

**GREATER CAMBRIDGE PARTNERSHIP'S TRANSPORT & WORKS ACT APPLICATION
FOR AN OFF-ROAD BUSWAY BETWEEN A11/A1307 & CAMBRIDGE BIOMEDICAL CAMPUS,
KNOWN AS CAMBRIDGE SOUTH EAST TRANSPORT (CSET) Phase 2.**

**COMMENTS FROM APT PLANNING LTD ON BEHALF OF DR. E TURNBULL-JONES,
A LOCAL STAPLEFORD RESIDENT WHO CYCLES ON THE DNA CYCLEWAY TO
ADDENBROOKES HOSPITAL & OBJECTS TO THE GCP APPLICATION.**

5th MARCH 2025.

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Qualifications & Experience.

1.1 BSc (Town Planning), MSc Civil Eng. (Transport Planning) at Imperial College, MRTPI.

1.2 Town Planner at Devon C.C, Essex C.C, L.B Camden, L.B. Lewisham, London Docklands, Sheffield & Tyne & Wear Development Corporations, Director of Barton Willmore, & present Director of Apt Planning Ltd, Planning Consultants:

1.3 Harwell Science & Innovation Campus, Oxford.

Attendance at regular meetings to discuss Master Plan, transport issues & planning applications as a Parish Councillor & attendance at two Local Plan Examinations leading to both Inspectors modifying the Local Plan policies for the Campus.

1.4 Provided evidence for an Appeal into the redevelopment of Esso Research Centre, Abingdon, Oxfordshire, & Call-in Inquiry for £300m Housing Infrastructure fund (HIF) Didcot By-pass & River Thames crossing, Oxfordshire, to deliver 18,000 new homes, refused by LPA.

1.5 I attended Milton Keynes Core Strategy & Aylesbury Vale Local Plan Examinations, promoting major urban extensions for Taylor Wimpey & Aylesbury College. Consultant to Corby B.C. for major urban extension application.

1.6 I have experience of attending numerous Examinations & Public Inquiries.

1.7 I have wide Transport Planning experience at Freeman Fox & Partners, Steer Davis & Gleave (now Steers) & Colin Buchanan, Consulting Engineers:

1.8 Evidence to Roskill Commission on Third London Airport, promoting Foulness as the preferred site, accepted by Prof. Buchanan in a minority report, rather than sites in Essex, Bedfordshire, Buckinghamshire & Hertfordshire, on behalf of Cambridgeshire & Essex County Councils.

1.9 As Head of Transport Planning, L.B. Lewisham, & at London Docklands Development Corporation, I promoted the River Thames Crossing of Dockland Light Railway to Lewisham as part of the Isle of Dogs Transport Strategy.

1.10 At Steers, Consultants, I carried out Transport modelling of the Dockland Light Railway, that led to the Canary Wharf Development Company providing £200m of private sector funding. Transport modelling for Wiltshire & West Yorkshire C.C. at Freeman Fox.

1.11 At the Sheffield Development Corporation, I provided the Regeneration Strategy justifying Sheffield Supertram for South Yorkshire Public Transport Executive, & was a team member that negotiated a £200m grant from the Department for Transport.

1.12 I have provided advice to Stapleford & Great Shelford Parish Council, Cambridge Connect & i-Transport on CSET passenger demand & journey time savings after meeting with Mott MacDonald, Transport Modelling Team, May 2021.

2. SUMMARY.

2.1 This summary, on behalf of a local resident of Stapleford, a Registrar at Addenbrookes Hospital, **who OBJECTS to the GCP proposed Busway**, on the following grounds that:

KEY ISSUES.

- i) **the Stated Aims to achieve economic objectives, did not include social or environmental objectives**, against which the preferred option is chosen.
- ii) **the growth assumptions should be limited to those included in the transport assessment**, & which provide certainty that the growth locations are deliverable, and have a robust evidence base.
- iii) **the Alternative A1307 On-road Options were not assessed either against Social & Environmental objectives**, or Local Plan policies, the National Planning Policy Framework (NPPF), transport assessment, planning & environmental statements.
- iv) **That 49% of journey time savings would not be achieved for Great Shelford, Stapleford & Sawston residents, given that only 29% of users originated there.**
The increased busway frequencies are cancelled out by longer walking time to fewer busway stops. The short distance to the CBC, (3-6kms), limits on-board journey savings, making cycling or rail (to the city centre) a more attractive option. This would lead to the lower Cost Benefit Ratio & LOW Value for Money in the 2020 Outline Business Case, by Mott MacDonald, Doc.CSET-20, Table 5.2.

2.2 **A request is made to the Secretary of State/Inspector** under the Transport & Works (Applications & Objections Procedure) (England & Wales) Rules 2006, Rule 10(9), to require the applicant to provide further information on these key issues, due to the following documents not being "adequate for the purpose."

The Statement of Aims.

2.3 In relation to **Doc. CSET-04 Statement of Aims**, to ask the applicant to explain why the five stated aims, to achieve economic objectives, do not address the social & environmental objectives of sustainable development, in the National Planning Policy Framework (NPPF), paragraph 8.

2.4 Paragraph 8 states that "the planning system has three overarching objectives, which are interdependent & need to be pursued in mutually supporting ways (so that opportunities can be taken to secure net gains across each of the different objectives)."

2.5 This request is made because the applicant has sought deemed planning consent to be granted, (under section 90(2A) of the Town & Country Planning Act 1990), under which decision-making means approving proposals that accord with an up-to-date plan, unless NPPF policies protecting assets of importance provide a strong reason for refusing it, or adverse impacts outweigh the benefits, when assessed against NPPF policies as a whole.

Growth Assumptions.

2.6 In relation to **Doc. CSET-21-06 Growth Assumptions**, to ask the applicant to explain on a table & map, the planning status, capacity & completion date of each site proposed for development in the area, where significant changes in traffic flows are predicted as a result of the scheme. This is required to ensure that the full growth assumptions in the CSET proposals have been included within the transport assessment of their impact.

2.7 It is uncertain whether the growth assumptions have been assessed in the transport assessment, because Doc. CSET-21-06, paragraphs 2.6 & 2.7, states that "the CSRM2 model is primarily based on the adopted Local Plan (up to 2031) & sites with planning consent ... & therefore have a high degree of certainty," & "the key limitation of CSRM2 is that it does not take account of sites to be allocated in emerging plans." It states that "the precise details of how growth will be provided (after 2031) are not yet known."

2.8 At Nov. 2024, the emerging GC Local Plan 2021-2041 timetable states:

- i) Reg.18 Draft Plan Consultation Autumn/Winter 2025.
- ii) Reg. 19 Proposed submission Plan Consultation. Summer/Autumn 2026.
- iii) Submission for independent examination Winter 2026.

It is unlikely that details of growth will be known before the plan is adopted in 2027.

2.9 The Inspector's June 2019 Report for the Vale of White Horse Local Plan Part 2 Examination found the release of Green Belt land for the proposed 4,500 new homes was "not sound" because only 1,200 new homes, to be completed in the plan period, had been included in the transport assessment. The Report's paragraph 42 stated: "There is no comprehensive evidence base that the whole area is developable."

Environmental Statement.

2.10 In relation to **Doc. CSET-10-1 Environmental Statement Non-Technical Summary, & Doc. CSET-21-12 on On-road & Off-road options**, to ask to applicant to explain where, or whether, the Alternative Options were assessed against relevant policies in the adopted Local Plan that are consistent with the NPPF, & against NPPF policies as a whole, rather than merely listing them in Doc. CSET-15, the Planning Statement, in accordance with the NPPF paragraphs 8 & 11.

2.11 **Part 11 of Schedule 4 of the Environmental Impact Regulations** requires the applicant to provide "an outline of the main alternatives studied by the applicant & an indication of the main reasons for his choice, taking into account the environmental effects."

2.12 **The Dft Transport Analysis Guidance (TAG 2018)** requires the applicant to Develop & **ASSESS** potential options, to identify better performing ones & undertake consultation & to Provide an Options Assessment Report & Scope for Further Appraisal.

- 2.13 The Alternative Options for an On-road A1307 route (Strategies 2 & 3 in Doc. CSET-21-12) were not assessed against the NPPF economic, social & environmental objectives, which are "interdependent & need to be pursued in mutually supporting ways (so opportunities can be taken to secure net gains across each of the different objectives)". NPPF para. 8.
- 2.14 The alternative options, with Strategy 1 being preferred as performing best against economic objectives, despite having the greatest cost & environment impact, did not consider an On-road A1307 Guided busway, which with Smart Technology, could include single track sections between bus stops to mitigate its environmental impact, given its proposed use being limited to 6-8 buses per hour.

Outline Business Case 2020.

2.15 In relation to **Doc. CSET-20 on Outline Business Case**, to ask the applicant to explain how estimated journey time saving are only 6-8 mins. for Park & Ride users, & 24-29 mins. for on-route users from Great Shelford, Stapleford & Sawston, on Table 5.2 of Doc. CSET-20, Outline Business Case, when savings from increased frequencies on the Guided Busway are cancelled out by increased walking distances to Busway stops. As on-board journey time savings from the Park & Ride to CBC of 6-8 mins. would be reduced to c.3 mins. as on-board journey distances from Great Shelford, Stapleford & Sawston are half the distance.

3. SITE DESCRIPTION & POLICY CONTEXT.

3.1 Site Description. The A1307/A1301 corridor study area is formed by two parallel A-Class roads of a rectangular-shaped site, orientated from Cambridge boundaries south eastwards towards Haverhill. Traffic from the A11/A505 can use either route to access Cambridge.

A Roman Road runs parallel to the north of the corridor between Haverhill & Fulbourn. The London-Cambridge railway runs along the A1301 with stations in the settlements of the Great & Little Shelford/Stapleford and Whittlesford Parkway.

3.1 The character of the area is largely agricultural land in open countryside.

3.2 The area, is approximately 8-9 kilometres long by 2-4 kilometres wide.

There are numerous roads linking the two A-Class roads, i.e. A11, A505, Sawston Road, Haverhill Road, Hinton Way, Granham's Road & Addenbrooke's Road.

3.4 The area forms the south eastern setting of the historic city of Cambridge.

The topography slopes from the prominent Wandlebury Country Park/ Gog Magog Hills, an important & well-used recreation area for Cambridge & South Cambridgeshire residents, on the A1307 corridor's the north east boundary down the west-facing slopes to the River Granta on the A1301 corridor.

3.5 Recent development has occurred between the A1307 & A1301 at Addenbrooke's Hospital/Cambridge Biomedical Campus (CBC) to the north west, & at Babraham Research Facility & Granta Park to the south east.

3.6 It is the development of these three Campuses which led to the perceived need for intervention to improve transport infrastructure, prior to the transport & environmental assessments.

4. THE GCP'S CSET 2 FIVE STATED AIMS Doc.CSET-04 & CSET-15, para 5.14.

4.1 Many of the GCP's five Statement of Aims in the Statement of Aims document, paragraph 2.3, are duplicated or fail to address social or environmental objectives of sustainable development:

- i) **Improving connectivity** to Babraham Research Facility, Granta Park, Addenbrookes Hospital & Cambridge Biomedical Centre, & other sites, by increasing modal options for a high-quality public transport network & improved active travel.
- ii) **Support the continued growth of Cambridge & South Cambridge economy**, by delivering journey time savings.
- iii) **Improve road safety on A1307 corridor.**
- iv) **Relieve congestion & air quality by encouraging use of sustainable transport options**, (A duplication of Objective 1).
- v) **Objective 5 is to deliver high quality public transport from Haverhill to Cambridge.** (An increase in the frequency of bus services, reduced severance, & increased uptake of sustainable transport, are a duplication of Objective 1).

5. APT PLANNING LTD'S POLICY CONTEXT FOR DEEMED PLANNING APPLICATION.

5.1 The relevant development plan policies for the area include:

i) the 2018 South Cambridgeshire Local Plan (SCLP).

The Plan supported Sustainable development which met economic, social & environmental objectives, paragraph 1.9.

Policy S/4 protects the Cambridge Green Belt.

Policy S/5 provides for 22,000 extra jobs & 19,500 houses 2011-31, in locations "having regard to the purposes of the Green Belt."

Policy S/6 accepted limited development in the rural area focused on rural centres & windfall development.

Policy S/7 limited development to sites within Development Frameworks & Neighbourhood Plans, e.g. Stapleford/Great Shelford Neighbourhood Plan.

Policy CC/9 on managing flood risk from two proposed crossings of R. Granta.

Policy E/2 allocated employment land for Cambridge Biomedical Campus.

Policies NH/2, NH/3, NH/4, NH/6 requires development to protect & enhance landscape character, agricultural land, biodiversity, & the green infrastructure strategy including Cambridge fringe sites.

Policies NH/8 & NH/13 requires development in Green Belt not to have an adverse impact on rural character & openness of Green Belt & on important countryside frontages on settlement edges with a strong countryside character.

Policy TI/2 on Sustainable Travel requires larger developments to demonstrate maximised opportunities for sustainable travel, & to have, or attain, sufficient integration & accessibility by walking, cycling or public & community transport.

ii) the 2008 Cambridge Southern Fringe Action Area Plan (CSFAAP).

Action Area Plan Boundary E (AAPE) includes land between A1307/A1301 & Addenbrooke's Road to the north & Haverhill Road to the south.

Policy CSF/5 Countryside Enhancement Strategy 2 requires "substantial mitigation measures over a wide area," to mitigate the release of Green Belt land at Cambridge Biomedical Campus. Under Structure Plan Policy P4/2, recreation areas, public access to open countryside, country parks & routes for walkers, cyclists & horses, would be required for major new developments adjoining the countryside, in the area between the A1307, Great Shelford, Stapleford, & Haverhill Road.

Under Policy CSF/11, all development would be within 400m (5 mins) easy walking distance of a High-Quality Public Transport bus stop, & a network of segregated pedestrian/cycleways connecting the villages to the countryside.

iii) The 2023 Policy Review of adopted local Plans for Greater Cambridge found that all policies were, or were generally, consistent with the NPPF.

- iv) **Emerging 2021 Greater Cambridge Local Plan Reg. 18: Preferred Options.**
Policy 17, Fig. 28, shows a potential future extension to the Cambridge Biomedical Campus (S/CBC-A on the map) & Area of Major Change at White Hill & Nine Wells to mitigate the release of Green Belt land. This will provide green infrastructure & biodiversity improvements to support the Strategic Green Infrastructure Initiative 3: Gog Magog Hills & chalkland fringe. The emerging Local Plan is unlikely to be adopted until 2027, so limited weight can be attached to it, given that the adopted Plan complies with NPPF.
- v) **The Stapleford & Great Shelford Neighbourhood Plan** has completed the Regulation 16 consultation stage, with examination arrangements anticipating an examiner's report by April 2025, prior to adoption. Policies S&G 9-16 protect & enhance biodiversity, landscape character, important views, & countryside frontages, Appendices 4-9 & Maps 1-17. Policies S&G 18-19 support active travel & management of transport impacts. Policies S&G 20-21 protect countryside access & its enhancement.

5.2 It is considered that the key objectives, against which the CSET proposals should be assessed, should be based on paragraph 8 of the National Planning Policy Framework (NPPF) on achieving sustainable development:

- i) **An Economic objective to provide infrastructure to support growth, (based on NPPF chapters 6 & 9 on Building a stronger economy & sustainable transport). This is to be achieved by Improving connectivity on the A1307 Corridor, to Addenbrookes Hospital, Cambridge Biomedical Campus, Granta Park & Babraham Research Facility, by providing a high-quality public transport network & improved active travel, using a vision-led approach to transport solutions.**
- ii) **A Social objective to support strong healthy communities with well-designed places, accessible services & open spaces, that reflect future needs, (based on NPPF chapters 8 promoting healthy communities).**
This is to be achieved by improving access for the local community to local services within Sawston, the Shelfords & Stapleford.
- iii) **An Environmental objective to protect and enhance the environment, (based on NPPF chapters 11, 13 & 15 on Making effective use of land, Protecting the Green Belt & the Natural Environment).**
This is to be achieved by making effective use of land & preserving the openness of Green Belt land, not conflicting with its five purposes, & ensuring that infrastructure can demonstrate a requirement for a Green Belt location, taking a strategic approach to green infrastructure by enhancing the natural capital at a catchment or landscape scale across local authority boundaries, improving air quality, biodiversity & meeting climate change targets, (see CSET-15 Planning Statement paragraph 4.5).

4.3 The GCP's Transport Assessment, paragraph 3.2, (Doc. CSET-19), only considers paragraphs 109,111,115, 116 & 117 of the NPPF (2024). It ignores the social & environmental objectives of sustainable development in paragraph 8 of the NPPF.

Example: Didcot Garden Town Housing Infrastructure Fund scheme (HIF1), Oxfordshire C.C, subject to a recent call-in hearing of a planning application, refused by the local planning authority.

5.3 The HIF1 scheme aimed to address the following issues:

- i) Local & regional economy, to unlock the delivery of 18,000 dwellings.
- ii) Local traffic issues, a plan for all modes of travel to improve connectivity.
- iii) Environment, to protect & enhance green infrastructure, the natural & built environment.
- iv) People & local communities, to facilitate movement across the Science Vale.

5.4 Transport Assessment report structure:

- i) Policy Context, national, regional & local plan policies.
- ii) Baseline transport conditions in Base Year.
- iii) The proposals.
- iv) Modelling Assessment.
- v) Environmental impact assessment.
- vi) Construction period.
- vii) Summary & conclusions.

5.5 This submission follows the transport assessment report structure for HIF1.

6. BASELINE CONDITIONS IN TRANSPORT ASSESSMENT (TA).

(see ES Vol 2, Fig. 5.1 on the need to identify baseline conditions in the EIA process).

6.1 Table 1. Existing Local Bus Services on A1307/A1301 Corridor (TA Fig. 5-6).

Route No.	AM Peak Frequency (mins).	Busway (mins)
13/13A/X13 Haverhill-Cambridge A1307.	15 (4 buses p. hour)	7-10
PR4 Babraham P&R-Cambridge A1307.	12 (5 buses p. hour)	7-10
7 Saffron Walden-Cambridge A1301.	20 (3 buses p. hour)	7-10

The journey time saving from busway increased frequencies would be c.2-10 mins.

6.2 The **On-Road A1307 Option** would increase peak bus frequencies from the current 3-5 buses per hour to up to 8 buses per hour on the A1307 & A1301. This would be the same frequency as for the GCP preferred CSET Guided busway proposals.

Traffic Delays (mins) (TA paragraph 5.43).

6.3 Table 2 shows that, where the CSET Phase 2 is located between A11 & Addenbrookes Hospital, "severe delays were not observed on the A1307 from A11 to Babraham Road Park & Ride", (with a typical 15 mins. Bus Journey time).

6.4 The GCP estimates the Route 13 is delayed by 5 mins. from A11 to CBC in the AM peak, & a further 8 mins. between CBC & the city centre, (TA paragraph 5.43). The TA statement in paragraph 5.65 confirms that "severe delays were not observed on the A1307 from A11 to Babraham Road Park & Ride." However, about 7 mins. AM peak delays occurred between Hinton Way roundabout & the city centre, including between Hinton Way roundabout & the CBC. Evening peak delays were limited to 750 metres south of CBC, with no significant delays south of Granham's Road.

6.5 The need for intervention primarily relates to the AM peak on the route from Hinton Way roundabout to the city centre, rather than between the A11 & the CBC on the A1307.

6.6 There is a need for intervention in the AM peak only on the A1307 from Haverhill Rd. to the Babraham Park & Ride roundabout, with Trafficmaster showing speeds of 14mph but 39 mph in the PM Peak, Doc.CSET-20 Outline Business Case, Table 10.2. Strategic Case.

6.7 CSET Phase 2 relies on an existing guided busway, from Addenbrookes to the City Centre. However, a low bridge precludes the use of double decker buses. The Trumpington PR3 Park & Ride service has a 10 mins. frequency & takes 13 mins. to the city centre. It does not use the Guided busway as a low bridge prevents the use of double deckers (with a capacity for 80 passengers). The bus lanes on the A1134 Trumpington Road route into the City Centre is the preferred route.

6.8 It is unclear whether the exclusion of double decker buses would prevent the use of the Guided busway if other interventions enabled the use of the A1307 to the city centre.

Table 2. Timetabled Journey Times.

Route No.	Routes	AM Peak 8-9am.	Off-Peak.	PM Peak 4-5pm.
13/13A	Gt. Abington-Addenbrookes			
	Inbound	15	15	15
	Outbound	15	15	15
13/13A	Addenbrookes-City Centre			
	Inbound	30 (+15 mins)	15	30 (+15 mins)
	Outbound	15	15	15
PR4	Babraham P & R-City Centre			
	Inbound	25	25	25
7	Addenbrookes-City Centre			
	Inbound	25	25	25
	Outbound	20	20	20

6.8 Rail Services are likely to be faster than the CSET estimated 9 mins. from A11 to CBC, compared to c.6 mins from Whittlesford to a new Cambridge South station, with a faster onward journey to the City Centre.

6.9 Whittlesford Station provides a 12 mins. Journey time to Cambridge, every 15 mins, which has not been assessed in the Transport Assessment.

6.10 The opening of a new station at Cambridge South (for Cambridge Biomedical Campus & Addenbrookes Hospital), will provide an alternative route to the CSET proposals from A11, at Whittlesford, to the Cambridge Biomedical Campus in c.6 mins. & the City Centre in 12 mins). It has not assessed in the Transport Assessment.

6.11 Shelford Station provides a 7 mins. Journey time to Cambridge, every 30 mins.

6.12 East-West Rail services between Cambridge South & Cambridge Station, will provide an alternative route, with additional services & greater frequencies, to the CSET proposals from the Cambridge Biomedical Campus (CBC) to the City Centre. It has not been assessed in the Transport Assessment.

FUTURE CONDITIONS.

- 6.13 The Cambridge Biomedical Campus Draft Supplementary Guidance** identifies 22,000 jobs in 2022, with a good modal split of 36% travelling by car & 33% by active modes (cycling & walking). The Guidance does not include an employment growth forecast.
- 6.14 The updated 2024 CBC Vision 2050**, has a projected need for 14,000-18000 sq.m (150,000-200,000 sq.ft) floorspace per year. The CAG Consultants London Employment sites Database 2021 estimated an employment density of 9-12 sq.m. per employee for B1 Class Offices & 36 sq.m. per employee for B2 Class Industry.
- 6.15 At Harwell Science Campus**, employment forecasts for offices/laboratories are based on an estimate from both B1 & B2 Use Classes. The estimated employment growth over 15 years to 2041 would be 1,000-1,250 new jobs per year or 15,000-18,000 new jobs. The Doc. CSET-15 Planning Statement, paragraph 4.35, estimates 9,510 new jobs by 2041 plus visitors.
- 6.16 In Planning terms**, limited weight can be given to development beyond 2031, which is the end of the Plan Period of the adopted Local Plan, due to the uncertainty on the release of Green Belt land as part of the emerging draft Local Plan process.
- 6.17 In Transport terms**, the transport modelling covered the period 2015, 2019, 2026 & 2041. Table 3 below shows no traffic growth 2019-2023. **The 2015 model exaggerates traffic growth because it doesn't allow for COVID-19 WORKING FROM HOME.** It only included adopted planning commitments up to 2031, not those in the emerging Local Plan, Doc. CSET-21-02 Economic Dimension, paragraph 1.3.2.

Table 3. REDUCTION in Traffic Conditions on A1307 for last 5 years 2019-2023.

Traffic Surveys on:	2019.	2020.	2021.	2022.	2023.	Change 2019-2023
A1307 Babraham Rd. (Site CARA09)						
Cars	11,056	9,818	10,027	-	9,756	-22%
Buses	145	130	169	-	137	-6%
Active travel	429	270	324	-	299	-30%
A1301 Shelford Rd. (Site CARA11)						
Cars	9,288	7,068	7,878	-	8,093	-13%
Buses	98	95	110	-	92.	-6%
Active travel	957	847	883.	-	770	-20%
DNA Cycleway (Site CARA27)						
Cycles	1,587	932.	1,119		1,220	-23%
Pedestrians	90	109	121		93	
Active travel	1,677	1,041.	1,245		1,320	-21%

Table 3 shows a 22% reduction in cars on the A1307, a 13% reduction on the A1301, & a 21% reduction on the DNA cycleway, over the last five years.

6.18 The Cambridgeshire Traffic Monitoring Report provides the information to identify & justify transport schemes for strategic planning. The period 2019- 2023 includes the period of COVID-19 restrictions, which ended in Feb. 2022. On paragraph 1.3.2, it states that: “Due to the prior two years of restrictions, longer term changes to behaviour (working from home, mode choice, reduced travel) may continue to be seen for many years to come.”

6.19 The CCC Dec. 2024 Quarterly Transport Data Update reports a -15% change in traffic 2019-2024 on Local Roads (A1307 & A1301), but a -14% usage of the Babraham Park & Ride site. In 2024, Hybrid working & Remote working accounted for 48% of working adults. Traffic growth is likely to be limited up to 2031 & uncertain after.

6.20 The March 2024 National Networks National Policy Statement, paragraph 4.27, includes the National Infrastructure Commission’s four design principles, which are omitted from the five Stated Aims:

- i) the mitigation of carbon emissions,
- ii) ii) improving people’s quality of life,
- iii) iii) making a positive contribution to local landscapes &
- iv) iv) Value for money.

6.21 The 2022 National Road Transport Projections Accessible Data for A Class-roads in Eastern England shows:

Traffic Growth 2015-2040.	2015.	2025.	2030.	2035.	2040.
Cars (Billion vehicle miles)	8.3	8.7	9.1	9.4	9.7
Traffic Growth 2025-2040					+11%.
Traffic Growth 2025-2060 Core Scenario					+21%.
Traffic Growth 2025-2060 Behavioural Scenario					+10%.
2025-60 Mode-balanced Decarbonisation Scenario					+11%

6.22 Recent research by Prof. Goodwin of Imperial College on the NRTP Projections shows that there is no sign that traffic projections can achieve legal commitments to Climate Change Targets to decarbonise by 2050, or reflect Government support for Active Travel. Only two scenarios do not adopt a “business as usual” approach by ignoring climate change targets, the Behavioural & Mode-balanced Decarbonisation scenarios.

6.23 Prof. Marsden of Leeds University has produced two traffic growth trajectories, one not compatible with climate change & the other having the possibility of meeting climate change targets, achieved by a 20% reduction in traffic levels.

6.24 Clarification is sought on the modelled traffic growth in vehicle miles 2015, 2019 & 2040, whether the model has adopted 2018 or 2022 NRTP projections, & if so, whether the selected scenario would meet legal commitments to climate change targets.

7 THE ALTERNATIVE STRATEGY OPTIONS.

7.1 Part 11 of Schedule 4 of the Environmental Impact Regulations requires the applicant to provide “an outline of the main alternatives studied by the applicant & an indication of the main reasons for his choice, taking into account the environmental effects.”

7.2 The DfT Transport Analysis Guidance (TAG 2018) sets out the Transport Appraisal process. Fig.1 describes Stage 1 Option Development.

- i) National & Local Policies – Understand current & future conditions.
- ii) Establish the need for intervention.
- iii) Identify specific intervention objectives & area to address identified need.
- iv) Generate options with a range of modes, approaches & scales of intervention.
- v) Undertake initial sift discarding those not meeting objectives, viability, or acceptability criteria.
- vi) Develop & ASSESS potential options to identify better performing ones & undertake public consultation.
- vii) Provide an Options Assessment Report & Scope for Further Appraisal.
- viii) Stage 2 – Further Appraisal.
- ix) Stage 3 – Implementation, Monitoring & Evaluation.
- x) Costs are as crucial to the assessment process as benefits, & should cover implementation costs, operating costs, maintenance costs, & enforcement costs.

7.3 Neither the Transport Assessment, nor the Environmental Assessment, have assessed alternative options to the GCP’s preferred option, contrary to TAG advice, such as:

- i) an inbound On-road bus lane on the A1307 (Strategy 2),
- ii) rail services from Whittlesford to Cambridge South & Cambridge, or
- iii) a Guided busway with passing places on south side of the A1307.

7.4 The Transport Assessment, paragraph 1.16, states that “alternative options considered, & the process by which the current proposed scheme was selected, is explained in Volume 2, chapter 4, of the Environmental Assessment.”

7.5 The Key Alternative options between A11/A1307 & the Cambridge Biomedical Campus (CBC):

- i) an Off-road route, or
- ii) an On-road route.

7.6 The results from the 2016 public consultation showed a preference for On-road solutions to minimise potential environmental impacts, (see EA paragraph 4.2.4).

7.7 Environmental Benefits of On-road Alternative Option, (EA Vol 2 paragraph 4.2.8).

- i) Less land-take.
- ii) Less landscape & visual impact.
- iii) Less loss of habitat, water quality, impact on River Granta.
- iv) Less disturbance to buried archeology.

7.8 The CSET Consideration of Green Belt issues by LDA, April 2021, did not include an on-road route within their Study Area, (see CSET-15 Planning Statement Fig.7, paragraph 2.28).

7.9 The CSET Phase 2 Environmental Statement Volume 2, Chapter 4, paragraph 4.2.2, considered the following Strategic Alternatives.

Fig. 4.1 sets out the Timeline undertaken to identify a preferred strategic option.

2016 WSP Draft Concepts report identified:

a) **Two Park & Ride sites** at Babraham Road (implemented) & A11/A1307 Park & Ride, (Concepts 1A & 1B).

b) **Five Off-road & on-road Rapid Transport Concepts:**

- i) An Off-road Rapid Transport Concept from A11 to CBC, (Concept 2A).
- ii) An On-road Rapid Transport Concept on A1307 from A11 to CBC, Concept 2B.
- iii) A Linton Bus Priority Concept, Concept 2C.
- iv) An Off-road Babraham Road Park & Ride to CBC, Concept 2D.
- v) An On-road Babraham Road Park & Ride to CBC, Concept 2E.

c) **Four Off-road & On-road Cycling & Walking Routes.**

- i) Two Cycling & Walking Off-road & On-road routes from A11 to CBC, Concepts 3A, 3B. These are being progressed under the Linton & Sawston Greenways schemes. Two Off-road & on-Road Cycling & Walking routes from Haverhill to CBC, Concepts 3A, 3B, 3C, & 3D.

7.10 In 2017, three alternative strategies were considered:

- i) **Strategy 1, Off-road Guided bus route from A11/A1307 to CBC.**
- ii) **Strategy 2, On-road Bus lanes on A1307 plus bus only link to CBC.**
- iii) **Strategy 3, On-road Bus lanes from A11/A1307 to CBC.**

7.11 The GCP concluded that Strategy 1, their preferred option:

- i) Delivered the scheme objectives better than Strategies 2 & 3.
- ii) Had the highest cost.
- iii) Had the greatest environmental impact.
- iv) Had more potential for biodiversity net gain & creation of a green corridor.

7.12 Under Section 1 of this submission, the scheme objectives are challenged, as not considering social & environmental objectives in the NPPF for a deemed planning application.

8. The Proposals – An assessment of Passenger Demand & Journey Time.

Passenger Demand

8.1 The Outline Business Case Report CSET-20 is dated 2025, but is a Mott McDonald Business Case dated 2020. It provides a summary of the demand appraisal of the Preferred Brown Option at Table 4.5. This assessment shows 500-600 Park & Ride passengers in the AM & PM Peak Hours demand from 2026 to 2036, but just 100 on-route passengers from Great Shelford, Stapleford & Sawston, (based on 300 passengers over 3 hours) in Table 4.7.

8.2 Table 5.1 shows the majority (66%) of these passengers would be travelling to/from the new Travel Hub Site, with the remainder (29%) having origin/destinations in Sawston, Stapleford and Great Shelford (c.15,000 pop), & 4% being extended service users.

Table 4. Number & Percentage of trips originating in these settlements 7-10am:

Village	No. of Passengers	
i) Great Shelford -	192	58%
ii) Stapleford -	19	6%
iii) Sawston -	121	36%
iv) Number & % of total trips 332 (100 in Peak Hour)		29%

8.3 Very few passengers are expected to be attracted to the new route from the villages, e.g. Stapleford with just 64 trips per day. It is unclear why so few passengers are attracted from Stapleford particularly as it is the closest to the village centre, OBC (Table 4.7):

Table 5. Distance of Busway stop to village centre. Busway (kms)

i) Great Shelford	1.23 (15 mins. walk)
ii) Stapleford	0.98 (12 mins. walk)
ii) Sawston	1.65 (21 mins. walk)
iv) Average distance of busway from village centre.	1.28 (16 mins. walk)
v) Cambridge Southern Fringe AAP Policy CSF/11	0.40 (400m or 5 minutes-walk).

The busway walking times would be 7-16 mins. longer than for existing Bus Route 7.

8.4 Tables 4.1-4.3 do not reflect total journey times, by excluding walk & waiting times. None of the village busway stops come close to the Cambridge Southern Fringe Action Area Plan Policy CSF/11 requirement that all development would be within 400 metres (5 mins. walk) of a bus stop.

8.5 With so few passengers due to the long walking distances to the stops, there would be merit in reviewing alternative options to ensure the maximum benefit is being derived from the cost of the infrastructure associated with a new stop, e.g.

Table 6. Alternative Options for Villages.

Option1: a Do Minimum option with increased frequencies on bus route 7 on the A1301, which provides stops within 400m of the village centres, & Sawston College (1,130 pupils).

Option2: Wittlesford Parkway – South Cambridge (6 mins.) Cambridge (12 mins)-North Cambridge.

The opening of South Cambridge rail station & East-West services on to Cambridge will provide an attractive option from the A11/A505 to CBC & for the villages, provided the Great Shelford rail services are improved.

8.6 Earlier studies (WSP 2017) indicated that Sawston would attract 30% of passengers & Stapleford around 20% of passengers on the Phase 2 CSET route. There have clearly been some changes in the input assumptions to demand modelling and these could be examined as part of a review.

8.7 The peak estimated demand along the Phase 2 CSET corridor is expected to be circa 600 passengers per hour in the peak direction. The OBC appraisal has assumed that there would be 8 services per hour along the route which at peak times would need to cater for an average of 75 passengers per vehicle.

8.8 The appraisal assumes a seating capacity of 46 passengers, with 30 passengers standing. It is a concern that in the opening year of the scheme it will be at capacity, because its attraction for car users would only decline if there is no spare capacity to accommodate them. Thus the 'high quality' public transport route will not be realised either with a large proportion of users expected to stand or due to lack of spare capacity.

Journey Time Savings (see Doc. CSET-20 Outline Business Case) (OBC).

8.9 The key benefit of the scheme is the journey time savings it would deliver in comparison to the Do Minimum service provision. The journey time savings are shown on Table 5.2 of the Outline Business Case, Doc. CSET-20.

8.10 The onboard journey time savings vary between 6 and 8 minutes when considering those passengers using the whole route i.e. from the Travel Hub Site to/from Cambridge.

Table 7. Origin of Journey Time Savings (mins.)	AM Peak	Off-Peak	PM Peak
From A11 Hub	6-8	8	8-12
From villages	26-29.	15	24-25

8.11 However, when considering those in the settlements along the route the journey time savings are considerably greater ranging from 15 minutes in the inter-peak to 25-29 minutes in the peak periods.

8.12 This is attributed in the Outline Business Case to a reduction in wait time due to the enhanced service frequency relative to the existing Citi 7 route.

8.13 Whilst better busway frequencies may account for some of the difference, (2-10 mins in my Table 1), this is countered by the increase walk times to the stops on the edge of the settlements, (7-16 mins in my Table 5). Walk times could range from 12 to 21 minutes compared with the assumed walk time at the Bus Route 7 of 5 minutes (my Table 5).

Overall, reduced journey times from better busway frequencies & cancelled out by longer walk times, compared to the existing bus route 7.

For the settlements of Great Shelford, Stapleford & Sawston, time benefits from faster on-board journeys would be about 3 mins instead of 6-7 mins, due to the shorter distances to CBC from these settlements, than from the A11/A1307 Park & Ride.

It is therefore unclear how journey time savings to On-route users of 24-29 mins. could be achieved by the Guided Busway.

8.14 The journey time savings are used to calculate the benefits needs to be reviewed to respond to this evidence. The GCP benefits are set in the OBC Economic Case (Table 5.5).

Table 8. Source of Benefits from Journey Time Savings (OBC Table 5.5)

i) Benefits to the passengers to/from Sawston, Stapleford, Great Shelford =	49%
ii) Benefits to those travelling to/from the Travel Hub =	43%
iii) Benefits coming from the wider route (services to/from Haverhill) =	7%

8.15 It is particularly unclear how only 29% of time savings from the journeys, from the few passengers originating from Sawston, Stapleford and Great Shelford, would deliver 49% of the benefits.

8.16 The limited 6-8 mins. savings for A1307 users would justify a lower cost scheme of an A1307 on-road bus lane or guided busway, to avoid the greater costs from three bridge crossings of the proposed scheme.

8.17 An on-road option would also be within a 400m walk of the whole of the Proposed CBC Expansion site, whilst the GCP preferred route does not meet the Cambridge Southern Fringe Action Area Plan Policy CSF/11 requirement, for all development to be within 400m (5 mins. walk) of a bus stop.

8.18 Thus, passengers of these settlements are essential to the viability of the scheme. Yet, it should be noted that no new passengers are attracted to the route from these settlements.

8.19 It is not clear why there are no new users although it may be in part the consequence of the distance of the route stops from each settlement. Nonetheless, there is the potential for greater benefit to arise from passengers in these settlements by increasing bus frequencies on bus route 7 on the A1301, rather than less frequent hourly or half hours services on the A1301 to complement the guided busway services, as is proposed. This is pertinent in light of the Low Benefits to Cost Ratio of the current scheme.

9. Environmental Assessment.

9.1 Corridor Description. Doc. CSET-10-01 Environmental Statement Vol 1, Non-Technical Summary, describes the scheme, its 16m width, its structures including two 100m+ long bridges plus embankments across the River Granta, & a Hobson Conduit bridge, which would not be required for an On-road route. The surrounding area, in paragraph 3.2, is described as “rolling agricultural hills including White Hill, Clarke’s Hill, Fox Hill & Magog Down” with the River Granta “meandering through the corridor & its associated flood plain,” with open fields around Stapleford, becoming more tree lined near Babraham.

9.2 The potential impact of its construction is divided into four components:

- i) **Physical environment** – The land within the red-line boundary for the route is 115 hectares of Green Belt & mainly agricultural land, (Doc CSET -15 paragraph 2.1).

An estimated 752,000 tonnes of sand & gravel would be brought to the site, which adjoins the settlements of Great Shelford, Stapleford & Sawston with 153,000 tonnes of existing soil, removed by 54,000 lorry movements on local roads within settlements.

The site which is on chalk bedrock, with the proposed route cutting through the middle of the Best & Most Versatile soils with structures & embankments in floodplain on the two river crossings across sand & gravel.

Air quality is good with varying noise levels, & highest along A1307, so air quality & noise levels from an On-road route would be less than for an Off-road route with lower base-line air quality & noise levels.

Comment: The preferred option is therefore contrary to:

Green Belt policy in NPPF paragraph 154, h) iii) because the proposed infrastructure cannot demonstrate a requirement for **this** Green Belt location.
South Cambridge Local Plan Policies S/4, S/6, S/7, CC/9, HN2-6 & 18.
Cambridge Southern Fringe Area Action Plan Policies CSF/5 & 11.
Stapleford & Great Shelford Neighbourhood Plan Policies S&G 9-16, 20-21.

An On-road A1307 option would make more efficient use of land, using highway land already affected by road noise, away from the setting of settlements of Great Shelford, Stapleford & Sawston, less agricultural land & avoid the need for bridges in the R. Granta floodplain.

Better integration with The Linton Greenway & A1307 which already provide for Active Travel & a service track, to allow the 16m width of the route to be significantly reduced.

It would avoid East-West Rail works south of & at South Cambridge station.

- ii) **Wildlife & habitats** – although agricultural land has a low ecological value, woodland, hedgerows, ponds, rivers ditches & field margins support a wide variety of protected & important wildlife including bats, badgers, amphibians, water vole, & birds.

Comment: An On-road option would largely avoid impacts to wildlife & habitats, with less need to provide mitigation due to loss of habitat.

- iv) **Local communities** – Great Shelford, Stapleford, Sawston & Babraham would be most affected, with smaller communities, houses & farms also affected. There are numerous public rights of way, National Cycle Route 11, three schools, five areas of open space & three health facilities within the corridor.

Comment: An On-road option would largely avoid impacts to local communities.

- v) **Cultural aspects** – Landscape character, including the River Granta Valley Character Area, would be affected by intrusion into gently rounded & rolling chalk hills, large scale landscape with fields enclosed by hedges & trees, 29 archaeological sites, & Local Nature Reserves, the setting of three Conservation Areas & numerous Listed Buildings. A total of 33 viewpoints have been identified which would be visible from the route.

Comment: An On-road option would largely avoid impacts to cultural aspects.

10. Cost/Benefit Ratio.

The Environmental Assessment Vol 2, Doc. CSET-10-02, sets out the costs & benefits.

Alternative Strategies	Est. Costs	Est. Benefits	Cost/Benefit Ratio
1. Mass Rapid Transit. (Off-road route)	£130-160m	£280-320m	
2. A1307 Bus Lanes (On-road route plus Off-road link to CBC)	£42-46m	£165-180m	
3. A1307 Bus Lanes	£39-44m	£145-165m	

10.1 The GCP is asked to explain why no Cost Benefit Ratios have been provided for Strategies 2 & 3, & whether maintenance costs have been included. The Council claimed £87m in defects related to maintenance on the St Ives busway scheme, with Nuttall settling an out of court settlement of £33m in 2013 & a further undisclosed settlement in 2023.

11 Conclusions.

11.1 This summary, on behalf of a local resident of Stapleford, a Registrar at Addenbrookes Hospital, **who OBJECTS to the GCP proposed Busway**, on the following grounds that:

KEY ISSUES.

- v) **the Stated Aims to achieve economic objectives, did not include social or environmental objectives**, against which the preferred option is chosen.
 - vi) **the growth assumptions should be limited to those included in the transport assessment**, & which provide certainty that the growth locations are deliverable, and have a robust evidence base.
 - vii) **the Alternative A1307 On-road Options were not assessed either against Social & Environmental objectives**, or Local Plan policies, the National Planning Policy Framework (NPPF), transport assessment, planning & environmental statements.
 - viii) **That 49% of journey time savings would not be achieved for Great Shelford, Stapleford & Sawston residents, given that only 29% of users originated there.**
The increased busway frequencies are cancelled out by longer walking time to fewer busway stops. The short distance to the CBC, (3-6kms), limits on-board journey savings, making cycling or rail (to the city centre) a more attractive option. This would lead to the lower Cost Benefit Ratio & LOW Value for Money in the 2020 Outline Business Case, by Mott MacDonald, Doc.CSET-20, Table 5.2.
- 11.2 **A request is made to the Secretary of State/Inspector** under the Transport & Works (Applications & Objections Procedure) (England & Wales) Rules 2006, Rule 10(9), to require the applicant to provide further information on these key issues, due to the following documents not being "adequate for the purpose."