DfT TWA/25/APP/01

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The Cambridge South East Transport Order

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBRIDGE SOUTH EAST TRANSPORT ORDER

Summary Proof of Evidence of Caroline McDade of Lichfields In respect of Planning Policy and Application for Direction for Deemed Planning

On behalf of Cambridgeshire County Council

10 November 2026

Planning Inspectorate Reference: DPI/E0535/25/7

1. INTRODUCTION

1.1 I am a Member of the Royal Town Planning Institute. I have over 25 years town planning experience working in consultancy including major infrastructure schemes, plan promotion, planning strategy and the submission of planning applications. I have, and am, promoting many development projects in the Green Belt.

1.2 I have prepared this proof of evidence on behalf of Cambridgeshire County Council. My proof of evidence considers the application for the Order **[CD1-02]** and the request that a direction be made that planning permission is deemed to be granted for the Scheme. It identifies the relevant planning policy and assesses whether the Scheme complies with it. Issues raised by representations to planning matters and how the evidence addresses these are responded to.

1.3 CCC has applied to the Secretary of State for Transport (SoS) pursuant to Section 6 of the Transport and Works Act 1992 (TWA) **[CD4-08, page 5],** for an order known as the Cambridge South East Transport Order **[CD1-02]** (Order) under Sections 1 and 5 of that Act in the terms of the draft Order which accompanied the Application **[CD1-02]**.

2. SCHEME PROPOSALS

2.1 The objective of the Order **[CD1-02]** is to authorise works and the purchase of land to allow the implementation, operation and maintenance of the two-way Guided Busway, mostly segregated from local highways running for approximately 8.5km commencing at Cambridge Biomedical Campus (CBC) at the southern end of Francis Crick Avenue (FCA) in Cambridge and terminating at the Travel Hub near to the A1307/A11/A505 road junction south east of the village of Babraham.

2.2 In overview, the Order **[CD1-02]** would authorise the construction, maintenance, and operation by CCC of the Guided Busway using one or more of the modes prescribed in article 2(g), (h), (i) or (j) of the Transport and Works (Guided Transport Modes) Order 1992 (1992 Order) **[CD4-15 page 2]** (although the Applicant has explained its intention to amend the Order to refer to modes which do not have physical guidance). This is sought with a request that the SoS gives a direction under section 90(2A) of the Town and Country Planning Act 1990 (as amended) (TCPA 1990) [**CD4-05, page 2]** that planning permission, so far as it is required, shall be deemed to be granted for the development proposed to be authorised by the Order **[CD1-02].**

2.3 The Order **[CD1-02]** would authorise CCC to construct, operate and maintain:

a) the two-way, mostly segregated Guided Busway approximately 8.5 kilometres in length commencing at the Cambridge Biomedical Campus (CBC) at the southern end of Francis Crick Avenue (FCA) in Cambridge and terminating at a Travel Hub near to the A1307/A11/A505 road junction southeast of the village of Babraham;

b) intermediate bus stops at Great Shelford, Stapleford and Sawston with upgraded walking and cycling routes to the stops and an Emergency Access and Maintenance Track (EMAT) running alongside the new route for the majority of the way, designed as a multi-user facility to be shared by pedestrians, cyclists and, for part of the route, horse riders for commuter and recreational purposes;

c) a Travel Hub building and P&R site near to the A1307/A11/A505 road junction southeast of the village of Babraham with car access from the A1307 and an improved walking and cycling route connecting the Travel Hub with Babraham High Street;

d) new bridges over the River Granta and Hobson's Brook to provide for the Guided Busway and adjoining the EMAT;

e) access roads, temporary compounds, stopping up, diversion and creation of public rights of way, highway crossings, drainage works, embankments, landscaping and attenuation and infiltration ponds; and

f) other ancillary works including utility diversions as required.

2.4 The Order **[CD1-02]** would also permit:

a) 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 Scheme; and the extinction and creation of private rights;

b) the temporary stopping up of highways; provisions relating to streets; and powers to survey and investigate land;

c) powers to carry out certain works in the highway and the right to use private roads for the purposes of construction; and

d) powers to carry out works to streets including the temporary diversion of streets.

3. SITE LOCATION

3.1 The Site is located to the southeast of Cambridge within a narrow corridor between the A1307 to the east, the A1301 to the west, the A11 to the south and the Cambridge Biomedical Campus (CBC) to the north. The Site passes through the administrative areas of South Cambridgeshire District Council (SCDC) and Cambridge City Council (CaCC) and through or past several existing larger villages including Great Shelford, Stapleford and Sawston.

3.2 The Site is approximately 8.5 km long and 115 ha in area and is linear in nature, running from CBC and FCA to Babraham, the A11 and A1307 where it finishes at a new A11 Travel Hub. The Site comprises all the land within the red line boundary required for the acquisition of permanent interests

for delivery of the physical infrastructure, landscaping, and mitigation for the busway route, as well as temporary interests required for construction.

3.3 The key Site constraints are as follows:

i) The majority of the route, including the proposed A11 Travel Hub, is located within the Cambridge Green Belt;

ii) A number of Sites of Special Scientific Interest (SSSIs) within the wider locality of the Site;

iii) Within the wider area of the proposed busway there are two Local Nature Reserves, several scheduled monuments, various designated heritage assets and two registered parks and gardens.

iv) Six highways and six Public Rights of Way (PRoW) that the Scheme will affect.

v) A gas main running northeast to south-west is located approximately 20 metres north-west of the proposed A11 Travel Hub, at its closest point.

vi) The Scheme route will cross Hobson's Brook once, and the River Granta twice. A number of unnamed ditches along the route will also be crossed by the Scheme.

vii) The majority of the Scheme's route is located in Flood Zone 1. The River Granta crossings are in Zones 2 and 3.

viii) Noise sensitive receptors including residential properties within community areas near the Scheme.

ix) The Scheme route passes through the Cam and Granta Tributaries Lowland Farmlands (3D) LCA and the Pampisford Lowland Chalklands LCA (8A). It also runs in smaller part through the Gog Magog Chalk Hills LCA (which comprises part of the Chalk Hills Landscape).

x) Varying topography along the Scheme route comprising urban edge, river valley, grasslands, agricultural fields and chalk hills.

3.4 An Environmental Impact Assessment (EIA) **[CD1-10.02]** has been undertaken for the Scheme.

4. OPTION DEVELOPMENT

4.1 The Scheme route has been subject to an extensive process of optioneering and refinement, which has been developed over the course of several years. Concepts have evolved from a long list of wider themes and strategies for the corridor to short-list options through rounds of refinement to bring forward the interventions. These were chosen as they were considered the best performing and most appropriate to meet the objectives set out for the Scheme **[CD1-19, page 126].** Rounds of

public consultation have taken place in line with key decision points and sifting of these options which helped to inform the evolution and design of the Scheme to its current state.

5. THE PLANNING POLICY FRAMEWORK

5.1 The Scheme is located within the administrative areas of South Cambridgeshire District and Cambridge City.

5.2 Section 90(2A) of the Town and Country Planning Act 1990 **[CD4-05]** provides that on making an order under the Transport and Works Act 1992, the Secretary of State may direct that planning permission for that development shall be deemed to be granted. Section 90(3) states that the provisions of the 1990 Act apply in relation to any planning permission deemed to be so granted – this refers to the planning permission itself, and not the process to grant deemed planning permission, which is under the Transport and Works Act 1992 [**CD4-08]**, not the 1990 Act.

5.3 As any direction for deemed planning permission approved by the Secretary of State will be under the Transport and Works Act 1992, and not under the 'planning Acts' as defined in the 2004 Act, section 38(6) is not engaged. However, my proof still provides a summary of national and local planning policy as important material considerations in the determination of this Application and in considering whether to direct that planning permission be deemed to be granted.

5.4 The development plan for the Scheme comprises the Cambridge City Local Plan (2018) **[CD8-01]** and South Cambridgeshire District Local Plan (2018) **[CD8-02]**, both policies maps **[CD9-34]** and **[CD9-28-31]**, the Cambridge Southern Fringe Area Action Plan February (2008) **[CD8-14];** the Stapleford & Great Shelford Neighbourhood Plan October 2025 **[CD8-13.01]** and the Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) **[CD8-03]**.

5.5 The Scheme is assessed against all key relevant adopted development plan policies and other relevant planning policies and associated planning guidance which are seen as material considerations.

6. PLANNING POLICY COMPLIANCE

6.1 In the course of my proof of evidence, the Scheme is assessed with reference to 10 topics relating to the need for the Scheme, the transport and movement policies, landscape and ecology impacts, technical matters of air quality, noise and vibration, heritage impacts, risk of flooding, land quality effects, the extent to which the Scheme encompasses climate resilience and reduces greenhouse emissions.

Need for the Scheme

6.2 I explain the need for the Scheme in planning terms, namely there is a need to sustainably resolve existing challenges to transport infrastructure in south east Cambridge which are inadequate to meet current and future travel demand. The Scheme is crucial to address congestion and delays which constrain access to employment, education and leisure opportunities. The government's ambitions for Cambridge means there is a need to accommodate significant growth in population, planned and potential employment and housing in Cambridge and South Cambridgeshire in the future too. In order to support this growth successfully, a meaningful shift from the private car to high quality public transport is required. The Scheme will provide improvements in public transport accessibility and connectivity in the area. This is addressed further in Mr Baker's **[CD27-01 APP-W2-01]** and Ms Diamant's evidence **[CD27-01 APP-W3-01].**

Transport and movement

6.3 The Scheme will support existing and new development through sustainable patterns of movement arising from major development being focused either side of the Green Belt in accordance with Policy TR3(1) of the NPPF 2026 **[CD11-01.01 page 69]**, Policy 80 (Supporting sustainable access to development) **[CD8-01]** and Policy 81 (Mitigating the transport impact of development) of the adopted Cambridge Local Plan (CLP) (2018) **[CD8-01]**. This requires strategic sustainable travel between the city and these locations to provide access to affordable housing and support the economy of Cambridge. This strategic alignment ensures reduced congestion and improved air quality by providing viable public transport alternatives to car dependency. The Scheme will mitigate traffic impacts along the A1307 and A1301, provides for multimodal trip generation and the promotion of sustainable modes of travel, realising the transport vision for the area identified in both existing and emerging development plan policy and guidance in accordance with Policy TR6(4) **[CD11-01.01 page 72]** and Policy TI/2 (Planning for Sustainable Travel) of the South Cambridgeshire District Council Local Plan (SCLP) (2018) **[CD8-02]** and meeting the objectives of the adopted high level Transport Strategy for Cambridge and South Cambridgeshire (2014) **[CD9-07].**

Landscape impacts

6.4 Ms MacLeod concludes **[CD27-01 APP-W8-01]** there are adverse impacts on openness, on landscape character and on visual receptors as a result of elements of the Scheme, but that mitigation has been proposed to avoid these being greater than they need to be, and that there is a commitment through the Design Principles to put into effect additional mitigation, I consider that the landscape and visual impact has been minimised as much as it can be given the nature and location of the Scheme.

6.5 The Scheme responds consistently with the aims of national and local planning policy with respect to landscape and design. Design principles are embedded which help to shape its form, setting, and in the long term minimise the visual impact of the Scheme in accordance with the principles of Policy N2(1)(a), Policy DP3, N2(1), Policy N3 **[CD11-01.01]** and Policy NH/2 of the SCLP 2018 **[CD8-02]** and Policy 59 of the CLP **[CD8-01].** This is further supported by the Landscape and Ecological Management Plan **[CD10.05 Appendix 2.2]** and Condition 11 **[CD1-14.01].**

Ecology impacts

6.6 Mr Watson concludes that the Scheme will have a neutral, not significant effect on designated sites of the Nine Wells LNR and Eversden and Wimpole Woods Special Area of Conservation (SAC) and neutral or slight adverse but not significant effect on the County Wildlife Sites (CWS) including Hobsons Brook, with Scheme amendments.

6.7 Mr Watson concludes there are no significant effects on habitats including hedgerows and watercourses with the implementation of mitigation measures. I adopt Mr Watson and Mr Morrissey's **[CD27-01 APP-W7-02]** findings with regards to the effects on wildlife which are also not significant in construction or operation.

6.8 In line with Policy N2(1)(f) (Improving the natural environment) **[CD11.01.01 page 89]** SCLP **[CD8-02]** Policy NH/4 (Biodiversity) and CLP **[CD8-01]** Policy 70 (Protection of priority species and habitats), the Scheme avoids significant harm to biodiversity through both the final route selection, providing ecology networks and the construction methods that will be employed. Where residual effects are unavoidable, I consider that appropriate mitigation and compensation measures are in place, such as bat sensitive lighting, seasonal timing of works, and amphibian friendly infrastructure.

6.9 Whilst the BNG uplift may be below 10% overall, it is still positive and it is the Applicant's aim to achieve 20% across all Applicant projects. In any event, BNG is not a statutory requirement for TWAO Schemes.

6.10 These matters have been discussed with HCT and GCSP and the conclusions are set out in the HCT Statement of Common Ground (SoCG) **[CD23-04]** and GCSP SoCG **[CD23]**.

Air quality and noise and vibration

6.11 The baseline at all receptors is below the relevant air quality and dust objectives, with negligible changes in concentrations with the Scheme. The effect of operational vehicle emissions was also considered to be negligible and not significant. The same conclusions were reached with regards to ecological receptors. Ms Sykes Proof of Evidence **[CD27-01 APP-W6-01]** confirms that the Scheme will result in a reduction in emissions along the A1307 corridor in the opening year.

6.12 The Scheme meets the objectives of CLP Policy 36 **[CD8-01 page 134]** and Policy S/C12 **[CD8-02 page 216]** of the SCLP through its low emissions and commitment to maintaining air quality standards and amenity across sensitive locations. The Scheme is expected to produce a modal shift that contributes to overall improvement of air quality, in line with Policies P3(2) and DP3 of the NPPF 2026 **[CD11-01.01]**.

6.13 Noise and vibration impact during construction will be managed through engineering and procedural controls, however, there will be noise impacts at the Travel Hub and on some residential roads for some of the duration of the works. These have been mitigated as far as possible. The ES explains that these changes in noise are unavoidable. According to Ms Wills' Written Statement **[CD27-01 APP-W7-02 page 5],** mitigation measures would be unfeasible to install due to access requirements. It is an urban environment and will remain dominated by road traffic, and additional noise from bus movements will likely be absorbed as the properties experience existing noise events each night in any event.

6.14 Significant noise effects during operation are also predicted but all occur where there is already substantial background noise so would be barely perceptible according to Mr Parsons **[CD27-01 APP-W7-02 paragraph 12].**

6.15 As the Scheme has reduced the noise impacts as far as reasonably practicable, the predicted changes in noise levels are not considered to be significant. There is accordance with CLP Policy 35 **[CD28-01]** and SCLP Policy S/C10 **[CD28-02]** and Policy P3 of the NPPF 2026 **[CD11-01.01, page 80].**

Effect on heritage assets

6.16 Policy HE4(2) requires proposals to avoid or minimise harm to the significance of heritage assets. I adopt Mr Ford's conclusions which find that in respect of built heritage, there is heritage harm and it is at the lower end of the scale in construction and operation, and for archaeological assets, there is also identified harm but this is at the higher end of the scale in construction.

6.17 In accordance with Policy HE6(4) of the NPPF 2026 **[CD11-01.01, page 96]**, such harm must be weighed against the public benefits of the proposal. Having attributed appropriate weight to the preservation of the setting of the built heritage, I conclude that the public benefits clearly outweigh the identified harm. It therefore follows that there is compliance with the statutory duty of the of the Planning (Listed Buildings and Conservation Areas) Act 1990.

6.18 Accordingly, I consider the proposals to be compliant with Policies HE4 and HE6 of the NPPF 2026. The harm identified is clearly outweighed by the very substantial public benefits to be delivered by the Scheme and the Desk Based Assessment (DBA) **[CD1-10.49 Appendix 2.2]** findings provide a sound basis for policy compliance under CLP **[CD8-01]** Policy 61 (Conservation and enhancement of

Cambridge's historic environment) and SCLP Policy NH/14 (Heritage Assets) **[CD8-02]**. The Scheme does not prevent the vision for Cambridge 2031 set out in the CLP page 8 from being achieved. Furthermore, the heritage impacts are not so significant that the special character of Cambridge as a compact city is affected (CLP page 19).

6.19 No parties lodged particular objections to the Scheme on heritage or archaeological grounds, and I refer to the Historic England SoCG **[23-03]**, noting they do not object to the Scheme.

Flood risk and drainage

6.20 Significant changes in flood risk have been avoided through the bridge design which spans the majority of the floodplain. There are small areas of floodplain where there would be encroachment. Flood storage compensation has been identified within the Order Limits so that there would be no increase in flood risk to any third-party land. The Scheme has also addressed the flood sequential test.

6.21 The drainage design is set out in the Drainage Strategy **[CD1-10.04]** and follows the principles of the SUDS hierarchy.

6.22 The Environment Agency has accepted the updated FRA **[CD1-10.23.01]** and flood modelling **[CD1-10.24.01]** and have removed their objection **[CD22-01]**, therefore there are no outstanding issues relating to fluvial flood risk.

6.23 Ms Bristow's Written Statement **[CD27-01 APP-W7-02]** concludes that the Scheme would have negligible impact during the construction phase, and no impact during operation, on groundwater and Hobsons Conduit.

6.24 The Scheme has addressed changes in water quantity (water scarcity). This is detailed in the ESA **[CD24-04 chapter 5]** and I consider this reflects the NPPF 2026 **[CD11-01.01]** environmental objective (c) to use natural resources prudently.

6.25 The Scheme accords with Policy F4(2) **[CD11-01.01 page 83]** and Policy F7(1) of the NPPF 2026 **[CD11-01.01 page 86]** and SCLP **[CD8-02]** Policy CC/9 in respect of flood risk. The use of SuDs addresses SCLP **[CD8-02]** Policy CC/8 and Policy 31 of the CLP **[CD8-01]** and SCLP **[CD8-2]**. The protection of groundwater around Hobson's Brook accords with Policy P3 of the NPPF 2026 **[CD11-01.01 page 79]**.

Effects on land quality

6.26 Whilst the Scheme will sterilise a small part of the Mineral Safeguarding Area, I consider it accords with the Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) **[CD8-03]** in so far as still protecting the wider majority of the MSA as a resource.

6.27 The Scheme's mitigation measures follow the waste hierarchy and aim to reuse as much material as possible. There is, therefore, general compliance with the NPPF 2026 environmental objectives and the Minerals and Waste Local Plan (2021) Policy 3.

6.28 Although the Scheme results in some harm to the Best and Most Versatile Land, Natural England has not objected and given the embedded mitigation measures, strategic transport benefits, and alignment with broader regional planning objectives, I consider the residual effects are acceptable in the context of policies in the Minerals and Waste Local Plan. I attribute limited weight to the conflict with Policy N2(1)(b).

6.29 In the context of the above conclusions, I find the Scheme complies with the development plan as a whole.

7. BENEFITS AND HARMS

7.1 I consider the very substantial planning benefits namely improved journey time savings and reliability, access to housing and employment sites, and better connections between villages, weigh heavily in favour of the Scheme, together with substantial air quality improvements, active travel contributions, reductions in greenhouse gas emissions and climate resilience.

7.2 I identify the harms arising from the Scheme which are limited to moderate harm to Green Belt, landscape character and archaeological assets, and loss of best and most versatile agricultural land,

8. GREEN BELT ASSESSMENT AND VSC

8.1 The Green Belt assessment considers the Scheme against NPPF 2026 **[CD11-01.01]** Green Belt policies. I conclude that the Scheme is transport infrastructure for the purposes of national Green Belt policy and there is a need for this Scheme and any route in this area would need to go through designated Green Belt land. There are no other routes not passing through Green Belt that fully achieve the objectives of the Scheme. Furthermore, the Scheme minimises the impact on the openness of the Green Belt and does not significantly conflict with the five nationally defined 'purposes' for Green Belt land. I therefore conclude that the Scheme is not 'inappropriate' development and not harmful to the Green Belt (NPPF GB7(1)(f)(i)) **[CD11-01.01 page 62]**. For completeness, I also carry out a balancing exercise to determine whether 'Very Special Circumstances' (VSC) apply and conclude that the very special circumstances in this case are highly compelling.

8.2 The Scheme delivers very substantial and specific public benefits that cannot be achieved to the same extent through different off road and on road route options, and which directly support national and local policy objectives. These benefits are strategic in nature, long-term in effect, and proportionate in impact.

8.3 The planning balance takes into account the harms and benefits arising from the Scheme, including the necessary heritage balances and, if an alternative conclusion is reached in relation to NPPF Policy GB7(1)(f)(i) **[CD11-01.01 page 62]**, the VSC balance. The Scheme passes these balancing exercises, and I conclude that the benefits decisively outweigh the harms in the planning balance.

9. STATEMENT OF MATTERS

9.1 I address the main issues from the Secretary of State's Statement of Matters. The Scheme responds to a clear and compelling strategic need: that is, improving accessibility and connectivity to key employment and housing sites, providing commuting journey time savings and reliability for users on the A1307, supporting a modal shift toward low carbon transport and providing public transport choice (Matter 1).

9.2 The environmental impacts of the Scheme are not considered to be significant and accord with national and local planning policy. I conclude that the Scheme requires a Green Belt location, is not inappropriate development in the Green Belt, but also there is a very special circumstances case that can be made which weigh heavily in favour of granting permission for the Scheme (Matter 4a).

9.3 The construction of the Scheme could result in the severance of adjacent agricultural fields. Whether these would then be allocated for future development in a development plan would be for the local planning authorities or the Greater Cambridgeshire Development Corporation to determine and the community would be consulted at that stage (Matter 4f).

9.4 I consider the strategic and local need I have identified provides compelling evidence that it is in the public interest for CCC to compulsorily acquire land for the Scheme (Matter 6a).

10. THIRD PARTY OBJECTIONS

10.1 I address relevant objections raised by stakeholders and third parties and these have informed my evidence. The main concerns raised by objectors were i) inappropriate development in the Green Belt, ii) BNG, iii) environmental impacts, iv) alternative route option, v) landscape impacts, vi) need for the Scheme and vii) links to Haverhill, matters which are already addressed elsewhere in my proof of evidence.

11. CONCLUSIONS

11.1 When assessed in its totality, I consider that the Scheme provides an appropriate balance between infrastructure delivery and environmental sensitivity and performs strongly against relevant planning policy tests. It enables delivery of critical growth planned in the Greater Cambridge area in the short and long term, supports decarbonisation objectives, and promotes sustainable spatial development patterns.

11.2 I consider that the need for the Scheme and the very substantial benefits arising from its development, that I have outlined, make a compelling case, in the public interest, for the use of compulsory land acquisition powers.

11.3 For the reasons outlined throughout this evidence, I support the proposal and recommend that the Secretary of State grant the Transport and Works Act Order and the associated direction for deemed planning permission.