not provide for any release of Green Belt land for housing development.⁵⁹ As capacity for new development on the edge of Cambridge has reduced, so new settlements have gained increasing significance for the supply of new housing, a trend which is carried forward into the

⁵⁴ Kelly Supplementary Proof of Evidence, paras.2.1-2.8.

⁵⁵ XIC Kelly Day 17 AM.

⁵⁶ XIC Kelly Day 17 AM; Kelly Proof of Evidence paras.3.1-3.11.

⁵⁷ XIC Kelly Day 17 AM; Kelly Supplementary Proof of Evidence para.

⁵⁸ CD29-71-2 PDF para.2.64 p.69.

⁵⁹ XIC Kelly, Inquiry Day 17 AM.

emerging Plan including through the allocation of further strategic scale development at Cambourne North.⁶⁰

30. Through its focus on new and expanding settlements, the emerging Plan also continues that part of the spatial strategy which protects rural villages from sporadic piecemeal development. In response to concerns raised by CPPF and CPC⁶¹ and other objectors in relation to pressure for development in villages and in the Green Belt as a result of the Scheme passing through those areas, Mr Kelly explained that having regard to the evidence base for the emerging Local Plan there was no basis for the Councils to pursue a spatial or planning strategy that would seek to deliver piecemeal development of those villages. Given the Councils' own evidence regarding the significance of the Green Belt in this location, it would make no sense to develop the Green Belt solely in reliance on infrastructure implemented by the Scheme.⁶²
31. Similarly, concerns regarding water scarcity have been taken into account in the emerging Local Plan and should not be considered as a matter pointing against the making of the Order or the granting of deemed planning permission. Constraints on water capacity are well understood by the Councils and there is a process in place to mitigate potential risks arising from the levels of abstraction and water demand required to facilitate the development identified in the Plan. That process includes plans to transfer new supply from Grafham in 2032 and a new Fens Reservoir from 2036 onwards and the “*staircasing*” or phasing of development in line with those measures.⁶³ As objectors accepted, any impact of water supply constraints on future development coming forward in the Cambourne to Cambridge corridor would be a matter to be considered through the planning application process for those developments.⁶⁴ Furthermore, potential water supply constraints apply equally to *any* future growth in Greater Cambridge, and are not specific to development which would be facilitated by the Scheme.⁶⁵ Ultimately, in response to questions from the Inspectors, Ms Buckingham on behalf of Friends of the

⁶⁰ XIC Kelly, Inquiry Day 17 AM; CD29-71-2 PDF p.73 Figure 12, which illustrates the increase in the relative contribution of new settlements to growth in Cambridgeshire from 18% to 44% of all growth.

⁶¹ Expressed for example at Littlewood Proof of Evidence, para.6.7.

⁶² XIC Kelly, Inquiry Day 17 AM.

⁶³ XIC Kelly, Inquiry Day 17 AM.

⁶⁴ XX Buckingham (Henderson), Inquiry Day 9 PM.

⁶⁵ XX Buckingham (Drabkin-Reiter), Inquiry Day 9 PM.

Cam conceded that water scarcity was not a reason to reject public transport improvements.⁶⁶

32. The further version of the emerging Plan continues to identify and rely on both the Scheme and East West Rail (“EWR”) to support the delivery of housing and employment growth in the Cambourne to Cambridge corridor, including a new allocation of 13,000 homes and 108,000sqm of employment space at Cambourne North.⁶⁷ Given the likely scale and significance of this further new settlement, Mr Kelly explained that it is no longer appropriate to rely on a single piece of public transport infrastructure to connect Cambourne and Cambridge (particularly in the light of the differing routes that the Scheme and EWR will take).⁶⁸ The order and magnitude of the increase in development proposed at Cambourne will result in significant increases in pressure on trips to Cambridge. In that context the Scheme’s importance for helping people to move sustainably between Cambourne and the city of Cambridge is increased.⁶⁹ Mr Kelly explained that the modelling underpinning emerging policies S/CBN Cambourne North and S/CB Cambridge indicates that the Scheme is essential for allowing the scale of development proposed in these allocations to come forward.⁷⁰ Policies for Cambourne in the emerging Plan also emphasise the place-making role of the Scheme in not just connecting Cambourne with Cambridge, but in enabling those living at Bourn Airfield and the surrounding villages to benefit from the increased scale of development at Cambourne, the proposed EWR station and the corresponding benefits in terms of access to services and employment.⁷¹
33. The importance of the Scheme to the emerging planning policy and site allocations for the Cambourne to Cambridge corridor is further emphasised in the Busway Integration Report which part of the evidence base for the emerging Plan. This Report considers how the existing guided busway network could be extended to support the expanded Cambourne and Cambourne North proposals.⁷² It notes in particular that “*the proposed Cambourne to Cambridge (CtoC) Busway will play a vital role in connecting both*

⁶⁶ Inspectors’ Questions of Susan Buckingham, Inquiry Day 9 PM.

⁶⁷ XIC Kelly, Inquiry Day 17 PM; Inspectors’ Questions of Stephen Kelly, Inquiry Day 17 PM; CD29-71-4 Policy S/CBN Point 1, PDF p.5.

⁶⁸ XIC Kelly, Inquiry Day 17 AM.

⁶⁹ XIC Kelly, Inquiry Day 17 AM.

⁷⁰ XIC Kelly, Inquiry Day 17 PM.

⁷¹ CD29-71-4 Policy S/CBN Points 3 and 34(c) PDF pp.5 and 12.

⁷² Kelly Supplementary Proof of Evidence, para.4.7; CD29-71-1.

existing and future development to key destinations in Cambourne and Cambridge, including employment areas, education, and healthcare” but that the full benefits of the Busway will only be realised if it is *“fully integrated with the form and function of the evolving Cambourne settlement”* and with EWR.⁷³ The Scheme is described as a key enabler of development at Cambourne, having regard to current network constraints and the need to tightly integrate Cambourne’s spatial and transport strategies to prioritise a mode shift away from car dependency.⁷⁴ The Scheme is envisaged as combining with EWR services *“to provide a fast, reliable public transport corridor to Cambridge and key employment hubs”*.⁷⁵ As explained by Mr Kelly, this demonstrates the opportunities provided by the Scheme to facilitate the delivery of sustainable growth being taken forward and capitalised on in emerging planning policy.⁷⁶ The route options set out at pp.23-27 of the Report also give an indication of the size of the potential future pool of residents (which run into the 10,000s) from which the Scheme could draw passengers following the development of Cambourne North.⁷⁷

34. The emphasis on the role of both EWR and the Scheme for development in the Cambourne to Cambridge corridor in both the emerging Local Plan and the Busway Integration Report should put to bed any remaining concerns that EWR will make the Scheme obsolete or that the two pieces of infrastructure are not complementary. As emphasised by Mr Kelly, in order to effect behaviour change in terms of mode shift and the ability to satisfy travel needs through public transport it is important that towns and settlements provide a range of public transport choices depending on the purpose or need for which a trip is undertaken. EWR and the Scheme are complementary in the sense that both pieces of infrastructure will, in different ways, enable people to live in Cambourne without needing a car.⁷⁸
35. In any event, objectors’ concerns regarding the impact of EWR on the Scheme and the allegation that EWR would make the Scheme obsolete appear to have largely fallen away. Mr Whitton-Spriggs accepted on behalf of CBAG that factors such as cost, frequency, starting point and destination would influence whether Cambourne residents used the

⁷³ CD29-71-1 at PDF p.3.

⁷⁴ CD29-71-1 at PDF p.7.

⁷⁵ CD29-71-1 at PDF p.7

⁷⁶ XIC Kelly, Inquiry Day 17 PM.

⁷⁷ XIC Kelly, Inquiry Day 17 PM; CD29-71-1 PDF pp.23-27.

⁷⁸ XIC Kelly, Inquiry Day 17 PM.

Scheme or EWR to travel to Cambridge, and ultimately conceded that the two pieces of infrastructure “*are complementary*” and that “*anything that gets private car traffic off roads is advantageous*”.⁷⁹ In re-examination, Mr Leigh confirmed that unlike the CPPF alternative, which he acknowledged was an interim solution,⁸⁰ the Scheme would be a permanent (albeit in his view incomplete) transport solution for Cambourne to West Cambridge even once EWR is in place.⁸¹ Mr Littlewood similarly accepted that the need for a residual public transport scheme in the Cambourne to Cambridge corridor will remain even if EWR is delivered.⁸² CPPF and CPC put forward no evidence to support the claim made in Mr Littlewood’s Proof of Evidence that the cumulative impacts of EWR and the Scheme would be “*unacceptable and unjustified to serve a relatively small population in Cambourne area (even with significant future growth)*”.⁸³ Even if it was correct at time of writing, which is disputed, this claim has been overtaken by the significant increase in housing proposed at Cambourne in the latest version of the emerging Greater Cambridge Local Plan.

Compliance of the Scheme with planning policy

36. As already explained, the Councils through their expert and locally informed officers undertook a comprehensive review of the application and supporting material including the environmental statement and concluded that the submissions were appropriate to allow the Councils to reach conclusions on the heritage and Green Belt balances and the overall planning balance. In the Councils’ view, the overall compliance of the Scheme with the adopted development plan and the limited nature of the residual planning harms justifies the Order being made and deemed planning permission being granted regardless of whether there may be a better or less harmful proposal which could be delivered instead. This is not the kind of exceptional case where the level of harm requires the alternative proposals put forward by CPPF to be taken into account as a matter of law as an “*obviously material consideration*”. Even if they are taken into account, they should

⁷⁹ XX Whitton-Spriggs (Henderson), Inquiry Day 7 AM; XX Whitton-Spriggs (Drabkin-Reiter), Inquiry Day 7 AM.

⁸⁰ XX Leigh (Cameron KC), Inquiry Day 12 AM.

⁸¹ RXN Leigh, Inquiry Day 12 PM.

⁸² XX Littlewood (Drabkin-Reiter), Inquiry Day 15 AM.

⁸³ Littlewood Proof of Evidence, para.3.18.

be given little to no weight for the reasons given below and those provided in the Applicant's oral and written evidence to the Inquiry.⁸⁴

The CPPF alternative

37. Mr Kelly explained that the Councils have not undertaken an independent assessment of the CPPF alternative or sought themselves to develop or suggest any alternative Scheme. Instead, the Councils have considered whether the Applicant's Scheme achieves the objectives set out in the adopted and emerging Local Plans and the TSCSC of contributing to meaningful, substantial shift away from private care use through infrastructure enhancements delivered early in the development process for sites, and whether the Scheme as a transport intervention can effectively deliver a paradigm shift in behaviour for all users.⁸⁵ The Councils consider that the process undertaken by the Applicant for the consideration and development of options over the past 10 years has been thorough and lawful and is sufficient to support the decision to promote the Scheme. On the basis of the evidence provided by the Applicant the Council's view is that the Scheme does achieve the objectives required of it.⁸⁶
38. As they do not present independent evidence on the matter, the Councils therefore rely on and adopt the Applicant's evidence on the CPPF alternative as presented to this Inquiry, in particular in relation to reliability of service, the deliverability, feasibility and safety implications of the proposed changes to Madingley Road, the resultant harms to the SSSI and the heritage significance of the American Cemetery and the further delay to the implementation of public transport improvements that would result from a refusal to make the Order and grant deemed planning permission.

Conclusion

39. As stated in Opening, the Scheme is critically important to enable the delivery of adopted development plan policy and the future expansion of Greater Cambridge in a sustainable and equitable way. The identified planning harms resulting from a scheme of this nature can be minimised appropriately through mitigation schemes and planning conditions

⁸⁴ Applying the approach in CD29-82 *Stonehenge WHS Ltd v Secretary of State for Transport* [2021] EWHC 2161 at paras.268-276.

⁸⁵ XIC Kelly Inquiry Day 17 AM.

⁸⁶ XIC Kelly Inquiry Day 17 AM.

such that the resulting level of residual harm is low and is outweighed by the significant public benefits that the Scheme will bring. The Inspectors are therefore respectfully asked to recommend to the Secretary of State that the Order be made, a direction be granted pursuant to s.90(2A) of the Town and Country Planning Act 1990 and a certificate be issued pursuant to s.19 of the Acquisition of Land Act 1981.

ESTHER DRABKIN-REITER
FRANCIS TAYLOR BUILDING
20 November 2025