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via email : transportinfrastructure@dft.gov.uk

Dear Sir/Madam

Cambourne to Cambridge Transport and Works Act Order

This letter consists of National Highways' representation in respect of the Transport and Works Act Order (TWAO) application by Greater Cambridge Partnership (the Applicant) for consent to a guided busway between Cambourne and Cambridge.

National Highways is the government owned company which operates, maintains and improves the Strategic Road Network (SRN) as the strategic highway company appointed under the provisions of the Infrastructure Act (2015) and in accordance with the Licence¹ issued by the Secretary of State for Transport.

National Highways is a statutory consultee to the planning process. It has a specific obligation to deliver economic growth through the provision of a safe and reliable SRN, in line with the provisions set out in DfT Circular 01/2022: The strategic road network and the delivery of sustainable development². The Circular sets out how National Highways will work with developers to ensure that specific tests are met when promoting a scheme. This includes ensuring the transport impact is understood, any mitigation (or other infrastructure) is designed in accordance with the relevant standards and that environmental impacts are appraised and mitigated accordingly.

National Highways recognise the aims of the scheme is to provide better public transport within the A428 and A1303 area, between Cambourne and Cambridge. The scheme aims to meet the following objectives:

- Ease congestion;

¹ [Highways England: licence \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/104444/highways-england-licence.pdf)

² [Strategic road network and the delivery of sustainable development - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/104444/strategic-road-network-and-the-delivery-of-sustainable-development.pdf)



- Offer sustainable travel choices;
- Connect communities and support growth; and
- Improve journey times.

In principle, National Highways support the schemes objectives, aligning with principles of sustainable development set out in the Circular 01/22. Paragraph 6 of the Circular states, '*...it will [the company] will support initiatives that reduce the need to travel by private car and enable the necessary behavioural change to make walking, wheeling, cycling and public transport the natural first choice for all who can take it.*'

National Highways has met with the Applicant and its consultants on several occasions prior to the submission of the TWAO and has reviewed the application documents. This has enabled National Highways to form a general understanding of the impacts of the proposed Development on the SRN. Issues of potential concern to National Highways are summarised in the attached representation.

In summary, the principal concerns to National Highways relate to impacts on the SRN during construction and operation of the Guided Busway can be summarised as follows:

1. Temporary acquisition of National Highways operational and non-operational land
2. Permanent acquisition of National Highways operational land;
3. Outstanding risks associated with the construction of the guided busway in close proximity to the A428;
4. Understanding risks associated with unknown detailed design;

These issues are set out in more detail in Annex A to this letter.

In conclusion, several matters require resolution before National Highways can support the proposals submitted in the application. However, we are keen to resolve the concerns raised within this Representation to enable the development to proceed, whilst safeguarding the safe operation of the SRN.

Please contact me if you require any further information.

Yours Sincerely

Alice Lawman

Alice Lawman – Spatial Planner

National Highways Spatial Planning (East)

Project: Cambourne to Cambridge Transport and Works Act Order Application

Subject: National Highways Representation to Cambourne to Cambridge Transport and Works Act Application

Date: 8th January 2025

1. Introduction

- 1.1 This note summarises the issues identified by National Highways from an initial review of the application documentation submitted for the Cambourne to Cambridge Transport and Works Act Order Application (TWAO).
- 1.2 The Cambourne to Cambridge scheme will provide a new 13.6km long busway, connecting Cambourne with the west of Cambridge, running along the A428 and A1303 corridor.
- 1.3 The scheme also includes the construction of a new Travel Hub to be located to the north of the A428 at Scotland Road. The Travel Hub will accommodate parking for up to 2,000 vehicles and 300 bicycles. Access to the Travel Hub will be located via a new signalised junction on Scotland Road, immediately north of the A428/Scotland Road/ St Neots Road grade separated junction.
- 1.4 National Highways in principle accept the objective of the scheme is to provide alternative public transport options, ease congestion and offer a connection between Cambourne and west Cambridge developments.
- 1.5 The Cambourne to Cambridge scheme crosses the A428 from the Travel Hub, to travel to the south of the A428 towards Cambridge. The proposed development proposes to cross the M11 via a new bridge, to be constructed as part of the scheme.

2 Temporary Land Acquisition

- 2.1 The Applicant's proposals to temporarily acquire National Highways land, including the A428 verge, for construction access are considered acceptable, as is any conversion of National Highways non-operational land into highway.
- 2.2 It should be noted that the applicant may be required to enter into Legal Agreements with National Highways establish on going management

agreements of National Highways assets and access to utilities. This includes plot numbers 4-052, 2-031, 6-079 and 5-054.

- 2.3 An Acquisition Schedule outlining National Highways position on each land parcel identified within the Book of Reference (BoR) has been appended to the response.
- 2.4 Where temporary acquisition of National Highways operational land is required, a Roadspace booking with the National Highways Network Occupancy team will be required. Conditions of the booking and therefore the use of the operational land will be agreed ahead of scheme. This includes plot numbers 4-053, 3-037, 9-096 and 9-092.

3 Permanent Land Acquisition

- 3.1 Notwithstanding the above comments, National Highways does not support the compulsory acquisition of land in its ownership for other purposes from the operation of the Strategic Road Network.
- 3.2 Due to the important function as part of the operational land associated with Strategic Road Network, National Highways object to the compulsory acquisition of the following plots:
 - 14-152;
 - 2-031;
 - 3-038;
 - 4-052;
 - 4-053;
 - 5-054;
 - 9-085c; and
 - 9-096.
- 3.3 National Highways operational boundary is defined by the New Roads and Streets Works Act (NRSWA) Red Line Boundary. NRSWA provides a legal framework for street and highway works and allows for works ancillary to the highway function and for provides a statutory right to place utilities and apparatus. It is therefore important for operational land to remain in the ownership and control of National Highways, to ensure highway safety for SRN users, to safeguard for future needs of the network and protect statutory right for undertakers to place apparatus.
- 3.4 A key area of concern is plot 3-038, where the guided busway is identified to be situated within estimated 5m of the A428 carriageway. This plot is situated between the A428 and Childerley Lodge creating a pinch point between the property and the SRN.

- 3.5 In addition, plot 2-031, where the guided busway is identified to be situated within estimated 5m from the A428 carriageway. This plot is situated along the Westbound verge of the A428 between the Broadway and St Neots Road structures.
- 3.6 National Highways confirms that the wording for Article 23 (2) (a) and (b) of the TWAO and concerning plot 14-150 is agreed.
- 3.7 With limited detailed design available for consideration, National Highways are unclear on the long-term safety implications for the A428 and the impact this may have on meeting future needs of the network.
- 3.8 At this stage of the feasibility of the project is considered acceptable, however, National Highways have concerns with the buildability of the project, without severely impacting the SRN in its current position.
- 3.9 National Highways request the busway is located as close to the southern boundary of the plot 3-038 and the boundary limits are reduced to ensure sufficient spacing of 3.5metres is available between the retaining feature and the SRN.
- 4 Understanding risks associated with the construction of the guided busway in close proximity to the A428**
- 4.1 National Highways have met with the GCP and their consultants to discuss the design of the Guided Busway in relation to the proximity to the A428. It is understood that further discussions will be required for the submission of detailed design of the scheme and agreement of technical approvals.
- 4.2 As stated above, National Highways key concern is with plot number 3-038 presenting a pinch point between Childerley Lodge and the SRN. DMRB CD127 requires a minimum of 3.5 metres verge, therefore, all works including retaining walls and features would need to be situated beyond this minimum limit. Consequently, this plot needs to be reduced to ensure the proposed development does not encroach the highway boundary and potentially have a negative impact on highway safety.
- 4.3 The proposed development should be designed in accordance with DMRB CD377 with respect of Vehicle Restraint System (VRS). This is to protect road users from the proposed development including the retaining feature and protect from errant vehicles leaving the carriageway. A Road Restraint Risk Assessment Process (RRRAP) assessment would also be required, depending on the distance from the carriageway.

- 4.4 In addition to the above concern regarding physical proximity to the SRN, National Highways wish to draw the attention to the following considerations.
- 4.5 The detailed design of the proposed development will need to take into account existing drainage assets. In accordance with DfT Circular 01/2022, paragraph 59 states no-third party connections are permitted into National Highways drainage assets. National Highways recommends the inclusion of a suitably worded condition.
- 4.6 National Highways require that an anti-glare is applied to the proposed fencing on the retaining wall, and along other areas of the busway route to ensure it does not result in an unacceptable impact on road safety.
- 4.7 A Vehicle Restraint System (VRS) will also be required in respect of the bridge including the parapets and the retaining feature.
- 4.8 In accordance with DMRB GG119, a Road Safety Audit is required, with recommendations considered during the Detailed Design stage of the project. This may include the requirement to provide VRS in locations along the route to reduce the impact on highway safety.

5 **Protective Provisions**

- 5.1 The Applicant's legal team held a number of meetings with National Highways' lawyers to discuss Protective Provisions to be incorporated into the TWAO. National Highways had previously provided a copy of its standard Protective Provisions to the Applicant and can confirm that the Protective Provisions contained in the TWAO are agreed.
- 5.2 Concerning the acquisition of National Highways land and any part of the strategic road network please note that paragraph 96 of the Protective Provisions provides that acquisition or use of land, rights or restricting covenants over any of the strategic road network is prohibited unless the consent of National Highways is sought and given in writing by National Highways.

6 **Statement of Common Ground (SOCG)**

- 6.1 The Applicant has not yet shared a draft SOCG with National Highways, however, key issues have been discussed prior to submission and remaining concerns have been included within this representation.

