

A low-angle photograph of a massive, ancient tree with a thick, gnarled trunk and a dense canopy of green leaves. A man wearing a hat and a plaid shirt is standing in the grass at the base of the tree, using a long measuring tape to measure the trunk's circumference. The scene is set in a grassy field with other trees in the background under a clear blue sky.

Figure 1 David Alderman, The Tree Register

Coton Orchard Limited Proof of Evidence

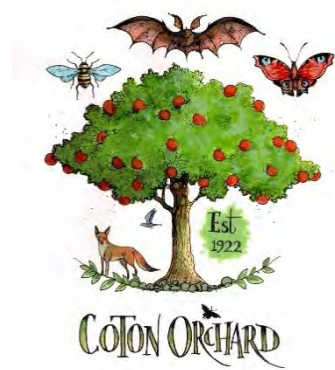
**Public Inquiry into the
Cambourne to Cambridge Transport and Works Act Order**

Public Inquiry Manager
Gateley Hamer

By Post:

Mrs J. Vincent, 21 Parkway, Horley, Surrey, RH6 7HX

By Email: Joanna.Vincent@gateleyhamer.com
 Brenda.Taplin@gateleyhamer.com
 Adam.Richards@wbd-uk.com



16th August 2025

Proof of Evidence

Cambourne to Cambridge Transport and Works Act Order Inquiry

This Proof of Evidence (PoE) is submitted on behalf of **Coton Orchard Limited** (affected tenant), **Houston Crest Properties Ltd** (landowner), and **Anna Gazeley** (long-time resident of Coton) in objection to the Cambourne to Cambridge (CtoC) Transport and Works Act Order (TWAO). The proposed scheme, submitted by Cambridgeshire County Council (CCC) on behalf of the Greater Cambridge Partnership (GCP), seeks the compulsory acquisition of land at Coton Orchard and the deemed grant of planning permission for the off-road segment of the CtoC busway.

This submission comprises three main sections:

- **Section 1: Summary of Proof of Evidence** – A brief overview, included in accordance with the Inspector's guidance, as the full document exceeds 1,500 words.
- **Section 2: Supplementary Notes on Updated Matters** – Key developments since submission of our original Statement of Case, including material changes in policy, safety, and deliverability.
- **Section 3: Appendix 1 – Statement of Case (original submission)** – Included in full to maintain clarity and consistency of references, hyperlinks, and section numbering. This document forms the evidential backbone of our PoE.

For any queries regarding this document or regards the next steps in the process, please contact me at the registered business address: Coton Orchard Limited c/o Landbeach Lakes, Ely Road, Waterbeach, Cambridge CB25 9PG. Email: anna@cotonorchard.com

Yours sincerely,
Anna Gazeley

Director Coton Orchard Limited / Company Secretary Houston Crest Properties Ltd
☎ 07874 138 391

Summary of Proof of Evidence

This statement is submitted as my summary Proof of Evidence. It has been prepared in a form suitable for oral delivery, as I intend to read it aloud when I participate.



Figure 2 CtoC Order. Works and Land Plans 13+14 proposed Section through Coton Orchard [\[link\]](#)

I am mindful of the Inspectors' encouragement to all participants to focus their evidence, minimise duplication, and use the Inquiry's time constructively. I will therefore concentrate today on the section of the proposed Cambourne to Cambridge busway that crosses Coton Orchard—a place I know intimately, and one that, if this scheme proceeds as planned, will be irreversibly damaged.

I maintain my full objection as set out in my Statement of Case (Appendix 1), which provides essential context. While I will defer to expert witnesses where appropriate, I reserve the right to make broader comment should it become necessary.

Let me reiterate: I am not opposed to improving public transport. Nor do I deny the need for better east-west connections. What I object to is the destruction of one of Cambridgeshire's most ecologically significant sites, in pursuit of a scheme that is neither proportionate nor justified.

1. Coton Orchard Is Not a Gap on a Map

Coton Orchard is not a wasteland waiting for re-use. It is not a monoculture, nor a derelict field. It is an established, thriving **traditional orchard**—one of Cambridgeshire’s largest—designated a **Priority Habitat** under the **UK Biodiversity Action Plan** and, in 2023, a **County Wildlife Site**.



Figure 3 Coton Orchard case study - CPRE

This is a landscape with deep ecological memory. Over 100 botanical species have been recorded in its understory. Twelve veteran apple trees—now listed on the **Ancient Tree Inventory**—support fungi, birds, invertebrates, and mosses typically confined to ancient woodland. These are the very species and habitats the applicant claims to prioritise in the **Cambridgeshire & Peterborough Local Nature Recovery Strategy** Consultation, yet proposes to destroy here¹.

The applicant’s own **Environmental Statement** acknowledges the site supports “a notable range of insects, including some nationally rare species,” and that its loss would have a “significant adverse effect.”

Dr Chris Preston identified over 40 mosses and liverworts; Jonathan Shanklin, Fellow of the British Antarctic Survey, documented 111 plant species—including *Lysimachia nummularia*, which he expected only in Madingley Wood SSSI. This supports Professor David Coomes’s view that Coton Orchard may hold comparable ecological value to Madingley Wood, once likely part of the same habitat.

¹ [Cambridgeshire & Peterborough Local Nature Recovery Strategy Consultation - Your Voice - Cambridgeshire County Council - Citizen Space](#)

Critically, this is not a choice between protection of one site or another as the applicant implies. Routing along the edge of the SSSI, an option suggested by CPPF, would cause negligible impact in comparison. While bisecting the orchard would irreparably damage its structure and function. Natural England guidance confirms that traditional orchards are especially vulnerable to fragmentation, which leads to habitat breakdown and biodiversity loss. Development along existing corridors avoids this.

Apple trees age rapidly and develop keystone ecological features within decades. While the applicant now acknowledges the veteran status of the founding Bramleys, they continue to characterize the orchard as mostly “*younger, high-density trees*”—a claim contradicted by survey data and the Woodland Trust’s support for its protection.



Figure 2. Dr Ed Pyne, Ancient Tree Specialist at the Woodland Trust, conducting an arboreal survey at Coton Orchard. [[Ancient Tree Inventory - Woodland Trust](#)]

2. Management: Conservation in Practice, Not Theory

The orchard has not been sprayed with pesticides for nearly thirty years. We’ve recovered heritage varieties, restored soil health, and maintained continuity of habitat. It is a working landscape shaped for biodiversity—with guidance from the [People’s Trust for Endangered Species](#), the Wildlife Trust BCN, the Woodland Trust, and [East of England Orchards Project](#), and through the hard work and dedication of volunteers. We’ve taken no direct government funding, yet have planted over 840 native hedgerow trees and added more than 150 fruit trees—grafted onto vigorous (MM111) or very vigorous (M25) rootstocks to maintain their status as traditional orchard trees. According to Natural England “*a traditional orchard is defined as a habitat of widely spaced, long-lived trees on standard rootstocks, typically M25 or MM111, managed with low chemical input and supporting rich grassland or deadwood ecosystems.*”

To meet these standards, our new plantings are spaced generously to allow full canopy development and ecological maturity. This is why the applicant's proposal to mitigate the loss of more than 500 veteran and mature fruit trees—whether through transplanting or infill planting between rows—fails to address the long-term requirements of a viable traditional orchard. It overlooks the structural and ecological roles these trees play over decades. As far as I am aware, no mitigation strategy has been offered at all for the hundreds of non-fruit trees also threatened by the proposed routing.

In partnership with **Blue Barrel Cider**, we've also introduced cider and perry varieties, along with *Malus sieversii*—the wild ancestor of the domestic apple—brought in to strengthen genetic resilience in the face of climate volatility. The rows are laid in a fixed orientation for wind and sunlight, established for over a century, with wide access corridors that also act as foraging routes for wildlife.

The proposed busway would cut directly through these rows, sever central access, and make the rest of the site unworkable. The loss isn't just of land—it is of function. Once a traditional orchard is fragmented, its biodiversity declines. When viability goes, stewardship goes with it. Habitat is not static; it must be actively maintained. That reality is too often overlooked by schemes that treat green space as ecologically inert.

3. Cultural Landscape and Wartime Legacy

My father bought Coton Orchard in 1996. He was a Londoner, evacuated to Cambridge during the Blitz. When he returned decades later, after a career abroad, he found the landscapes of his childhood vanishing. He didn't buy the orchard to develop it, but to protect it—to preserve a piece of what he had known and to pass something meaningful on to future generations.

He converted the disused buildings into a garden centre and allowed the rest of the site to return to low-intervention management. He did so at personal cost, driven by the belief that some places should simply endure.



Figure 4 Excerpt from Coton Orchard book showing how new structures follow original footprints

Coton Orchard also carries a quieter, largely unacknowledged wartime history. It provided shelter to Austrian Jews fleeing persecution—an act of refuge now marked by an Anne Frank sapling, grown from the tree that stood outside her hiding place in Amsterdam. The orchard is listed on the [UK Holocaust Map](#). That heritage may be invisible to engineers, but it is deeply rooted in the community.

“Go outside... amidst the simple beauty of nature,” Anne Frank wrote in her diary, *“and know that as long as places like this exist, there will be comfort for every sorrow, whatever the circumstances may be.”* Her words are a reminder that the value of landscapes like Coton Orchard must not be measured in pounds and pence alone.

4. Environmental Protections Ignored

In January 2025, South Cambridgeshire District Council issued a **Tree Protection Order** covering the veteran trees. The TEMPO score was 16, well above the threshold. The orchard’s formal status as a **County Wildlife Site** confirms its irreplaceability.

National policy is also clear. The **NPPF** states that development resulting in the loss of irreplaceable habitats should be refused unless there are *“wholly exceptional reasons.”* Veteran trees fall into that category. There is no *“exceptional”* justification here—no housing target, no safety imperative, no overwhelming public need.

Even if one accepts the scheme’s broader transport case, this specific section and alignment—through a **Priority Habitat**—is not the only option. Viable, cheaper, less damaging alternatives exist. They are not speculative: they have been formally proposed by Cambridge Past, Present & Future and are supported by most stakeholders.

5. Practical Consequences

www.cambridgeindependent.co.uk

July 30 - August 5, 2025



Leo Jordan of Blue Barrel Cider meets Daniel Clifford at Midsummer House. Inset, from top, Blue Barrel Cider, Leo and Emma Jordan at Coton Farm. Pictures: Coton Orchard

Will this be the last cider launch from embattled Coton Farm?

Figure 5 "Origins" Cider – Second Edition unveiled by Blue Barrel at Midsummer House

It is not only biodiversity that suffers. The orchard's fragmentation undermines its entire economic model. We supply fruit on a commercial basis to local cider-makers like Blue Barrel—this year launching our third collaboration at the Tate Modern, a celebration of heritage and the apple's ancient origins. This premium product has already received praise from industry professionals, is a finalist in the [Great British Food Awards](#) (11th August), and is set to appear on the tables of two-Michelin-star chefs.

We also share fruit non-commercially with the community, food banks, and charities—and crucially, with the wildlife that depends on this mosaic habitat. We manage **hedgerows** for nature, support **community** events, and host **educational visits**. These activities all rely on full-site access and continuity of care.

If the land is bisected, it is not just the footprint of the tarmac that matters. It is the severing of rows, the narrowing of corridors, the fencing of field boundaries, the loss of viability. That is how biodiversity loss occurs—not always through bulldozers, but through operational failure.

No one disputes that public transport is a public good. But it cannot be pursued through unnecessary environmental harm.

6. Opposition and Credibility

A **Compulsory Purchase Order** must serve a compelling case in the **public interest**—ordinarily understood to mean benefit at a national or significant regional level. It is difficult to see how a **1.6-mile section of busway** could meet that threshold on its own. The reason this scheme has drawn national, even international attention, is not because of the scant benefit this short stretch might bring to the public, but because of the sheer scale of destruction it proposes—most notably to **Coton Orchard**.

Over **23,800 people** have signed the CPPF [petition](#). Public objections have come from leading experts, including Nobel prize winning economist **Sir Partha Dasgupta**, **Sir David King**, former Chief Scientific Adviser to the UK Government, and **Lord Whitty**, former Chair of the House of Lords Environment Committee.

THE TIMES | Thursday September 12 2024 17

News

Academics see red over green plan to bulldoze orchard

Laurence Sleator

Cambridge academics have accused the university of being "complicit" in the destruction of one of Britain's largest fruit orchards to make way for a transport project designed to tackle climate change.

Councillors in the area have voted in favour of building a £200 million, nine-mile dedicated busway connecting Cambourne to Cambridge as part of efforts to cut congestion, improve air quality and promote greener travel.

But the proposed route runs through Coton Orchard, a century-old site that is home to a wide range of wildlife and contains about 1,000 trees that produce plums, pears and 26 varieties of apple.

A small section of the route also goes through land owned by the University of Cambridge, meaning authorities need permission from the university to proceed with the busway.

At a meeting among staff in July, Dr Diarmuid O'Brien, pro-vice chancellor for innovation, said the university had decided to negotiate a 125-year lease of the land for the busway—opening up

the possibility of the orchard being bulldozed. This prompted some senior figures to accuse the university of "sleepwalking into a damaging and highly visible blunder on climate change".

Sir Partha Dasgupta, an economist at the university who conducted a 2021 government review into biodiversity, said we must "despair" at the "destructive logic" of destroying trees for greener modes of transport.

Addressing O'Brien, he said: "The proposal has the same insidious logic that has shaped biodiversity loss throughout the world. The orchard will not return, the mangrove forest won't have space to recover its previous glory, and the bat population will die because it has nowhere to go. The University of Cambridge is unable to appreciate the underlying destructive logic in this. We should all despair."

Other senior figures have objected to the plan including Sir David King, a former chief scientific adviser, and Lord Whitty, a Labour peer and former environment minister.

Dr Sam Lucy, former director of admissions for all Cambridge colleges, said: "The university's apparent complicity in enabling the destruction of ancient habitat in the form of Coton Orchard, the disregard for stated institutional aims of environmental sustainability and, quite simply, acting as a bad neighbour... is disappointing to say the least."

Katy Edgcombe, a fellow at Newnham College, told the meeting the decision to lease the land "amounts to an endorsement of a profoundly damaging project. I do not expect the university to be greatly concerned about a gross waste of taxpayers' money, but I do expect it to care about unnecessary and irreversible environmental damage." She added that the university "currently seems to be not merely a consenting party to but an enthusiastic collaborator in this disaster".

Campaigners want the council to consider an alternative route that involves building next to the existing road rather than through the orchard, the eighth-largest traditional orchard in the UK. A petition against the plans has attracted more than 20,000 signatures. The council responded to the concerns by saying the university is "not in a position to dictate the preferred route" and this would be a matter for a statutory planning process. It has previously said the estimated 500 trees that would have to be felled would be replaced by many more, leading to a "biodiversity net gain" of more than 10 per cent.

The council intends to issue an application to Louise Haigh, the transport secretary, for approval. She can decide if a public inquiry is required.

A university spokesperson said: "The university has chosen to negotiate the lease of this land as a preferable alternative to losing it by means of a compulsory purchase order. The choice of preferred route is entirely a decision for the Greater Cambridge Partnership, of which the university is a non-voting member."



Figure 6 National and International Media Coverage – Print and Broadcast

Fourteen NGOs have raised serious concerns, including the **Woodland Trust**, the **People's Trust for Endangered Species**, and **The Wildlife Trusts**.

This is not a fringe campaign. It is a broad, cross-party, evidence-based objection to a scheme whose environmental cost is out of all proportion to its claimed benefit.

Conclusion

The Inspectors will visit Coton Orchard during the course of the Inquiry. I am grateful for that. I hope what you see there—the veteran trees, the mosaic of habitats, the unbroken hedgerows—will reinforce the point I’ve tried to make today.

This is not a matter of sentiment or obstruction. It is a question of legal compliance, environmental consequence, and public value.

The GCP’s proposed off-road route offers too little, at too high a cost. It causes irreversible harm without exhausting less damaging alternatives. That is not a proportionate response to our transport challenges.

I urge the Inspectors to reject the proposed alignment, and to recommend that any future scheme uphold the environmental, cultural, and planning standards that this region, and this orchard, deserve.



Figure 7 Aerial view from the orchard: mature scrub and trees threatened by the busway, with Coton village and CPPF reserve beyond—corridors for people and nature at risk.

Supplementary Notes on Updated Matters

A. Applicant addendum [CD1-10.06 Environmental Statement Addendum, June 2025](#). Impacting our SoC Grounds for Objection; 1. 7. 9. & 10.



Figure 8 12 Bramley Trees listed on the [Ancient Tree Inventory - Woodland Trust](#)

In its updated tree survey, the applicant now **acknowledges the veteran status** of the twelve original Bramley trees planted in 1922. It then states that “*few fruit trees from the original planting remain, with most of the orchard now containing younger dwarf trees*” [2.1.1].

While in part technically correct, this is misleading: by definition, **every tree planted since 1922 is younger. Many are nevertheless mature, decades old**, and—due to the early senescence of fruit trees—already exhibit veteran features that support some of Britain’s rarest and most endangered species.

The suggestion that the orchard has degraded as a traditional orchard habitat due to age of remaining and new trees is also unfounded. Nowhere in **Natural England’s definition** does it state that trees must be old. What matters is structure and management: **widely spaced trees on vigorous rootstocks**, maintained with **low-intensity inputs** and supporting **rich grassland** and **deadwood habitats**.

In recent years, we have deliberately transitioned from a purely commercial layout to a conservation-led model. Over 100 new trees have been planted on vigorous (MM111) or very vigorous (M25) rootstocks in the last two years, with a further 50+ grafted saplings—developed in collaboration with the East of England Orchards Project, Sarah Juniper, and Trees Are Good—scheduled for planting in 2026. More than 1,000 native hedgerow trees

have been planted across the orchard under Woodland Trust schemes between 2023 and 2025, with another 420 planned for 2026.

This combination of established and planned planting—rooted in traditional orchard principles and implemented through wide spacing, careful rootstock selection, and low-intensity management—underscores the futility of the applicant’s suggested ‘mitigation’ and ‘enhancement’ measures. Proposals to plant saplings into what fragments of orchard remain are both ecologically and practically misguided. The areas left untouched by the proposed route are not degraded land awaiting improvement—they are already rich, functional ecosystems, comprising biodiverse scrub, established hedgerows, and maturing orchard trees that support a wide array of species. Attempting to ‘mitigate’ by inserting trees into these habitats risks damaging what is already thriving. Moreover, the applicant is not offering to expand or enhance the site in any meaningful way. The reality is that the work of orchard restoration and species-rich planting is already underway, led by those who live and work here. Far from compensating for biodiversity loss, the applicant’s proposals subtract from an existing success story and offer nothing substantive in return.



Figure 9 Queen's Green Canopy Planting

The applicant maintains, as set out in Appendix TR14.2 of the Environmental Statement, that impacts on the veteran Bramleys could be mitigated through protection or, in the case of six trees within the draft Order Limits, by **transplanting** them. Additional information is provided in the addendum to that strategy. But transplanting veteran fruit trees is not mitigation—it is ecological fiction. These century-old Bramleys are not just old apple trees; they are **keystone biological structures with complex deadwood microhabitats, fungal communities, and mycorrhizal networks that cannot**

survive relocation. Peer-reviewed research is clear. *Cowan et al.* (2011)² found that transplanting mature trees results in extensive root loss and high mortality. *Strouts and Winter* (1994)³ concluded that “*Veteran trees should not be moved... because of the high risk that they will not survive the shock of being transplanted.*” Even if a trunk survives, the decay habitats and symbiotic relationships it sustained are destroyed. No respected arboricultural body supports translocation of fruit trees as compensation. The science is unequivocal: veteran trees must be protected in situ. Moving them is not preservation—it is loss, postponed by logistics.

The applicant claims that apple trees T6, T7, and T8 are “*of sufficient size and condition to allow for successful transplanting,*” **contingent on a lead-in time of up to three years** for root pruning, **followed by a decade of monitoring and recovery.** But this timeline alone casts doubt on the scheme’s feasibility. A three-year preparatory period, followed by ten years of fragile aftercare, does not align with the applicant’s own programme for delivery. Nor is it clear whether the translocation methods referenced are based on studies involving fruit trees—particularly ones as extensively hollowed and structurally delicate as these Bramleys. Veteran fruit trees differ significantly from parkland specimens or amenity trees in both physiology and ecology. Their age, internal decay, and reliance on complex soil-microbe relationships make them particularly vulnerable to stress and root disturbance. The suggestion that these century-old trees could be relocated without fatal consequence is not only unsupported—it is implausible.

Even if one were to accept the transplant proposals at face value, the question of delivery remains unresolved. The **Greater Cambridge Partnership**—the architect of the scheme and its proposed mitigation—is **a time-limited body funded under the City Deal**⁴, currently expected to disband by **2030**. Meanwhile, Cambridgeshire County Council, the applicant, is itself the subject of ongoing national discussions around local government reorganisation, with unitary authority models⁵ under active consideration. In both cases, the institutions proposing long-term ecological management may not exist in the timescales required to monitor, support, or enforce it. How, then, is the public to have confidence that these mitigation offers are anything more than sleight of hand—designed to secure consent now, without any credible mechanism for accountability or consequence in the years to come?

² Cowan, G., et al. (2011). Physiological decline in mature transplanted trees, *Arb Journal*, 33(4), 235–248.

³ Strouts, R., & Winter, T. (1994). *Veteran Trees: A Guide to Good Management*, Ancient Tree Forum. [[link](#)]

⁴ [Greater Cambridge City Deal signed - GOV.UK](#)

⁵ [Devolution and Local Government Reorganisation | Cambridgeshire County Council](#)

B. Strategic Transport Delivery: Absence of Operator Support Undermines Scheme Purpose. Impacting our SoC Grounds for Objection; 4.

At the Preliminary Meeting held on 24 June 2025, **Alison Melton**—Special Adviser to the Mayor—confirmed **Mayor Paul Bristow**'s intention to participate in this Inquiry.



- Tory mayor Paul Bristow says he'll pursue light rail and bin busway plans
- Lib Dems win county council control thanks to six votes in one division

Figure 10 Cambridge Independent May 7 - May 13, 2025

Following his election in **May 2025**, the Mayor of the **Cambridgeshire & Peterborough Combined Authority** publicly confirmed that he does not intend to operate bus services along the GCP's proposed off-road route. As Transport Authority, it is the Mayor—not the applicant, Cambridgeshire County Council—who holds statutory responsibility for commissioning and funding bus services under the Bus Services Act 2017. The County Council is responsible for highways infrastructure, but not for operating the public transport that would use it.

Mayor Bristow has instead outlined a revised strategy: light rail as a long-term goal, and in the meantime, targeted investment in improving frequency and coverage of existing bus services using existing infrastructure. These are practical, cost-effective solutions that can deliver real benefits to passengers now—without compromising green belt, wildlife corridors, farmland, or countryside, or impeding economic growth.

Without the support of the Transport Authority, no services will run on the proposed route. Without services, the scheme cannot deliver its claimed public benefit. And without that benefit, the justification for compulsory acquisition falls away.

C. Safety Concerns with the Busway Design Impacting our SoC Grounds for Objection; 8.

Police investigate after fire engine and two guided buses collide – Stagecoach driver ‘critical’ and 18 other people injured in crash



This was the scene near Northstowe following a shocking incident in which a fire engine on an emergency call and two guided buses were in a collision, leaving 11 people in need of treatment **News | page 7** Pictures: Keith Heppell

Decade of safety failures on busway condemned

■ Three people died ■ Two children seriously injured ■ Council fined £6m

Figure 11 Judge Mark Bishop criticised the authority for its "rigid and blinkered response" [BBC]

The applicant asserts⁶ that the proposed scheme will deliver “a high degree of inherent safety” through adherence to the Road Safety Audit process, ROGS principles, and the anticipated integration of sensor-based guidance, speed-limiting systems, and a designated emergency corridor. These assurances, however, must be assessed in the context of past experience within the same authority and infrastructure framework.

In **April 2025, Cambridgeshire County Council was fined £6 million by the Health and Safety Executive** following the deaths of three individuals and multiple injuries associated with the original Cambridgeshire Guided Busway. The investigation identified systemic failings in both design and management, including excessive vehicle speeds (up to 56 mph), poor lighting, inadequate signage, and the lack of fencing in areas known to pose significant risk. Fencing along the southern route was not installed until March 2024—years after the system opened and only following multiple fatal incidents. On the same day the sentencing was handed down, a fire engine collided with two guided buses—further highlighting persisting design vulnerabilities.

The applicant distinguishes this proposal from its predecessor. However, it is being brought forward by the same authority, operating under the same institutional structures,

⁶ Draft Statement of Common Ground (21 July 2025)

and with similar personnel. Assertions of improved oversight and lessons learned must be considered in the light of these continuities.

The reliance on the CAVForth autonomous bus trial as precedent also raises questions. That project operates in a tightly controlled urban setting with short-range vehicles and low operational complexity. It is not readily comparable to the rural, open, and multi-use corridor proposed here. There is, to date, no published evidence that the proposed technology has been tested or demonstrated to be safe under similar environmental or operational conditions.

The concerns raised are not hypothetical. Peter Rayner, former British Rail operations manager with over fifty years' experience, served as a professional witness at the St Ives Guided Busway Public Inquiry. A native of Coton who grew up in the orchard, Mr. Rayner combines technical expertise with detailed local knowledge. His warnings—especially regarding the system's limited risk tolerance in conditions of low visibility, narrow access, and unpredictable use—went unheeded. The Health and Safety Executive's prosecution has since confirmed the seriousness of those early concerns. While the applicant now states that "*lessons have been learned*," it has not adequately addressed the issues identified.



Figure 12 Runners, walkers, school children & workers cross the proposed busway route at multiple points

This is not a vacant corridor through disused land. It is a living landscape—one defined by long-established patterns of use. Volunteers and staff move across it daily to care for trees, undertake surveys, or support seasonal harvesting. School groups visit for environmental education as part of structured learning. These are established activities, grounded in community practice. Yet the current design includes no defined internal crossing provision within the orchard and offers only limited, as yet undefined, solutions at its public-facing boundaries.

The applicant acknowledges in its own documentation that “*full details of the guidance technology and vehicle design have not been defined at this stage of the project. The assumption is that similar technology as used on the CAVForth scheme would be used.*” Given that this is a guided busway proposal—where the core rationale, footprint, and risk profile all derive from the specifics of the guidance mechanism—this omission is significant. In the context of a Transport and Works Act Order, and particularly one involving compulsory acquisition of land, it is reasonable to expect a higher degree of certainty. These powers are extraordinary. They must be exercised with care, and only on the basis of clear, demonstrable evidence—not intentions still in development.

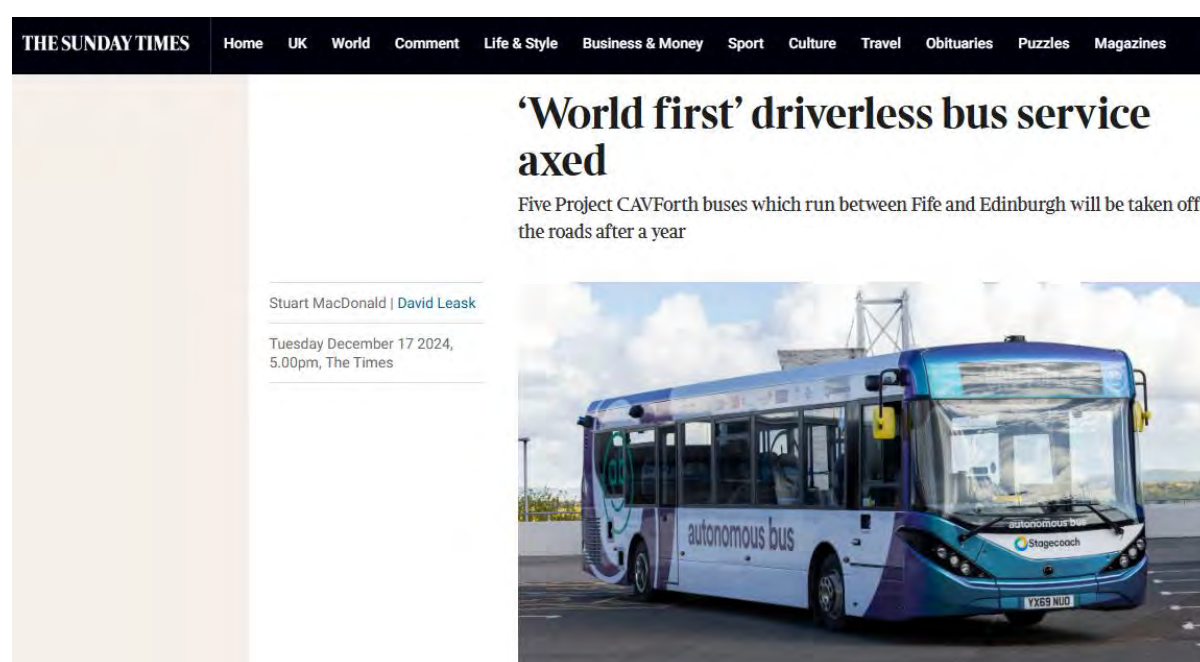


Figure 13 The “driverless” service actually involved two staff members on board to supervise

The applicant holds up the CAVForth autonomous bus trial as a glimpse of the future. But that future, as it turned out, arrived quietly and departed just as fast. Launched in May 2023 to much fanfare, the trial promised to usher in a new era of driverless public transport. Instead, it was quietly wound up in February 2025, citing low passenger numbers despite a capacity of 10,000 journeys per week⁷. The buses ran not through tangled field paths or ecologically sensitive landscapes, but across the controlled and largely empty expanse of the Forth Road Bridge. Even there, they required two staff on board—a “safety driver” and a “bus captain”—casting doubt on the promise of lower labour costs⁸. The service was heavily subsidised through the UK government’s £81 million investment in connected and autonomous mobility trials⁹, and still it failed to survive. Passengers were required to disembark at either end and reboard conventional

⁷ Stagecoach East Scotland (2025) *Autonomous Bus Trial to End in February 2025*. Available at: <https://www.route-one.net/news/cavforth-autonomous-bus-service-to-end-due-to-low-patronage>

⁸ The Times (2025) *Driverless bus route between Fife and Edinburgh to be axed*. Available at: <https://www.thetimes.co.uk/article/driverless-bus-fife-edinburgh-axed-35pk0xj8j>

⁹ Centre for Connected and Autonomous Vehicles (2023) *CAVForth Project Overview*. Available at: <https://www.gov.uk/government/publications/connected-and-autonomous-vehicles-cav-research-and-development-projects>

services, a friction that proved fatal to ridership¹⁰. Yet this is the model being invoked to justify a 40-metre-wide road driven through a County Wildlife Site, across high-grade agricultural land, through a City Wildlife Site, and into a Conservation Area. CAVForth's failure didn't stem from potholes or poor PR. It failed because people didn't use it. There is nothing in that outcome that recommends it as a precedent for Cambourne to Cambridge—except, perhaps, as a warning.

Under Section 13(1) of the Transport and Works Act 1992, compulsory acquisition powers may only be granted for land “*required for the purposes*” of the scheme¹¹. That requirement presumes a scheme whose operational foundations are clearly defined, such that the Secretary of State can be satisfied that the land is both necessary and proportionate to the intended public benefit. This principle is reinforced by the Department for Transport's Guidance on Transport and Works Act Orders, which states that applicants must ensure their proposals are “*sufficiently developed to enable the Secretary of State to reach a proper judgement on the case for granting the order.*”¹² Where essential elements—such as the guidance system of a guided busway—remain undefined, the case for compulsory purchase is not only incomplete but potentially contrary to statutory and policy expectations. The powers sought are exceptional; they require certainty, not assumption.

¹⁰ Edinburgh Napier University (2024) CAVForth: Public Attitudes to Autonomous Buses – Interim Findings. Available at: <https://innovationhub.napier.ac.uk/environments/environment-case-study-cavforth-project>

¹¹ Transport and Works Act 1992, s.13(1).

¹² Department for Transport, Guidance on the Procedures for Transport and Works Act Orders (2006), para 5.5. 05.08.2025

D. Misleading Assertions in the Applicant's Statement of Case

The Applicant's Statement of Case contains multiple assertions concerning Coton Orchard with which we fundamentally disagree. Many of these points have already been addressed elsewhere—either in our own submissions or through the testimony of expert witnesses—and need not be repeated here. However, two claims are so frequently made, and so critical to the narrative the applicant seeks to establish, that they merit specific correction.

(i) *Coton Orchard “is not publicly accessible”*



Figure 14 Blossom Day – One of many free, publicly accessible events held at Coton Orchard [BBC News]

This is demonstrably false. Coton Orchard is not only physically accessible to the public through managed and permitted access, but it is also socially and educationally open in ways that many officially designated nature sites are not. Over the past decade, Coton Orchard has hosted school groups, Brownies, company volunteer days, conservation walks, moth trapping evenings, expert-led **bioblitzes**, and citizen science events. Public-facing partnerships—such as those with the **East of England Orchard Project**—run bookable workshops on grafting and traditional orchard management. Annual celebrations such as **Blossom Day**, **Apple Day**, and the winter **Wassail** are free and open to all.

In practical terms, the orchard is more publicly accessible and more regularly visited than Madingley Wood SSSI, the very site the applicant uses for ecological comparison. Madingley Wood, while of great ecological importance, is accessible by permission only and largely closed to unsupervised public use. Coton Orchard, by contrast, is walked, worked, studied, and celebrated year-round by a wide cross-section of the local and

scientific community. Public access, in this context, is not defined by the presence of a turnstile—it is defined by invitation, welcome, and meaningful engagement. Coton Orchard offers all three.



Figure 15 East of England Orchards Project class at Coton Orchard

(ii) Coton Orchard “has long been considered commercially unviable”

This claim is unsupported by fact. Coton Orchard Ltd has declared profits to HMRC for more than two decades. While the business model has evolved—shifting from intensive production to nature-based stewardship—it remains financially robust. Revenue comes not only from fruit sales, but also from the sub-letting of refurbished farm buildings to Blue Diamond Garden Centre, whose tenancy underpins the long-term maintenance of the site.

The viability of this mixed-use model depends on access to the entire landholding. Fragmenting the site would not enhance its function—it would dismantle it.

More troubling is the applicant’s choice of language. In multiple documents, the orchard is described as “*degraded*,” “*unproductive*,” and “*nonviable*.” These are not neutral descriptors—they are value judgements drawn from a reductive frame: one that recognises nature only when it is extractive, and sees land as useful only when exploited. This is precisely the worldview challenged by Professor Sir Partha Dasgupta in his government-commissioned *Economics of Biodiversity Review* (2021). “*Nature is our most precious asset*,” he writes, “*yet we have failed to manage it sustainably, and its value is not reflected in market prices*.” His core argument—that ecosystems must be treated as capital, not scenery—has been endorsed at the highest levels of government. It requires decision-

makers to consider ecological function, cultural meaning, and long-term resilience—not merely gross yield per acre.

Sir Partha is also one of many who have walked the orchard’s avenues—not as a passive observer, but as a participant. He has cited Coton Orchard in his lectures as an exemplar of how a landscape can support biodiversity, cultural memory, and sustainable practice. He has even joined the community in wassailing these very trees—an old rite of hope and gratitude. That act, like the orchard itself, defies the applicant’s characterisation. These are not degraded edges. They are working systems—ecologically dynamic, socially rooted, and economically viable.

By that measure, Coton Orchard is not a failing asset but a thriving one. To call it “nonviable” is not to reveal its limitations, but to expose the narrowness of the applicant’s lens.



Figure 16 Wassailers walk orchard paths set to be cut by the proposed busway [Cambridge Independent]

Proof of Evidence Appendix 1

Statement of Case (original submission)

This Statement of Case is submitted on behalf of **Coton Orchard Limited** (affected tenant), **Houston Crest Properties Ltd** (landowner), and **Anna Gazeley** (long-time resident of Coton) in objection to the Cambourne to Cambridge (CtoC) Transport and Works Act Order (TWAO). The proposed scheme, submitted by Cambridgeshire County Council (CCC) on behalf of the Greater Cambridge Partnership (GCP), seeks the compulsory acquisition of land at Coton Orchard and the deemed grant of planning permission for the off-road segment of the CtoC busway.



We fully support improvements to public transport and active travel connectivity between Cambourne and Cambridge. However, the GCP's preferred route (shown above) is fundamentally flawed. We specifically object to the off-road segment (referred to in the Deemed Planning Drawings¹³ as Sections 6 to 11, highlighted above, spanning approximately 1.6 miles), which would cut through Madingley Hill, best and most versatile (BMV) farmland, and Coton Orchard—a Priority Habitat and County Wildlife Site—inflicting irreversible harm on an irreplaceable landscape.

Rather than supporting central government's growth objectives, the GCP's preferred route is likely to conflict with the planned reservoir expansion and East West Rail (EWR) projects, critical to addressing water scarcity and improving connectivity. Additionally, this route would consume a disproportionate share of the City Deal grant, diverting funds from infrastructure projects that better align with the government's goals while complementing its broader vision for sustainable growth.

Better alternatives exist, such as the on-road proposal by Cambridge Past, Present & Future (CPPF). This would deliver the necessary transport improvements, align with government priorities, and achieve these aims at a lower financial and environmental cost—all without the lasting damage of the current proposal.

¹³ [CambourneToCambridgeTWAO-CCC - CtoC-16-DP4-00.pdf p2](#)

This Statement of Case sets out the grounds for our objection to the TWAO, largely as first submitted in our formal objection. We understand that experts in carbon calculations, veteran trees, biodiversity, economics, and transport policy have raised independent objections. Therefore, while we have retained our original points to ensure the wider framework of our objection remains clear, we have not expanded our analysis, instead offering the perspective of someone directly affected—a ground-level view of what this scheme means for the landscape, community, and future of the area.

This document continues with a personal statement followed by a structured list of objection points.

A Personal Perspective

My father, Albert Gazeley, was born in London's East End, the youngest of six children. As part of Operation Pied Piper, he and his siblings were evacuated to Cambridge during the Blitz, where they made their home. A third-generation clockmaker, he had no ties to farming, yet he grew up in an era when orchards shaped the landscape – the air alive with birdsong and the hum of insects.

After serving in the RAF, he built a career in the Far East with Seiko watches, always longing to return. When he did in 1996, much of what he cherished had vanished – orchards grubbed up, nightingales silenced. Then, an advert in the Cambridge Evening News caught his eye: Coton Orchard for sale – a development opportunity. Others saw profit; he saw a chance to preserve history.

He converted the cold stores, replacing the asbestos roof, and leased them to a garden centre, allowing the rest of the orchard to transition from commercial to conservation. Pesticides were abandoned. The soil – undisturbed – teemed with life. New trees were planted – heritage varieties on vigorous rootstock, not for yield, but for resilience. Fallen trees became rich deadwood habitats, vital for biodiversity.

Some say personal history has no place in a public inquiry, but it matters. The applicant reduces the orchard to numbers on a spreadsheet – a place where a subtraction can be mitigated by a sapling planted elsewhere. But an orchard is not just a collection of trees. As Peter Rayner¹⁴, who was born there, put it: “To see the orchard as a collection of trees is itself a flawed approach. It is, and always has been, part of the heritage of Cambridge and its surrounding villages.”

Even the applicant's own Environmental Impact Assessment admits this land is a lifeline for red-listed birds, bats, invertebrates, fungi and mosses – species declining everywhere, yet thriving here. Fracture the orchard, and the ecosystem collapses.

At a time when our council has declared a climate emergency, what sense is there in destroying Cambridgeshire's largest remaining traditional orchard? To reach net zero? Healthy soil is a carbon sink. To clean the air? Trees store carbon and produce oxygen. For economic growth? A reservoir is planned for Maddingley Hill, yet the GCP route would run straight through it. To improve transport? The busway would terminate at Grange Road – already gridlocked, with no clear onward connections. Is it cost-effective? The Benefit-Cost Ratio (BCR) is below 0.5 – a failure by any reasonable standard.

I will leave the technical arguments to those with PhDs and Nobel Prizes – many of whom oppose this scheme. But as someone who has watched and listened for over a decade, I ask: what sense is there in this?

I know what the cost will be – to our county's finances, its environment, and its heritage.

¹⁴ [YouTube](#) Peter Rayner reading his letter to the Cambridge Independent

Grounds for Objection

1. Significant Adverse Environmental Impact:

Coton Orchard, Cambridgeshire's largest traditional orchard¹⁵, is designated a Priority Habitat under the UK Biodiversity Action Plan¹⁶, recognised as a “hotspot for biodiversity.” This unique mosaic habitat supports veteran trees, hedgerows, and orchard floor habitats, offering irreplaceable ecosystems for a wide range of wildlife. It is on Best and Most Versatile (BMV) farmland and within the Cambridgeshire greenbelt. It is an irreplaceable haven for biodiversity on the margin of a large, urbanised, city. Cambridgeshire is already the most nature depleted county in the country¹⁷, has among the poorest canopy cover¹⁸ and worst water quality, with 89%¹⁹ of its rivers showing unacceptable levels of nutrient pollution.

The TWAO Environmental Statement²⁰ acknowledges that “the orchard supports a notable range of insects, including some nationally rare species” and that its loss will have a “significant effect.” However, the report understates the site’s biodiversity, simplifies the mitigation of its destruction, and contains misleading statements. For example, the claim that the orchard “was managed intensively in the past through the use of pesticides and herbicides²¹” fails to reflect that over the subsequent three decades such practices ceased, the orchard has flourished, now supporting over 100 botanical species in its understory, as documented by Jonathan Shanklin²², in July 2024 and has the support of Pesticide Action Network UK²³

In October 2023, Coton Orchard was designated a County Wildlife Site due to its exceptional ecological value, including its veteran trees. As part of the selection process, Wildlife Trust Officer Lucy Wilson confirmed that most trees exceed 40 years of age, with some dating back to the original 1922 plantings. Twelve of these trees are listed in the Woodland Trust Ancient Tree Inventory²⁴, including a Bramley apple tree with a 2.44-metre circumference – one of the largest of its kind recorded in Britain²⁵.

Apple trees are particularly valuable wildlife habitats as they age quickly, developing veteran features such as hollow trunks, rot holes, dead wood, and sap runs much sooner than slower-growing species like oaks. These features provide essential nesting sites and food sources for a wide range of invertebrates, birds, bats, and fungi. The presence of these veteran apple trees directly contradicts the applicant’s assertion that the orchard is “dominated by high-density younger trees.”²⁶

¹⁵ PTES Traditional Orchard [inventory](#)

¹⁶ Natural England Technical Information Note TIN020

¹⁷ The Cambridge Nature Network – [Report](#) prepared by The Wildlife Trust BCN

¹⁸ FOE Tree Cover Mapping [Report](#)

¹⁹ [Citizen testing finds 75% of rivers in Britain in poor ecological health | Rivers | The Guardian](#)

²⁰ GCP Environmental Statement NTS Document Ref: CtoC-9-00 p21

²¹ GCP Environmental Statement Ref: CtoC-10-ESO-00 p103

²² British Antarctic Survey Emeritus Fellow, Botanical Society of Britain & Ireland Recorder for Cambridgeshire

²³ <http://cotonorchard.com/letters/PANUK.pdf>

²⁴ Ancient Tree Inventory [Map](#)

²⁵ Recorded by David Alderman of <https://treeregister.org/> Aug 2023

²⁶ CtoC-10-ESO p103

On 15 January 2025, by a vote of seven to one, the South Cambridgeshire District Council (SCDC) Planning Committee approved the making of a Provisional Tree Protection Order (TPO) PZZHXBPN²⁷, recognising the significant conservation value of these trees. The Tree Evaluation Method for Preservation Orders (TEMPO) score of 16 confirms their high importance, as this assessment considers factors such as amenity value, condition and longevity. A score of 16 falls within the “definitely merits a TPO” category, highlighting the trees’ exceptional ecological and landscape significance and reinforcing the need for their protection.

Coton Orchard’s rich biodiversity is further evidenced by its role as a critical habitat for numerous protected and rare species:

- **Bats:** “A total of eleven bat species were recorded during the survey period. These comprised *Nathusius*, *Common* and *Soprano Pipistrelle* bats, *Noctule*, *Serotine*, *Leisler's*, *Barbastelle*, *Brown Long-eared*, *Whiskered/Brandt's*, *Natterer's* and *Daubenton's*.” “The hedgerow with the most activity was hedgerow 10, along the eastern boundary of Coton Orchard”²⁸ emphasising its importance as a habitat corridor and feeding ground.
- **Invertebrates**²⁹: A “sizeable area of habitat mosaic in Coton Orchard (2.2ha) will be lost to the Scheme, which contain a notable diversity of invertebrate species. Surveys identified 239 species, 14 Nationally Scarce species, including eight beetles, two bees and four moths. ... given the range and number of species, and rarity of some, the impact will result locally in a significant adverse effect.” Additionally, Red Data Book species were recorded in 2024 by the Cambridgeshire Moth Group³⁰ not reflected in the EIA.
- **Birds:** Forty-two breeding species were observed in Coton Orchard 2024 (Sixty-seven within survey area³¹) by applicant surveyors WSP³², including “Five Species Listed on Section 41 (Priority Species) of the Natural Environment and Rural Communities (NERC) Act, 2006”. Additionally, sixty-one³³ species was noted by RSPB and other Cambridgeshire recorders, twenty-nine BoCC Red/Amber-listed and/or NERC Priority Species.
- **Soil Biodiversity:** Including fungi, mosses, and lichens, are critical to ecosystem health and resilience. Dr Merlin Sheldrake³⁴, a leading expert and author of *Entangled Life*, describes Coton Orchard as “a national treasure... a century-old island of undisturbed biodiversity in a highly developed landscape: its communities of plants, animals, and fungi cannot be replaced.” Dr Chris Preston recorded 45³⁵ species of mosses and liverworts at Coton Orchard, including

²⁷ [Agenda for Planning Committee on Wednesday, 15 January 2025, 10.00 a.m.](#)

²⁸ Cambridge Ecology 02/04/2020 P0608-R-019b Ref. 3.10, p20-21

²⁹ GCP Environmental Statement Ref: CtoC-10-ESO-00 p69, p106

³⁰ Reported in [Guardian](#)

³¹ CtC-10-ESO-00 p69

³² TR5.18 Breeding Bird Survey Report: Coton Orchard 2024 p8

³³ Coton Orchard Species Record: [Birds](#)

³⁴ https://en.wikipedia.org/wiki/Merlin_Sheldrake

³⁵ Coton Orchard Species Record [Mosses](#) and liverworts

Thuidium tamariscinum, typically found only in ancient woodlands. These findings underscore the orchard's uniqueness and its essential role in biodiversity conservation.

The TWAO application fails to fully account for the ecological significance, rich biodiversity, and irreplaceable habitat that Coton Orchard provides. Steve Oram, Orchard Biodiversity Officer at the People's Trust for Endangered Species, summarises³⁶: "This utterly destructive proposal can never achieve biodiversity net gain due to the vast amounts of damage that it will do to an ancient orchard full of veteran trees, and the enormous impact of a road going through so much previously undamaged and unfragmented countryside."

2. **Adverse Commercial Impact:**

The fragmentation of Coton Orchard by the proposed busway has implications that extend beyond ecological damage, threatening its economic viability as well. Over the past 30 years, the orchard has transitioned from intensive fruit & juice production to a conservation-focused, pesticide-free approach, prioritising quality over quantity, seeking premium pricing to meet production costs. This shift includes the cultivation of heritage varieties of apples, cider apples, pears, and perry pears.

In collaboration with local enterprise Blue Barrel Cider³⁷, the orchard planted 30 new cider apple trees last season, with plans to add 50 more this season, alongside establishing a heritage perry orchard. Apples from the veteran Bramley trees were used to create a limited-edition *Cuckoo's Return*™ cider, as well as blended with Arcadia Orchard's Black Dabinett apples to produce a premium sparkling cider, *East to Eden, Origins*™. By expanding Coton's stock of heritage trees, the orchard aims to achieve greater self-sufficiency and, in turn, supply other cider & perry makers. Additionally, trees from the Tian Shan Mountains (*Malus sieversii*)—the wild ancestor of all domestic apple varieties—have been introduced. These trees bring genetic diversity, enhancing natural resilience to climate change and pests, while offering unique flavour profiles that add a compelling selling point to the orchard's products.

Traditional orchards are defined by trees grafted onto vigorous rootstocks³⁸, requiring wider spacing and substantial acreage to sustain operations, particularly at lower production intensity. At Coton Orchard, the rows of apple trees have been planted in a carefully established north-to-south orientation, with avenues maintained between them to facilitate uninterrupted access for tractors and other essential machinery. Over decades, these rows—together with the adjoining hedgerows—have become deeply rooted and integral to the orchard's operational and ecological structure. Unlike ploughed fields, this orientation cannot be arbitrarily altered without fundamentally impairing the orchard's functionality. The proposed busway and its associated infrastructure would sever these critical access routes, making operations impractical and rendering the orchard commercially unsustainable.

³⁶ [ptes_letter.pdf](#)

³⁷ [Our Story - Blue Barrel Cider](#)

³⁸ UK Biodiversity Action Plan; Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008.

Without economic viability, the orchard cannot be managed effectively for conservation. Habitat loss would extend far beyond the immediate busway footprint, as traditional orchard management practices—critical to maintaining biodiversity—would become unfeasible. This fragmentation would jeopardise the orchard’s future, undermining its cultural heritage and its role as a reservoir of biodiversity. The cascading effects of this scheme would leave an irreplaceable environmental and economic void in the local landscape. None of the above has been adequately considered or reflected in the TWAO application.

3. **Poor Value for Money (VfM):**

The Department for Transport's Value for Money framework classifies a Benefit-Cost Ratio (BCR) below 1 as “poor.” The initial BCR for the Cambourne to Cambridge (CtoC) project stands at 0.43³⁹ based on 2010 prices. Adjusting for inflation to 2025 would further diminish this ratio.

In the Autumn Budget 2024⁴⁰, Chancellor Rachel Reeves reaffirmed the government's commitment to East West Rail (EWR), with initial services between Oxford, Bletchley, and Milton Keynes set to begin in 2025, and extensions to Bedford by 2030. While the specific route to Cambridge is under consultation, both proposed alignments include stations at Cambourne, offering a more efficient solution for long-term growth and potentially duplicating infrastructure and expenditure, thereby further reducing the VfM of the CtoC busway as currently proposed. A less costly on-road alternative, referenced overleaf, could help achieve comparable growth objectives more swiftly and at a fraction of the cost, delivering significantly better VfM.

4. **Insufficient Public Benefit:**

At the CCC meeting on 21st March 2023⁴¹, Council Leader Lucy Nethsingha outlined two key objectives for the CtoC busway: “decarbonisation ... moving to a net zero economy” and enhancing public transport links between Cambourne and Cambridge, particularly to destinations like post-16-year-old education colleges, employment centres, Addenbrooke’s Hospital, and the Biomedical Campus. The CtoC project as outlined, however, falls short of evidence to demonstrate that these objectives will be met.

- **Carbon Emissions:** The EIA estimates a net saving of approximately 5,000 tonnes of CO₂ equivalent (tCO₂e) over a 60-year period⁴². The report itself concedes that this is “a minor benefit given the time taken to reach net zero and the relatively small overall carbon reduction.” This equates to an annual reduction of less than 100 tCO₂e—a negligible contribution in the context of UK transport emissions, which were 406 million tCO₂e in 2022⁴³. To provide further context, this reduction represents approximately 0.0016% of the 4th UK Carbon Budget,

³⁹ Mott MacDonald Outline Economic Case 17th January 2020 [link](#)

⁴⁰ [Autumn Budget 2024 \(HTML\) - GOV.UK](#)

⁴¹ YouTube recording [Full Council - 21 March 2023](#)

⁴² CtoC-10-ESO-00 p23

⁴³ Transport and environment statistics 2022 Gov.uk [link](#)

with projected contributions of 0.0003% to the 5th and 0.0004% to the 6th Carbon Budgets. Such fractional impacts render the scheme's claimed carbon benefits statistically insignificant. Carbon savings these minimal raises serious questions about the project's justification from a carbon reduction perspective. In light of the urgent need for impactful climate action, the scheme's carbon performance fails to meet the threshold for meaningful contribution to the County⁴⁴ or UK's net-zero targets.

- **Travel options:** The CtoC route fails to address practical travel needs and lacks integration with existing transport services. Bus franchising in Cambridgeshire is still in its early stages, making it likely that any new services will depend on commercial operators, such as Stagecoach, which already runs Cambourne–Cambridge services (e.g., Bus Route 4⁴⁵, changing at Drummer Street Bus Station). Andy Campbell, former Managing Director of Stagecoach East for 14 years and a respected authority on local transport, has publicly criticised the CtoC route as “fundamentally flawed.” Speaking on BBC Radio⁴⁶, he highlighted that terminating the route at Grange Road fails to provide direct access to Addenbrooke's Hospital, post-16 education in Cambridge, and other key destinations. Bypassing major transport corridors, such as the M11 and A14, the proposed busway restricts connectivity and limits integration with the wider transport network. These fundamental shortcomings severely undermine the scheme's ability to deliver meaningful improvements to regional travel infrastructure.

5. Alternative Options:

A viable in-highway alternative has been proposed by the local conservation charity Cambridge Past, Present and Future (CPPF). This option, when considered alongside the future East West Rail (EWR) connection linking Cambourne and Cambridge while serving additional destinations, provides a practical and sustainable solution.

The CPPF will supply the technical details of their proposed route. However, several key objections raised by the GCP and CCC Councillors during consultations and meetings to which I was privy warrant closer scrutiny to ensure a thorough and fair assessment of the CPPF in-highway alternative.

- **American Military Cemetery (AMC):** Cllr Elisa Meschini, Chair of the GCP, has claimed that the CPPF's proposed on-road alternative is unviable due to an objection from the AMC⁴⁷ citing terms of their covenant. However, this assertion is contradicted by AMC Superintendent Matthew Browne⁴⁸, who addressed the GCP Executive Board⁴⁹ to express specific support for the CPPF's proposed on-road route.

⁴⁴ Approx 0.0057% source [CCC](#)

⁴⁵ Stagecoach journey planner [link](#)

⁴⁶ BBC Radio Cambs Chris Mann Show 22 April 2024 available BBC Sounds

⁴⁷ Full Cambs County Council Meeting 21 Mar 2023

⁴⁸ American Magazine [Report](#)

⁴⁹ GCP Exec Board meeting 01.07.21. [YouTube](#)

- **Madingley Wood SSSI:** The protection of Madingley Wood, a Site of Special Scientific Interest (SSSI), is frequently cited by GCP officers (and in turn Councillors) as a reason for rejecting the CPPF's proposed on-road routing. Jo Baker, GCP Project Manager, claimed that “the strip of land between the fence line and the highways contains mature native trees that are more valuable than the trees to be lost at Coton Orchard.” However, in a letter dated 25 September 2024, Baker acknowledged that the GCP “have not undertaken a tree survey for Madingley Wood SSSI”. Unlike the applicant’s proposal, which involves constructing a new infrastructure bisecting Coton Orchard, the CPPF on-road alternative utilises the existing road infrastructure, avoiding harm to both Coton Orchard *and* the SSSI. The existing road will remain in use regardless of the busway’s construction, meaning the applicant's alignment would unnecessarily add to environmental disruption in this sensitive area. In contrast, the CPPF route minimises additional impact, preserving the integrity of the SSSI while saving Coton Orchard and avoiding the ecological harm caused by severing its habitat.
- **Independent Audit:** Officers and Councillors reference an independent audit to support the off-road option presented by the applicant, implying validation of the proposed route and discrediting the CPPF on-road alternative. However, the audit explicitly states, “It is not the role of this audit to adjudicate between conflicting options,”⁵⁰ highlighting its limited scope.

The audit further emphasises the need to consider “significant changes in the wider context, including the impact of Covid-19, the increasing importance of climate change, the government’s new bus policy, (and) East-West Rail” stressing that these factors must be addressed in the next stages of developing the CtoC scheme. The audit also critiques the scheme’s reliance on the City Access program, which proposes soft measures such as reducing on-street parking and reallocating road space to active travel, without offering alternative solutions to improve city-wide bus accessibility. Crucially, it notes that “no detailed modelling of the likely impact has been conducted, so it remains uncertain whether bus accessibility will improve.”

This lack of conclusive analysis undermines the credibility of claims that the proposed route has been validated and raises significant questions about the robustness of the applicant’s approach.

6. Significant Opposition:

The GCP off-road routing for the CtoC busway has faced significant cross-party and expert opposition, both locally and nationally. As of 9th March 2025, the CPPF petition⁵¹ has gathered **23,685** signatures which also reflects public opinion demonstrated in each and every consultation over the past years. Prominent opponents include Baroness Jenny Jones, Green Party peer and environmental advocate, and Lord Whitty, Labour peer and

⁵⁰ GCP CtoC Audit 2021 [Final Report](#) p.6 & p69

⁵¹ Petition link <https://www.change.org/p/save-the-green-corridor-cambourne-to-cambridge-bus-lane-not-busway>

former Parliamentary Under-Secretary of State for Food, Farming and Sustainable Energy. Sir Partha Dasgupta, economist and author of the Dasgupta Review on biodiversity, and Sir David King, former Chief Scientific Adviser and climate change expert, have also raised objections. Conservation organisations opposing the route include the People’s Trust for Endangered Species (PTES), The Wildlife Trusts, and The Woodland Trust. High-profile environmental advocates such as Dr Merlin Sheldrake, biologist and author, and Chris Packham, naturalist and broadcaster, have joined the call for the proposal to be reconsidered. This extensive opposition reflects a broad and credible coalition against the proposed off-road routing of the CtoC busway⁵².

7. **Planning Policy Conflicts:**

National Planning Policy Framework (NPPF) “Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons”. Jack Taylor⁵³, lead campaigner at the Woodland Trust, emphasised that “these veteran trees are protected through the NPPF” and are a “vital and treasured part of the UK’s natural and cultural landscape.”

8. **Technical and Financial Issues:**

The unresolved technical challenges, funding uncertainties, and lack of evidence supporting the feasibility of the CtoC project raise serious concerns about its viability as outlined in the application.

- **Guidance System:** The application cites a “market sounding exercise” of 6 options, conducted in October 2018, which concluded that both kerb-guided and optical guidance systems could meet the scheme’s requirements but does not make a definitive selection. The applicant acknowledges that “the physical infrastructure required for each system would differ.”⁵⁴ The failure to select a single system at this stage potentially undermines the robustness of the project’s technical foundation.
- **Safety and Financial Concerns:** Throughout consultations, the public has been led to believe that the proposed CtoC busway will mirror the existing Cambridgeshire Guided Busway, which operates between Cambridge, Huntingdon, and St Ives. This system uses a kerb-guided mechanism, one of the two guidance systems under consideration for the CtoC project as mentioned above. However, the existing busway has faced significant safety issues.

Between 2015 and 2021, three fatalities occurred on the Cambridgeshire Guided Busway. In May 2023, the Health and Safety Executive (HSE) initiated legal proceedings against CCC for historic health and safety failings related to these

⁵² We can provide evidence, if required.

⁵³ Article <https://www.woodlandtrust.org.uk/press-centre/2023/05/veteran-trees-bus-route-rethink/>

⁵⁴ CtoC-10-ES4-00 ES Scoping Report 2.4.3 & 2.4.5 p12

incidents. By September 2024, the council admitted liability, pleading guilty to two charges under the Health and Safety at Work Act.

The financial repercussions of these safety failures are considerable. The council faces significant legal and compensation costs, with potential fines estimated to reach eight figures⁵⁵. Additional safety measures, such as installing new fencing along the busway, have further strained resources. These expenses compound CCC's existing budget deficit, currently standing at £28 million.

As the accountable body for overspending by the GCP, CCC assumes further financial risk from unresolved safety and operational concerns surrounding the proposed CtoC busway. These issues, if not adequately addressed, could lead to substantial budgetary overruns, placing further strain on already limited public funds.

The proposed route would not only transect valuable habitats but also sever well-used paths connecting residents to the school south of the alignment and homes to the north. Additionally, it would disrupt farm and orchard routes, necessitating crossings that have yet to be adequately addressed. Given the serious incidents associated with the original guided busway, such oversight appears negligent. These concerns would not arise if the CPPF on-road alternative were adopted, offering a safer, more cost-effective, and less disruptive solution.

- **New Service Reservoir at Madingley:** The applicant's alignment of the CtoC busway appears to conflict with Anglian Water's (AW) preferred pipeline corridor and associated infrastructure for the proposed Fens Reservoir⁵⁶, a critical project to address Cambridgeshire's severe water scarcity. Addressing this scarcity is a key factor underpinning the approval of 3,500 homes at Bourn Airfield⁵⁷—a decision that overrode Environment Agency objections. This approval is subject to Section 106 funding, which includes contributions for transport infrastructure potentially linked to the CtoC scheme. The proposed alignment therefore raises serious technical and funding concerns that the applicant has only superficially addressed.

While the Fens Reservoir is still in the consultation phase, the proposed location for the new service reservoir near the existing facility at Madingley is a logical choice for AW, enabling efficient integration with Cambridge Water's network by co-locating new infrastructure alongside existing facilities. This strategic approach minimises disruption and reflects sound engineering principles.

The new Madingley Hill reservoir is estimated to be approximately 200m by 200m⁵⁸—around eight times the width of the motorway (24–28m). If the busway

⁵⁵ [Judge due to sentence Cambridgeshire council after busway deaths - BBC News](#)

⁵⁶ Phase two consultation – p35 <https://fensreservoir.co.uk/assets/images/downloads/Associated-Infrastructure-brochure-2024-FINAL-WEB-SPREADS.pdf>

⁵⁷ SCDC notice of approval <https://www.scambs.gov.uk/news/formal-planning-permission-issued-for-new-village-at-bourn-airfield-after-similar-decision-for-west-cambridge-site>

⁵⁸ CtoC-10-ESO-00 11.3.6. p128

were required to span the reservoir, as it does the M11, it would necessitate substantial additional infrastructure, significantly increasing both the carbon footprint and financial cost of the project. Avoiding the reservoir entirely would also pose considerable challenges due to the surrounding terrain and the need for integration with other infrastructure, further complicating and escalating costs. Moreover, rerouting the busway to bypass the reservoir expansion would likely take it beyond the boundaries of the current TWAO application, potentially nullifying the scheme by rendering it incompatible with the submitted plans.

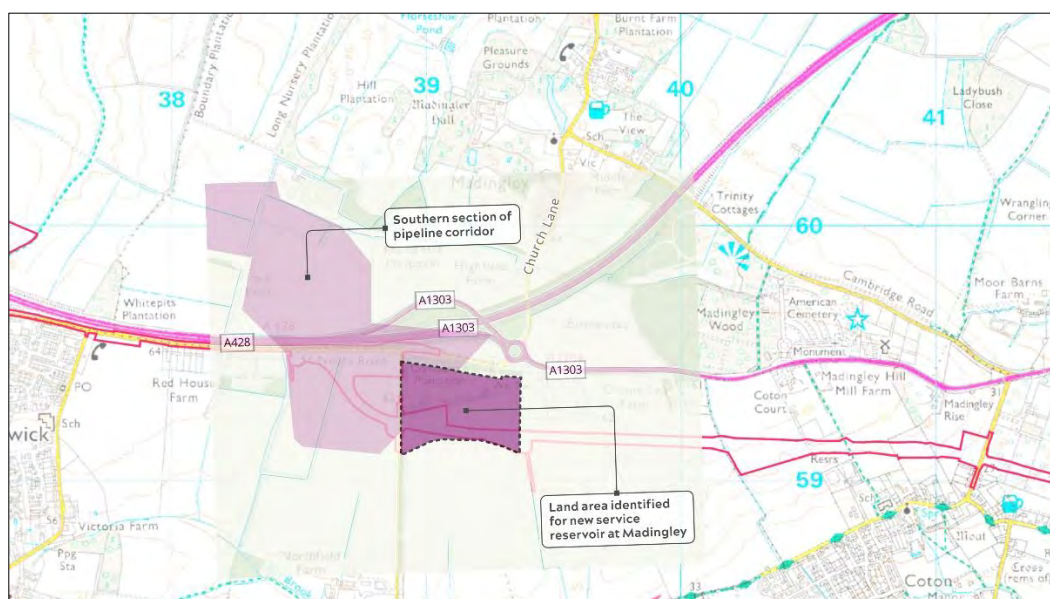


Illustration above created by overlaying maps from AW and CTOC consultation brochures.

The applicant's off-road route risks creating unnecessary conflicts between the busway and this essential water infrastructure. Construction activities for the proposed route could delay or disrupt the reservoir project, which is vital for regional growth and sustainability. Moreover, the additional infrastructure costs required to mitigate these conflicts would further inflate the CtoC scheme's already significant budget.

These issues could be entirely avoided by adopting an on-road bus lane along Madingley Road, as proposed by CPPF. This alternative achieves the project's objectives while avoiding interdependencies that risk undermining both schemes.

9. Heritage and Cultural Impacts:

Cambridgeshire's fruit-growing heritage is a vital part of its cultural identity, with over 20 apple varieties originating in the county. Traditional orchards like Coton Orchard are rare survivors of this legacy, as England and Wales have experienced an 81%⁵⁹ decline in such sites. Coton Orchard holds significant historical value, not only as part of Cambridgeshire's rich fruit-growing heritage but also as a site of cultural and historical importance. During World War II, it served as a refuge for Austrian Jews, embedding it deeply in the local community's memory. In recognition of this heritage, an Anne Frank

⁵⁹ [Orchards vanishing from the landscape, says National Trust - BBC News](#)

Horse Chestnut sapling has been planted within the orchard, symbolising resilience and hope. This is now noted on the UK Holocaust Map⁶⁰, further underscoring the site's significance in Holocaust remembrance. The destruction of this orchard for the proposed busway would result in the irreparable loss of a key cultural and historical landmark, undermining efforts to preserve the region's heritage for future generations.

10. **Insufficient Mitigation Measures:**

In the context of Biodiversity Net Gain (BNG) Regulations⁶¹, the loss of any Irreplaceable Habitat precludes achievement of BNG for that habitat. Veteran trees are deemed Irreplaceable Habitat and so removal would mean that it is technically not possible to achieve net gain in biodiversity of veteran trees.

11. **Insufficient Funding and Financial Viability Concerns:**

The applicant's Estimate of Costs for the CtoC project is £192.3 million⁶², excluding £15.3 million already spent, bringing the total to £207.6 million⁶³—a 14.5% increase. This figure is significantly underestimated. Adjusted for risk (£165.2 million base cost in 2020, Tender Price Index (TPI): 192⁶⁴), and projected inflation to 2026 (TPI: 228), along with reasonable contingency and factors such as increased employer National Insurance contributions announced in the Autumn Budget of 2024 (8.7%)⁶⁵, the estimated cost rises to between £226.1 million and £307.9 million.

Under Rule 10(2)(c) of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006, a Funding Statement must demonstrate sufficient and reliable funding for the proposed works.

The applicant's statement relies on:

- **City Deal Grant**⁶⁶ (£500 million), with £200 million subject to review in 2025 and not guaranteed for CtoC alone.
- **Section 106 Contributions** (£37.9 million⁶⁷), which are only partially allocated to the CtoC scheme, alongside other projects.

The inclusion of the full Section 106 contribution figure for CtoC is misleading, as it is not exclusively allocated to this project. City Deal funding, already over-programmed with a published deficit of £73 million⁶⁸, further complicates funding reliability. CCC, designated as the accountable body for shortfalls, faces a projected budget gap of £34.2 million in 2025-26. Moreover, in March 2024, the Government allocated £7.2 million to progress the

⁶⁰ <https://www.ukholocaustmap.org.uk/map/records/coton-orchard>

⁶¹ DEFRA (2024a) Guidance Irreplaceable habitats <https://www.gov.uk/guidance/irreplaceable-habitats>

⁶² Estimate of Costs TWAO ref CtoC-8-00

⁶³ GCP Exec Board Agenda 02/10/24 p99 [Document.ashx](#)

⁶⁴ Tender Price and Building Cost Indices <https://costmodelling.com/>

⁶⁵ [December 2024 issue of the Employer Bulletin - GOV.UK](#)

⁶⁶ <https://www.gov.uk/government/news/greater-cambridge-city-deal-signed>

⁶⁷ CtoC-7-00 6.1 Cambourne West £8.7 + 6.2 Bourn Airfield £20.0 + 6.3 West Cambridge £9.2 = £37.9

⁶⁸ GCP Exec Board Agenda 02/10/24 p99 [Document.ashx](#)

Cambridge South East Transport (CSET) scheme to TWAO submission due to escalating costs, highlighting that similar GCP projects are underfunded.

In contrast, the CPPF on-road scheme, which avoids the need for a costly motorway bridge, is estimated to cost just 10% of the current proposal. This alternative delivers comparable transport benefits at vastly reduced cost within a much shorter construction delivery time.

Conclusion

The proposed CtoC busway, specifically the off-road segment and additional motorway bridge, is a deeply flawed scheme that fails to justify its environmental destruction, excessive cost, and weak public benefits. Despite promises of enhanced connectivity and sustainability, the project achieves neither. Its Benefit-Cost Ratio remains below the Department for Transport's acceptable threshold, and the claimed carbon savings are statistically insignificant, offering no meaningful contribution to net-zero goals. The lack of a viable funding plan and over-reliance on overstretched public resources further undermines its feasibility. By contrast, the on-road alternative proposed by CPPF offers a practical, sustainable solution that can be delivered more quickly and at just 10% of the cost. Combined with the forthcoming EWR link, these alternative addresses connectivity and economic growth goals while preserving the invaluable heritage and biodiversity of Coton Orchard and Madingley Hill. As the landowner, HCP strongly objects to the compulsory purchase of its land for a scheme that is neither justified in the public interest nor compliant with planning and environmental standards. Such acquisition would irreparably harm the orchard's unique ecological and cultural value while failing to deliver proportional public benefits.

Request for Site Visit

The full extent of the environmental damage and the viability of an alternative route cannot be fully appreciated without first-hand observation. I respectfully request a site visit as part of the public inquiry, specifically to assess Madingley Road, the SSSI boundary, and Coton Orchard—crucial context no written submission can fully convey.

For any queries regarding this statement or regards the next steps in the TWAO process, please contact me at the registered business address: Coton Orchard Limited c/o Landbeach Lakes, Ely Road, Waterbeach, Cambridge CB25 9PG. Email: anna@cotonorchard.com

Yours sincerely,

Anna Gazeley

Director Coton Orchard Limited

Company Secretary Houston Crest Properties Ltd

☎ 07874 138 391



Figure 17 Above orchard looking up Madingley Hill



Figure 18 Above orchard looking across woodland scrub towards Cambridge