THE CAMBRIDGE SOUTHEAST TRANSPORT ORDER

OBJECTION

STATEMENT OF CASE

THE OBJECTION LARGELY REFERS TO THE DOCUMENTS SUBMITTED BY THE APPLICANT

PARTICULARY CSET 15, AND CSET 9, CSET 5, CSET 4

B REEVE A local resident

August 5th 2025

BEEORE GETTING TO MY STATEMENT I MAKE A SHORT COMMENT ON THE PRE INQUIRY MEETING NOTES

The majority of documents submitted by the County Council to this Hearing relate to the actual building of the Busway. It gives the impression that the decision to proceed with the Busway has already been made . Therefore I was very pleased to read in the Notes on the Pre Inquiry Meeting, para 21 ,where you, the Inspectors laid out the " Main Considerations" for the Hearing notably the first four issues which I summarise as
Aims and Objectives .
Alternative Options .
Cost .
Effect of implementation .

These really do list the fundamental issues which should have been the subject of a much more open debate over the last 10 years .

THE PROPOSAL

To understand why one should site a carpark/ travel hub facility adjoining the main route into Cambridge and the main route to the whole of the Addenbrookes complex and then not to adapt this route or one close by but to create a considerably longer busway route of 8.5k through a most attractive part of the Green Belt one has to realise that the GCP has wanted, as a matter of policy, to build a completely off road guided bus link in this area for the past 10 years.

10 years ago it was under the guise of Three Campuses to Cambridge now the Objectives are to:

1. TO IMPROVE CONNECTIVITY to south east and central Cambridge. Basically to build a park and ride facility and guided bus system from the 1307/A11 to the west side of Addenbrookes.

2.TO IMPROVE JOURNEY TIMES on public transport into Cambridge and to improve reliability on journeys along the 1307.

3.TO IMPROVE ROAD SAFETY along the 1307.

4.TO RELIEVE CONGESTION .

5.TO IMPROVE TRAVEL INFRASTRUCTURE with high quality public transport between Cambridge and Haverhill, increase frequency of buses, reduce accidents and increase sustainable transport.

This Objection will show that this Application fulfils very few of these Objectives.

The 8.5 km route meanders through the Green Belt and is far from a direct route, needing two concrete bridges over the river Granta one having a construction length of 450m the other a total length of 750m and a shorter bridge over Hobsons Brook.This landscape is not just one of open fields but a landscape of chalk downland rising in part from the river Granta to Magog Down and Wandlebury. The route has gradually crept further up the downland and a large part is now located in the centre of the Green Belt where it will be much more visible and detrimental to the vista towards Magog Down and the number of Heritage Assets as listed in the Application. The Proposal is not a rapid transit system into Cambridge or the CBC, but one which has three stops and five roads to cross which the Applicant acknowledges reduces the openness of the Green Belt.This landscape is of great visual importance to Cambridge as a whole since they are the only hills in the area and create a most important backdrop to the city and to the Heritage Assets sited within the landscape. This is simply an increasingly visually important landscape asset close to Cambridge and to unnecessarily damage it with a Busway that would, if necessary, be far better sited adjacent to the 1307 is unnecesary destruction.

7000 local people say the proposal harms the Green Belt. Better Ways for Busways says it does.The Trustees of three Heritage Assets say it does, one of which I understand considers it so harmful that they are spending a large part of their funds in opposing an application submitted by their own Local Authority.The CPPF who are brought in to advise both South Cambs and the City on sensitve planning issues have said it does and are having to oppose the Application in this Hearing.

THE APPLICATION

Apart from the considerable amount of damage to the Green Belt the fundamental aspect of the proposed Busway is whether it is a necessary undertaking and whether it would be financially viable.The Application makes some comment on costings but not on the viability. The GCP presumably briefed the Local Authorities and County who must have been led to believe that the Proposal was viable but this Objection raises serious questions over this.

There are four fundamental questions to be considered.

1. The Objection shows that the guided bus makes little contribution to improving public transport into Cambridge.
Fundamentally it is a P+R providing further carparking for the CBC .

2. Will this carpark and busway 8.5km away from the CBC be financially viable to operate every 10 minutes for 18 hours a day ? Regardless of the agreed harm done to the Green Belt does such a limited use justify the capital expenditure let alone the running costs ?

3. Even if the proposal were financially viable does it warrant the damage to this landscape within the Green Belt which the Applicant themselves states as causing "harm" to the Green Belt and an "inappropriate development" ?

4. There are alternative solutions and there needs to be more open discussion about access to the CBC area and to now the opened Cambridge South Station.

Prior to the submission of the Application in January 25 those who objected have done so largely on the basis of common sense. The route is obviously overwhelmingly damaging to the Green Belt and if a guided bus is required a route adjacent to the 1307 is by far the better option since although still in the Green Belt it would be far less harmful.

Now that we have had the opportunity of reading through the Application, unbelievably we can see that the Applicant themselves is putting forward the case for Refusal !

The present situation is that this Application, in planning terms, has been approved by South Cambs, Cambridge City and Cambridgeshire County and the Applicant is now asking the TWOA to approve that it is acceptable to build a guided bus system along this approved route.

One assumes that the Local Authorities were presented with the same information when they Approved the Proposal that is now submitted to the TWOA. If this is the case then they should have read or at least have been advised by the GCP of the Planning Advice prepared by their own Planning Consultants which is now part of this submission.

Of all the documents submitted in this Application the Statements in CSET 15 are of overwhelming importance. In fact they are virtually the only documents that are needed to Refuse the Application yet it appears that despite their content South Cambs, Cambridge City and the County approved the Proposal.

Now it is left for the TWOA to decide whether it is acceptable to build a guided bus system along a route that the Applicant states harms the Green belt and is inappropriate development

How can it be that the Local Authorities continue to pursue an Application opposed by so many of its electorate knowing that a key part of their actual submission states the case for Refusal ? Both Local Authorities will have refused many applications that although are outside the Green Belt, but border it, on the grounds that the Application would have an adverse effect on the Green Belt. Yet here the Local Authorities themselves have Approved an Application that is very largely within the Green Belt and yet state that it "harms" the Green Belt and is "inappropriate development".

The TWOA should look particulary carefully at CSET 15 which submits the Planning Statement and Green Belt Assesment prepared by the Applicants two planning consultant LDA and Strutt and Parker (SP) . These two Statements run to 68 and 84 pages respectively and are the most important part of the Application since they attempt to make the case for the fundamental issue.

That a guided bus be constructed along this route ?

The LDA Statement makes comment on many of the concerns raised by those who are, and have long been, opposed to this Proposal and in truth it supports the Objectors Case .
It comes to the conclusion in section 12.1.4 of its Statement.

"Consequently, the project as a whole is considered to harm the Green Belt."

Strutt and Parker (SP) in their statement agree with the LDA statement and give the strong impression that they need to put forward a fallback argument of
" very special circumstances" in order to have a chance of Approval.

In 7.114 SP conclude. **"Having established that the proposed development is "inappropriate development" as it does not preserve the openness of the Green Belt……it is necessary to consider whether " very special circumstances exist to support the development."**

The Applicant in submitting these two Statements is clearly saying that they are aware that the Application harms the Green Belt and that they are relying on the argument of

“very special circumstances”. The Application is full of contradictions even within the Planning Statements themselves where some areas of obvious “ harm” are considered to be acceptable and it is this lack of consistency in the Applicants Case that further reduces the Applications credibility.

The Application is largely made up of detail on the construction of the Busway itself when the overwhelming issue at this stage should be whether the route is appropriate for a Busway and just as important whether it is financially viable.

The fact that the Application states that the Proposal harms the Green Belt and is inappropriate development and that it should only be considered on whether “very special circumstances” exist, then one could well argue that this Hearing should only concern itself with that point. A closer reading of the Applicants two planning statements will show why the conclusions of “harm” and “inappropriate development” were reached.

COMMENT IS MADE ON THE TWO PLANNING STATEMENTS

THE STATEMENTS OF LDA and STRUTT AND PARKER PROVIDE SO MUCH SUPPORT AND ECHO MANY OF THE VIEWS OF THOSE WHO OPPOSE THAT TIME IS SPENT REVIEWING THESE FIRST BEFORE MAKING ADDITIONAL COMMENT.

COMMENT ON THE LDA STATEMENT

At the very beginning of their Statement on the first page of their section 1.1.4 LDA really concede that they believe that the Application harms the Green Belt .They say that their Statement “forms an independent assessment of the potential impacts of the project on the Green Belt.”They state that their report feeds into SP’s Statement that looks into the wider considerations as well as those undertaken by LDA, one of which is whether **“very special circumstances”** exists.

To be raising “very special circumstances” at the outset is a clear indication that both consultants in common with the overwhelming number of Objectors believe that the Application clearly damages the Green Belt sufficiently for it to be refused, and that it would be better to attempt to argue that although damaging there are “very special circumstances”.

From the outset LDA try and be supportive of the Application, partly in hope of even avoiding the very special circumstances argument by saying that any damage done is minor but omitting to comment sufficiently on the seriously damaging aspects and certainly not making any comment on the possibility of considering a alternative 1307 route.Their Statement makes no further comment on the ”very special circumstances”and leaves that to SP.

LDA have advised the Local Authorities since 2020 and prepared four reports over the years.The Statement submitted on behalf of the Applicant is dated dec.24 and its 68 pages consider whether the proposal complies with the NPPF Guidance and other local legislation in order to assess whether it does harm to the Green Belt. The most relevant section of the Statement regarding the effects on the Green Belt are paras 12.1.1 to 12.17 where it splits the Busway into sections in order to comment in detail..Their conclusion is given in 12.1.4.
"Consequently the project as a whole is considered to result in harm to the Green Belt"
One assumes that LDA attempted to look at the Proposal in as a positive manner as possible for the Applicant yet still arrives at this conclusion. One wonders how the Statement would be written if they were acting for the Objectors ?

In section 2 of their Statement LDA look at what they term a Green Belt Policy Test. They refer to NPPF 154(h) which states that any development needs to **"preserve the openness of the Green Belt and not conflict with the purpose of including land within the Green Belt"** The para goes on to refer to the SP analysis that a Green Belt location is required for the purpose of this development. No more is said and probably for obvious reasons the LDA allow the SP statement to stand without any further comment.

Whatever route one looks at for a possible Busway it will have to be within the Green Belt, but the chosen route maximises the damage done as the route travels through the most sensitve part of the landscape. The GCP are well aware that a route adjacent to, or in part using the 1307 although within the Green Belt would cause considerably less harm, be shorter, and be the obvious route.

The Public, over the years, have expressed considerable opposition to the proposal and the GCP have resorted to being very selective in how they present and interpret surveys in order to obtain results that would be closer to supporting their route.. It doesn't require specialist knowledge to see that the proposal is damaging and for confirmation consulting the NPPF Guidance confirms this obvious fact. One has to conclude that the Local Authority has been so fixed on this damaging route its Planning Consultants have had to try and justify it.

Based on SP's incorrect view that this chosen route is the only one available LDA start to look at whether the proposals regardless of the damage done would still "preserve the openness of the Green Belt "since NPPF 153 states that **"inappropriate development is by definition, harmful to the Green Belt and should not be approved except in "very special circumstances".** LDA consider the route in relation to both the NPPF and the Local Authorities Advice on Green Belt Purposes.

In **Point 2 of the Local Authorities own Local Cambridge Purposes states that any work should "maintain and enhance the quality of its (Cambridge) setting.**

The LDA Statement quite correctly concludes that it does not.

LDA SPLIT THE ROUTE INTO FOUR SECTIONS IN ORDER TO MAKE MORE DETAILED COMMENT

In Section 4 starting at 4.2.10 LDA explain how they will assess the effect of the route on the openness of the Green Belt.These need to be read and related to their comments on each part of the route.

SECTOR NEAR ADDENBROOKES LDA 8
In 8.4 LDA are aware of the importance of this landscape setting to Cambridge.

" This sector plays an important part in the setting of South Cambridge" and "much of it lies in the lower foothills of the Gog Magog Hills which are an important feature of the setting of Cambridge in their own right and also form the backdrop of the views out of and across the City.The Gog Magog Hills are the major component of the sense of place….."

I think the reference to "sense of place" is very telling. It is a phrase that should not be used lightly and the fact that it is applied to this landscape reflects the importance that LDA attach to it. These hills contain the Heritage Assets of Hobsons Brook, Magog Down and Wandlebury and together are an important backdrop to the City.
The Statement tends to look at openness as the avoidance of physical structure above ground which at first sight is quite logical but although the track is at ground level or adjusted ground level and it is argued that it would not impede the openness it is not an accurate view. The fact that there would be a bus passing a given point every five minutes is in effect a very visible moving structure. In addition, although not referred to in this Application there is the strong possibility that wire fencing will be required to enclose the busway for health and safety reasons. Recent judgements regarding deaths on the busway route to St.Ives make this very likely and confirmation should be sought that this will be the case since a fenced busway will clearly be even more of a visible scar.
It is difficult to understand how LDA can emphasis the importance of this landscape and it being " the major component of the sense of place…" then state that " the proposal would avoid conflict with Green Belt Purposes.".The nature of downland is gently rising open land and local people in recent years fought to create a Trust to preserve it for that very quality. How can LDA say that the Busway would avoid conflict ?

The bridge, a minimum of 2.5m high over Hobsons Brook would be 13.9m wide with ramped approaches. This is not a simple structure that could offer some delight but a reinforced concrete structure more akin to what one would see along a main road .
Here the LDA consider it as a" volume of new development that would reduce openness."
This presumably is the Applicants view.

SECTOR SHELFORD TO STAPLEFORD LDA 9

LDA state that "The river Granta and its valley form a key characteristic in the south of the sector "
Reading 9.5.2 clearly records the harm that would be done.The route has become longer and much more visible by now having to loop much higher up the hills to pass around the visually damaging Strawberry Fields development that sticks out well into the Green Belt that was granted Approval on Appeal and then it has to descend back down to the river Granta. This extends to the water meadows and the required bridge over the river. This bridge has a deck width of 14.4 m ; a span of 118m,and height of 5m.The earth embankments to the south would be 380m long and to the north 300m long .This is a massive piece of construction placed over a small river in a Green Belt location, The stated height of 5m is the eaves height of a two storey house, if this is to the underside then the structure and any railing could take this to 7m.and then if Health and Safety want fencing it is even worse. Over this structure buses would be passing every five minutes.This construction would extend 750 m in total simply to cross a river less than ten meters wide and would be truly a blot on the landscape.

This is a massive amount of construction work around a small river that is designated a county wildlife site.The comments LDA make are very much restrained but they do say in 9,8.3 that this " would introduce a volume of additional built development into open countryside.This would reduce openness…"
Remember NPPF 154 h, states any development should **"preserve the openness of the Green Belt and not conflict with the purposes of including land within the Green Belt."**
What is left of the protected wildlife site ?

9.8.3 lists the anticipated harm caused by the proposals in this sector.

Encroachment on views out of Greatt Shelford and a degree of harm from the route itself in this sector.
And
The stops along the route introduce additional built development, reduce openness and effect the setting of the village. It would be in conflict with National and Cambridge Green Belt policies.

These are the comments of the Applicant applying for Approval !

SECTOR NORTH AND EAST OF SAWSTON LDA 10

The land here is more level and LDA consider that the minimal need for cut and fill maintains the openness.
In 10.4.1 LDA say that the "open gently undulating landform is important to the character…" and that "The river Granta and its valley form a key characteristic…"

We have already seen in the previous sector that the bridge construction will be 750m long sited in this " key characteristic" !

Despite their description of the landscape LDA state that because there is little earth moving the proposal is "considered to preserve the openness of the Green Belt…."

LDA describe this is an attractive open landscape and to argue that because the track is at ground level it doesn't harm the Green Belt because there is no height to the structure does not reflect the truth.
As already mentioned it is vital to remember that it is almost certain that the track will have to be protected with security fencing following the court case over deaths on the St.Ives busway.

The Application as submitted shows the busway having only a low hedge for protection and makes much of the concept that the maintenance track would be appropriate for pedestrians, cyclists and even horse riding !, although buses would be passing every five minutes at possibly 60mph .There is no way that this or any part of the busway does not impinge upon the openness.
10.6.2 states that the bus stop facility on the boundary to Sawston because of the height of structure and traffic controls, drop off, parking ,signage etc all affect the openness.

10.6.3 describes the second extensive bridge construction over the Granta spanning 130m with a width of 14.4m and height to underside of 2.3m which seems at odds with the intention for tractors to pass under. The embankments to the north will be 150m and to the south 175m. This is another major construction and LDA do say it will reduce openness and cause a moderate-minor degree of harm.

Reading up to 10.8.3 is a confusing exercise.

SECTOR SOUTH OF BABRAHAM LDA 11

The carpark/ travel hub is an extensive amount of development. This is a visually attractive landscape, particulary so when driving towards the 1307/A11 junction. The landscape here contributes much to making Babraham, arguably the most attractive, and least spoilt village close to Cambridge. The treed landscape makes a major contribution to the Conservation Area and a development of this size and activity inevitably will have an adverse effect on the setting of the village and be in conflict not only with NPPF Guidance but the Local Authorities own Cambridge Purposes policy of

"any work should maintain and enhance the quality of its setting."

The application route running south of Babraham continues to have a damaging effect on the Green Belt. The river Granta here is a particulary attractive area which is acknowledged by LDA **"The River Granta and its vegetated valley form are characteristic through the middle of this sector,"**

LDA state that some of the vegetation will be removed. The construction of the bridge is referred to again in this sector, here in 11.6.3 LDA state that **"volume of development would be substantial…"** and **"that there would be a reduction in the openness of the Green Belt"**

Remember again NPPF 154 and the Applicants own Cambridge Purposes guidance.

Babraham and its surrounding landscape recognised by LDA as an attractive village and landscape will be severely affected by what the Applicant describes as **"…substantial development "** namely the carpark for 1250 cars and travel hub; the clearing of vegetation along the river and the 450m long construction of the bridge.

Reference is again made to the bridge which was also commented on in LDA 10. In 11.8.3 LDA sum up the effect of the bridge,**"This would reduce openness and result in moderate – minor degree of harm to the Green Belt arising from the reduction in openness."**
It is difficult to give credibility to the LDA Statement when on one hand they state that the volume of development would be substantial, and then say that there would be a moderate to minor degree of harm and of course all in the Green Belt.

When Cambridge is pressured by so much development as in this case, the Local Authorities own Application, it becomes even more important to adequately protect what little quality building and landscape we have left, It is a sad irony that the Applicant submitting the Application also has the Cambridge Purposes Policy stating that.
"any work should maintain and enhance the quality of its setting"

LDA finish their Statement with Section 12 stating their conclusions have been arrived at after their analysis of each sector of the route.
As already referred to they conclude in 12.1.4

"Consequently the project as a whole is considered to result in harm to the Green Belt"

THE STRUTT AND PARKER STATEMENT

SP start their case by saying "it is important therefore to establish whether or not the proposed development is inappropriate development in the Green Belt and to demonstrate a need for its Green Belt location."

SP refer to NPPF 154 reference "(iii) local transport infrastructure which can demonstrate a requirement for a Green Belt location."Starting at 7.11 SP make the case that a Green Belt location is required but make the point that the Public showed **" a preference for on- highway solutions to minimise potential environmental impacts."**

SP in 7.32 state that the GCP arrived at the view that the route has to be on Green Belt land "in the absence of any available alternative options outside the Green Belt"

This is correct. There is not an alternative options outside, but there is certainly one within which the GCP have been reluctant to seriously consider,which is the 1307 route and this has been the publics preferred route for the obvious reasons.

SP spend time talking about appropriateness and openness and arguing that a Busway being at ground level does not affect openness without taking into account the effect of cut and fill, two particulary long and large bridge constructions, the urbanising effect of stops, control systems and drop off areas and the extensive carparking complex.
Neither SP or LDA make reference to the fact that buses will be very visible passing every five minutes which of course is the fundamental reason for the Proposal. The other great concern already mentioned, is that it is more than likely that the Busway will have to be protected with wire fencing for health and safety reason and this will clearly effect the visible nature of openness but restrictive of physical access as well.

Despite trying to argue that the Proposal as it is, would not unduly affect openness SP end up in 7.40 supporting the LDA conclusion "openness would not be preserved, and that there would be a conflict with Green Belt Purpose.

THE APPLICANTS CASE FOR "VERY SPECIAL CIRCUMSTANCES"

The Planning Statements at the outset clearly reflected the view that the Application required "very special circumstances" to be argued, and this is confirmed in their conclusions that the Applicant is left only with trying to argue that there are very special circumstances and SP commence their case referring to NPPF 153 which relates to harm to the Green Belt and in part states**,….."very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposal is clearly outweighed by other considerations."**
NPPF 154 goes on to list works that might not be inappropriate and SP have obviously built their case around NPPF 154.(h iii)

"local transport infrastructure which can demonstrate a requirement for a Green Belt location."

SP in building this case for "very special circumstances" simply rely on this statement.

"in the absence of any available alternative options outside the Green Belt"

This is true, but no reference is made to an alternative option within the Green Belt that the GCP are well aware of. SP build their case solely on the false premise that the proposed route is the only one available and that because of this NPPF 154(h iii) can be used to support this Application.
The fact that there is a far better alternative route within the Green Belt or at least an alternative route it is not discussed.
This manipulation of the facts negates the statement they make that

"in the absence of any available alternative options….." Clearly the Applicant has asked their planning consultants to make the case for the Application route and not to make any reference to possibly using the 1307 route.

The overwhelming argument to support the case for very special circumstances should be a comparison with the route adjacent to the 1307 and to explain why their chosen route, despite the damage done is the best option, but no comparison is made which goes a long way to supporting the view that despite the inappropriateness and the lack of very special circumstances the Applicant has been determined to use the chosen route.

SP's RESPONSE TO NPPF 153 LISTING DAMAGE DONE IN ADDITION TO THAT CAUSED BY THE PROPOSAL TO SUPPORT VERY SPECIAL CIRCUMSTANCES.

In order to pursue this argument of "very special circumstance" the NPPF asks the Applicant to list any additional harm done over and above the harm of the accepted inappropriate development. They put forward four additional areas of harm which presumably they believe to be inconsequential.

Loss of Agricultural land

For this argument SP state the loss of agricultural land is moderate, yet earlier in 7.92 they state that 92% of the land lost is classified as "good or very good" and only 8% classified as" moderate".This is another example of trying to manipulate the argument.

Landscape

In 7.96 SP refer to the various guidelines .Particulary telling is the reference to the South Cambs Local Plan in which this Proposal lies which says **"development must respect and aim to retain or enhance the character of the local landscape**".
and the National Character Area guidance which says that
" proposals should aim to conserve and enhance green infrastructure…"

In 7.97 SP use rather careful language to minimise the considerable alteration to the landscape "During construction there will be significant residual landscape effects to the Granta valley"
The reality is that there are large areas particulary close to the Granta that with earth moving and bridge construction will remodel the river area which the Applicant has designated a county wildlife site ! How does this relate to maintain and enhance ? SP assess the damage to the landscape as moderate, but LDA concluded that it caused harm and SP supported this view. SP now in this argument over very special circumstances consider the damage as moderate.

Construction

Here in arguing that there are "very special circumstances" SP assess the construction work as of " limited weight" in harm to the Green Belt, forgetting that the construction work for one bridge extends for 750m and the other for 450m. They have already stated that the Proposal is harmful to the Green Belt and "inappropriate" They agreed with the LDA assessment that "openness would not be preserved and that there would be conflict with Green Belt Purposes."

Loss of trees

SP consider it to be of "limited weight".

SP in accepting that the Proposals are " inappropriate development" then try and argue that there is very little additional harm done to the Green Belt which is counter to them confirming the views of LDA . SP are trying to put together a reserve position that damage is minimal and the benefits are great. There is just no consistency in the SP Statement.

SP's LIST OF BENEFITS THE PROPOSAL WOULD PROVIDE TO SUPPORT THE ARGUMENT FOR "VERY SPECIAL CIRCUMSTANCES"

In order to support the **"very special circumstances "** argument SP reduce the support they have given to the LDA judgements and attempt to play down the damage that would be caused and go on to try and put together a list of benefits which are either debateable or would apply equally to a 1307 route.

BENEFIT	COMMENT
Cost Benefit	These are very questionable calculations For a route that must clearly be more expensive than a 1307 route.
Cycling along maintenance path	The safety aspect of this is debateable but the same could apply to a 1307 route. The whole question of the safety of cyclists and the public using a maintenance path adjacent to the Busway will be relooked at in the light of deaths on the St. Ives route. The 1307 already has an off road cycle lane for much of the route.Therefore the same safety concerns would not exist.
Reduce congestion on the 1307	A route adjacent to the 1307 would do the same.

Increase public transport capacity	Same applies to the 1307 route and a route here would make a greater contribution.
Improve journey times	Not so for public transport since very few would get off the No.13 bus to transfer to the guided bus in order to travel into Cambridge.The guided bus route would take longer therefore few would use it.
Possibility to integrate more staff buses	A 1307 route could do the same.
Improve access to Babraham Resaearch Granta and CBC	The Application route does not provide good access to Babraham or Granta A route along 1307 would provide better access to Babraham.
Support housing along the 1307	More explanation required, but a route along the 1307 would do the same
Could link housing and employment	A 1307 route would do the same
A sustainable transport route	What does this mean? A 1307 route would surely do the same.
Access to public transport for students Employment gains	A 1307 route would do the same.
Construction jobs would be created	A 1307 route would do the same

The fact that there is an alternative route which the Applicant does not wish to refer to in this Application immediately negates their case for "very special circumstances" SP put forward this list of benefits as being "very special" but as can be seen from the comments there are few if any benefits for this route compared to the alternative 1307 route. In fact the benefits using the 1307 route are greater, something many have been telling the GCP for years.
None of these so called benefits can even be considered as "special" let alone "very special" as would be required by the NPPF.

In 7.108 SP continue with the forlorn hope that the proposal is not inappropriate but they clearly believe that it is. They are aware that Approval will only be granted if it can be shown that "very special circumstances" exist and that these "clearly outweigh the Green Belt harm and any other harm." SP in 7.110 describe their list of benefits as "an extensive range of benefits resulting from the proposed development,which constitutes the "very special circumstances". Very clearly the Applicant has demonstrated that they have no case at all.

Their Application largely argues the case for Refusal and one has to wonder why it was approved by the Local Authorities and County in the first place.

SP move on to try and argue that the proposals are sustainable but the reality is that a route using the 1307 is far more sustainable from every point of view.
It is most difficult to find a logical thread to SPs case they jump about between arguing that the Proposal is appropriate and inappropriate, I presume because they hope that it does not have to rely on "very special circumstances"'
When SP get to their summary in 7.114 they finally accept that

"the proposed Development is inappropriate development"

SP's analysis of the harms and benefits of the actual route lead to this conclusion .SP must clearly know that this view seriously damages the Application and finally in 7.118-7.121 revert back to arguing that their list of Objectives set out at the outset are the "very special circumstances".

THESE BEING

Improving Public Transport
To reduce pressure for the need to release Green Belt land for housing
Shorter journeys to work
Investment
To provide more access for public use
Increased connectivity
The proposed cycle and pedestrian routes alongside the busway.

The view that the Proposals improve public transport into Cambridge and that they provide shorter journeys is not correct and the use of the service track for the public has to be looked at more carefully in light of a recent court judgement and most likely will have to be fenced in, thus further reducing the Openness.. The reality is that this is only a P+R 8.5 km away from, and only serving the CBC and makes little contribution as a transport system into Cambridge. SP do not show any reason as to why this route has any "very special circumstances" which the NPPF requires them to make. SP have already stated that the route harms the Green Belt and is inappropriate They make no comment on, or comparison with a route adjacent to the 1307 also running through the Green Belt.

There are no "very special circumstances".

COMMENT ON STRUTT AND PARKERS CONCLUSIONS ON THE APPLICATION SP8.

Presumably these are the Conclusion of the Applicant presented by their Planning Advisors Strutt and Parker and LDA.

Point 8.2 confirms the reality that this is really only a P+R for CBC. There is no mention of it being a guided busway into Cambridge..8.2 comments on the general

points of a growing city and the pressure on housing and growth which are all true but the question here should really be,
What are the very special circumstances for building the busway along this route and there is no answer.

Point 8.3 makes reference to the cycle track which seems to be a major very special circumstance and as commented on in this Objection there are going to be serious issues over the safety of this adjacent to buses that could be travelling at 60mph.It must be virtually certain that the busway will have to be fenced in.

In 8.4 SP say that the Application is " strongly supported" by the NPPF but this is not true, the Applicants Planning Statements alone confirm that the Proposals harm the Green Belt and is inappropriate development largely because the Applicant has measured the Application against the NPPF guidance and found it wanting.The Conclusion refers to general planning policies ,but these are not very special circumstances related to this particular route.

Point 8.5 is again a generalised argument.There is no disagreement over the fact that it is not possible to use a route that lies outside the Green Belt, but the Application makes no comparison with a possible alternative, the 1307 route, within the Green Belt. We are not made aware of why the GCP dismissed this option at an early stage.

Again SP show no consistency in their argument, they state again that the development "is not inappropriate development within the Green Belt." alongside saying that in conclusion ,SP 7.114

"the proposed development is inappropriate development"

It seems that they continue with the hope that the TWOA will disagree with their conclusion that the proposal is inappropriate thus avoiding the need to make a case for very special circumstances but for safety add in that they have demonstrated "the compelling need for the busway and the lack of alternative options" All of which this Objection has shown not to be the case.
This all gives the impression that the Local Authorities via the GCP just want to build a guided busway regardless of the damage they state it will do to the Green Belt, and without much questioning of its viability.

ADDITIONAL POINTS OF OBJECTION

From the evidence of the two separate Planning Consultants Statements it appears that the GCP have tried to get them to support an Application that does not comply with much of the legislation and the NPPF guidance.

If a guided busway is required and is viable, then the obvious route is to use a site adjoining the 1307 and the GCP are well aware of this. Prior to the Application the Applicant looked at two options for making use of a 1307 route, but only considered bus lanes rather than a busway. GCP are well aware this was the publics preferred route for whatever system was chosen but manipulated the argument by not considering it as a Busway route.

THE ADVANTAGES OF USING THE 1307 ROUTE FOR A BUSWAY IF IT IS CONSIDERED VIABLE.

The 1307 route could be off road, the same as the proposed. It is shorter, far more direct, and therefore quicker and no doubt less cost.

The 1307 route doesn't damage the setting of the river Granta,

The 1307 route doesn't require two long bridge constructions130m or the bridging of Hobsons Brook

The 1307 route avoids having to urbanise the Green Belt where the route would run with bus stops,drop off points,parking bays,traffic lights signage, and probably high metal fencing.

The 1307 route is far more appropriate for 12 buses per hour travelling at 60mph.

On the 1307 the traffic light controls for the cross roads would be at an existing junction rather than in the centre of countryside as in the proposed.
More logical, less intrusive.

IT LEAVES THE GREEN BELT LARGELY UNTOUCHED AND PROVIDES THE SAME SYSTEM ON A QUICKER LESS COSTLY ROUTE.

Regardless of where the busway is sited a dedicated system only serving the west side of Addenbrookes for a very limited number of users with a system running a bus every 10 minutes for 18 hours a day is most unlikely to be financially viable.
If this mistake is made then at least siting it adjacent to the 1307 would mean it could be transitioned into a more direct service into Cambridge.

COMMENT ON THE OBJECTIVES OF THE PROPOSALS
CSET 04 STATEMENT OF AIMS
These were listed in the Introduction to the Objection and are now commented on.
Objective One
To improve connectivity to Employment sites in southeast Cambridge and central Cambridge.

The Objective states this is to improve access to employment sites at the CBC, Babraham Reasearch, Granta and central Cambridge. Access to CBC would be improved but since Babraham Research and Granta are not connected it is of minimum advantage to them.
The intention that the Busway would be used by commuters for access into Cambridge is very misguided and that will be expanded on in comments on Objective

Two. The reality is that this is a guided busway largely taking car users from the 1307/A11 to CBC 8.5 km away rather than building access and parking facilties nearer the site. This is a considerably longer and meandering route and it would not be rapid transport having three stops and five road crossings.

Elsewhere the Application states that there will be six buses per hour each way and that the service would run for 18 hours a day which is the sort of frequency required to attract users, but a bus passing every five minutes at times at 60mph will be severely disruptive to the five roads it has to cross.
Assuming that the Application is correct about the likely number of commuters using the Busway to commute to CBC it may be well used at rush hour but little used for the rest of the day, and very little at evenings and weekends.The same would apply for the return journey.The use would be well under that required for a system of in effect twelve buses per hour for eighteen hours a day. Then what happens, is the system to be subsidised or reduced ? These thoughts are beginning to be asked about the St. Ives Busway where apart from the millions being spent on legal costs and the erecting of protective fencing the speed limit is now reduced to 30mph generally, and 20mph at crossings. The frequencies have been reduced because of less use and now some Councillors are questioning its viability.

Objective Two
To support the continued growth of Cambridge and south Cambridge economy.

The Objective states that the Busway will improve public transport journey times into Cambridge and reduce traffic on the 1307 and help employment.

As commented on in Objective One, the Application seems to expect that the Busway would be used by commuters wanting to get into central Cambridge as well as the CBC. However it is clear that this would be a much longer journey than the present alternatives. Few people wanting to travel into Cambridge would choose to park at this carpark and take the 8.5km bus to the Biomedical Centre and then onwards via a rather indirect route to the centre, a journey that in total could take over three quarters of an hour.

The obvious decision is for the car user to continue on past the carpark and within ten minutes be at the Babraham Road carpark. The Objective states that in particular this system improves public transport into Cambridge but this is most unlikely since only some of those working at CBC would get off the No.13 bus and use the Busway since generally the no.13 bus takes around 10 minutes to arrive at the Addenbrookes bus stop as there are few stops between the carpark and Addenbrookes.

The No.13 is rapid transport compared to the guided bus.
Therefore to assume the Busway would be well used by many travelling into Cambridge is a false hope.

In addition it is more than likely that that Addenbrookes staff commuting by bus would continue to use the No.13 bus since it is more convenient and it is likely that even some going to the CBC side would prefer to park at Babraham P+R and cycle simply because their car is nearer work.

Reading the Objectives it could well be the case that the viability of the Application assumes that it will be much used for access into Cambridge which is more than doubtful. This is simply a P+R for car commuters to the CBC, and not for bus users commuting to CBC or those travelling into Cambridge.

Objective Three
To improve road safety on the 1307.

The Objective states that the Busway would reduce accidents on the 1307,reduce speed incidents and reduce road crossing incidents. All these are very tenuous arguments and would apply to any busway route and hardly a sufficient reason for locating the busway through this part of the Green Belt.

Objective Four
To relieve congestion and improve air quality

The Objective is to encourage the use of sustainable transport and relieve congestion. This Objective has already been covered in the response to the first three Objectives.

Objective Five
To improve active travel infrastructure and public transport in southeast Cambridge

The Objective is to improve public transport between Cambridge and Haverhill,and to improve its frequency .To reduce severance for cyclists,pedestrians and equestrians.

This Objective does not make any contribution to improving public transport into Cambridge. In the response to Objective Two it is shown that the journey time into Cambridge from the P+R site via the Busway will take longer than the existing options. The journey from the P+R site to Haverhill will be the same for both the guided bus and a No.13 bus.

Therefore when carefully considered the set of Objectives put forward in the Application are largely flawed.

The Busway makes little or no difference to public transport access into Cambridge.

The Busway is very largely an encouragement for car users going to CBC to use the P+R rather than drive nearer to CBC.

The Busway does not connect with Babraham Research or Granta.

The Busway will make little difference to the economy of southeast Cambridge apart from the CBC.

The busway might have some minor effect on improving accident rates and congestion, but an alternative route would do the same.

The busway would have minimal benefit in improving public transport between Cambridge and Haverhill.

Put simply this is only a P+R for CBC 8.5 km away and makes little contribution as a guided busway into Cambridge.

MOVING ON TO ADDITIONAL POINTS

THE PURPOSE OF THE CAMBRIDGE SOUTHEAST TRANSPORT

This Application is submitted under the direction of CSET which for the past ten years has been tasked with looking at its primary role to alleviate traffic congestion on the 1307.

Those who commute along this route know that the greatest congestion is the morning rushhour traffic backing up from the Addenbrookes roundabout which can extend back past the Babraham Road roundabout.
The proposed busway which is basically a P+R for the CBC would obviously have some positive effect, but as described in this Objection it would have minimal effect on commuting into Cambridge. It will be very expensive and unlikely to be financially viable.It is an environmentally damaging undertaking which the Applicant themselves states is " harmful" and "inappropriate development"and there are alternatives that would make a greater contribution to alleviating congestion at the Addenbrookes roundabout.

There are, I believe already three multi-storey carparks on the west side of Addenbrookes as well as ground level parking and a further multi storey is proposed. There will be car users from the southeast wanting to get to these who will still have to continue to use the Addenbrookes roundabout..In addition there are the two P+R sites at Babraham Road and Trumpington all fairly close at hand and a third planned at the M11/ Cambridge South junction within a kilometre of the Trumpington P+R. At a guess probably 60% of traffic at rush hour on the 1307 is turning into Addenbrookes and the GCP will be well aware of this.
An obvious improvement that is known to the GCP is to form an access from somewhere around the Babraham Road roundabout to the south and west side of Addenbrookes. The GCP have been told this many times and again it is put forward in the Better Ways for Busways submission. This access alone without the proposed A11 junction carpark or guided busway would have a much greater effect on alleviating congestion on the 1307 at far less cost and damage.
The GCP have looked at and rejected the bus lane options on the 1307 that would have been used in conjunction with this new access which would serve a greater number of commuters than the limited number of P+R car users accessing the CBC,

The GCP have presented this proposal as if it was a guided busway into Cambridge as well as linking with CBC presumably to try and reduce the criticism that it is really only a P+R for CBC, but as this Objection shows the Busway would be little used for access into Cambridge.
The west side of Addenbrookes already has three multi storey carparks and it is clearly considered that more parking is required. Presumably the siting of additional parking 8.5km away is aimed at reducing traffic coming closer to Cambridge which is understandable, but it is a very expensive and damaging solution and unlikely to be financially viable. I guess the GCP fear the access road would lead to more pressure on providing parking closer to work but the reality is that this is where the work is and the access road would make a big contribution to alleviating congestion at the Addenbrookes roundabout.

In addition to the Biomedical facilities there is the recently opened Cambridge South Station ,There will be many people in South Cambridge thinking of using this in preference to getting to the main station but it looks as though there will be no specific parking provided and I see that the CSET are now suggesting that Busway would provide suitable parking. Again it looks as though the balance of discussion has favoured CBC over the wider south east. The station site chosen is the closest to CBC whereas if it had been sited a little further away it would be easier to provide a carpark.
The whole process of looking at South East Cambridge Transport has so far taken over ten years with much spent on consultants trying to justify a flawed route through Green Belt when the GCP themselves were well aware that the most obvious and viable route was one utilising the 1307.

We have both Local Authorities and the County Council deeming this Application Approved, seemingly without raising any questions. One would have thought that with the amount of local and knowledgeable opposition from three Heritage Trusts there would have been some support from a local councillor but I am not aware of any. This is all a rather disturbing situation when the flaws are so obvious and there are so many questions that could be asked.

COSTS

One has to make reference to the Estimate of Costs CSET 09.

This is only a single sheet and the total costs, including risks, is 160m which is the same estimate given in 2023. Looking at the figures given it appears that the actual cost given for the construction of the busway itself is under 95m with the surveying at 13m, land compensation at 12m and consultants fees at 28m which means that consultants fees, leaving out surveying, are in excess of 28% of the cost of construction which at first glance appears extraordinarily high.

Putting aside the fact that the Applicant is left relying on non existent "very special circumstances" to obtain Approval, the TWOA should ask whether the purpose of the route warrants a guided bus, whether the cost estimates are realistic, and whether the Application is financially viable and acceptable value for public money.

FURTHER THOUGHTS ON VIABILITY

This Objection has made the case that this Proposal in reality would be a P+R and busway largely for the limited number of commuters wanting to get to the CBC, and this is confirmed by the Application itself and would make little contribution to access into Cambridge for either car user or public transport.

Siting the carpark in the vicinity of the A11/1307 junction means that it could make a much more useful contribution as a P+R using the 1307 route, reducing pressure on Babraham Road P+R, and if the access road is built then there could be a separate route into the CBC. More space could be given over at Babraham P+R to Addenbrookes with shuttle bus connections. This is basically the proposal put forward by Better Ways for Busways and could probably work well with the minimum of alteration to the 1307.

This alternative is similar in principle to the CSET proposals for building another P+R at the M11/Cambridge South junction only a mile away from the Trumpington P+R. However the landscape adjacent to the A11/1307 is far more attractive and it would have a considerable urbanising effect on the largely unspoilt village of Babraham . It would be wise to reconsider whether a visually less destructive location could be found in the vicinity of this junction. In addition this location must be 10km from the city centre which would deter a considerable number of commuters from using it as a P+R.

The purpose of the CSET is to look at the wider issue of access into Cambridge but it has lost its way with the fixation on this off road guided bus proposal.

CONCLUSIONS FOR REFUSAL

In nearly every respect this Application is flawed and has to be REFUSED.

For ten years the GCP has sought to build an off road busway as a matter of policy and not of analysis, and this Application is the culmination of this intent.

The opposition from many is based on common sense. It does not need expert opinion to arrive at the conclusion that the Proposal causes unnecessary and overwhelming damage to the Green Belt.

The Applicant is well aware that even if considered necessary or viable, a route adjacent to the 1307 would be far less damaging, quicker and more logical.

This is not a busway into Cambridge and very few travelling into Cambridge would use it.

This is a park and ride facility for car users commuting to the CBC and of little use to those commuting by bus.

This makes little difference to public transport between Cambridge and Haverhill.

The busway system to the CBC, with a bus every ten minutes for eighteen hours a day will only have minimal use outside rush hour and even less use at evenings and weekends.

Regardless of the route a dedicated busway only to the CBC is almost certainly not financially viable.

The estimates of cost of the project need closer study . The busway construction costs in CSET 09 are estimated at 95m with fees of 28m , nearly 30% of construction cost.

The Application meets very little of the Applicants five Objectives stated at the outset.

It does not appear that CSET has looked carefully enough at the wider movement of traffic using Babraham P +R ,the whole of Addenbrookes, Cambridge South Station and Trumpington P+R .

The Applicant states that the Proposals “cause harm to the Green Belt” and is “inappropriate development” because apart from commonsense, when looking at the the NPPF and Local Planning Policies their guidance clearly confirms those views.

The Applicant is left only with trying to justify that there are “very special circumstances” for Approval. This is impossible to do when no comparison is made to the alternative route within the Green Belt. The reasons put forward are neither “very special” or even “special”. They are non existent.

The Applicant who has Approved this Proposal is now submitting this Application which contains an overwhelming case for REFUSAL.

August 5th 2025

THOUGHTS SINCE THE SUBMISSION OF SEPTEMBER 2025

A very relevant issue to closely look at is that flagged up in your, the Inspectors Pre-Enquiry Notes.
Main Considerations points 8 and 9 which will look at the implications of development on agricultural land and the risk of development through "severance of fields by the Busway" This is a big concern of many and is very real.

Look at the route which runs very centrally through the undulating Green Belt land particulary around Magog Downs which a Trust was created to protect, and that the Applicant considered had a "sense of place". Downland is gently rising open landscape and here it has already been recently compromised by the visually unfortunate Strawberry Fields development and now adding a fenced-in Busway would be a further reduction in openness and the diminishing of the Downland.The Busway will leave large tracts of land, and I mean maybe over 30% adjacent to Sawston ,Stapleford and Shelford which would inevitably be built upon.Yet the Applicant puts forward as one of the "very special circumstances" is that the Busway would reduce the pressure for the need to release this high quality Green Belt land for housing!
It could well be that the GCP have had this in mind all along and that this is the reason for the stops which have never tied up with a rapid transit system to the Bio Medical Centre. It is notable that in the summary of the CSET PHASE 2 the emphasis is on "Catching the bus from each stop will be easier,with improved walking ,cycling and wheeling links" and "Direct journeys to the existing busway, Cambridge South railway station, the main Cambridge railway station and the city centre"
As my Statement shows the Busway is a flawed project and has little to do with improving access into the City Centre.

This could well be a continuation of the lack of openness from the GCP, a view that gains more credence when one looks at developments since the TWOA submission in January 25. The GCP Local Plan now puts forward the plan to build 4500 houses at Grange Farm on the opposite side of the junction to the Busway carpark.This is a massive development sited in the same quality of landscape as the Busway . Can I be forgiven for thinking that there might be a connection between this and the Busway ? Is there a possibility that the GCP are concerned about the viability of the rapid transit route only to the Bio Medical Centre and the lack of users ? Viability is by far the most important question to answer followed by investigating alternative solutions which are absent from the Order but put forward by Objectors.

The catalyst for considering putting 4500 houses on Grange Farm is the prospect of the approval of the TWOA Order for the Busway despite the fact that this can hardly be considered a busway to the city centre.An Approval would lead to the loss of a large amount of Green Belt land adjoining the villages and of course the loss of the high quality landscape at Grange Farm.The irony being that one of the Applicants arguments for "very special circumstances" being that the Busway would reduce the pressure to develop Green Belt land around the route of the Busway by providing better access from beyond the 1307.

November 10th 2026