



5 March 2025

Re: The GCP CSET Scheme (Transport and Works Act Order application)

I object to the application by Cambridge County Council and Greater Cambridge Partnership for a Transport and Works Act Order on the following grounds:

- The application refers in the Funding Statement only to “discussions” with MHCLG about obtaining funding from Government, and asserts that “the Applicant expects the full costs of delivering the CSET2 Scheme will be met by Government funding,” but without providing any evidence of the Government’s intention.³

- The connection provided to the Babraham Research Campus is worse than the connection currently provided by the 13 bus service. The latter stops on Babraham Road, and the walk to the various buildings on the campus is between about 450m and 1.3km through the campus site. By contrast, the walk from the CSET2 Park & Ride is up to about 2.4km, a significant part of which is on a farm track through fields. Not only is this significantly less convenient, it would also be experienced as unsafe after dark, especially by women. This is not picked up in the Equality Impact Assessment (EqIA).

¹ https://api.parliament.uk/historic-hansard/written-answers/1996/jan/22/transport-and-works-act-1992#S6CV0270P0_19960122_CWA_216

² <https://www.gov.uk/government/publications/transport-and-works-act-orders-a-brief-guide-2006/transport-and-works-act-orders-a-brief-guide--2>

³ Funding Statement §5 (doc ref CSET-08-00 rev 00)

limit of 50mph, but no traffic calming measures to self-enforce that limit. This too is not picked up in the EqIA.

It is unspecified which other employment sites are considered under “other employment sites in South East Cambridge”, but the key one is the Peterhouse Technology Park on Fulbourn Road, home to Arm, Cambridge Water and other companies. These are not served at all by the CSET2 busway.

In terms of serving the villages, the stops are on the very outer edges of Great Shelford, Stapleford and Sawston. Babraham and the Abingtons are served only by the stop at the P&R. The walking distances from these stops are roughly as follows:

- *Great Shelford: up to 2km*
- *Stapleford: up to 2.5km*
- *Sawston: up to 3.3km*
- *Babraham: up to about 1.8km from the P&R*
- *Little Abington: up to about 2.3km from the P&R*
- *Great Abington: up to about 3.5km from the P&R*

3. The applicant’s own evidence shows that Objective 4 (“Relieve congestion – Relieve pressure at network pinch points”) is barely, if at all met. It fails entirely to relieve congestion that impacts emergency service vehicles, including ambulances based at Addenbrooke’s Hospital.

The Transport Assessment includes two tables that show where the largest differences in congestion are expected between the “Do Minimum” and with-CSET2 scenarios. These show that congestion may worsen on some roads in Cambridge, and will not be significantly relieved on the A1307 or A1301 entering or leaving Cambridge.

Table 7-2 - 2029 Volume over Capacity Results in the AM Peak

Name of junctions where changes of note occur (+/- 5% or more)	Volume over Capacity (%)		Difference (%)
	DM	DS	
Westbound on Long Road approaching Trumpington Road	87	105	18
Southbound on Cherry Hinton Road at Queen Edith’s/Robin Hood Junction	84	90	6
Westbound on Babraham Road approaching Cambridge Road in Sawston	92	86	-6
Northbound A1307 approaching the Babraham Research Campus entrance roundabout	90	85	-5

Table 7-3 - 2029 Volume over Capacity Results in the PM Peak

Name of junctions where changes of note occur (+/- 5% or more)	Volume over Capacity (%)		Difference (%)
	DM	DS	
Northbound on Gonville Place approaching Parkside/Mill Road Junction	90	101	11
Southbound on Cherry Hinton Road at Queen Edith’s/Robin Hood Junction	93	101	8
Eastbound on Fulbourn Road at Queen Edith’s/Cherry Hinton Road junction	100	91	-9
Access representing Bartlow off the A1307 south of Horseheath	83	77	-6

4. GCP has not updated its modelling base year since 2019 (i.e. pre-COVID), and is therefore basing its transport and economic impact forecasts on a highly unreliable foundation. For a project of this scale and cost, there is no reasonable justification for GCP not to have re-calibrated its strategic transport model (CSRM 2) using traffic counts and bus patronage figures collected in 2023 or 2024 that captured post-COVID travel patterns.

Instead, the GCP has applied “post-model adjustments ... to demand forecasts”⁴ It claims that this is “the simplest and most transparent”, but omits to mention that TAG Unit M4 guidance also warns of the risks and limitations of taking this approach (emphasis added):⁵

However, as well as including all the issues with the previous method(s), it also presents the most risk to the model results and appraisal. This is because applying adjustments to model results means that the model has effectively not used the change in travel patterns, reflecting the changed conditions. Care should also be taken that adjustments are made consistently across the model results so as not to distort the appraisal (e.g. demand and costs). It will be expected in these cases that assumptions made are extremely clear and that a series of sensitivity tests will be undertaken to mitigate the risks around potentially unreliable model results. This method should only therefore be considered if quick, proportionate decisions need to be taken, so long as the risks to analytical assurance are explicitly highlighted. There may be situations where a simpler approach is appropriate, for example when looking at short-term projections that are likely to be updated regularly.

In short, GCP’s approach is clearly not consistent with DfT’s advice.

5. The journey time savings afforded by the proposed scheme are not clearly set out, with defined start and end points, a detailed description of the “Do Minimum” scenario tested, and a full set of assumptions about the maximum and average speed buses will be able to travel on the busway (the average including dwell times). It is therefore impossible to assess the plausibility of the journey times, and the relative savings against a reasonable “Do Minimum” scenario, or any alternative scheme GCP has considered or others have proposed (see point 6 below).
6. Congestion experienced on Babraham Road close to Cambridge is almost entirely confined to the section north-west of the Hinton Way roundabout. A segregated bus route between the Hinton Way roundabout and the Biomedical Campus would bypass congestion and multiple traffic lights, greatly reducing journey times and variability. This would pass through land owned by Cambridgeshire County Council, some of which is proposed to be allocated for further expansion of the Biomedical Campus in the next Local Plan.⁶

On occasions, inbound traffic can queue back beyond the Hinton Way roundabout in the morning peak. A proportionate transport solution would seek to provide an inbound bus lane east of the Hinton Way roundabout. According to the Preferred Options Report produced for GCP in 2017, “The majority of this section [from the Babraham Research Campus to Hinton Way] has sufficient highway land available to accommodate carriageway widening on the south side of A1307 to enable a 4m wide bus lane to be added to the existing layout, without a requirement to acquire additional private land. This would not reduce capacity for other vehicles but would add capacity for buses to flow freely alongside the queues.”

Past Wandlebury, the A1307 was at one time dualled. One lane of this section could be reinstated as a bus lane. As a continuation of the bus lane described in the previous paragraph, there would be 2.1km of segregation for inbound buses. This would provide similar future-proofness as the proposed CSET2 busway.

Iterations of this proposal have been submitted to GCP at various stages in the project development, but the GCP has appraised materially different designs, which it has found wanting.

⁴ Transport Assessment §4.5 (doc ref CtoC-21-00 rev 00)

⁵ TAG Unit M4 §B.3.4 (<https://www.gov.uk/government/publications/tag-unit-m4-forecasting-and-uncertainty>)

⁶ <https://www.greatercambridgeplanning.org/emerging-plans-and-guidance/greater-cambridge-local-plan-the-20-year-master-plan-for-the-greater-cambridge-area/>

It has not appraised the scheme as submitted. A separate objection by *Better Ways for Busways* to the TWAO application will set out in greater detail how this alternative would work.

7. The alternative solution referred to in paragraph 6 above has significant benefits not provided by GCP's proposed busway. Firstly, it will better serve Babraham Research Campus by calling at (enhanced) stops at the access to the campus site on the A1307. As mentioned in paragraph 2 above, these are approximately 450m to 1.3km on foot from the buildings on the campus, compared with up to 2.4km from the proposed new Park & Ride. The westward expansion of the Campus now being proposed⁷ will be very well served by stops on the A1307 and very poorly served by CSET2.

The second major benefit of the alternative is that a bus lane may be used by all buses, public and private service coaches, emergency service vehicles, and other public service vehicles (subject to appropriate drafting of the associated Traffic Regulation Order). Whereas the proposed busway will only be legally usable by guided vehicles, fitted with the required guidance technology and operated by someone with relevant training.

8. The scheme will be responsible for

- Construction: 43,234 tCO_{2e}⁸
- Operational: 188,789 tCO_{2e}⁹

It is somewhat surprising that that operational emissions are not negative, compared with the Do Minimum scenario. More startling is that they total (over 60 years) over four times the construction emissions. The "Road user carbon (difference between Do Minimum and Do Something scenarios)" amounts to 196,253 tCO_{2e}. Without seeing the workings, this is hard to reconcile this with the claim in the Transport Assessment that total vehicle-mileage in the Do Something scenario is lower than in the Do Minimum scenario:¹⁰

"As shown in Table 7-1, under the DS scenarios of 2029 and 2041, there is a reduction in the total number of VehKM travelled across the [Affected Road Network] with an estimated annual reduction of 3.8 and 3.3 million in 2029 and 2041 respectively."

One of the meanings of "sustainable transport" is that it is lower carbon than the private car. Yet, somehow this "sustainable transport option" (as described in the Planning Statement) is not repaying the carbon debt of construction but multiplying it.

9. The Transport and Works Act exists to facilitate the construction of railways, tramways and waterways. Because of the tight constraints within these must be built (in particular with respect to gradients and bends), the TWA grants stronger compulsory purchase powers than does the Highways Act. The scope of the TWA has over time been extended to include physically guided buses and then, in 2022, to include non-physically guided buses.

The proposed CSET2 busway will be built to similar specifications as an ordinary road with no abnormal constraints. It is therefore unclear how the TWA, rather than the Highways Act, is the appropriate legal instrument to seek planning consent and compulsory purchase orders. If for no other reason, the point made in paragraph 7 above strongly suggests that the Highways Act would be the more appropriate legal instrument.

10. The order application includes plans for an "emergency and maintenance access track." The Environmental Statement states that "sensor guidance" is the preferred option for the busway (though provides no further detail).¹¹ As this would not require guidance rails, there would be nothing physically preventing an emergency service or maintenance vehicle driving on it. There is

⁷ https://www.babraham.com/media/5mob12fj/consultation-boards-a4_240225.pdf

⁸ Environment Statement §16.5.1 (doc ref CSET2-10-02)

⁹ Environment Statement §16.5.2 (doc ref CSET2-10-02)

¹⁰ Transport Assessment §7.6 (doc ref CSET-19-00)

¹¹ Environment Statement §2.1.8 (doc ref CSET2-10-02)

therefore no justification within the terms of the TWA for building a second parallel road for emergency and maintenance purposes if the busway will be built with sensor guidance. The fact that the second road will serve as an active travel route is irrelevant in the context of the TWA, which makes no provision for infrastructure that is not “ancillary” to the guided transport infrastructure. There is no sense in which a cycle/footpath is necessary for, or supportive of, the guideway or vehicles using it.

Yours sincerely,

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(private citizen)