

Statement of Case of Objection to the proposed Cambridge County Council (CCC) and Greater Cambridge Partnership (GCP) Cambourne to Cambridge (C2C) TWA Order from Dr John T Green on 11th March 2025

I am Dr John Timothy Green, of 3 St Catharine's Hall, Coton, Cambridge CB23 7GU. After several years as a Lecturer in Applied Mathematics at Cambridge, I was involved in the governance of organisations in many different contexts: I have sat on the Board of a FTSE company and of several SMEs as well as that of a major London NHS Trust; I was Chief Co-ordinating Officer of Imperial College responsible inter alia for merging 5 medical schools & NHS Trusts into Imperial. I have extensive experience in project management and in governance in many settings.

1. Summary of my Objection

In my experience a project, at any level, in any setting, must have strong governance which oversees rigorous and evidence-based processes. That has not happened here.

My Objection cites evidence of significant failures in due process and governance by several of the organisations involved in the sequence of decision-making which resulted in this Application. The Objection also cites evidence of the subsequent manipulation of this evidence by a party involved in the decision. I list the evidence under 3 broad headings:

- A. Failures in due process & obfuscation by persons of influence
- B. Promotion of self-interest
- C. Censorship of information already in the public domain

Failures in due process & governance, together with obfuscation, collusion and censorship of the public record, have resulted in this Application for a TWAO being intrinsically flawed.

2. Terminology

The route detailed in this TWAO is referred to as the 'Preferred Route' in the Outline Business Case and elsewhere as 'the off-road route'. Other than in direct quotation I refer to it here as **'the off-road route'**.

Two on-road routes have been considered and almost always referred to in identical terms, leading to confusion:

- a) an on-road route with both inbound & outbound busways (& ancillary walk/cycle ways) which is referred to variously as 'the on-road route'; I refer to it here as **'the on-road route'**;
- b) an on-road route with an inbound only busway (& ancillary walk/cycle ways) which has also been referred to frequently as an 'on-road route'; to obviate confusion, I refer to it here (other than in quotation of others) as **'the inbound on-road route'**.

3. Recitals

(i) On 1st July 2021 the GCP Executive Board approved¹ that the off-road route detailed in this TWAO be taken forward to the next stage in the process, basing the validity of its decision on an independent audit which it had commissioned from Amey Consulting². GCP submitted their report (Better Public Transport: Cambourne to Cambridge Project)³ to Cambridgeshire County Council (CCC) on 21st March 2023 recommending that CCC agree to take forwards the off-road route to an application for a TWAO.

(ii) Over the previous years, the GCP had commissioned various consultant reports regarding the off-road and on-road routes; GCP never commissioned at any time any report on the inbound on-road route.

Other bodies commissioned reports on the inbound on-road route: Cambridge Past Present & Future (CPPF) in 2021⁴ and from Mott MacDonald (MM) in 2019⁵, both of which were shared with the GCP.

Each reference is attached as a document (indexed as FN1 ... 45). The provenance of each in the public record is given in each footnote below and is also listed at the end of this document below (FN1 = Footnote ¹ etc).

¹ <https://bit.ly/4gkxBO2>

² <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/C2C-Independent-Audit-Final.pdf>

³ <https://bit.ly/41EmsoZ>

⁴ <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/Submissions/First-Batch/250221-Cambridge-PPF.pdf>

⁵ <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/C2C-LLF/C2C-LLF-Technical-Note-Madingley-Road-Quick-Wins-14-05-2019.pdf>

4. Evidence for my objection

For transparency I declare that some of the evidence below was presented to the Regent House of the University of Cambridge ('the University') on Tuesday 9 July 2024⁶ although the version published for the record⁷ was redacted by the Registry of the University (see **D** below).

A. Failures in due process & obfuscation by persons of influence

A.1 There was no clear and shared understanding (neither amongst members of the GCP nor of the CCC) of the purpose of an independent audit; neither was there a shared understanding of the remit and content of the independent audit by Amey Consulting.

An independent audit (an examination of whether or not due process has been followed by an organisation) is very different to an independent report (an examination of facts leading to conclusions or recommendations).

The Vice Chair (then) of the GCP Executive (who subsequently became its Chair) was present at the GCP Executive on 1st July 2021 when a representative of Amey Consulting attended and clearly outlined the purpose, remit and scope of its Independent Audit⁸. The Audit states: "the remit of this audit is not to evaluate the merits or otherwise of specific route alignments"⁹. **To be clear this independent audit did not audit any documentation or process within the GCP concerning the inbound on-road route.**

The (by now) Chair of the GCP presented the report from the GCP Executive (Better Public Transport: Cambourne to Cambridge Project)¹⁰ to the CCC on 21st March 2023, recommending that the off-road route be taken forward for this TWAO. An amendment to the resolution sought an impartial evaluation of the inbound on-road and the off-road option¹¹ as had been requested of the GCP on many occasions and by many bodies previously. In her presentation to the CCC the Chair of the GCP misinterpreted, deliberately or not, the purpose and scope of the Audit leading to many of the Councillors explicitly stating that they were confused. The Chair of the CCC meeting made no attempt to clarify the confusion and therefore the decision by the CCC was, at least for some members, based on an ambiguous evidence-base. The Chair of the CCC made no attempt to help members of the Council understand unambiguously what they were voting on and its true evidence base.

The failure (by the Chairs of GCP & CCC) to clarify misunderstandings demonstrates inadequate governance of process.

A.2 In the meeting of the CCC on 21st March 2023 the conduct of the Chair of the GCP was inappropriate resulting in the decision taken by the CCC to have no credibility.

The GCP Chair ('the Chair') in presenting the report from the GCP to the CCC began: "you have been lied to"¹² and later, in summarising the debate, stated that she had become "intolerant of falsehoods being offered"¹³. Yet the Chair herself had continuously repeated the GCP mantra¹⁴ that the GCP had properly assessed the alternatives explicitly citing the GCP commissioned audit of May 2021 by Amey Consulting. She repeated the misleading claim that it is a "falsehood" to say that "no-one has ever directly compared the on-road route with the off-road route"¹⁵; deliberately or not, she used ambiguous terminology ['the on-road route'] which ambiguity, without any correction being offered, was a failure in process and governance leading to a decision of questionable robustness.

⁶ Discussion 090724 JTGreen contribution.pdf (timed 8/7/24@1035 submitted in advance as required by email to contact@proctors.cam.ac.uk by email 8/7/24@1145)

⁷ <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6749/section5.shtml>

⁸ <https://bit.ly/49HheLO> Minute 12

⁹ <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/C2C-Independent-Audit-Final.pdf> \$6.1 p 57

¹⁰ <https://bit.ly/41FkyEp>

¹¹ <https://bit.ly/3ZEGqNH> Appendix D Item 7 Minute 128

¹² <https://www.youtube.com/watch?v=iwbAi8Q9e5Q> at 1:41:20

¹³ Ibid at 2:27:43

¹⁴ Ibid at 43:08, 43:26, 36:23, 47:15 and etc

¹⁵ Ibid at 2:27:50 ... 2:28:22

Towards the end of the debate one Councillor rehearsed the [REDACTED] that “the on-road route has been thoroughly examined over many years and would have a significant impact on trees”¹⁶. This exploited the ambiguity of terminology and did nothing to clarify the position for confused Committee members: the on-road option has been examined but not the inbound on-road option which the CPPF proposed.

Madingley Wood (an SSSI) and the American Cemetery have been referred to many times as reason why an on-road solution would not work; such claim has been made by the GCP and its Chair¹⁷ who stated that it is “false” to claim that “the on-road route would not result in the removal of any trees”¹⁸. That is misleading: both the 2019 MM and the 2021 CPPF reports conclude that the inbound on-road busway could be accommodated without any take of land or impact on these sites (such as the removal of trees), a conclusion supported by the Superintendent of the American Military Cemetery at the GCP Executive on 1st July 2021¹⁹. No GCP report has concluded that the inbound on-road route would “result in the removal of any trees”.

The Chair claimed²⁰ that “the GCP has properly assessed the alternative routes for public transport and this has been confirmed by independent audit ... Evidence does not support the assertion that the on-road solution would perform better ... nor that an overall bus lane could be provided ... there is insufficient space to deliver such a scheme at the more constrained points of Madingley Wood & the American Cemetery”.

These claims above obfuscate in places and are factually incorrect in others:

- the independent audit has not “confirmed” that “the GCP has properly assessed the alternative routes”;
- the GCP has not considered the alternative route of an inbound on-road route despite the many requests to do so;
- there is no “Evidence” (other than evidence to the contrary in the MM & CPPF reports) – and the Chair fails to reference her assertion that evidence does not support the assertion that the on-road solution would perform better;
- she gives no evidence to support her claim “there is insufficient space to deliver such a scheme at the more constrained points of Madingley Wood & the American Cemetery”; both MM & CPPF reports demonstrate otherwise for the inbound on-road route.

The Chair relies upon the independent Audit to justify rejection of the inbound on-road option (whilst the Audit didn’t evaluate, consider or review that option in any way at all, nor was its remit to do so).

Many statements made to the CCC by the Chair, as well as others, are [REDACTED] and are misleading. The 55 Councillors were, at the GCP Chair’s own admission, “[REDACTED] to”; **indeed they were [REDACTED] or, if not, certainly confused including by the GCP Chair** (which the CCC Chair took no steps to rectify). Over many years there have been endless reports, confusing terminology and ambiguous use of the term ‘on-road busway’ thereby obfuscating which option is being addressed at any time. How could Councillors be expected to distil the truth from the mountain of ambiguous evidence? As one Councillor summed it up²¹: “there is so much misinformation going on”.

The decisions made by this meeting were (as subsequently recognised by Councillors on CCC, one of the 3 bodies to which GCP is accountable) based on opinions not facts.

A.3 In the meeting of the CCC on 11th February 2025 the conduct of the Chair of the GCP was devious or deceitful in responding to issues and when proposing a resolution to confirm CCC’s previous decision to submit the application for a TWAQ.

A question from the public (CPPF) requested confirmation that the Waterbeach to Cambridge (W2C) Busway submission would not repeat mistakes previously made in the C2C project (referring particularly to the widely held belief that not all on-road solutions – including the inbound on-road route – had not been examined for C2C). The GCP Chair (Cllr Meschini) rehearsed the same responses as she had in previous meetings (including that on 21st March 2023). “It is a requirement that we should undertake a full assessment of on-road solutions ... that has been

¹⁶ Ibid at 2:25:55

¹⁷ Ibid at 36:16

¹⁸ Ibid at 2:28:00

¹⁹ <https://www.youtube.com/watch?v=4nPewwgf7Lk> at 3:19:40

²⁰ <https://www.youtube.com/watch?v=iwbAi8Q9e5Q> at 43.09 – 43.32

²¹ Ibid at 1:21:42

done”²²; again later “Did we not consider on-road options for C2C ... yes we did²³; you can repeat that [we didn’t consider an inbound on-road busway] for as long as you want but it’s still inaccurate.” Yet no evidence has ever been provided (though asked for many times) for such ‘assessment’ or ‘options appraisals’ or indeed of the ‘objectives’ she refers to regarding an inbound on-road route. Her claims were unevidenced and several Councillors repeated calls for a full investigation of all on-road options which they said has not been done: “we’ve tried before to get the onroad route fully analyzed and despite our best efforts through amendments that hasn’t happened”²⁴ (referencing attempts on 21st March 2023 and previously). Cllr Count set out the true position: “We should have really considered the later proposals from CPPF [for an inbound on-road route]”; “and I can’t believe that they ever have been considered ... and we keep getting reassurances that they have”²⁵.

Another member of the public asked²⁶ whether recent developments regarding EWR particularly in respect of those developments subsequent to 21st March 2023, impact the proposal to continue with the TWAO. The Chair responded that EWR “confirm that C2C will complement EWR”²⁷ but the ambiguity and extent to which this was true was questioned by Councillors²⁸ and the Chair defended her claim by stating “this assurance comes from EWR themselves” which in itself is no answer. When subsequently asked about the impact of Anglia Water’s proposal for a reservoir on or close to the off-road route the Chair said we “will continue to work closely with Anglia Water to ensure there is no conflict with the [Madingley Hill] reservoir & the busway will be planned in accordance”²⁹. The veracity of this was again challenged by Councillors but no comments on how to mitigate potential economic or environmental impacts on C2C were offered. The Chair was asked about the viability of buses joining at a junction with Grange Road citing the views of bus operators; Cllr Meschini responded “Grange Road yes it will take the busway buses for the same reason that it takes the HGVs that currently go down there and there’s already a bus going down Grange Road there is no problem there don’t invent one”³⁰. The answer correctly stated that Grange Road is indeed wide enough for buses but ignored the actual question regarding the feasibility of the junction (about which transport consultants and bus companies have raised their concerns).

Cllr Atkins repeated concerns³¹ which had also been raised by other Councillors at the meeting on 21st March 2023 that many stakeholders continue to question the veracity and robustness of many arguments put before them and seek to have a thorough evidence basis for many of Councillor Meschini’s statements. Other Councillors made similar points³². Cllr Sharp was concerned about the governance of the process through which these proposals had come direct to CCC from GCP³³; he questioned why the matter had not been through the Council’s formal committee structures. Incidentally I note that the GCP is formally accountable to three councils (CCC, SCDC & Cambridge City Council); I can find no record of how or where that accountability has been carried out or documented let alone co-ordinated.

The vote itself on the motion to confirm the resolution to proceed with the TWAO was put by the Chair of the meeting; when announcing the vote he said that he would elide two decisions together (on C2C [d] and on another busway CSET [e])³⁴ (whilst also including [c] which merely noted both submissions to SofS). Whilst acknowledging Councillors could have asked for the agenda items to be split, the momentum with which the Chair took the item hardly gave them time to realise what was happening. This was not due process within a robust governance structure, especially the speed with which the decision was announced then implemented.

Over the last few years, Councillors, CPPF, stakeholders & others have repeatedly asked the GPC for an option appraisal to be done for the inbound on-road route. The response has repeatedly been that it has

²² https://www.youtube.com/watch?v=qVI_mhQFBEO at 21:21

²³ Ibid at 1:10:17

²⁴ Ibid at 41:10 ... 41:25

²⁵ Ibid at 50:35 ... 50:51

²⁶ Ibid at 25:12

²⁷ Ibid at 27:27

²⁸ Ibid at 41:40; 46:12; 51:07

²⁹ Ibid 28:27

³⁰ Ibid 1:11:03

³¹ Ibid 37:00 ... 40:27

³² Ibid 41:40; 46:14

³³ Ibid 1:03:08

³⁴ Ibid 1:12:51

been done (sometimes erroneously referring to audit reports - see A1 above) but never providing an appropriate document ... yet still insisting that "it has been done".

The instances above would be of no concern were they isolated or few in number. But the obfuscations, if not deceptions, deliberate or otherwise, in particular those made time and time again by the Chair of the GCP, bring into question the legitimacy of the CCC's decisions and therefore its decision to approve the application for a TWAO.

C. Promotion of self-interest

The Executive Board of the GCP at the times in question comprised three elected members with full voting rights (one from each of the three partner councils) and two non-voting members co-opted by the Executive Board itself: one nominated by the business board and one nominated by the University³⁵.

The non-voting representatives appointed by the University exploited their position by exerting undue influence.

a) I set aside whether or not it was appropriate to have the major landowner in the area (the University) on the GCP Executive and if one landowner why not others. Nevertheless, it is irrefutable that the University and the GCP have worked closely together over many years whilst developing the off-road route, exemplified by the alignment of the off-road route with existing and proposed University roads, buildings and infrastructure: that could not be mere coincidence.

The University has supported the off-road route for many years as part of its strategy and has taken steps 'to actively promote the route through the site'³⁶ **notwithstanding that the inbound on-road route (but not the on-road option) would also go through their West Cambridge site.** The University has never spoken in favour of examination of the inbound on-road route demonstrating its unwillingness to subscribe to an open and transparent process, despite posturing otherwise: for example, at the meeting of the GCP Executive on 1st July 2021, the University's member (Philip Allmendinger) stated that the University supported the off-road solution rather than the on-road solution and spoke to justify the resultant transection of the greenbelt³⁷ whilst accepting the environmental impact as inevitable.

b) At the meeting of the GCP Executive on 1st July 2021 both the non-voting University representative and the business representative (Claire Ruskin) held up their hands and voted to support the motion (which was noted by members of the public present). Yet the video record of the meeting on 1st July 2021 is puzzling. The publicly available record (available on YouTube from the meeting until now) dropped out at exactly the time the vote was being recorded³⁸. When in December 2024 I asked GCP's Democratic Services to explain this, Nicholas Mills (11/12/24 at 08:49) emailed me a reference to a different version of the meeting which does indeed show the vote (including the two representatives holding up their hands)³⁹. There are now 3 versions of the meeting on the web with 3 associated transcripts, two of which are the same, and one of which is significantly different.⁴⁰

Public observers at GCP Executive meetings have noted that voting by non-voting members in GCP meetings has occurred over several years and practised by different incumbent non-voting members. The GCP Executive has only 5 official members; the fact that 2 of those (non-voting) members do hold their hands up within such a small executive group is a sign of lax governance, unchecked by the chair of the meeting. Whilst I do not question that the clerk of the meeting recorded votes appropriately, such behaviour could be construed as undue influence in the decision-making process.

³⁵ <https://www.greatercambridge.org.uk/about-us/governance/executive-board#:~:text=The%20board%20comprises%20three%20elected,by%20the%20University%20of%20Cambridge.>

³⁶ <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6744/section1.shtml#heading2-6>

³⁷ <https://www.youtube.com/watch?v=4nPewwgf7Lk> at 4:21:00 ... 4:21:50 (version 1)

³⁸ Ibid at 4:26:25

³⁹ <https://youtu.be/vopKQYMxhwM?si=Gyy9Gj2RXZUGJui6> at 3:36:04 (version 2 as supplied by GCP Democratic Services which redirects to version 3)

⁴⁰ <https://www.youtube.com/watch?v=vopKQYMxhwM> (version 3)

The inappropriate interventions of the University's non-voting member created an aura of collusion which may have influenced the members who were eligible to vote, particularly when voting; at least the behaviours demonstrated flaws in due process not checked by the Chair of the meetings at any time.

C. Censorship of information already in the public domain

In early 2024, the University proposed that it lease a parcel of its land to the CCC in order for the off-road route to take its planned course (thereby aligning with the main road through its West Cambridge site, built many years before)⁴¹. Such a decision required the agreement of the Regent House (the body of its senior members). Sufficient members of the Regent House were concerned about this lease that a 'Discussion' was called before it being agreed.

Discussions of the University give any member of the Regent House the opportunity to record their views in the public record. Having given notice of wishing to speak on a topic, a member may either speak on the day off-the-cuff (as it were) after which the contribution is transcribed verbatim or, more commonly, especially after Covid, one submits the text electronically in advance to the Proctors and it is 'read to the record', the 'record' being the Reporter which is available to the public in printed and digital formats. I contributed electronically to the Discussion held on 9th July 2024 by submitting my contribution⁴² to the Proctors on 8th July 2024; the Senior Proctor replied by email the same day at 13:37 stating that "we will ensure these are read into the record". But they were not – **they were censored and redacted, something which has not, in my and many others' experience, happened in the many years over which I have been a senior member of the University.**

The version of my contribution which was subsequently published in the Reporter⁴³ differs in two material respects (i & ii) from the contribution which I submitted to the Discussion.

(i) A redaction made by the Reporter's Editor as a fait accompli

The Discussion took place on 9th July. On 13th July I was informed by the Officer of the Reporter Editor ('Officer') that the Discussion Report would be published on 17th July. Just 30 hours prior to its eventual publication, the Officer sent me a marked-up version⁴⁴ of my remarks with various amendments to my submitted contribution stating she had "suggested some amendments to the remarks at issue which would enable publication". I was bewildered by this apparent threat of non-publication and particularly concerned about one redaction. At this late hour, thinking publication might be suppressed altogether, I reluctantly agreed to the changes. These two sentences from the beginning of para 8 of my submitted contribution were redacted:

Many statements made to the CCC (and indeed to the GCP including by its Chair) are [REDACTED] and are misleading. The 55 Councillors were, at GCP Chair's own admission, [REDACTED] to"; indeed they were [REDACTED] or, if not, certainly confused including by the GCP Chair.

My submitted contribution⁴² listed the references to the record of the CCC to justify this statement (as are also listed here as footnotes here: FN12 ... FN20).

The Officer sent me several Comments within her marked-up version⁴⁴ of my submitted contribution citing the following reasons for her redaction:

- This statement is indirect but it does identify one person - the GCP Chair - as the source of [REDACTED]'.
- This suggests that the GCP Chair was admitting that the GCP had [REDACTED] to the Councillors, but that was not the meaning of the GCP Chair's words.
- Where is the evidence that the Councillors were [REDACTED] (or confused) including by the GCP Chair?
- I note, but don't fully understand, the first comment; maybe it should read "... the GCP Chair - as **the a** source of [REDACTED]".
- The second comment maybe her interpretation of the GCP Chair's words but it was not mine.
- The "evidence" lies in the entirety of 2½ hours of the CCC meeting from which I referenced 11 (each < 60 second) video clips (footnotes: FN12 ... FN20 etc).

Each reader is able to form their own (and maybe different) opinions.

⁴¹ <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6747/section1.shtml#heading2-3>

⁴² Discussion 090724 JTGreen contribution.pdf

⁴³ <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6749/section5.shtml>

⁴⁴ Editor's marked up version 16/7/24 at 1325: Busway – Dr Green remarks with Markup.docx

But the result of the redaction was to remove from the University's public record, many references (although already publicly available) which justified my opinion, thereby removing from a public record, references which were unsupportive of the University's position.

The purpose of a Discussion is for contributors to present their opinions, differing as they may, from one another or from those of officers of the University. **The Editor's opinion may differ from that of a member but that is not a reason for the redaction of a contributor's opinion, particularly when it is evidenced by the public record and particularly when it is not libellous or unlawful – and if it were so, surely it would have been censored in the CCC meeting itself or indeed on its public record?**

(ii) An unexplained substitution about which I was neither consulted nor notified before its publication and which substitution I believe to be completely unjustifiable

The Officer had advised me that there may be a further change required. Subsequently, on 16th July at 20:17 (just 23 hours before publication) she wrote: "in the event that we do need to make a small adjustment tomorrow (and that is by no means certain) we'll do so in a way that is sensitive to your message and context (and of course we'll let you know)". I responded immediately asking her to inform me before 10:15am on the following day (which indeed turned out to be the day of actual publication) of "your position at that time, indicating what specifically is causing you a problem" but I heard nothing. This change was made (apparently within the then 9 hours prior to publication) without my being told or given opportunity to comment. I was informed by the Editor of the substitution one hour after its publication (17th July at 20:42).

The following paragraph of my submitted contribution was **deleted**:

Tangled up within these discussions has been the effect on Madingley Wood, a Site of Special Scientific Interest (SSSI), and on the American Cemetery which has been referred to many times as a reason why "an on-road solution" would not work. This claim has been made by the GCP and its Chair [ref <https://www.youtube.com/watch?v=iwbAi8Q9e5Q>, at 36:20] who stated that it is "false" to claim that "the on-road route would not result in the removal of any trees" [<https://www.youtube.com/watch?v=iwbAi8Q9e5Q> at 2:28:05].

It was **substituted** with:

Tangled up within these discussions has been the effect on Madingley Wood, a Site of Special Scientific Interest, and on the American Cemetery which has been referred to many times as a reason why 'an on-road solution' would not work. This claim has been made by the GCP and its Chair. However, both the 2019 MM³ and the 2021 CPPF² reports note that moving the route to the south to avoid taking land from the SSSI and the American Cemetery was possible.

The deletion of 2 references which supported my argument was certainly not "sensitive to [my] message and context" and weakens the paragraph's impact. The Editor, in so doing, contradicted the very principles underlying my whole contribution to the Discussion - **only statements for which evidence is cited can be credible.**

As in (ii) above, the result of the substitution was to remove many publicly available references from a public record, references which were unsupportive of the University's position.

So why did the Editor delete these evidential references which are on the public record? My contribution is in no way libellous and only repeats public record. Whilst the Editor might disagree with my opinions, she should not make independent edits which weaken their impact nor should she delete evidential references in rewriting my submission. It is up to each reader to form their own opinion from the opinions of all the contributors to a Discussion.

On 21st July I appealed to the Council of the Senate (the University's ultimate governing body) asking that my concerns be addressed 'on the record'. The Registry is the chief administrator of the University and as such is also Secretary of the Council of the Senate; she is also 'Editor of the Reporter'. In response⁴⁵ to my appeal she refuted almost all my concerns except agreeing to publish a correction in the Reporter to her amended insertion ("*Tangled up within these discussions ...*") as follows:

'the contents of the two reports do not appear to support the conclusions drawn in this paragraph of your remarks. ... I have asked the team to publish a correction omitting the following text and related footnotes from the Discussion report as published on 17 July, with a note to explain the omission: "This claim has been made by the GCP and its Chair. However, both the 2019 MM and the 2021 CPPF reports note that moving the route to the

⁴⁵ Letter from Registry dated 30th July 2024 sent by email: Dr Green 30.07.2024.pdf

south to avoid taking land from the SSSI and the American Cemetery.”
This correction has never been published (incomprehensible to me as it is).

In the Editor’s opinion “the contents of the two reports do not appear to support the conclusions”. Why does that allow her to suppress publication of my opinion?

It is notable that the Editor of the Reporter did not choose to edit or correct or change contributions to the very same Discussion (footnote 27) of the following contributors:

Dr O’Brien, Pro Vice-Chancellor (*a senior office of the University*) claimed that “potential environmental impacts ... and alternative route options ... are beyond the University’s remit and control”.

Ms Flood (*a member of the Council of the Senate*) said “There is not an option that does not include the disposal of this land”).

No evidence is given by these contributors to support their claims; references cited in my published contribution show them to be [REDACTED] Why did the Editor not take opportunity to correct these – undoubtedly because they supported the University’s preference namely the off-road route at any cost – environmental or financial.

This matter could be viewed as being wholly within the remit of the University itself and not within the remit of the Department of Transport. But the **consequences** of the Editor’s unprecedented censorship of my contribution to a Discussion which should be accurately reported in the public domain **is** of significant relevance to the TWAO Application since it reflects the extent to which the University will go in order to achieve its own ends.

The University, as a key player in the GCP and its decision-making, has censored and distorted the veracity of the written record by redacting facts already on the public record in order to promote its, and the GCP’s, preferred route; this evidences further collusion between the GCP and the University.

Collusion and censorship within the process leading to this application for a TWAO bring the credibility of the recommendations and conclusions of this application for a TWAO into serious question.

5. Conclusion

Failures in due process & governance, together with obfuscation, collusion and censorship of the public record, have resulted in this Application for a TWAO being intrinsically flawed.

List of Footnotes (FNs)

Each reference is attached as a document (indexed as FN1 ... 45). The provenance of each in the public record is given in each footnote and is also listed below (FN1 = Footnote 1 etc).

1. <https://bit.ly/4gkxBO2>
2. <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/C2C-Independent-Audit-Final.pdf>
3. <https://bit.ly/41EmsoZ>
4. <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/Submissions/First-Batch/250221-Cambridge-PPF.pdf>
5. <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/C2C-LLF/C2C-LLF-Technical-Note-Madingley-Road-Quick-Wins-14-05-2019.pdf>
6. Discussion 090724 JTGreen contribution.pdf (timed 8/7/24@1035 submitted in advance as required by email to contact@proctors.cam.ac.uk by email 8/7/24@1145)
7. <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6749/section5.shtml>
8. <https://bit.ly/49HheLO> Minute 12
9. <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/C2C-Independent-Audit-Final.pdf> \$6.1 p 57
10. <https://bit.ly/41FkyEp>
11. <https://bit.ly/3ZEGqNH> Appendix D Item 7 Minute 128
12. <https://www.youtube.com/watch?v=iwbAi8Q9e5Q> at 1:41:20
13. Ibid at 2:27:43
14. Ibid at 43:08, 43:26, 36:23, 47:15 and etc
15. Ibid at 2:27:50 ... 2:28:22
16. Ibid at 2:25:55
17. Ibid at 36:16
18. Ibid at 2:28:00
19. <https://www.youtube.com/watch?v=4nPewwgf7Lk> at 3:19:40
20. <https://www.youtube.com/watch?v=iwbAi8Q9e5Q> at 43:09 – 43:32
21. Ibid at 1:21:42
22. https://www.youtube.com/watch?v=qVI_mhQFBEQ at 21:21
23. Ibid at 1:10:17
24. Ibid at 41:10 ... 41:25
25. Ibid at 50:35 ... 50:51
26. Ibid at 25:12
27. Ibid at 27:27
28. Ibid at 41:40; 46:12; 51:07
29. Ibid 28:27
30. Ibid 1:11:03
31. Ibid 37:00 ... 40:27
32. Ibid 41:40; 46:14
33. Ibid 1:03:08
34. Ibid 1:12:51
35. <https://www.greatercambridge.org.uk/about-us/governance/executive-board#:~:text=The%20board%20comprises%20three%20elected,by%20the%20University%20of%20Cambridge.>
36. <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6744/section1.shtml#heading2-6>
37. <https://www.youtube.com/watch?v=4nPewwgf7Lk> at 4:21:00 ... 4:21:50 (version 1)
38. Ibid at 4:26:25
39. <https://youtu.be/vopKQYMxhwM?si=Gyy9Gj2RXZUGJUi6> at 3:36:04 (version 2 as supplied by GCP Democratic Services which redirects to version 3)
40. <https://www.youtube.com/watch?v=vopKQYMxhwM> (version 3)
41. <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6747/section1.shtml#heading2-3>
42. Discussion 090724 JTGreen contribution.pdf
43. <https://www.admin.cam.ac.uk/reporter/2023-24/weekly/6749/section5.shtml>
44. Editor's marked up version 16/7/24 at 1325: Busway – Dr Green remarks with Markup.docx
45. Letter from Registry dated 30th July 2024 sent by email: Dr Green 30.07.2024.pdf