

Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne, CB23 6EA

www.greatercambridgeplanning.org



Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minister House
33 Horseferry Road
London, SW1P 4DR

By email only

Case officer: Charlotte Burton
Principal Planner - NSIP and Major Infrastructure Team

E: charlotte.burton@greatercambridgeplanning.org
M: 07745 545085

Our ref. 25/00081/TWA

7 March 2025

Dear Secretary of State,

The Cambridge South East Transport Order

Registration of South Cambridgeshire District Council and Cambridge City Council as Interested Parties

South Cambridgeshire District Council and Cambridge City Council (collectively 'the Councils') received formal notification on 7 January 2025 that Cambridgeshire County Council has applied pursuant to section 6 of the Transport and Works Act 1992, for an Order under sections 1 and 5 of that Act in the terms of the draft Order (draft Order).

This letter, submitted by the Greater Cambridge Shared Planning Service is the formal response by Cambridge City Council and South Cambridgeshire District Council to that notification and seeks to register both Cambridge City Council and South Cambridgeshire District Council as interested parties.

SUMMARY

The proposals make an important contribution towards the provision of public transport and active travel options in the south-east Haverhill to Cambridge corridor and therefore underpin the delivery of the spatial development strategy contained within the adopted Cambridge City and South Cambridgeshire District Council Local Plans (2018). The proposals seek to secure the objectives within the adopted Local Transport Strategy 2014 and the Local Transport and Connectivity Plan 2023. These documents are important to support and facilitate the existing and planned growth in the adopted and emerging development plans within Greater Cambridge, by securing a modal shift from private car use to public transport and active travel. The proposals will improve public transport and cycle connectivity between Cambridge and important employment sites within the internationally significant Greater Cambridge economy and provide alternative, sustainable, travel choices to existing car bourn trips to the Cambridge Biomedical Campus.

Greater Cambridge Shared Planning Service (GCSP) - on behalf of the Councils - has been engaged in pre-application discussions with the applicant over a number of years and welcomes the scheme coming forward to the application stage. However, in reviewing the submission, the Councils have identified several matters which have not yet been resolved to their satisfaction. The Councils request that these matters are resolved before the application is determined to ensure that adequate assessment has been carried out and appropriate mitigation measures have been identified and secured through any consent granted. These matters are covered in the comments below, and are summarised as follows:

1. Analysis of the scheme's alignment with the Cambridge South Station, East West Rail and Sawston Greenway schemes.
2. Updated ecology surveys, and resulting assessment and identification of mitigation measures.
3. Further consideration of the construction impact on Hobson's Brook and Nine Wells Local Nature Reserve, and consideration of alternative proposals and/or mitigation measures.
4. Further assessment of the operational impact on Hobson's Brook, and consideration of alternative proposals and/or mitigation measures.
5. Further scrutiny of Biodiversity Net Gain calculations and confirmation of how long-term management and maintenance arrangements will be secured.
6. Further consideration and assessment of construction and operational lighting.
7. Further clarification on Landscape Visual Impact Assessment.
8. Clarification of impact on trees.
9. Further discussion on detailed design and Design Principles.

10. Further discussion to agree planning conditions.

GCSP has raised these matters with the applicant before submitting this representation, with a view to engaging in further discussions to resolve them as far as possible before this application progresses to the public inquiry. GCSP will provide an update on these discussions and the Councils' position on these matters before the start of the public inquiry.

ROLE OF THE SCHEME IN DELIVERING THE OBJECTIVES OF THE DEVELOPMENT PLAN

The CSET scheme directly addresses the objectives of the adopted and emerging development plans for Cambridge and South Cambridgeshire, and the local transport policy framework for the area south of Cambridge that supports these. CSET will deliver one of the schemes identified in the Local Transport Plan to support locally, regionally and nationally important growth in this area, including at the Cambridge Biomedical Campus (CBC). CSET is supported in principle by the policy framework set out as follows.

The adopted and emerging development plans identify significant areas of growth in the area south of Cambridge including the CBC:

The adopted Cambridge Local Plan 2018 includes the site allocation for the Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change within policy 17 for development required to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities, related higher education and other medical research institutes, with associated support activities. South Cambridgeshire Local Plan 2018 includes a site allocation for the Cambridge Biomedical Campus Extension within policy E/2 to support the site's continuing development, alongside enabling further development at Granta Park (SCLP 2018 policy E/15).

The emerging Greater Cambridge Local Plan (as set out in the First Proposals 2021 consultation) identifies a further allocation at the Biomedical Campus (Policy S/CBC) to continue to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities, related higher education and sui generis medical research institutes, associated support activities to meet the needs of employees and visitors, as well as residential uses for affordable and key worker homes for campus employees. The First Proposals also identified an allocation at Babraham Research Campus (Policy S/BRC) to support the continued success of this nationally important facility, alongside further policies to support the expansion of the Wellcome Genome Campus (Policy S/GC).

The adopted local transport policy objectives seek to enable sustainable growth in these areas and identify CSET as a central solution to manage transport impacts:

The Cambridgeshire County Council Transport Strategy for Cambridge and South Cambridgeshire (2014) supported the adopted Cambridge and South Cambridgeshire

Local Plans 2018. It identified the Haverhill to Cambridge Corridor as one of seven major corridor programme areas. It highlighted the cluster of research and knowledge-based sites (Granta Park, the Babraham Research Campus and nearby at the Genome Campus) within close proximity to each other, and the role of Cambridge as a regional centre for employment, retail and primary healthcare for people living in Haverhill. The Strategy recognised the problem of congestion on the A1307 which slows journeys for cars and buses and highlighted the significant potential for this to worsen with development at Granta Park, Babraham Research Campus and Haverhill.

The 2014 Strategy aimed to create a high-quality passenger transport corridor which offers a real alternative to using the private car for trips between Haverhill and Cambridge. Due to the lack of rail service, bus services were the focus for passenger transport within the corridor. A busway/high quality passenger transport corridor and an additional Park and Ride site was planned in the longer-term. The proposed CSET scheme - providing a segregated off-road busway and Travel Hub - would therefore meet these objectives within the 2014 Strategy.

The adopted Local Plan policies reflected the 2014 Strategy: CLP 2018 policy 17 referred to above supports measures to enhance access to the campus including for cyclists, pedestrians, wheelchair users and other disabled people, and mitigate the impact on the existing road network and parking in the surrounding area. It also supports provision for the extension of existing conventional bus services, busways and Park and Ride services to meet the needs of the resident and working populations, including disabled people. SCLP 2018 policy E/2 referred to above requires measures to enhance access to and within the Cambridge Biomedical Campus including provision for cyclists, pedestrians, wheelchair users and people with other disabilities, and mitigate impacts on the wider road network and parking in the surrounding area.

The up-to-date Local Transport Plan for the area - the Cambridgeshire and Peterborough Combined Authority Local Transport and Connectivity Plan (LTCP) 2023 – identifies six goals: productivity (including supporting housing and employment growth); connectivity; climate; environment; health; and safety. The CSET scheme directly addresses each of these goals. The LTCP 2023 identifies CSET, alongside the other GCP corridor schemes, as essential to linking the growing communities along [the Haverhill-Cambridge] corridor. Beyond this, the LTCP identifies CSET's role, alongside Cambridge South Station, in catering for the significant number of people who will be working at CBC, and linking the campus to other major employment sites along the A1307 corridor towards Haverhill, connecting the internationally significant life sciences and research and development clusters at Babraham Research Campus and at Granta Park.

The emerging development plan reflects the LTCP 2023 in acknowledging the central role that CSET will play to the transport strategy for the area south of Cambridge. The emerging Local Plan allocation at CBC referred to above identifies that delivery of further growth is dependent on ensuring that the level of vehicle trips is limited to an appropriate level for the surrounding road network. Transport evidence supporting the First Proposals assumed delivery of CSET, alongside Cambridge South Station, as the central mitigation enabling this. As such, the CSET scheme would make an important

contribution towards reducing dependency on private car by providing a high quality public transport and active travel route.

The importance of growth in this area south of Cambridge and at the CBC has national importance to the UK economy and local studies emphasise the need for sustainable transport to support growth:

Beyond the local development plan, the Case for Cambridge published by the previous Government in March 2024 sets out the importance of Cambridge as a leading centre of science and innovation and its contribution to the UK economy. It highlights the opportunities to grow the city. The Cambridge Delivery Group established by the Government will focus on enabling and accelerating key developments that align with the overall strategy for growing the urban area of Cambridge and spreading the benefits to the wider region. It identifies the specific opportunities to expand the CBC and Addenbrooke's Hospital, supported by £7.2 million investment for locally-led transport schemes serving the CBC. The CSET scheme directly delivers this.

Building upon the emerging Greater Cambridge Local Plan First Proposals, GCSP commissioned Icen Projects Limited to prepare a report on 'Greater Cambridge Growth Sectors Study: Life science and ICT locational, land and accommodation needs' (September 2024). The report emphasizes the importance of life sciences and ICT sectors to the economy of Greater Cambridge. It highlights that the success and growth of these sectors requires good public transport, connectivity and place-making. As a scheme identified in the up-to-date Local Transport Plan, the CSET scheme makes an important contribution to providing sustainable transport to meet the local and national objectives for growth.

In summary:

The CSET scheme would achieve the objectives of the adopted local transport plans which support the existing and planned growth of employment and residential areas within the adopted and emerging development plans, including the locally, regionally and nationally significant CBC.

DETAILED MATTERS TO BE RESOLVED PRIOR TO DETERMINATION

This is a summary of the matters the Councils request are resolved prior to determination of the application to ensure that adequate assessment has been carried out, and appropriate mitigation measures have been identified and secured through any consent granted. Further details will be provided in the Councils' Statement of Case in due course.

1. Analysis of the scheme's alignment with the Cambridge South Station, East West Rail and Sawston Greenway schemes.

The Cambridge South Station (CSS) is located at the northern end of the scheme's red line boundary on Francis Crick Avenue. The integration of the CSET scheme with the CSS is critical to achieving successful multi-modal travel and to place-making within the

CBC. The CSS includes works to widen the railway line to the south of Addenbrooke's Road and environmental mitigation along both sides of the railway line. This includes land within the red line of the CSET application boundary. The site plans do not currently show the widened track or environmental mitigation that has been approved within those areas. It is important that these are shown on the drawings so that the alignment of the two schemes and their cumulative impact can be properly assessed. This includes any impact that the CSET scheme may have on the approved CSS environmental mitigation and biodiversity net gain. It is also important to have information on how the construction programmes align so that cumulative impacts can be properly assessed. The applicant should explain how they have engaged with Network Rail to avoid conflict.

The Sawston Greenway is a GCP scheme to provide an active travel route through Sawston, Stapleford, Shelford and the CBC. The scheme is currently at detailed design stage and may come forward under permitted development rights or requiring planning applications to be submitted. It includes plans to widen and light the existing DNA path to the east of the railway line. This includes land within the red line of the CSET application. It is important to understand the relationship between these two schemes which both appear to be making improvements to the same piece of infrastructure. The CSET scheme realigns the DNA path and a situation must be avoided where improvements to the DNA path made under the Sawston Greenway scheme are 'undone' by the CSET scheme. The applicant should explain how the two schemes align to ensure they are complementary and to minimise disruption to users of the DNA path as much as possible.

Proposals for East West Rail were published for non-statutory public consultation in December 2024/January 2025. The scheme is an important component supporting growth within the 'Oxford to Cambridge Arc' which has been given fresh support by the current Government. The CSET scheme includes land within the Safeguarding Area of the East West Rail scheme to the east of the railway. This includes land for the busway and active travel route, and potentially includes areas for environmental mitigation and construction compounds. There is limited information about what this area is intended for in the East West Rail proposals. The applicant should provide more information about how they have engaged with the East West Rail Company to ensure alignment in terms of land use and construction programmes within this area to avoid conflict.

2. Updated ecology surveys and resulting assessment and identification of mitigation measures.

The majority of ecological surveys - with the exception of the habitats survey and the winter breeding birds survey - were carried a number of years ago and are now considered out of date. As a result, the Councils are not yet satisfied that the surveys provide a reliable basis for assessment or identification of appropriate mitigation. Updated surveys must be provided along with updated assessment and mitigation measures, which must align with updated landscape plans. The applicant has informally advised that these surveys will be updated before the public inquiry. The Councils welcome this and request sufficient time for officers to review and comment on any new information.

3. Further consideration of the construction impact on Hobson's Brook and Nine Wells Local Nature Reserve (LNR), and consideration of alternative proposals and mitigation measures.

Hobson's Brook is an Awarded Watercourse to the City Council and a designated chalk stream. The City Council has been actively engaged in its restoration through the Greater Cambridge Chalk Stream Project. The Nine Wells LNR has the springhead which is the source of the brook. Therefore, construction and operational works within the area of the LNR and the brook have the potential to impact on this important chalk stream.

The proposed construction compound to the north of Hobson's Brook is positioned in close proximity to the Nine Wells LNR and its boundary encompasses the brook on its southern side. This poses a significant risk of pollution to the brook during construction. The Councils request further information on whether alternative locations have been considered for the construction compound in areas further away from Hobson's Brook to mitigate the potential environmental risks.

If this is not possible, then the site compound boundary must be set back from Hobson's Brook, excluding the brook's banks and allowing sufficient easement to maintain access and wildlife corridor. Further discussions are also required on the detailed wording of an appropriate condition to secure surface water drainage mitigation measures to avoid pollution entering the brook during construction.

Additionally, the Councils understand that the temporary bridge that crosses Hobson's Brook - in a sensitive location as it exits the Nine Wells LNR - will only be used for the diverted DNA path by cyclists and pedestrians. If the bridge will be used by construction vehicles, then the Councils request further discussions on the design of the bridge to ensure no additional run-off or pollution enters the brook.

4. Further assessment of the operational impact on Hobson's Brook, and consideration of alternative proposals and mitigation measures.

The proposed Attenuation Pond 1 and Ecology Pond to the south of Hobson's Brook would be in close proximity to the Nine Wells springhead. The location of these ponds may influence groundwater levels, potentially affecting the Nine Wells springhead and subsequently the flow of the brook. This would affect the ecological value of this important chalk stream.

The Councils request further assessment of the impact of the ponds on groundwater levels and flow into the brook to be carried out. The Councils request that the ponds are repositioned further from the Nine Wells springhead and Hobson's Brook to avoid any potential issues. As this affects the proposed site plans and the drainage strategy, this matter must be resolved prior to determination.

5. Further scrutiny of Biodiversity Net Gain calculations and confirmation of how long-term management and maintenance arrangements will be secured.

Overall, the Councils welcome the applicant's target of achieving 20% biodiversity net gain (BNG). However, as a matter of course, the applicant must provide copies of the data to validate the BNG calculations. In addition, the applicant must confirm that long-term management and maintenance arrangements are in place with landowners for onsite and offsite provision, and must demonstrate how this would be secured through any consent granted. This may require Section 106 Agreements or Conservation Covenants which should be in place prior to determination.

6. Further consideration of construction and operational lighting.

The proposed compound to the south of Addenbrooke's Road would have perimeter lighting for security reasons. As described above, this compound lies directly adjacent to the Nine Wells LNR where Noctule and Pipistrelle bats have been recorded foraging and commuting, with Barbastelle bats recorded nearby. This could have more than a minor impact, with a more likely adverse significance. As well as considering alternative locations for the site compound, the Councils request further discussions on the impact on commuting and foraging bats during construction to consider security lighting within compounds, and on a lighting design to suit ecologically sensitive receptors.

In addition, the operational phase will require a sensitive lighting scheme along the route and at the Travel Hub. Barbastelle bats were detected in the area around the Travel Hub. This species is very light-averse and therefore any new lighting in this area will have an impact. Given the very rare status of this species, officers consider that there would be a minor impact with slight adverse but not significant result. As there will be operational safety and security requirements for the lighting scheme, further discussions are requested on the lighting design to ensure a sensitive lighting scheme can be achieved as much as possible before the application is determined, as this may require changes to the site layout.

7. Further clarification on Landscape Visual Impact Assessment (LVIA).

Some clarification is required on areas identified within the LVIA to take account of recently completed developments near to the route and the proposed solar canopies at the Travel Hub, to ensure a robust assessment of the scheme. This is required prior to determination to ensure adequate assessment of the scheme's impact on the landscape and identification of appropriate mitigation.

8. Clarification on impact on trees.

Clarification is sought on the proposals for tree 'AT025' - a mature Oak - within the Travel Hub and the existing plane trees (CT051 to CT077 and CT121 to CT123) on Francis Crick Avenue (which have been included within the submission notwithstanding that it is understood these works will be carried out under permitted development rights). There is currently some inconsistency between the documents submitted which should be clarified prior to determination to ensure appropriate protection and/or mitigation is secured.

9. Detailed design and Design Principles.

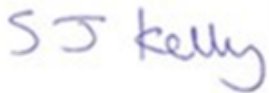
The Councils raised several matters about the detailed design of the scheme at the pre-application stage which have not been addressed in the submission. In summary, these matters relate to the detailed design of the Travel Hub, the bus stop areas and landscaping, with respect to layout, accessibility, landscaping, sustainability and design. Further detail will be provided in the Councils' Statement of Case. The applicant has informally advised that these matters will be resolved through further discussions on the detailed design at the discharge of condition stage. However, some of these matters relate to elements shown on the submitted plans listed for approval in the Request for Deemed Planning Consent. Therefore, the Councils are concerned that there would not be scope for changes to be made at the discharge of condition stage. These matters must be resolved prior to determination. Alternatively, the plans must be amended to remove these detailed elements, and appropriately worded conditions put in place to secure approval at a later stage, with appropriate references made within the Design Principles document to guide the detailed design.

10. Planning conditions.

Further discussions are required to agree the appropriate wording of planning conditions, including some additional conditions sought by consultees. GCSP expects to agree a final draft of proposed planning conditions with the applicant in a Statement of Common Ground before the public inquiry.

If further clarification is required in respect of the comments made, please contact my team. The Councils will also continue to reserve their right to appear before any public examination of the proposals in due course.

Yours sincerely,



Stephen Kelly

Joint Director of Planning

On behalf of South Cambridgeshire District Council and Cambridge City Council