Statement of Case- Proposed Cambourne to Cambridge (C2C) Busway Route

Dear Secretary of State for Transport

I, Andrew Davidson of [redacted], present my statement of case for the public inquiry of the Cambourne to Cambridge Busway Route that was submitted as a Transport and Works Act Order (TWAO) in November 2024.

Please note that I am supportive of a busway into Cambridge that will help reduce traffic and therefore improve air quality, but I am opposed to the proposed route given the increased risk of flooding to surrounding areas and that there are better alternatives.

I am concerned that the proposed structure over Bin Brook will increase the flood risk to the Gough Way estate, further upstream. I would like to highlight how the consultation processes revealed that the overwhelming majority of participants wanted an on-road solution, yet the submission includes the route that the vast majority of participants opposed.

Additional reasons for speaking at the public inquiry are to highlight the obvious cheaper and unharmful solutions, including the one offered by Cambridge Past Present and Future (CPPF) which has been ignored by the GCP.

Increase Flood Risk

The diagrams included from page 31 to 35 in the document, Appendix TR 13.1: Flood Risk Assessment, with filename “Appendix TR13.1 - FRA.pdf”, appear to exclude the Gough Way estate from the flood model. The diagram is truncated, perhaps deliberately, only showing a very localised view around the Bin Brook crossing and does not show the impact half a kilometre upstream. This calls into question the integrity of WSP and whether they intended to mislead the department of transport to get their proposal approved.

Additionally, the documents are dated October 2024 suggesting the flood risk assessment was conducted recently. Perhaps this is the reason that the residents of the Gough Way estate have not been consulted about the findings from this assessment or perhaps the intention was to never consult them. We only became aware of this assessment after the submission in November 2024.

Please note that this estate suffered flooding in 1978 and again in 2001 as illustrated in the following diagram:

https://www.damtp.cam.ac.uk/user/pvl/FLOOD/bin_brook01.jpg

The diagram is also provided as an offline image “bin_brook01.jpg”.

A relief channel was dug along the western edge of the estate after the first flood but proved completely inadequate the second time.

I am not a flood risk expert, but I think even a layman can identify that a highly elevated bridge with wide embankments could act as a damn during spells of sustained and heavy rainfall and this could eventually result in flooding of the Gough Way estate. Today and without a busway over Bin Brook, the Gough Way estate is already vulnerable to flooding.

I also do not believe the model submitted by the GCP accounts for scenarios where debris entering the watercourse, blocks it at the crossing. I have lived next to Bin Brook for 20 years and I can testify that I have witnessed countless trees, vegetation and other debris gathering in it following storms. Fortunately, there are public spirited residents who clear debris from the culvert following storms, but would be unaware of blockages at the proposed Bin Brook crossing.

More important than ever, with the increase in flood risk from climate change, it is essential that designs are compliant with the National Planning Policy Framework. This means that the designs must ensure that they either reduce the risk of flooding or do not increase flood risk to surrounding areas. In my opinion, the submission demonstrates neither and is therefore not compliant, and I urge you to commission an independent flood risk assessment using the Environment Agency. Sadly, I no longer trust the GCP and their consultants to do this with impartiality.

Unfair Consultation process

The consultation was run twice because the GCP did not like the results from the first consultation where an overwhelming majority voted for the on-road option along Madingley Road and against the off-road option across green belt land.

The credibility of the consultation process is in question with serious flaws identified in the submission. The main points to be covered are:

- The unjustified decision by the GCP to keep the most unpopular route as an option following the first consultation, “better bus journeys consultation 2015”.
- The deliberate split of the on-road support in the second consultation
- The incorrect baseline cost for the off-road option by Mott Macdonald in their Options Assessment Report (OAR)
- The local community’s efforts to engage the GCP rather than the other way round

<u>The Better Bus Journeys Consultation of 2015</u>

The consultation involved leafletting to 8000 households and 20,000 postcards with 2193 respondents to the survey. The results were not what the GCP wanted, 66.8% of votes were in favour of the on-road route with 65.5% opposed to the off-road route. See Table 4-2 – Key Consultation Findings on page 25 of CtoC-6-00-00 Consultation Report.pdf. Strong opinions against Area 1 South (off-road) were expressed, due to the damaging effect it might have on Coton and the landscape of the area

If the GCP was truly impartial and followed the guidance from the consultation then it would not have persisted with the off-road option requiring yet another consultation and the hiring of an expensive consultants.

In the results report it was stated "Following consultation, the Area 1 Central and South and Area 2 North and Central corridors were considered for the next stage of Scheme development", where Area 1 South was exactly the option that 65.5% of people opposed. The following inadequate justification was provided, "Further detail was requested on Area 1 Central, therefore two options were considered for consultation during the next consultation phase". What further detail and by who?

The deliberate split of the on-road support in the second consultation

The second consultation concluded on 29 January 2028, a gap of around 2 years since the first consultation. The GCP were not so naive this time to ask honest and straightforward questions. Instead, they commissioned expensive consultants to analyse the data from the previous consultation and ask questions that would divide up the support for the on-road route.

The results were 58% for on-road options and 30% for off-road. However, it was presented in report as 40% for one on-road option and 18% for a variant on that on-road option. All off-road options were presented as united 30%. This gave the impression that the votes had narrowed down to 40% versus 30%. Please refer to Table 5-2 – Key Consultation Findings (Phase 1) on page 34 of the Consultation report. Again, this still wasn't the result the GCP wanted so they handpicked some residents and ran a "qualitative focus group" and not surprisingly they voiced support for the off-road option. The focus group was 42 people, whereas 2020 people had responded to the second consultation.

The most popular option was ruled-out by another group set up by the GCP and entitled the "the consultees" although it's undocumented who these people were, how they were appointed and how they wielded so much decision-making powers.

The incorrect baseline cost for the off-road option by Mott Macdonald in their Options Assessment Report (OAR)

The GCP commissioned Mott Macdonald, a large London constancy firm of some 20,000 employees, to score the various options including on-road and off-road options.

The OAR2 (C2C-OBC-2020-Options-Appraisal-Report-Part-2-Appendix-B.pdf) report states that it used an industry methodology, MCAF scoring, but the application looked anything but best practice. Arbitrary assessment criteria were used, policy fit, contribution to economic growth, contribution to improved transport network, contribution to quality of life, scheme deliverability, stakeholder support.

The scoring is subjective, for example the off-road options scores higher for the "South Cambridgeshire Draft Local Plan, 2014" where the policy "Aims to have a balance between development and conservation" and "Sets out the levels of employment and housing development over the plan period". Mott Macdonald have scoured the policies for anything where there maybe a statement that better fits with the off-road option. In the case of the "South Cambridgeshire Draft Local Plan, 2014", they find the following statement "There needs

to be a segregated high quality public transport route from new developments and along transport corridors as well as segregated high-quality walking and cycling routes". Both off-road and on-road satisfy the policy yet off-road scores higher. As there are 6 policies, all similar, the off-road option gets a multiplying score. Please see Theme 1 – policy fit of "C2C-OBC-2020-Options-Appraisal-Report-Part-2-Appendix-B.pdf".

For theme 2 you could argue the two options should score the same as their linkage to the criteria are tenuous.

The bias in the report really reveals itself in theme 4, Environment Impact – Green Belt, where the on-road options scores only one point higher than off-road despite the off-road option ploughing through a mile of wildlife habitat and a section of the West Fields. The On-road option is unfairly marked down on "Environmental impacts – Biodiversity" because the existing road runs next to protected woodland. The on-road busway will reduce the traffic next to the woodland yet is penalised in the scoring. It is nonsensical. The on-road route is also unfairly penalised because it runs next to the American Cemetery and may impact the grass verge next to the road.

Theme 5 - Deliverability has scoring that shows bias towards the off-road option. It is only one point less for scheme cost despite being an order of magnitude bigger. For, construction method, how can you build a new bridge over the M11 without shutting the motorway? Not considered in the scoring.

However, the main flaw with the Mott Macdonald OARs being that when nearly all the higher scoring was based on Benefits-to-Cost ratio, it is super important your costs are accurate. The estimated cost of the off-road option is £192,284,900 whereas the baseline assumed by Mott Macdonald was £124,326,000, representing only 65% of the estimated costs.

The initial BCR results for the off-road option was below the required 2:1 ratio as recommended by DfT. An adjusted BCR was developed based on a percentage uplift detailed in the strategic outline business case (SOBC) but had the correct cost of £192,284,900 been used, it would have fallen short of the required 2:1 ratio.

Worth also reminding the public inquiry of Cambridge County Council's track record in managing the costs of large infrastructure contracts. In 2011 the actual costs of the guided busway project were £148M compared with the budgeted £84M. Bam Nuttal's contracts team outmanoeuvred the County Council's contract team with every scope discussion. If the same level of overrun happens on the off-route option then that could lead to costs of £339M. We have to be realistic and take this higher assumed cost.

I would suggest to the public inquiry that the GCP instructed Mott Macdonald that the off-road option should win in the scoring and that some sort of structured scoring system should be contrived so that it looked like there was a credible scientific method applied. In scrutinising the methodology, it's obvious that the scoring is fabricated to meet this end.

The local community tried to engage the GCP rather than the other way round

The GCP boasts in its consultation report that "It was iterative; issues raised informed the Scheme development and were thereby carefully considered as part of each subsequent round of consultation" when in reality it was the local community that tried to engage the GCP with

constructive ideas and were entirely ignored. The Local Liaison Forum (LLF) suggested an option 6, it suggested looking at alternative existing roads such as using Clark Maxwell Road but any helpful idea was simply rejected.

When Cambridge Past Present and Future (CPPF) presented a highly professional and credible proposal, this represented a real opportunity for the GCP to finally engage the community. Instead, it stated that it would not consider the proposal as it was too late, they were already decided.

Better Options

East-West Rail

As mentioned, I'm generally supportive of a busway which could complement the East-West Rail link, which concluded its consultation process on 24th January.

https://eastwestrail.co.uk/consultation2024

East-West Rail promises to deliver a transport link from Cambourne to Cambridge North (Science Park), Cambridge Central station and Cambridge South (Biomedical Campus), i.e. to workplace destinations as opposed to Grange Road. It is worth considering that if the East-West Railway is delivered, it will positively impact the estimated transit times detailed in the C2C consultation document (calculated pre-pandemic) as more people opt for train rather than car,

Cambridge Past Present and Future's (CPPF) On-Road Option

Rather disappointingly, the proposal by CPPF was not considered by the Greater Cambridge Partnership (GCP). I've included an offline copy of the CPPF proposal:

"CPPF-Cambourne-Cambridge-alternative-4e-(extract).pdf".

The CPPF proposal was written by a leading consultancy firm specialising in transport planning, transport infrastructure design and environmental assessments in the UK.

In the CPPF proposal, large improvements to bus journey times along Madingley Road can be achieved relatively quickly with in-highway interventions. The design includes 1,135m of bus lanes and other technical interventions, which would reduce a 42-minute delay to under 10 minutes. It is expected to cost well under £10M and to provide most of the same social benefits as the GCP option, at a benefit–cost ratio (BCR) in excess of 4.0, compared with 0.48 for GCP's option. The GCP's option will only yield £63 million of benefit for a budgeted outlay of £192 million representing poor values for public money expenditure.

Adams Road Option

The GCP's option (involving the Bin Brook crossing) avoids a short section of transit along Madingley Road. I urge you to take a brief look at a map of this area and observe the many alternative options from the Cambridge University West Site, using existing infrastructure. Utilising existing roads such as Adams Road or Wilberforce Road would remove the need for the Bin Brook crossing which would save considerable cost but crucially, not contribute to increased flood risk.

Act Now before 2030

If the GCP had simply moved ahead with the on-road option back in 2015, it may well have been up and operational by now and with no risk of the city deal grant not being spent by 2030. Stubbornness has led to where we are now so it's time to act together. There is time to implement a busway solution before the budget is lost, we need to replace the GCP leadership with more open minded and pragmatic leaders, properly assess the CPPF proposal and get the plan implemented as soon as possible. Let's get Cambridge moving again and as one community.

Yours sincerely

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