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GREATER CAMBRIDGE
SHARED PLANNING

Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minister House
33 Horseferry Road
London, SW1P 4DR

By email only

Our ref. 24/04529/TWA

8th January 2025

Dear Secretary of State,

Cambridge County Council has submitted a Transport and Work Act Order to the Department for Transport (DfT) for a new busway, and travel hub, and also providing a path for walkers and cyclists linking Cambourne to Cambridge Order

Registration of South Cambridgeshire District and Cambridge City Councils as Interested Parties

South Cambridgeshire District Council (SCDC) and Cambridge City Council received formal notification on 12th November 2024 that Cambridgeshire County Council (the County Council) has applied pursuant to section 6 of the Transport and Works Act 1992, for an Order under sections 1 and 5 of that Act in the terms of the draft Order (draft Order). On behalf of South Cambridgeshire District Council and Cambridge City Council, this letter provides the Councils' formal response to the notification.

Proposed development

The Councils have reviewed the whole scheme and — while noting that part of the works would be located within the Cambridge City administrative boundary — most of the proposal would be located within South Cambridgeshire, comprising:

- a two-way busway 13.6 kilometres in length commencing at Sterling Way, Cambourne and terminating at Grange Road, Cambridge segregated from local highways except for stretches of on-road running along St Neots Road, Hardwick and Charles Babbage Road within the Cambridge University West Cambridge Campus;

- intermediate bus stops along the route and an emergency and maintenance access track running alongside the two-way busway for most of the length of the busway which would be accessible to pedestrians and cyclists. Most of the length of the track will also function as a bridleway or permissive bridleway;

- a new travel hub building and Park and Ride site at Scotland Farm, Dry Drayton with access for the buses over the existing bridge carrying Scotland Road over the A428;

- new bridges over the M11 and at Bin Brook to provide for the two-way busway and adjoining emergency and maintenance track;

- access roads, temporary compounds, stopping up, diversion and creation of public rights of way, highway crossings, drainage works and attenuation and infiltration ponds.

It is noted that the Order, if permitted, also seeks:

- the compulsory acquisition of land for the proposed works and ancillary purposes, including worksites; the acquisition of rights and restrictive covenants over specified land; provisions for the temporary use of land in connection with the proposed scheme; and the extinction and creation of private rights
- the temporary stopping up of highways; provisions relating to streets; and powers to survey and investigate land;
- powers to carry out certain works in the highway and the right to use private roads for the purposes of construction;
- powers to carry out works to streets including the temporary diversion of streets;
- acquisition of replacement land for exchange open space land.

Site context

The proposed scheme, located to the west of Cambridge, runs from Sterling Way near Cambourne to Grange Road on the Cambridge fringe, passing through South Cambridgeshire and Cambridge City areas, including Cambourne, Bourn Airfield, Hardwick, Coton, West Cambridge, and the Cambridge fringe. It comprises a narrow corridor to construct the busway, transport stops, bridges, and ancillary works, with ecological and landscape mitigation, except for the Scotland Farm travel hub north of the A428.

The need for the scheme

A central plank of South Cambridgeshire District Councils (SCDC) adopted 2018 Local Plan relies upon the delivery of a high-quality public transport access corridor between Cambridge and Cambourne. The spatial development strategy outlined in this adopted Local Plan is also shared with the adopted Cambridge City Local Plan (2018) – which together seek to meet the identified housing needs for the "Greater Cambridge area." Achieving sustainable development through planned growth at Bourn Airfield and at Cambourne West alongside supporting the travel choices and mode shift from private cars of the existing community of over 12,300 people in Cambourne and many more in surrounding villages underpins the adopted Transport Strategy which was developed alongside the 2018 Local Plan for SCDC and Cambridge City Councils. This corridor is not merely a desirable enhancement but a critical and specific infrastructure requirement integral to meeting the sustainable development objectives outlined in the spatial development strategy contained in the adopted Local Plans for the area.

The South Cambridgeshire Local Plan (2018) explicitly predicates development at Bourn Airfield on the provision of infrastructure, including a high-quality public transport corridor. Policy SS/6 specifies the need for robust on- and off-site infrastructure to mitigate the impact of development and facilitate sustainable growth. The Inspectors' Report on the Local Plan reinforces this requirement, emphasizing the necessity of the Cambourne to Cambridge transport link to integrate Bourn Airfield into the broader economic and social fabric of Greater Cambridge.

This link is therefore essential for several reasons:

1. **Housing Delivery**: The Planning Permission (ref S/3440/18/OL) for development of 3500 homes at Bourn Airfield, approved in 2024, currently limits the number of new homes to 500 until a public transport link between the Cambridge and the site is operational. New homes at Cambourne West and potential further growth identified north of the A428 associated with the East – West Rail project will also rely upon this complementary public transport infrastructure to "hard wire" new homes into the Cambridge economy and ensure optimal housing delivery rates to meet both national as well as local house building targets.
2. **Economic Integration**: Cambridge serves as the primary employment hub for the region. The transport link ensures that residents of new and existing settlements providing a range of housing choices, including more affordable housing options, can access job opportunities in Cambridge, support economic growth in the City and align with the spatial development strategy's emphasis on sustainable commuting patterns.
3. **Research and Education:** Cambridge Universities' West Cambridge Campus has planning permission for some 383,300 square metres of academic, research and development and employment space. The project provides an important and reliable transport connection between this significant new campus/innovation site and the more affordable homes available to the west of Cambridge. Through the Scotland Farm travel hub, the proposal also supports more sustainable and reliable journeys into the City and the West

Cambridge Campus from those travelling along the enhanced A428 trunk road connecting Cambridge to Milton Keynes.

4. **Sustainable Transport Goals**: The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) identifies the A428/A1303 corridor as a congestion hotspot and prioritizes sustainable transport solutions, including the Cambourne to Cambridge busway. A high-quality public transport corridor is therefore integral to reducing reliance on car travel and achieving regional sustainability objectives.
5. **Meeting the needs of communities**: The transport link is an important enabler of equitable access to opportunities, especially for those groups including young people and non-car owners who are otherwise unable to access the educational, employment, cultural and social opportunities provided within Cambridge City, and for employers in South Cambridge, to access the City workforce.
6. **Strategic Importance of Cambridge**: The Greater Cambridge region is poised to enhance its position as Europe's science capital, driving significant economic growth and innovation. Key to unlocking this potential is addressing housing, connectivity and infrastructure needs. By improving transport options and accessibility, this project will support sustainable patterns of growth, support the expansion of world-leading science and technology sectors, and will sustainably connect the places where people live and work together. The project therefore meets the need for transport infrastructure to deliver the Strategic policies of the adopted Local Plans for the area, aligns with the government's levelling-up agenda and will support the continued growth of the Greater Cambridge economy as a globally competitive region and a cornerstone of the UK Government's economic growth mission.

Biodiversity impacts

The Cambourne to Cambridge Busway project submission nevertheless raises several biodiversity considerations that require further engagement and detailed consideration. The Coton Orchard County Wildlife Site is identified as an area of significant ecological value. The loss of veteran apple trees is acknowledged, with translocation proposed as a mitigation measure. However, given the uncertainty surrounding translocation success, the applicant should consider additional habitat creation both within and outside the order limits to ensure effective compensation.

Barbastelle bats, associated with the Eversden and Wimpole Special Area of Conservation (SAC), are sensitive to habitat disruption. Proposed measures, including "hop overs" and a sensitive lighting strategy, are beneficial provided that temporary impacts during vegetation removal are addressed. Interim solutions, such as willow fencing during construction, should be integrated into the Code of Construction Practice to mitigate short-term effects and support bat commuting routes.

Updated ecological surveys have identified the presence of great crested newts in previously undocumented ponds outside the order limits and improved data on breeding bird habitats. These findings underline the importance of maintaining an up-

to-date ecological baseline throughout the project's lifecycle to guide mitigation strategies effectively.

The project's current assessment indicates it will not achieve a 10% Biodiversity Net Gain (BNG) target within the order limits. The applicant should engage further with stakeholders to develop off-site solutions that align with BNG objectives, ensuring adequate legal agreements are in place to secure long-term habitat management.

Additional issues for consideration include ensuring badger underpasses align with engineering requirements, defining the management of new and existing water bodies, and incorporating operational lighting impacts on invertebrates into mitigation plans. The absence of river condition surveys for potential bridge crossings, such as Bin Brook, should be addressed to confirm that habitat impacts remain minimal.

It is noted that other sites with statutory designations, including Maddingley Woods SSSI located 260 metres north will be unaffected either directly or indirectly by the proposals.

The applicant's approach to sensitive ecological areas will benefit from further design refinement and ongoing collaboration with relevant stakeholders.

Heritage Impacts

The Councils have reviewed the Transport and Works Act Order application for the proposed busway, travel hub, and link between Cambourne and Cambridge from a building conservation perspective. The Design and Access Statement, Environmental Statement, and Non-Technical Summary identify several heritage assets in proximity to the scheme, including two Registered Parks and Gardens, four Conservation Areas, 33 listed buildings within 250m (ranging from Grade I to Grade II* and II), and several locally significant buildings. Among these is the Grade II* listed memorial, including its attached walls, steps, and pool surround at the Cambridge American Military Cemetery and Memorial, which lies outside the application site. The impact on this designated heritage asset is anticipated to be indirect, primarily affecting its setting. The Environmental Statement refers to a heritage assessment (Technical Report 7) that evaluates the significance and setting of these assets. Including this report as a supporting technical document would provide a more comprehensive understanding of the heritage considerations.

The application demonstrates a methodological approach to assessing potential impacts on both designated and non-designated heritage assets. However, further work is recommended to fully evaluate the extent of these impacts, drawing on the level of detail applied in the archaeological assessment. This would help identify where design-led mitigation or potential enhancements are necessary to minimize harm and enhance the historic environment. The Councils encourage continued investigation to ensure the scheme aligns with conservation objectives and adequately protects the significance of the affected heritage assets

Green Belt impact

The Cambourne to Cambridge Busway proposal includes development within the Cambridge Green Belt and has been assessed against the requirements of the National Planning Policy Framework (NPPF) 2024. The NPPF confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in "very special circumstances," where the potential harm to the Green Belt is clearly outweighed by other considerations (NPPF 2024, paragraph 155).

The Council recognises that the proposal has been designed to minimize harm to the Green Belt by incorporating measures that align with its five purposes, particularly the project's role in enabling strategic growth options that prevent urban sprawl and safeguarding the countryside from piecemeal encroachment. The route integrates with existing and proposed developments, including Cambourne, Bourn Airfield, and the West Cambridge Campus, while limiting encroachment into undeveloped areas. Where impacts on openness are unavoidable, the design includes extensive landscape mitigation measures to reduce visual intrusion and enhance environmental quality.

The proposal also responds to the strategic transport needs identified in the Transport Strategy for Cambridge and South Cambridgeshire (TSCSC), the adopted South Cambridgeshire Local Plan (2018), the Cambridge Local Plan (2018), and the emerging Greater Cambridge Joint Local Plan. These plans prioritize sustainable transport solutions to address existing congestion, support planned growth, and improve access to employment and services while protecting the Green Belt. The development directly aligns with these objectives by providing a high-capacity, sustainable transport link to connect housing and employment hubs, including the potential to support sustainable transport choices for future growth North of Cambourne associated with the proposed East West Rail station at Cambourne.

The application identifies the compelling need for the development to support the adopted 2018 South Cambridgeshire Local Plan in line with the area’s wider growth agenda, which cannot be delivered effectively without sustainable transport infrastructure. It also demonstrates that no viable alternative exists outside the Green Belt to achieve comparable connectivity and growth benefits. The proposal incorporates enhancements such as tree planting and biodiversity measures, which align with NPPF requirements for minimizing environmental impacts.

By demonstrating the need for the development and its public benefits and indicating how harm to the Green Belt has been minimized, embedding mitigation into the design, the Councils consider that the proposals would satisfy the NPPF's test for very special circumstances to justify the “inappropriate development” proposed.

Landscape Impacts

The Councils have reviewed the proposed plans, Design and Access Statement, and Landscape and Visual chapter of the Environmental Statement. The proposed route, landscape design, and Landscape and Visual Impact Assessment (LVIA) reflect draft information reviewed during earlier stages of engagement, and the Councils support the landscape design strategies described in the Design and Access Statement.

The successful integration of the transport corridor into the existing landscape and the delivery of effective mitigation measures will depend on detailed design, implementation, and the long-term management of landscape features. This includes both soft and hard landscaping, street and site furniture, buildings, and other structures associated with the development.

The draft deemed planning conditions align with matters agreed as part of the pre-application engagement with the Councils, addressing detailed design and future management.

Several areas of sensitivity along the route will require further detailed landscape design information at the condition release stage, including:

- The Scotland Farm Travel Hub
- Coton Orchard
- Integration of the busway with the West Cambridge Conservation Area, including the protection and detailing of works to existing trees
- Design and detailing of bridge structures, culverts, retaining walls, and other built elements
- Attenuation basins and above-ground drainage features
- Bus stop design, including associated lighting and street furniture

The Councils also note that the cumulative projects list does not include the East West Rail project and recommends that the status of this project be considered and where appropriate addressed, given its proximity to and potential interaction with the proposed development. Ongoing engagement on these elements will support the successful delivery of a high-quality and integrated landscape design.

Arboriculture impact

The Councils have reviewed the arboricultural documents submitted for the Cambourne to Cambridge Busway project, including the Coton Orchard Veteran Tree Review, the draft Veteran Tree Mitigation and Compensation Strategy, Technical Report 14, and The Rifle Range Track - Tree Protection Proposals. These documents detail the impacts on veteran trees and other arboricultural features within the draft Order limits.

The Veteran Tree Review (Appendix TR14.1) identifies two veteran apple trees (T9 and T12) at Coton Orchard under the National Planning Policy Framework (NPPF) definition. T12, a Champion Tree for its species, lies outside the proposed route and is not anticipated to be affected. T9, located at the southern edge of the draft Order limits, is directly impacted by the development. Mitigation measures for T9, including precise alignment details and stringent protection during construction, will require further detailed design.

The draft Veteran Tree Mitigation and Compensation Strategy outlines mitigation measures for T9 under paragraph 186(c) of the NPPF and voluntary measures for five other trees (T5, T6, T7, T8, and T10) in line with the Biodiversity Gain

Requirements (Irreplaceable Habitat) Regulations 2024. Mitigation options are detailed under the four elements of the mitigation hierarchy.

Technical Report 14 assesses impacts on additional arboricultural features, including poplar trees at Coton Orchard. Recommendations include maintaining a topple distance of one tree length for stability where thinning or removal occurs. The Rifle Range Track - Tree Protection Proposals set out measures to safeguard trees along this section of the route, aligning with BS5837:2012 standards.

Further key considerations include:

- **Boundary Poplar Trees at Coton Orchard:** The assessment identifies sections of poplar trees that will require thinning or removal to accommodate the busway. The potential impact on the stability of retained trees has been noted, with a topple distance of one tree length recommended to ensure safety and reduce risks.

- **Tree Preservation Orders (TPOs):** The route passes through areas in SCDC and Cambridge City with trees subject to TPOs. The implications of the proposals upon these protected trees will require detailed design responses and careful assessment to minimise avoidable harm and comply with statutory obligations.

- **Arboricultural Best Practices:** The assessment follows BS5837:2012 recommendations, ensuring that tree impacts are appropriately evaluated and mitigation measures, such as tree protection zones during construction, are proposed.

- **General Habitat Connectivity:** Beyond individual trees, the loss of vegetation along the busway route may impact wildlife corridors. The applicant should consider supplementary planting to enhance biodiversity and restore connectivity after construction.

Further information and engagement will be needed during the condition discharge stage to address these issues in detail and ensure the project adheres to best practices in arboricultural and environmental management. These measures will support compliance with local and national planning policies while mitigating the ecological impacts of the development.

These documents will be reviewed further as part of the Councils' Statement of Case. The Councils will expect to continue engaging with the applicant to address arboricultural impacts through detailed design and mitigation measures.

Sustainability impacts

The Councils have reviewed the approach to assessing climate change, greenhouse gas (GHG) emissions, and water resources in the Environmental Statement and supporting technical reports. The use of the high-emissions scenario (RCP 8.5) for climate resilience assessment is welcomed. Technical Report 3 outlines potential

climate impacts, including changes in precipitation and flood risk, temperature increases (e.g., a 5°C rise in summer), and wind. Embedded mitigation includes designing embankments to address ground condition changes and the provision of tree planting to offer shading at crossings and rest areas. The Councils encourage further tree planting and the use of cool paving materials for the emergency access track to reduce heat build-up.

GHG emissions from user operations are estimated to result in carbon savings of -36,060 tCO2e over the scheme's lifetime. These are partly offset by infrastructure carbon impacts (+29,130 tCO2e) and vegetation changes (+1,910 tCO2e), resulting in a net reduction of -5,020 tCO2e over 60 years. This contributes 0.0016% of the 4th UK Carbon Budget and positively to the 5th and 6th budgets. Further refinement of embodied carbon calculations is anticipated, with opportunities to reduce infrastructure emissions. The Councils recommend adopting low-carbon materials, such as engineered timber, in the design of the travel hub.

Buses will initially operate as hybrid electric vehicles, transitioning to full electric. The Councils encourages engagement with the transport operators in order to define and commit to a specific date for achieving fully electric or ultra-low-emission vehicles.

Flooding considerations focus on watercourse and groundwater impacts. The Councils recommend extending the scope to include potable water supply, given regional water scarcity. Measures should include reducing water use during construction and installing water-efficient facilities at the travel hub and compounds. Strengthening Condition 16 of the Request for Deemed Planning Consent to address water efficiency during both construction and operation is also advised.

Park and Ride Facility

The proposed Scotland Farm Park and Ride facility, to be included as part of the development, is designed to significantly reduce car traffic in Central Cambridge. To be located along the A428, it will provide 2,000 parking spaces and 300 bicycle spaces, enabling car users from as far as Milton Keynes and Bedfordshire to transfer to sustainable bus travel before arriving in the city. This aligns with the Cambridge Local Plan (2018), South Cambridgeshire Local Plan (2018) and the emerging Greater Cambridge Local Plan, supporting the Transport Strategy for Cambridge and South Cambridgeshire (2014) by prioritising park-and-ride facilities to reduce congestion and private car use in the City.

By integrating with the Cambourne to Cambridge Busway, the Park and Ride will facilitate frequent, reliable bus services connected to intercity public transport, easing pressure on key corridors like the A1303/Madingley Road and M11. Additionally, the facility also supports Cambridge's Air Quality Management Plan objectives by intercepting private combustion vehicles from using the City roads and reducing congestion and all vehicle emissions, contributing to cleaner air and supporting sustainable urban growth objectives.

Connectivity impacts

The Councils have reviewed the connectivity opportunities facilitated by the Cambourne to Cambridge Busway. The scheme will deliver enhancements to active travel infrastructure by integrating pedestrian and cycle linkages along its length. A dedicated emergency and maintenance track will also serve as an active travel route, providing a continuous, safe, and accessible path for cyclists and pedestrians between key development sites, including Cambourne, Bourn Airfield, local communities of Bourn, Caldecote, Hardwick, Coton and the West Cambridge Campus. The Councils note that supporting similar use of the access track to the guided busway serving Northstowe has contributed to a number of commuting journeys into the City being undertaken by electric and pedal bicycles.

The scheme is also expected to support multimodal connectivity, particularly with the proposed East West Rail station at Cambourne. SCDC encourages prioritizing integration between the development and the station to ensure seamless connections for sustainable travel – for journeys into the City but also for journeys westwards from the area towards Bedford, Milton Keynes and Oxford. Enhancing access to the potential new station via cycle and pedestrian infrastructure will also maximize connectivity opportunities for local communities along the route and encourage a shift toward active and public transport modes.

The Councils note key features of the scheme include improved crossings, shaded rest areas, and linkages to the Cambridgeshire Greenways, supporting both commuting and leisure travel. These enhancements are considered to be public benefits that align with broader objectives to encourage mode shifting and reduce reliance on private vehicles, improve public transport reliability, and deliver environmental and health benefits.

The Councils highlight the importance of ensuring that connectivity within and around Cambourne is fully realized by coordinating the busway's design with the East West Rail proposals. This will optimize the benefits of both projects and support regional growth by linking housing, employment, and transport hubs. The Councils looks forward to continued engagement to refine the active travel infrastructure and achieve the full potential of the connectivity benefits offered by the scheme.

Accessibility impacts

The Councils welcome the opportunity to engage further on the accessibility aspects of the proposal. Accessibility is a key component of inclusive design, and the Councils encourage further consideration of detailed provisions to ensure the scheme meets the highest standards of accessibility and inclusivity for all users.

The Councils therefore welcome a commitment that all buses using this route will be fully accessible, including features such as two wheelchair spaces, priority seating, and full audio and visual announcements. These measures are essential to ensure equitable access for all passengers, particularly those with disabilities or mobility challenges.

The Design and Access Statement references the Inclusive Mobility guidance, stating that a minimum of 2% of parking will be designated for disabled users. The Councils recommend increasing this to 5% to align with Local Plan requirements and ensuring all designated bays are located as close as possible to bus stops to maximize convenience for users with mobility impairments.

The provision of cycle stands at the Travel Hub is noted, and the Councils welcome the commitment to inclusivity. It is recommended that this is further clarified to specifically include disability-inclusive racks to accommodate adapted cycles and ensure accessibility for all cyclists.

The proposal to include accessible toilet facilities at the Travel Hub is welcomed. The Councils encourage the provision of both a Changing Places standard toilet and wheelchair-accessible toilets to ensure facilities meet the needs of all users. Consideration of a mix of single-sex and gender-neutral toilets in self-contained units is also supported as a measure to provide a safe and inclusive environment.

The commitment to signing and information being in line with Inclusive Mobility guidance is supported, and the Councils recommend ensuring that audio announcements are fully integrated for visually impaired users at bus stops, within the Travel Hub, and on buses.

The Councils expect further engagement with the applicant team on these details, which could be submitted as part of the condition discharge stage, to ensure that accessibility provisions are embedded throughout the scheme and deliver an inclusive transport solution for all users.

Environmental Health impacts

The Councils have reviewed the application and accompanying Environmental Statement (ES) and technical reports to assess the scheme's potential impacts on noise, air quality, and land contamination, ensuring they align with local and national policy standards.

- **Noise:** The ES and Technical Report 1 (Acoustics) identify potential noise impacts during construction and operation. Mitigation measures, including environmental noise barriers and adherence to the Code of Construction Practice (CoCP), are necessary to minimize disruption to sensitive receptors. Detailed noise modelling will determine the effectiveness of these measures. The Councils note the inclusion of Local Environment Management Plans (LEMPs) to address site-specific concerns and recommends conditions to ensure compliance with noise control measures.
- **Air Quality:** Technical Report 2 (Air Quality) concludes that the scheme is unlikely to have significant adverse effects on air quality during construction or operation. Proposed mitigation, including a Dust Management Plan as part of the Construction Environmental Management Plan (CEMP), will minimize construction-phase impacts. Operationally, the scheme is expected to improve air quality due to reduced road traffic, with receptor locations showing compliance with UK air quality standards.

- **Land Contamination:** The Councils have reviewed Technical Report 11 (Land Contamination) and note that further clarification on Appendix TR11.1 would be beneficial to fully assess the site in terms of contamination. Subject to additional detail, the methodology and proposed mitigation appear satisfactory, including the planned ground investigations, a Materials Management Plan, and potential remediation measures, which could be secured via conditions.

The Councils support these measures and encourage further engagement to ensure all aspects of noise, air quality, lighting and contamination are addressed comprehensively during the project's detailed design and implementation stages.

Conclusion

The comments above acknowledge the assessment of the scheme details submitted by both South Cambridgeshire District and Cambridge City Councils. While the need for the development is recognised and agreed upon, the Councils note that further detail and clarification may be required to address specific areas of concern. It is anticipated that these details will be provided through management plans and further engagement during the public inquiry process. The Councils look forward to engaging further on these matters.

The Councils acknowledge that the decision on whether to allow the proposals is a matter for the Secretary of State. In such circumstances, the Councils would nevertheless be responsible for the approval and enforcement of planning conditions that secured the mitigation of identified impacts. On that basis, if further clarification is required in respect of the comments made, please contact my team. The Councils will also continue to reserve their right to appear before any public examination of the proposals in due course.

Yours sincerely,

Stephen Kelly
Joint Director of Planning and Economic Development
On behalf of
South Cambridgeshire District Council and Cambridge City Council