

Secretary of State for Transport

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To Secretary of State for Transport



**CAMBOURNE TO CAMBRIDGE (CtoC) TRANSPORT AND WORKS ACT ORDER (TWAo) –
SUBMISSION OF OBJECTION FROM STAKEHOLDER**

I write on behalf of **Coton Orchard Limited** (affected tenant) (**COL**), **Houston Crest Properties Ltd** (landowner) (**HCP**), and as a thirty-year resident of Coton, to formally object to the proposed CtoC TWAo, as submitted by **Cambridgeshire County Council (CCC)** on 12 November 2024. We oppose the making of the TWAo for the deemed grant of planning permission for the CtoC busway and the compulsory acquisition of HCP land for the off-road segment of the route. HCP contends that **Greater Cambridge Partnership (GCP)** has failed to demonstrate a compelling case in the public interest to justify the scheme, including the compulsory acquisition of its land and that planning permission for the CtoC busway should not be granted.

To be clear, we do not object to much-needed improvements to connectivity between Cambourne and Cambridge, increased public transport services, or the provision of a safe active travel route. However, we strongly oppose the off-road section of the proposed route between Maddingley Mulch and West Cambridge that would bisect Coton Orchard.

This objection is based on evidence across several areas, including significant environmental degradation, adverse commercial impact, insufficient public benefit, and non-compliance with planning policies. The proposed scheme threatens the ecological integrity of Coton Orchard—a designated Priority Habitat under the UK Biodiversity Action Plan—by destroying veteran trees and habitats that support numerous protected species.

This environmental harm is compounded by the project's failure to demonstrate value for money, evidenced by a Benefit-Cost Ratio below the Department for Transport's acceptable threshold and the absence of a viable funding plan to ensure successful delivery. Furthermore, the scheme conflicts with planning policies aimed at conserving irreplaceable habitats and lacks sufficient public benefit to justify the environmental and economic costs.

The detailed grounds for this objection are set out below.

1. Significant Adverse Environmental Impact:

Coton Orchard, Cambridgeshire's largest traditional orchard¹, is designated a Priority Habitat under the UK Biodiversity Action Plan², 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 country³, has among the poorest canopy cover⁴ and worst water quality, with 89%⁵ of its rivers showing unacceptable levels of nutrient pollution.

The TWAO Environmental Statement⁶ 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 herbicides⁷” 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 Shanklin⁸, in July 2024 and has the support of Pesticide Action Network UK⁹

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 criteria 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 Inventory¹⁰, including a Bramley apple tree with a 2.44-metre circumference—one of the largest of its kind recorded in Britain¹¹. Apple trees are particularly good habitats for wildlife because they get old relatively quickly (they are “early senescent” hardwood trees), developing veteran features such as hollow trunks, rot holes, dead wood and sap runs much sooner than other species like oaks. These facts contradict the applicant’s assertion that the orchard is “dominated by high-density younger trees.”¹²

¹ PTES Traditional Orchard [inventory](#)

² Natural England Technical Information Note TIN020

³ The Cambridge Nature Network – [Report](#) prepared by The Wildlife Trust BCN

⁴ FOE Tree Cover Mapping [Report](#)

⁵ [Citizen testing finds 75% of rivers in Britain in poor ecological health | Rivers | The Guardian](#)

⁶ GCP Environmental Statement NTS Document Ref: CtoC-9-00 p21

⁷ GCP Environmental Statement Ref: CtoC-10-ESO-00 p103

⁸ British Antarctic Survey Emeritus Fellow, Botanical Society of Britain & Ireland Recorder for Cambridgeshire

⁹ <http://cotonorchard.com/letters/PANUK.pdf>

¹⁰ Ancient Tree Inventory [Map](#)

¹¹ Recorded by David Alderman of <https://treeregister.org/> Aug 2023

¹² CtoC-10-ESO p103

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"¹³ emphasising its importance as a habitat corridor and feeding ground.
- **Invertebrates**¹⁴: 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 by the Cambridgeshire Moth Group¹⁵ not reflected in the EIA.
- **Birds:** Forty-two breeding species were observed in Coton Orchard 2024 (Sixty-seven within survey area¹⁶) by applicant surveyors WSP¹⁷, including "Five Species Listed on Section 41 (Priority Species) of the Natural Environment and Rural Communities (NERC) Act, 2006". Additionally, sixty-one¹⁸ 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, is critical to ecosystem health and resilience. Dr Merlin Sheldrake¹⁹, 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 45²⁰ species of mosses and liverworts at Coton Orchard, including *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, summarises²¹: "This utterly destructive

¹³ Cambridge Ecology 02/04/2020 P0608-R-019b Ref. 3.10, p20-21

¹⁴ GCP Environmental Statement Ref: CtoC-10-ESO-00 p69, p106

¹⁵ Reported in [Guardian](#)

¹⁶ CtoC-10-ESO-00 p69

¹⁷ TR5.18 Breeding Bird Survey Report: Coton Orchard 2024 p8

¹⁸ Coton Orchard Species Record: [Birds](#)

¹⁹ https://en.wikipedia.org/wiki/Merlin_Sheldrake

²⁰ Coton Orchard Species Record [Mosses](#) and liverworts

²¹ [ptes_letter.pdf](#)

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 Cider²², the orchard planted 30 new cider apple trees this season, with plans to add 50 more next 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 rootstocks²³, 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.

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.

²² [Our Story - Blue Barrel Cider](#)

²³ UK Biodiversity Action Plan; Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008.

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 0.43²⁴ based on 2010 prices. Adjusting for inflation to 2025 would further diminish this ratio.

In the Autumn Budget 2024²⁵, 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 2023²⁶, 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 period²⁷. 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 2022²⁸. To provide further context, this reduction represents approximately 0.0016% of the 4th UK Carbon Budget, 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 County²⁹ or UK’s net-zero targets.

²⁴ Mott MacDonald Outline Economic Case 17th January 2020 [link](#)

²⁵ [Autumn Budget 2024 \(HTML\) - GOV.UK](#)

²⁶ YouTube recording [Full Council - 21 March 2023](#)

²⁷ CtoC-10-ESO-00 p23

²⁸ Transport and environment statistics 2022 Gov.uk [link](#)

²⁹ Approx 0.0057% source [CCC](#)

- **Travel options:** The CtoC route fails to address practical travel needs and lacks alignment with existing transport services. Bus franchising in Cambridgeshire is still in its early stages, making it likely that any new services will rely on commercial operators, such as Stagecoach, which already runs services between Cambourne and Cambridge (e.g., Bus Route 4³⁰ changing at Drummer St 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 proposed as “fundamentally flawed.” Speaking on BBC Radio³¹, he highlighted that terminating the route at Grange Road provides no direct access to Addenbrooke's Hospital, Hills Road Sixth Form College, or other key locations where people actually need to travel. Bypassing major transport corridors such as the M11 and A14, the proposed busway restricts connectivity and reduces its potential to integrate with the broader transport network. These shortcomings severely limit 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 AMC³² citing terms of their covenant. However, this assertion is contradicted by AMC Superintendent Matthew Browne³³, who addressed the GCP Executive Board³⁴ to express specific support for the CPPF's proposed on-road route.
- **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

³⁰ Stagecoach journey planner [link](#)

³¹ BBC Radio Cambs Chris Mann Show 22 April 2024 available BBC Sounds

³² Full Cambs County Council Meeting 21 Mar 2023

³³ American Magazine [Report](#)

³⁴ GCP Exec Board meeting 01.07.21. [Youtube](#)

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,”³⁵ 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 19th December 2024, the CPPF petition³⁶ has gathered 22,120 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 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

³⁵ GCP CtoC Audit 2021 [Final Report](#) p.6 & p69

³⁶ Petition link https://www.change.org/p/save-the-green-corridor-cambourne-to-cambridge-bus-lane-not-busway?source_location=search

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 busway³⁷.

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 Taylor³⁸, 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.”³⁹ 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 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

³⁷ We can provide documentary evidence, if required.

³⁸ Article <https://www.woodlandtrust.org.uk/press-centre/2023/05/veteran-trees-bus-route-rethink/>

³⁹ CtoC-10-ES4-00 ES Scoping Report 2.4.3 & 2.4.5 p12

figures⁴⁰. 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 schools 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 Reservoir⁴¹, 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 Airfield⁴²—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 200m⁴³—around eight times the width of the motorway (24-28m). If the busway were required to span the reservoir as it is the M11, it would necessitate substantial additional infrastructure, significantly increasing both the carbon footprint and financial cost of

⁴⁰ [Judge due to sentence Cambridgeshire council after busway deaths - BBC News](#)

⁴¹ Phase two consultation – p35 <https://fensreservoir.co.uk/assets/images/downloads/Associated-Infrastructure-brochure-2024-FINAL-WEB-SPREADS.pdf>

⁴² 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>

⁴³ CtoC-10-ESO-00 11.3.6. p128

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.

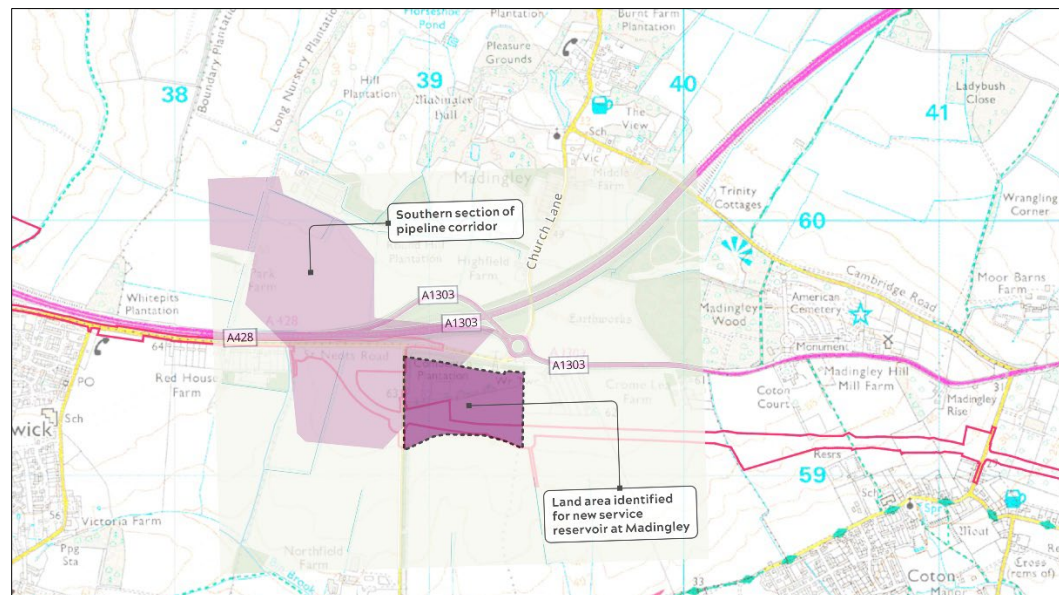


Illustration above created by overlaying maps from AW and CTOC consultation brochures.

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%⁴⁴ decline in such sites. Coton Orchard specifically also holds significant historical value, serving as a refuge for Austrian Jews during World War II, further embedding it in the local community's cultural memory. 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.

⁴⁴ [Orchards vanishing from the landscape, says National Trust - BBC News](#)

10. **Insufficient Mitigation Measures:** In the context of Biodiversity Net Gain (BNG) Regulations⁴⁵, 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 million⁴⁶, excluding £15.3 million already spent, bringing the total to £207.6 million⁴⁷—a 14.5% increase. This figure is significantly underestimated. Adjusted for risk (£165.2 million base cost in 2020, Tender Price Index (TPI): 192⁴⁸), 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%)⁴⁹, 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 Grant⁵⁰ (£500 million), with £200 million subject to review in 2025 and not guaranteed for CtoC alone.
- Section 106 Contributions (£37.9 million⁵¹), 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 million⁵², 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 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.

⁴⁵ DEFRA (2024a) Guidance Irreplaceable habitats <https://www.gov.uk/guidance/irreplaceable-habitats>

⁴⁶ Estimate of Costs TWAO ref CtoC-8-00

⁴⁷ GCP Exec Board Agenda 02/10/24 p99 [Document.ashx](#)

⁴⁸ Tender Price and Building Cost Indices <https://costmodelling.com/>

⁴⁹ [December 2024 issue of the Employer Bulletin - GOV.UK](#)

⁵⁰ <https://www.gov.uk/government/news/greater-cambridge-city-deal-signed>

⁵¹ CtoC-7-00 6.1 Cambourne West £8.7 + 6.2 Bourn Airfield £20.0 + 6.3 West Cambridge £9.2 = £37.9

⁵² GCP Exec Board Agenda 02/10/24 p99 [Document.ashx](#)

Conclusion

The proposed CtoC busway, particularly the off-road segment, 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.

We respectfully urge the Secretary of State to dismiss this application outright to prevent unnecessary environmental harm, financial waste, and reputational damage to the decision-making process. Should outright dismissal not be deemed appropriate, we request that a Public Inquiry be convened to scrutinise the scheme's numerous deficiencies and to ensure a comprehensive assessment of all viable alternatives.

Please could all written correspondence in relation to this objection be sent to the registered business address: Coton Orchard Limited, c/o Landbeach Lakes, Ely Road, Waterbeach, Cambridge CB25 9PG. Email: anna@cotonorchard.com.

Please do not hesitate to contact me if there are any queries regarding this response or to advise of what happens next with the proposed Transport and Works Act Order.

Yours sincerely,

Anna Gazeley

Director Coton Orchard Limited

Company Secretary Houston Crest Properties Ltd

☎ 07874 138 391