Proof of Evidence – Planning

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BW4B - BETTER WAYS FOR BUSWAYS

Ref. TWA/25/APP/01

TRANSPORT AND WORKS ACT 1992:
THE PROPOSED CAMBRIDGESHIRE COUNTY COUNCIL AND GREATER CAMBRIDGE PARTNERSHIP, CAMBRIDGE SOUTH EAST TRANSPORT ORDER ('CSET2')

November 2026

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1. QUALIFICATIONS AND EXPERIENCE

1.1 My name is Steven Andrew Stroud, and I am a chartered town planner (MRTPI). I hold undergraduate honours degrees in History and Law and a master's degree (MSc, School of Geography and the Environment) from the University of Oxford. I hold a further master's degree (MA) in Town and Country Planning from the University of the West of England and was awarded a master's degree through research (MRes) by the University of Salford in respect of an extended inquiry into the effects of public art as a tool for place making. I recently graduated with an IHBC-accredited MSt degree in Building History from the University of Cambridge.

1.2 I have been involved in an extensive range of development proposals, including large-scale (>1000 dwellings) mixed-use urban extensions, brownfield regeneration and >1 million sq. ft enterprise parks, leisure (including 'SnOasis': once proposed to be Europe's largest indoor winter sport resort), retail, infrastructure and renewable energy, specialist accommodation, and other development of varying scales including involvement in Nationally Significant Infrastructure Projects.

1.3 I am currently a Director at James Bailey Planning; a specialist planning consultancy working for national and regional housebuilders and promoters, other private clients, and the public sector. Prior to this I was the acting Chief Planning Officer for Babergh and Mid Suffolk District Councils, having previously managed their Strategic Projects team for several years, latterly holding the post of Strategic and Professional Lead – Development Management and Heritage.

1.4 I have appeared as an expert witness at numerous public inquiries and hearings.

1.5 The evidence that I have prepared and provide for this Inquiry is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

2. SCOPE AND STRUCTURE OF EVIDENCE

2.1 This proof of evidence ('Proof') is prepared on behalf of Better Ways for Busways ('BW4B') in relation to the application for the Cambridge South East Transport Order. It addresses the planning merits of the proposed scheme, referred to in this proof as 'CSET2', and the associated request for deemed planning permission.

2.2 My Proof considers the justification for the proposed development in the light of the relevant policy framework, its anticipated benefits, its environmental and other adverse effects, and the availability of reasonable alternatives. It informs an assessment of whether making the Order and granting the associated deemed planning permission would be justified in the public interest bearing in mind also that it would involve the compulsory purchase of land for which there must be a compelling case in the public interest.

2.3 I recognise the importance of improving sustainable transport provision and accessibility in the Cambridge south east corridor, and I understand that BW4B does not challenge the principle or need for such provision generally. The existence of that need does not, however, determine whether the particular alignment and infrastructure proposed *in this case* are justified. My assessment therefore examines the relationship between the benefits claimed for CSET2 and the effects arising from the means chosen to deliver them, against the alternative promoted by BW4B ('BW4B Alternative').

2.4 My Proof should be read alongside the transport evidence of Mr Neil Rowe and the landscape evidence of Mr Peter Leaver. Mr Rowe addresses the transport case and the BW4B Alternative advanced by BW4B in comparison to CSET2. Mr Leaver addresses the comparative landscape and visual effects, including the physical and perceptual effects relevant to Green Belt openness and its purpose (c). I rely upon their specialist evidence and explain its implications for my planning assessment.

2.5 My scope includes the application of planning policy, the assessment of Green Belt appropriateness, and the weighing of the benefits and adverse effects of the proposals. I also consider the planning significance of the BW4B Alternative as a material consideration, including the extent to which it could meet the identified transport objectives with less adverse environmental effects.

2.6 Section 3 provides the background to my evidence and identifies the principal issues. Section 4 explains the decision-making framework and relevant planning policies. Section 5 contains my assessment of the substantive issues, drawing together the specialist evidence where appropriate. Section 6 presents the overall balance of considerations and my conclusions; it can be read as a Summary Proof.

3. BACKGROUND AND MAIN ISSUES

The Proposed Scheme

3.1 Cambridgeshire County Council is the applicant for the proposed Cambridge South East Transport Order. The scheme has been developed by the Greater Cambridge Partnership and comprises Phase 2 of the Cambridge South East Transport project; hence, 'CSET2'. Phase 1 comprises road safety, walking, cycling and bus priority measures along the A1307 between Cambridge and Haverhill. The present application concerns the proposed guided busway, Travel Hub and associated infrastructure. [**CD1-15.01, paragraphs 1.1 and 1.14-1.15**]

3.2 As submitted, CSET2 comprises approximately 8.5 kilometres of busway connecting a Travel Hub near the Fourwentways junction with the Cambridge Biomedical Campus ('CBC'). It includes three intermediate stops serving Great Shelford, Stapleford and Sawston, and an adjoining emergency and maintenance access track which would also provide an active travel route. The Travel Hub would provide 1,250 car parking spaces. The proposals also include bridges, highway alterations, earthworks, drainage, lighting and landscaping. [**CD1-15.01, paragraphs 1.3, 2.6 and 3.1**]

3.3 Much of the proposed route would cross agricultural land to the north-east and east of Great Shelford, Stapleford and Sawston, including crossings of the River Granta. The busway outside the CBC and the proposed Travel Hub lie within the Cambridge Green Belt. In December 2021, outline planning permission was granted on appeal for a retirement village and associated countryside park on the edge of Stapleford, with reserved matters subsequently approved. The CSET2 alignment would run between the retirement village and the proposed country park, introducing a new transport corridor across land intended to provide public access and recreation [**CD3-23.1, paragraph 8(c)**].

BW4B's position and the BW4B Alternative

3.4 BW4B's Statement of Case acknowledges the need, in principle, to improve accessibility and provide reliable public transport serving Haverhill, Linton and the wider area to the south and east of Cambridge. Its objection concerns the justification for the particular scheme promoted and whether the identified transport objectives could be met through an alternative involving less environmental harm and lower expenditure. [**CD3-23.1, paragraph 2**]

3.5 The BW4B Alternative is described in Mr Rowe's transport evidence, having been foreshadowed in the '*BW4B Alternative Proposal*' document which accompanied the group's Statement of Case [**CD3-23.2**]. The BW4B Alternative would retain the proposed A11 Travel Hub and make greater use of the A1307 corridor, combining sections of bus priority with operation in general traffic. It would combine improvements along the existing A1307 corridor with a new connection of approximately 1.65km between Hinton Way roundabout and the CBC. As explained by Mr Rowe, part of the proposed CBC connection could ultimately operate along the Southern Gateway road envisaged as part of the campus expansion, reducing the extent of dedicated new busway required. [**Mr Rowe's proof, section 2.**]

3.6 In my opinion, the planning assessment ought to address both proposals given the detailed scheme that has been worked up by BW4B, which is more than vague or inchoate. This includes the effects and delivery requirements of the BW4B connection into the CBC, as well as the advantages claimed for using the existing highway corridor.

3.7 The applicant has assessed an 'on-road option' in **CD12-12**. That assessment reports stronger economic performance for the promoted scheme, while also concluding that the on-road option would have less environmental impact overall. It identifies

additional advantages and constraints which require consideration, including active travel provision, biodiversity enhancement, land requirements and the relationship with development at the CBC. Mr Rowe deals with the implications of **CD12-12** in his proof, from a transport perspective.

Main issues

3.8 The central question for my evidence is whether the benefits of the particular development proposed justify its adverse effects and the powers sought, having regard to the relevant policies and reasonable alternatives. This requires consideration of the benefits CSET2 would provide, the additional advantages claimed over the BW4B Alternative, and the environmental consequences of achieving those advantages.

3.9 Within the scope of my planning evidence and in this Proof, I identify the following principal issues:

a. The need for the scheme and the weight to be given to its anticipated benefits.

b. The landscape, visual and other environmental effects relevant to the planning assessment, including the extent to which those effects would be avoided, reduced or remain following mitigation, during construction and operation.

c. The application of Green Belt policy, including whether the development falls within a category which is not inappropriate, whether its impact on openness has been minimised, and its effect upon the purposes of the Green Belt. Where the development is inappropriate, the assessment must also address whether very special circumstances ('VSC') exist.

d. The significance of the BW4B Alternative, having regard to its ability to meet the identified transport objectives, its environmental effects, comparative costs and benefits, and the practical requirements for its delivery.

e. Whether, taking these matters together and considering how the anticipated benefits and mitigation would be secured, the planning case supports making the Order and granting deemed planning permission. This includes the planning justification relevant to the compulsory acquisition powers sought.

3.10 My assessment brings the relevant findings together under the decision-making framework set out in section 4.

4. STATUTORY DUTIES AND POLICY CONTEXT

4.1 This section identifies the framework within which I assess the planning merits of CSET2. It addresses the decision whether to make the Order, the associated request for deemed planning permission, and the justification for compulsory acquisition. It then identifies the relevant development plan policies, national planning policy and other material considerations.

Statutory Framework and Approach to Decision

4.2 The application falls to be determined under the *Transport and Works Act 1992* ('1992 Act'). Section 13(1) provides for the Secretary of State to make an Order giving effect to the proposals, with or without modifications, or to decline to make an Order. The associated request for deemed planning permission is made under section 90(2A) of the *Town and Country Planning Act 1990* ('1990 Act'). That provision enables the Secretary of State, when making the Order, to direct that planning permission be deemed to be granted, subject to any conditions specified in the direction.

4.3 The Department for Transport's guidance, *'Transport and Works Act orders: a brief guide'*, explains that the purpose of the procedure is to enable an informed decision on whether making the Order would be in the public interest. Its section entitled 'The Secretary of State's decision' identifies the relevant considerations as including local and national planning policy, the need for the scheme, environmental and community impacts and proposed mitigation, whether the scheme can reasonably be funded, and whether any proposed compulsory acquisition is justified.

4.4 Alternatives are expressly relevant to the decision, where section 13(2) of the 1992 Act permits the Secretary of State to decline to make an Order where any of its 'objects' *could be achieved by other means*. This therefore provides an express basis for

considering whether other means of achieving the objectives affect the justification for the proposals before the Inquiry, and in this case that would mean consideration of the BW4B Alternative promoted by BW4B.

4.5 I approach the application and associated request for deemed planning permission on the basis that the statutory presumption in favour of the development plan in section 38(6) of the *Planning and Compulsory Purchase Act 2004* ('2004 Act') does not strictly govern their determination. However, I understand it to be common ground that local (and also national) planning policies nevertheless remain important considerations in deciding whether the Order should be made and deemed planning permission granted (in accordance with the guidance quoted above). My evidence therefore assesses the proposals against the relevant policies, identifies any accordance or conflict, and explains the weight I attach to those findings. In particular, the Green Belt policy tests inform the assessment of acceptability and the wider public interest judgement that needs to be made.

4.6 In addition, the compulsory acquisition powers require a compelling case in the public interest sufficient to justify interference with the rights of those affected. This includes consideration of whether the land and rights sought are required for implementation of the scheme and whether their acquisition is proportionate. My evidence addresses the planning considerations bearing upon that justification, including the need for the development, its benefits and adverse effects, and the significance of reasonable alternatives.

Development Plan

4.7 The Scheme crosses the administrative boundary between South Cambridgeshire and Cambridge City. The principal development plan documents relevant to the land affected by the Scheme, together with their accompanying policies maps, are:

- Cambridge Local Plan, adopted October 2018 [**CD8-01**];
- South Cambridgeshire Local Plan, adopted September 2018 [**CD8-02**];
- Cambridge Southern Fringe Area Action Plan, adopted February 2008 [**CD8-14**];
- Cambridgeshire and Peterborough Minerals and Waste Local Plan, adopted July 2021 [**CD8-03**]; and
- Stapleford and Great Shelford Neighbourhood Plan, made 2 October 2025.

The made Neighbourhood Plan forms part of the development plan. It supersedes the emerging version currently identified as **CD8-13**.

4.8 In assessing these policies, I have regard to their consistency with the current National Planning Policy Framework ('NPPF'). Paragraph 2 of Annex A to the NPPF provides that development plan policies, or parts of policies, which are materially inconsistent with its national decision-making policies should receive very limited weight, subject to the exception for plans examined and adopted or made against the current Framework. Other policies should not receive reduced weight merely because they predate it. Accordingly, I assess the relevance and weight of individual provisions, rather than treating the age of a plan as determinative.

4.9 Policy S/4 of the South Cambridgeshire Local Plan and Policy 4 of the Cambridge Local Plan identify the extent of the Cambridge Green Belt and direct the assessment of development within it to national Green Belt policy. I therefore assess the Scheme's Green Belt acceptability against the current Framework, including the exception in GB7(1)(f) upon which the Applicant has confirmed that it intends to rely (at the Pre-Inquiry Meeting on 20 October 2026 ('PIM')). I address that national policy framework below.

4.10 South Cambridgeshire Policy NH/8 also addresses the location, design and landscaping of development within the Green Belt. Its first limb requires

development to avoid adverse effects on rural character and openness. Insofar as that provision would impose an absolute requirement to avoid any adverse effect on openness (which would have been consistent with previous iterations of the NPPF), it is materially inconsistent with the 'minimisation' test now found in GB7(1)(f). I give that aspect very limited weight in accordance with Annex A. The remaining provisions require consideration on their own terms. In particular, landscape mitigation and design remain relevant and are consistent with national policy, but cannot substitute for the correct application of the national Green Belt tests.

4.11 Landscape character and the setting of settlements are also addressed by policies operating separately from the classification of development in the Green Belt. South Cambridgeshire Policies NH/2 and HQ/1 seek development which responds appropriately to landscape character, local distinctiveness and its surroundings. Policy 8 of the Cambridge Local Plan addresses the city's setting and urban edge, while Policies 55 and 59 concern contextual design, landscape and the public realm. These provide a framework for assessing the planning implications of Mr Leaver's evidence, alongside the relevant national policies.

4.12 The development plan also supports sustainable transport and employment growth. South Cambridgeshire Policy TI/2 promotes sustainable travel, while Policies E/2 and E/15 provide the policy context for the Biomedical Campus extension and established employment areas, including Granta Park. Cambridge Policies 5 and 80 support sustainable transport and accessibility. Policy 17 supports the CBC and expressly addresses improved access and provision for bus, Busway and Park and Ride services, alongside landscape requirements. Policy 5's support for transport schemes is qualified by the need for appropriate, current assessment and consultation.

4.13 The Cambridge Southern Fringe Area Action Plan remains relevant to the northern part of the Scheme. Policy CSF/5(2) provides for a Countryside Enhancement

Strategy for the area between Cambridge, Babraham Road, Haverhill Road and the built-up edges of Great Shelford and Stapleford. Its objectives encompass landscape, biodiversity and public access improvements.

4.14 The made Stapleford and Great Shelford Neighbourhood Plan adds more detailed requirements within its neighbourhood area, noting that it has only formed part of the development plan since after the application was made. Policy S&GS 12 addresses landscape and settlement character, including the villages' separate identity from Cambridge and the contribution of identified Visually Important Open Land. It requires proportionate landscape and visual assessment where adverse effects are identified, appropriate mitigation and refusal where significant landscape character harm remains after mitigation.

4.15 I apply the relevant policies to the evidence in Section 5 and bring those findings into the overall planning balance in Section 6. The emerging Greater Cambridge Local Plan is considered separately below under other material considerations.

The National Planning Policy Framework

4.16 A new NPPF was published on 17 August 2026, after the application was made. Its national decision-making policies are a 'critical' material consideration in assessing the planning merits of the Scheme within the statutory framework described above. Its policies must be read together, including their relevant footnotes and annexes.

4.17 Policy S3 establishes the approach to the presumption in favour of sustainable development. Where a proposal is partly within and partly outside a settlement, S3(2) requires S4 and S5 to be applied to the relevant parts before reaching an overall view. Although S5(1)(a) includes transport infrastructure among the forms of development supported outside settlements, S5(5) directs proposals within the Green Belt to the specific Green Belt policies elsewhere in the Framework. In my view, given that the

majority of the CSET2 proposal (and BW4B Alternative) relate to land outside of settlements and in the Green Belt, national decision-making policy GB7 is of fundamental importance because this establishes whether a development proposal would or would not be appropriate in the Green Belt.

4.18 As above, at the PIM the Applicant confirmed its reliance on GB7(1)(f). For transport infrastructure, GB7(1)(f)(i) requires a Green Belt location to be necessary, the effect on openness to be minimised, and significant conflict with Green Belt purposes to be avoided, which I appreciate is a more flexible approach to the wording of the previous NPPF.

4.19 Accepting that a Green Belt location is inevitably going to be necessary for either CSET2 or the BW4B Alternative, the key policy tests, which both must positively address, are:

a. Whether the impact on the openness of the Green Belt is minimised; ***and***
b. Whether there would be a significant conflict with the Green Belt purposes.

4.20 The Planning Practice Guidance ('PPG') explains that the assessment of openness requires a judgement informed by the circumstances of the case. Relevant considerations can include spatial and visual effects, the duration and reversibility of development, and the activity it generates; indeed, the PPG expressly recognises that this includes 'the degree of activity likely to be generated, **such as traffic generation**' (my emphasis). Openness is therefore not assessed solely by reference to visibility or the effectiveness of screening. I rely upon Mr Leaver's evidence concerning the physical and perceptual effects of the works and their operation in this regard. [**PPG, paragraph 013, Reference ID: 64-013-20250225.**]

4.21 In my judgement, a sufficiently defined and practical alternative (e.g. the BW4B Alternative) meeting the relevant transport objectives with appreciably less interference with openness is relevant to a judgement as to whether effects have been

minimised. Such considerations are undertaken separate to a question of if and to what extent there would be any conflict with any of the Green Belt purposes (which for the purposes of Mr Leaver's evidence focuses upon purpose (c)).

4.22 Under GB6, development outside the GB7 exceptions is *inappropriate*. Approval then requires very special circumstances ('VSC'): other considerations must *clearly outweigh* harm from inappropriateness and all other harm, with substantial weight given to Green Belt harm. This in my view is a high hurdle.

4.23 If GB7 is satisfied, the Framework excludes Green Belt harm and any requirement for VSC. Separate adverse effects, including landscape harm, remain relevant and must be identified and assessed on their own merits.

4.24 In that event, NPPF S5(5) requires approval unless adverse effects would substantially outweigh the benefits when assessed against the national decision-making policies. It also requires application of S5(2), which identifies conflict with policies expressly requiring refusal in specified circumstances as a situation in which that balance is likely to arise.

4.25 The national decision-making transport policies provide support for sustainable movement while requiring consideration of environmental effects. TR3 addresses sustainable locations and connectivity, including opportunities to improve rural public transport and active travel. TR3(1)(d) expressly requires the environmental effects of traffic and infrastructure to be assessed, with opportunities taken to avoid or mitigate adverse effects. TR4 addresses access, design and the prioritisation of sustainable modes. TR8 concerns protection and improvement of public rights of way. These policies are relevant both to the claimed benefits and to the effects on existing routes and their users.

4.26 TR6 requires proportionate transport assessment and consideration of reasonable future scenarios, including cumulative effects and travel by different modes. It also identifies severe residual network impacts and unacceptable highway safety effects as grounds for refusal, during construction as well as operation. I draw upon Mr Rowe's evidence when assessing these matters and the extent to which the transport benefits relied upon are supported by the evidence.

4.27 Other relevant national policies include CC2, N2 and DP3. Of particular importance are N2(1)(a) and (b), which address landscape character and the quality of agricultural land, and DP3, which requires development to respond to its context and integrate with its surroundings. DP3(3) provides that proposals should be refused where, without clear justification, they conflict with the requirements of DP3(1) or relevant aspects of DP3(2). I consider the application of these policies in Section 5.

Other Material Considerations

4.28 The wider transport policy context includes the Cambridgeshire and Peterborough Local Transport and Connectivity Plan (2023) (**CD8-09**), the Combined Authority's Bus Strategy (2023) (**CD8-11**), and the Transport Strategy for Cambridge and South Cambridgeshire (2014) (**CD9-07**). These documents support investment in sustainable transport, improved accessibility and infrastructure capable of accommodating growth. The contribution which the proposed scheme and the BW4B Alternative would make towards them is relevant to my assessment of their respective planning merits.

4.29 The Greater Cambridge City Deal and the Government's statements concerning Cambridge's economic potential provide further context for investment in infrastructure. The Government's letter to local leaders dated 23 August 2024, included at **CD9-10**, identifies the importance of addressing constraints on sustainable growth, including transport congestion. I recognise the national

significance of Cambridge's economy and the contribution which improved access to its employment, research and healthcare facilities can make.

4.30 The Cambridge Biomedical Campus Supplementary Planning Document was adopted by both Councils in April 2025. It therefore supersedes the consultation draft referred to in the Applicant's Planning Statement. Paragraph 3.33 expressly identifies the CSET project, alongside Cambridge South station, as an opportunity to improve connectivity and reduce car use. Development principles 4d.2 and 4d.3 promote integration with surrounding communities and sustainable transport connections. The SPD provides guidance for the existing Campus and its allocated development phases; it does not itself allocate further expansion.

4.31 The emerging Greater Cambridge Local Plan is capable of being a material consideration, where consultation on the Proposed Submission Plan (Reg 19) took place between 3 August and 25 September 2026. Policy DM4 of the NPPF provides the framework for assessing the weight attributable to its policies, taking account of the stage of preparation, unresolved objections and consistency with national plan-making policies. Taking those factors into account, I consider the emerging Local Plan to be of very limited weight such that it should not be a determinative factor in the decision, at the present time.

4.32 Nevertheless, I note that emerging Policy I/SI proposes safeguarding land for CSET2 against development which would prejudice its construction or safe operation. Its supporting text, at paragraph 10.48, explains that safeguarding reflects the submitted TWAO application and that future decisions must take account of changes agreed through that process. In my judgement, the safeguarding does not itself establish that the proposed CSET2 alignment is preferable to the BW4B Alternative or predetermine the outcome of the TWAO application.

4.33 Emerging Policy S/CBC identifies a proposed Southern Gateway road between Granham's Road and Dame Mary Archer Way. Mr Rowe notes that this connection

is also shown in the May 2026 KMC Transport Strategy, while drawings accompanying the approved CBC Phase 2 reserved matters (24/01529/REM) identify indicative road spurs for future campus expansion. The BW4B Alternative could therefore make use of the proposed Southern Gateway road for part of its connection into the CBC, potentially reducing the extent of new dedicated busway infrastructure required.

5. MAIN ISSUES AND ASSESSMENT

Need, objectives, and the basis of comparison between schemes

5.1 I recognise the need to improve sustainable transport provision in the Cambridge south east corridor, including access to employment, healthcare and other services. This is consistent with BW4B's acceptance, in principle, of the need for improved accessibility and reliable public transport serving Haverhill, Linton and the wider area. My assessment concerns the extent to which that need justifies the *particular* development proposed, having regard to its effects and the BW4B Alternative.

5.2 The Applicant's Statement of Aims (**CD1-04**) identifies five objectives against which the contribution of CSET2 can be assessed. In summary, these concern:

i. better connections to employment destinations in southeast and central Cambridge;
ii. supporting economic growth in Cambridge and South Cambridge;
iii. making travel safer for all users of the A1307 corridor;
iv. reducing congestion and improving local air quality; and
v. improving provision for public transport and active travel, including the connection between Cambridge and Haverhill.

5.3 I support the principle of these objectives. I also recognise that paragraph 2.2 of the Statement of Aims expressly promotes an off-road route into the CBC and onward into Cambridge. In my judgement, however, the justification for that approach requires examination of the advantages it would deliver in practice, alongside its adverse effects and the performance of the BW4B Alternative. The Applicant's stated preference for an off-road route does not resolve that comparison of itself.

5.4 An assessment must therefore consider how each proposal would serve the wider corridor and transport network. This includes the destinations served, the accessibility of stops, the services using the infrastructure, and the implications for services remaining on existing roads. The relevance of the wider network is illustrated by the Applicant's Transport Assessment, which describes both services using CSET2 and conventional services continuing along the A1307 through BRC. Mr Rowe considers the comparative implications for connectivity and accessibility in his transport evidence.

5.5 The Applicant's account of the 2018 option selection acknowledges that the chosen strategy involved greater cost and environmental impact, while claiming greater economic benefits and stronger performance against the objectives. To my mind that identifies an important issue for this Inquiry: the nature and scale of any additional advantages of CSET2, the confidence which can be placed in their delivery, and whether they justify the additional effects and expenditure involved. I consider those matters alongside the applicable policy requirements.

5.6 I therefore rely upon Mr Rowe's evidence to assess the transport implications of these differences and upon Mr Leaver's evidence when considering their landscape, visual and Green Belt implications.

Connectivity and accessibility

5.7 The first scheme objective concerns connections to employment sites in southeast and central Cambridge. In planning terms, the contribution towards that objective depends upon the practical accessibility of those destinations, where services would stop, how passengers would complete their journeys, and the quality of the connections available. The relationship between the proposed infrastructure and the places it is intended to serve is therefore material to the weight attributable to this benefit.

5.8 The treatment of Babraham Research Campus ('BRC') provides a particular point of distinction between CSET2 and the BW4B Alternative. Mr Rowe explains that the BW4B Alternative would retain the existing bus stops and signal-controlled crossing on the A1307 near the campus entrance, with bus-priority measures on the approaches. This would direct investment towards the route already serving BRC. Mr Rowe also identifies the possibility of buses entering BRC itself, subject to agreement with the campus. However, the BW4B Alternative does not depend upon this, given the existing bus stop provision on the A1307.

5.9 The proposed CSET2 busway follows a different alignment. Mr Rowe identifies a walking distance of approximately 1.6 kilometres from the centre of BRC to the A11 Travel Hub, increasing to more than 2 kilometres from some parts of the campus. Those distances limit the convenience of accessing the new busway through the Travel Hub for people travelling to or from BRC.

5.10 The BW4B Alternative would provide bus priority along the corridor used to reach the existing BRC stops. CSET2 would principally provide new infrastructure on a route away from them, with BRC continuing to rely upon the existing conventional service. Drawing upon Mr Rowe's evidence, the BW4B Alternative has an **identifiable advantage** in the relationship between its proposed investment and direct access to BRC.

5.11 Connections to the CBC and other employment destinations also require consideration. The Applicant proposes services continuing beyond the physical limits of the new busway, including to and from Haverhill, and identifies services to Granta Park subject to suitable access and facilities. Mr Rowe considers that the two proposals would offer broadly comparable bus accessibility to Granta Park, Addenbrooke's Hospital and the wider CBC. His evidence therefore identifies access to BRC as a particular distinction between them.

5.12 Mr Rowe's evidence also examines the accessibility of the proposed intermediate stops for residents of Sawston, Stapleford and Great Shelford. His Figures 6 and 7 compare walking catchments around existing bus stops with those around the proposed CSET2 stops. His analysis identifies limited coverage of the existing settlements within a 400-metre walk of the proposed stops.

5.13 The planning benefit should therefore reflect the accessibility improvement actually provided to different users. The proposed stops could offer useful connections for *some* residents, but their provision should not be equated with a comparable improvement in convenient access throughout each settlement.

5.14 Taken together, these matters support a more nuanced assessment of the connectivity benefits claimed for CSET2. The BW4B Alternative offers a particular advantage in serving BRC through the existing A1307 corridor. The assessment of accessibility must also reflect the wider transport network as it now exists, including the opening of Cambridge South railway station in June 2026. As Mr Rowe explains, this provides an additional means of accessing the CBC, including for passengers travelling from Shelford. This does not negate the benefits of improved bus provision but is relevant to understanding the additional connectivity benefits attributable to CSET2.

Journey times, reliability, and congestion

5.15 I accept that CSET2's segregated route would protect buses from congestion along that section of their journey. The question is how much advantage this would provide over the BW4B Alternative.

5.16 The Applicant's Transport Assessment identifies the A1307 approach from Hinton Way towards Cambridge as a particular source of delay. The journey from Hinton Way to the CBC took around three minutes outside peak periods, compared with

more than eight minutes in the morning peak. Severe morning delays were not identified between the A11 and Hinton Way. These findings draw on 2019 traffic data. [**CD1-18.01, paragraphs 5.64-5.65**]

5.17 Mr Rowe explains how the BW4B Alternative responds to that pattern. It combines targeted bus priority, including measures at BRC, with a continuous inbound bus lane of approximately 2.1 kilometres approaching Hinton Way. The proposed link from Hinton Way to the CBC would allow buses to bypass the congested A1307 approach. Part of that proposed connection also corresponds with the Southern Gateway road contemplated in the expansion plans for the CBC, as discussed at paragraph 4.33 above.

5.18 The Applicant questions the journey times achievable where buses would continue to share the A1307 with other traffic. [**CD12-12, section 3.4.**] Mr Rowe's response is that the sections left without bus lanes do not generally experience congestion, with specific measures proposed to address queues at BRC. His approach is to provide priority where it would make a practical difference.

5.19 Mr Rowe's evidence identifies a credible approach to tackling the main sources of delay with substantially less new off-road construction. This does not establish that both proposals would deliver identical journey times or reliability, but it is material to the judgement of whether CSET2's additional advantages justify its additional cost and environmental effects.

Road safety and active travel

5.20 The Applicant links CSET2's road safety benefits to reduced traffic flows and improved walking and cycling provision. CSET2 would also introduce crossings of existing roads and public rights of way. The Applicant proposes traffic signals at road junctions and crossing arrangements for rights of way users. Mr Rowe identifies that CSET2 would require six new highway junctions and intersect four existing public

rights of way, whereas the BW4B Alternative would require two new junctions and an additional arm at Hinton Way roundabout, without creating comparable intersections with the PRoW network.

5.21 The BW4B Alternative would also require safe design of its bus lanes and junction alterations. For walking and cycling, Mr Rowe identifies an established network, including the Linton Greenway, which crosses the A11 by footbridge and continues through farmland and the BRC rather than following the A1307 throughout, and the DNA Path (part of National Cycle Network Route 11) between Shelford and the CBC. He explains that the BW4B Alternative would retain the existing provision along the A1307 and its connections to bus stops. This is relevant when judging what CSET2 would add.

5.22 In my judgement, the walking and cycling provision of CSET2 are positive but must be assessed against the network already available. In light of Mr Rowe's evidence, road safety does not provide a clear basis for preferring CSET2 over the BW4B Alternative.

Costs and value for money

5.23 The Applicant's October 2026 Economic Appraisal Refresh reports an adjusted benefit-cost ratio ('BCR') of 1.60. This supports its case that CSET2 offers medium value for money. I recognise that this weighs in favour of the scheme. The medium category depends on including £43.1 million of wider economic benefits; without those benefits, the initial ratio falls within the low category[1]. [2026 Economic Appraisal Refresh, Tables 4.1 and 5.1]

5.24 The reported tests of lower growth and changed travel demand produce adjusted BCRs of 1.56 and 1.52, which remain within the medium category. However, both

[1] According to the DfT's 'Value for Money Framework', a BCR of between 1.0 and 1.5 represents low value for money (**CD13-08, Table 5.1**).

retain the same £43.1 million of wider economic benefits. They therefore do not test how changes to those benefits would affect the result.

5.25 The refreshed assessment also covers walking and cycling along the whole route and assigns approximately £14.2 million to health and journey quality benefits. Those benefits are included in the reported BCR.

5.26 The Applicant's comparison in CD12-12 assigns its on-road option a lower cost but also a substantially lower BCR. Mr Rowe identifies material differences between that option and the BW4B Alternative now advanced. He also notes that the Applicant's earlier options assessment in CD1-25.07 produced closely comparable overall scores for the off-road and on-road options, at 51 and 50 respectively. The October 2026 Economic Appraisal Refresh updates the appraisal of CSET2 but does not provide an equivalent assessment of the BW4B Alternative. I do not suggest that the Applicant is obliged to undertake a full economic appraisal of BW4B's scheme; however, the evidence does not provide a directly comparable, up-to-date economic assessment of the two proposals.

5.27 In my judgement, the economic evidence provides support for CSET2 but does not establish that it offers better value for money than the BW4B Alternative. I do not undertake my own economic appraisal, and recognise the limitations of the comparative information available. More fundamentally, the economic findings do not determine compliance with Green Belt policy or the wider planning balance. Those matters require separate consideration alongside the scheme's benefits and adverse effects.

Landscape and visual effects

5.28 I rely upon Mr Leaver's evidence to assess the comparative landscape and visual consequences of the two proposals. He has undertaken an independent reassessment of the landscape effects, drawing upon the Greater Cambridge Landscape Character

Assessment. His conclusions identify significant adverse landscape effects associated with CSET2, including permanent changes which would not be removed by the proposed mitigation.

5.29 Both proposals would retain the A11 Travel Hub. The key comparison therefore focuses on the different alignments between the Travel Hub and the CBC.

5.30 CSET2 would introduce a new transport corridor across open countryside. Its effects would arise from the combined presence of the busway, adjoining track, bridges, embankments, stops, lighting and moving vehicles. These works would divide fields and introduce urban features and activity into rural surroundings. Planting could soften some views, but would not remove the changes to landform, field patterns and landscape character.

5.31 Mr Leaver identifies significant adverse landscape effects south of the CBC, including the setting of Nine Wells and Hobson's Conduit, and in the Granta Valley east of Stapleford and south of Babraham. In the valley landscapes, bridges and embankments would intrude into surroundings characterised by their small scale, tranquillity and separation between settlements. Mr Leaver considers that these significant adverse effects would be permanent and would not be removed by the proposed landscape mitigation.

5.32 The BW4B Alternative would make greater use of the existing A1307 corridor. This would avoid much of the field subdivision and the new bridges and embankments associated with CSET2. Although the A1307 passes through the valued Gog Magog Hills landscape, Mr Leaver finds that using the existing carriageway and adjoining verge would limit the landscape effects there to slight adverse.

5.33 The BW4B Alternative would cause some harm due to the new link between Hinton Way and the CBC that would cross open fields, disrupt field patterns and introduce

transport infrastructure and activity. Nevertheless, Mr Leaver assesses its landscape effects as slight to moderate adverse, rather than significant.

5.34 In my judgement, the lasting harm identified for CSET2 conflicts with Policy NH/2's requirement to respect and retain, or enhance, local landscape character. Within the Stapleford and Great Shelford neighbourhood area, the significant harm remaining after mitigation also conflicts with Policy S&GS 12. I also consider that the scale and nature of the engineering works would fail to respond appropriately to the rural context or integrate with the surrounding landscape, contrary to DP3(1). I recognise that DP3(2)(d) supports the provision of transport infrastructure. However, in light of the materially less harmful approach identified by the BW4B Alternative, I am not persuaded that the additional intrusion associated with CSET2 has been clearly justified. I therefore also find conflict with DP3(3).

5.35 I attach substantial weight to these adverse landscape effects. The BW4B Alternative's materially lower landscape impact is an advantage in the planning assessment and is an important material consideration. It strengthens the need for the Applicant to demonstrate that the additional benefits claimed for CSET2 justify its greater harm.

5.36 A further consideration is the relationship between CSET2 and the permitted retirement village and countryside park at Stapleford. The proposed busway would run between these two elements, introducing a physical barrier and associated activity into an area intended to provide public open space and recreation. I recognise that the Applicant proposes a controlled crossing to maintain pedestrian access; nevertheless, this would not entirely overcome the physical and perceptual separation caused by the busway, or its effects upon the character and enjoyment of the countryside park. These are additional adverse effects which I take into account in my overall assessment.

Green Belt openness

5.37 GB7(1)(f) requires the impact on Green Belt openness to be minimised, rather than necessarily avoided altogether. Some effect on openness may therefore be permissible. In applying this requirement, I consider the choice of route, the extent and form of the works, and the practical opportunities available to reduce their effects. In my judgement, whether such opportunities have been taken is relevant to assessing compliance with the minimisation requirement.

5.38 CSET2 would introduce substantial infrastructure into open countryside. The busway, adjoining track, bridges, embankments and associated structures would occupy and divide open land. Their presence would be apparent across hillsides and within the Granta valley. Regular bus movements would also introduce activity into areas where existing activity is largely associated with agriculture. These changes would be permanent.

5.39 Planting could soften the appearance of parts of the scheme and reduce some visual effects. It would not remove the infrastructure, reverse the changes to landform or prevent the additional activity. The effect on openness must therefore be assessed beyond the extent to which the works could eventually be screened.

5.40 Mr Leaver concludes that CSET2's effects on openness have not been mitigated as far as practically possible. He identifies scope to reduce those effects through changes to the alignment. His assessment also explains how greater use of the existing road corridor would avoid much of the intrusion associated with the proposed route.

5.41 The BW4B Alternative demonstrates the relevance of that approach. Much of its route would use the existing A1307 carriageway and adjoining verge, concentrating infrastructure and activity along an established transport corridor. This would substantially reduce the introduction of new infrastructure into open countryside.

5.42 Mr Rowe's evidence provides the transport basis for considering the BW4B Alternative as a practical means of improving public transport through the corridor. Its lower impact on openness is therefore relevant to whether the effects of CSET2 have been minimised.

5.43 For the transport reasons explained above, I am not persuaded that those claimed advantages justify the choice of a materially more intrusive alignment. Read together, Mr Rowe's and Mr Leaver's evidence identifies a practical opportunity to meet the corridor's transport needs with appreciably less interference with openness. On that evidence, I conclude that CSET2 does not satisfy the minimisation requirement in GB7(1)(f).

Green Belt purpose (c): countryside encroachment

5.44 Purpose (c) is to assist in safeguarding the countryside from encroachment. Under GB7(1)(f), the question is whether the development would significantly conflict with that purpose.

5.45 CSET2 would introduce a new transport corridor across agricultural fields, hillsides and river valleys. Its bridges, embankments, stops and associated works would extend development into areas which retain a predominantly rural character. The effect would extend beyond the land directly occupied by the busway, through the subdivision of fields and the influence of new infrastructure on their surroundings.

5.46 Mr Leaver describes how parts of the route would extend the perceived settlement edge and leave smaller areas of countryside between existing development and the busway. He also identifies repeated disruption of established field patterns. These findings demonstrate how the scheme would erode the countryside's character and continuity along its route.

5.47 Mr Leaver concludes that these effects would result in significant conflict with Green Belt purpose (c). I agree with that conclusion. In my judgement, the extent of countryside affected, the scale of engineering works and the permanent changes to rural character establish significant encroachment into the countryside.

5.48 The BW4B Alternative would concentrate much of its infrastructure along the existing A1307 corridor. This would limit the spread of development into the surrounding countryside and avoid the new crossings of the Granta valley and much of the field subdivision associated with CSET2.

5.49 I recognise that the BW4B Alternative's new CBC connection would also encroach into countryside. However, this would be a more limited incursion in an area already influenced by the A1307 and the existing campus. Taking its extent and context into account, the Alternative's route works would not significantly conflict with purpose (c).

5.50 CSET2's significant conflict with purpose (c) provides a separate reason why it does not satisfy GB7(1)(f), in addition to my conclusion on the minimisation of effects on openness.

Green Belt conclusions

5.51 I accept that a Green Belt location is required for transport infrastructure connecting the A11 corridor with the CBC. That satisfies one part of GB7(1)(f). However, the proposal must also both minimise its effect on openness and avoid significant conflict with Green Belt purposes.

5.52 For the reasons explained above, CSET2 fails both of those requirements. Either failure is sufficient to exclude it from GB7(1)(f). On the Applicant's case, I therefore conclude that CSET2 is inappropriate development in the Green Belt.

5.53 Under GB6, that gives rise to harm by reason of inappropriateness, alongside the identified harm to openness and purpose (c). I attach substantial weight to the Green Belt harm. Approval would require VSC: the considerations supporting the proposal must *clearly outweigh* that harm and all other harm arising from the development.

5.54 The BW4B Alternative must be assessed against the same requirements. Its greater use of the existing road corridor provides a material advantage insofar as the two proposals follow differing alignments and routes.

5.55 Relying on Mr Leaver's evidence, I conclude that the BW4B Alternative would minimise its effects on openness and would not significantly conflict with the Green Belt purposes, including purpose (c). Its greater use of the existing highway and more limited new construction would provide the required transport connection while containing and minimising any intrusion into the countryside. Assessed as a whole, it therefore falls within GB7(1)(f) and is not inappropriate development. It would not require VSC, although its remaining landscape and other effects must still be weighed.

Other environmental considerations

5.56 The Applicant's Environmental Statement identifies the permanent loss of 53 hectares of best and most versatile ('BMV') agricultural land and states that this loss cannot be mitigated [**CD1-10.01, section 4.4**.]. This lasting loss weighs against CSET2. It is also relevant to NPPF N2(1)(b), which requires consideration of agricultural land quality and opportunities to use poorer-quality land where significant development of agricultural land is necessary. In the light of the BW4B Alternative, I am not persuaded that the loss of agricultural land on this scale is necessary to meet the identified transport objectives.

5.57 The BW4B Alternative's greater use of the existing highway offers scope to reduce new agricultural land take. Its new CBC connection and the Travel Hub would still require land but the overall reduced land take is a comparative advantage.

5.58 The Environmental Statement identifies harm to archaeological remains. The Heritage Mitigation Strategy provides for further investigation and mitigation, but recording remains before their removal does not preserve them in place. Any remaining harm must be weighed according to the significance of the remains affected.

5.59 Biodiversity improvements are a benefit. Revised draft condition 17 would require at least 10% biodiversity net gain. The weight I give this depends on the habitats proposed and how their delivery and long-term care would be secured.

5.60 The October 2026 Economic Appraisal Refresh includes costs from carbon emissions, air pollution and noise. Its carbon and air quality calculations assume diesel buses, although it estimates a net carbon reduction with an electric fleet. These considerations are already included in the BCR and should not be counted twice.

Deliverability and certainty of benefits

5.61 The weight I give the transport benefits depends on how likely they are to be delivered. Bus routes, stops and service frequencies will determine who benefits and by how much. Credible arrangements are needed to provide and sustain those services.

5.62 Mr Rowe explains that the BW4B Alternative would be delivered predominantly within existing highway land and land owned by Cambridgeshire County Council. He considers that this would enable its implementation through powers available under the Highways Act, without requiring a TWAO. This is a material distinction from CSET2, which involves substantial new infrastructure across privately owned

land including compulsory purchase. Mr Rowe also identifies how the proposed CBC connection could be integrated with the Southern Gateway road contemplated in the campus expansion proposals. These considerations provide a credible basis for a potentially simpler delivery process.

5.63 CSET2 has an identified funding route. Homes England has allocated approximately £161 million in recoverable funding, subject to the necessary approvals, an approved Full Business Case and a funding agreement. This supports its delivery prospects, although the funding is not unconditional. Funding for the BW4B Alternative would need to be secured but the absence of an equivalent funding agreement at this stage does not establish that the BW4B Alternative is incapable of delivery or that its progression would necessarily entail a substantial delay.

5.64 The proposed expansion of the CBC and the development of the Grange Farm site, proposed to be allocated in the emerging Greater Cambridge Local Plan, may increase the need for improved transport infrastructure. However, their planning status, likely delivery and transport needs must be considered. They do not, by themselves, establish the need for this particular alignment. Grange Farm would also need a connection across the A11, with further costs and delivery requirements. The October 2026 Economic Appraisal Refresh confirms that the development's dependence on CSET2 has not been tested through modelling.

6. PLANNING BALANCE AND CONCLUSIONS (SUMMARY PROOF)

Benefits of CSET2

6.1 I support the principle of improved sustainable transport provision in the Cambridge south east corridor. Better connections to employment, healthcare and other services, together with greater opportunities to travel by public transport, are important objectives. However, the need for improved transport does not, of itself, establish that the particular infrastructure and alignment proposed by CSET2 are justified. My assessment considers whether its benefits outweigh the adverse effects of the development, having regard also to the BW4B Alternative.

6.2 I attach significant weight to the transport and associated economic benefits of CSET2. Its segregated route would protect buses from congestion along that part of their journey, improve access to the CBC and support Cambridge's nationally important economy. However, the extent of those benefits must reflect the services expected to operate, the accessibility of stops and the connections available to existing communities. For the reasons identified in Section 5, and relying upon the evidence of Mr Rowe, I am not persuaded that CSET2 would necessarily deliver materially better accessibility across the corridor than the BW4B Alternative.

6.3 The Applicant's adjusted BCR of 1.60 provides support for the economic case and indicates medium value for money, which I recognise as a positive consideration. However, the appraisal does not provide a directly comparable economic assessment of the BW4B Alternative and therefore does not establish the relative value for money of the two schemes. Nor does it determine the acceptability of CSET2 against planning policy. I have also taken account of the extent to which transport, economic

and environmental effects are already reflected in the appraisal, to avoid counting the same benefits more than once.

6.4 I attach moderate weight to the additional walking and cycling opportunities, recognising their value alongside the existing network. I attach moderate weight to the proposed biodiversity enhancements, subject to their delivery and long-term management being secured. The wider policy support for sustainable transport and economic growth also weighs in favour of the scheme. Its identified funding route lends confidence to its prospects of delivery, although the relevant approvals and agreements remain outstanding. I attach limited additional weight to the prospect of unlocking development at Grange Farm, given the uncertainties identified.

Adverse effects of CSET2

6.5 Against these benefits, I have identified substantial harm to the Green Belt. For the reasons set out in Section 5, CSET2 would fail to minimise its effects on openness and would significantly conflict with Green Belt purpose (c), by introducing substantial new infrastructure and associated activity across open countryside. It therefore fails to satisfy GB7(1)(f) and constitutes inappropriate development. In accordance with GB6, I attach substantial weight to the resulting Green Belt harm, including harm arising from inappropriateness, loss of openness and countryside encroachment.

6.6 I also attach substantial weight to the adverse landscape effects identified by Mr Leaver. The proposed busway, bridges, embankments and associated infrastructure would introduce a new transport corridor across agricultural fields and rural landscapes, including the Granta valley and land south of the CBC. These works would cause lasting changes to landform, field patterns and landscape character. The effects would be permanent and significant adverse effects would remain

notwithstanding the proposed mitigation. I find conflict with South Cambridgeshire Policy NH/2 and, within the relevant neighbourhood area, Policy S&GS 12.

6.7 A further significant adverse consideration is the permanent loss of 53 hectares of best and most versatile agricultural land. This is a substantial area of productive agricultural land, the loss of which cannot be mitigated. I attach significant weight to this harm, having regard particularly to NPPF Policy N2(1)(b).

6.8 I have also considered the other environmental effects identified in Section 5, including effects upon archaeology, biodiversity, carbon emissions and air quality, together with the mitigation proposed. I also take account of the effects upon the permitted countryside park at Stapleford, including the separation of the park from the retirement village and the implications for its recreational use and amenity. My overall conclusion rests principally upon the Green Belt, landscape and agricultural land effects. I recognise that some of the physical changes giving rise to landscape harm are also relevant to Green Belt openness and countryside encroachment and have allowed for that overlap in reaching my overall judgement.

The significance of the BW4B Alternative

6.9 The BW4B Alternative is a critically important consideration in this assessment. As explained by Mr Rowe, it provides a credible means of addressing the identified transport needs through targeted bus-priority improvements along the existing A1307 corridor and a new connection between Hinton Way and the CBC. It would retain the proposed A11 Travel Hub, address the principal sources of congestion and offer particular advantages in serving BRC. Although journey times and reliability would not necessarily be identical, the evidence establishes a practical approach to achieving the transport objectives with materially less new infrastructure across open countryside.

6.10 Mr Leaver's evidence identifies a substantial difference in the environmental consequences of the two proposals. Greater use of the existing highway corridor would avoid much of the field subdivision, substantial engineering works and intrusion into the Granta valley associated with CSET2. The BW4B Alternative would itself cause some environmental harm, particularly through the new CBC connection and the shared Travel Hub. Nevertheless, its overall landscape and Green Belt effects would be materially lower. For the reasons given in Section 5, I also conclude that the BW4B Alternative would satisfy GB7(1)(f) and would not constitute inappropriate development.

6.11 I recognise that further detailed design, statutory approvals and funding arrangements would be required to deliver the BW4B Alternative, and that it has not progressed to the same stage as CSET2. Nevertheless, Mr Rowe's evidence identifies it as a credible and practically deliverable alternative, making substantial use of existing highway infrastructure and publicly owned land, with the potential to proceed without a TWAO. Its proposed connection into the CBC could also be integrated with infrastructure already contemplated as part of the campus expansion. In my judgement, it is sufficiently defined and credible to inform the assessment of whether the substantially greater environmental harm associated with CSET2 is justified.

The Planning Balance

6.12 My primary conclusion is that CSET2 constitutes inappropriate development in the Green Belt. Under GB6, very special circumstances will not exist unless the harm arising from inappropriateness and all other harm is *clearly outweighed* by other considerations. I have considered the full range of benefits identified above, including the significant transport and economic benefits, the additional active travel opportunities, biodiversity enhancements and wider policy support. Taken together,

I do not consider that these benefits ***clearly*** outweigh the substantial Green Belt harm and the other adverse effects identified.

6.13 In reaching that conclusion, I attach particular importance to the scale and permanence of the environmental effects and the evidence that the identified transport objectives could be achieved through a materially less harmful approach. I recognise the advantages claimed for CSET2's segregated alignment, but I am not persuaded that those advantages are sufficient to justify the additional harm. Accordingly, VSC have not been demonstrated, and CSET2 conflicts with GB6.

6.14 If, contrary to my primary conclusion, the Secretary of State considers that CSET2 satisfies GB7(1)(f), it would not constitute inappropriate development and no requirement for very special circumstances would arise. Green Belt harm would be excluded from the balance. The relevant national policy assessment would instead include S5(5), under which development should be approved unless its benefits would be substantially outweighed by adverse effects, assessed against the national decision-making policies. I also recognise the need to apply S4 to those parts within settlements, in accordance with S3(2).

6.15 On that alternative basis, the substantial adverse landscape effects and significant permanent loss of high-quality agricultural land remain material considerations in their own right. The proposed alignment would introduce extensive engineering works into rural landscapes, causing lasting changes which would not be overcome by mitigation. In my judgement, these effects conflict with the contextual design requirements of DP3(1), alongside Policy N2 and the relevant development plan policies. Having regard to the less harmful approach identified in the evidence, I do not consider that the additional intrusion associated with CSET2 has been clearly justified. This engages the refusal provision in DP3(3). This is also relevant to S5(2), which identifies conflict with a national decision-making policy expressly requiring

refusal as a circumstance in which adverse effects are likely to substantially outweigh the benefits.

6.16 I recognise that S5(5) establishes a presumption in favour of approval and that the adverse effects must substantially outweigh the benefits to displace it. Nevertheless, even giving significant weight to the transport and economic benefits, I conclude that this threshold is met. My judgement reflects the extent and permanence of the landscape and agricultural land harm, the significant adverse landscape effects which would remain after mitigation, and the conflict with the relevant national decision-making policies. Moreover, the evidence that the transport objectives could be achieved through a materially less harmful approach strengthens that conclusion. I would therefore find against CSET2 even if it were held not to be inappropriate development in the Green Belt.

Public Interest and Conclusions

6.17 The BW4B Alternative is also directly relevant to the decision whether to make the Order. Section 13(2) of the 1992 Act expressly permits the Secretary of State to decline to make an Order where any of its objects could be achieved by other means. The evidence demonstrates that there is a credible alternative approach capable of addressing the corridor's transport needs while substantially reducing the environmental harm associated with CSET2. Mr Rowe's evidence also identifies material differences in the statutory procedures and land acquisition requirements potentially involved in delivering that alternative. These considerations reinforce my conclusion that the objectives of the proposed Order could be achieved by other means and are material to the assessment of whether making the Order is justified in the public interest.

6.18 I recognise the importance of improving public transport and the public benefits that CSET2 would provide. However, the need for better transport does not

automatically justify the particular development proposed or the compulsory acquisition powers sought. Having considered the scheme's benefits, its adverse effects and the opportunities to achieve its objectives by other means, I do not consider that the planning evidence establishes a compelling case in the public interest for the compulsory acquisition associated with this alignment.

6.19 For these reasons, I conclude that CSET2 should not be authorised. I therefore recommend that the Secretary of State decline to make the Order and not grant the associated deemed planning permission.