



Report to the Secretary of State for Transport and the Secretary of State for Housing, Communities & Local Government

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Inspectors appointed by the Secretaries of State

Date 08 June 2026

TRANSPORT AND WORKS ACT 1992

ACQUISITION OF LAND ACT 1981

TOWN AND COUNTRY PLANNING ACT 1990

THE CAMBOURNE TO CAMBRIDGE ORDER 202()

**REQUEST FOR A DIRECTION FOR DEEMED PLANNING
PERMISSION**

**APPLICATION FOR A CERTIFICATE IN RESPECT OF OPEN
SPACE**

Inquiry opened on 16 September 2025

File Ref: DPI/E0535/25/1

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CASE DETAILS

The Order

- The Cambourne to Cambridge Order would be made under sections 1 and 5 of the Transport and Works Act 1992.
- The application for the Order was made by Cambridgeshire County Council to the Secretary of State for Transport on 12 November 2024.
- The Order would authorise the construction, maintenance, and operation of a guided busway between Cambourne and Cambridge; intermediate bus-stops along the route; an emergency and maintenance access track; a travel hub building and park and ride site at Scotland Farm, Dry Drayton; bridges over the M11 and Bin Brook; access roads; temporary compounds; the stopping-up, diversion and creation of public rights of way; highway crossings; drainage works and attenuation and infiltration ponds. The Order would also permit the compulsory acquisition of land for the proposed works and ancillary purposes; the temporary stopping-up of highways; provisions relating to streets; powers to survey and investigate land; powers to carry out works in the highway; the right to use private roads for the purposes of construction; powers to carry out works to streets including their temporary diversion; and the acquisition of replacement land for exchange open space land.

Summary of Recommendation: That the Order be made with modifications.

The request for a direction for deemed planning permission

- The request for a direction for deemed planning permission was submitted by Cambridgeshire County Council to the Secretary of State for Transport on 12 November 2024.
- The request seeks a direction 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.

Summary of Recommendation: That a direction be made that planning permission be deemed to be granted, subject to conditions.

Application for a certificate in respect of open space

- The application was made by Cambridgeshire County Council to the Secretary of State for Housing, Communities and Local Government on 12 November 2024.
- The proposed Order includes a power to compulsorily acquire permanent interests in two areas of open space to the east of the M11.
- The application requests a certificate under section 19(1)(a) of the Acquisition of Land Act 1981 on the basis that replacement land would be given in exchange.
- The Secretary of State stated their intention to give a certificate by a letter dated 11 February 2025.

Summary of Recommendation: That a certificate be issued.

1. PROCEDURAL MATTERS

Responsibility for the Order Scheme

- 1.1 The Order Scheme has been prepared by the Greater Cambridge Partnership (GCP), which is the body responsible for delivery of the Greater

Cambridge City Deal¹ (City Deal). Greater Cambridge is the administrative areas of Cambridge City and South Cambridgeshire District. The GCP Executive Board is a joint committee of three local authorities: Cambridgeshire County Council (CCC), Cambridge City Council (CCiC) and South Cambridgeshire District Council (SCDC). Although the GCP is expected to promote public transport schemes, it is not a legal entity which is capable of making an application for a Transport & Works Act Order. Consequently the application has been made by CCC.

The inquiry

- 1.2 The inquiry sat for 22 days: 16-19, 23-26 & 30 September; 1, 14-17, 21 & 22 October; and 5, 11-13, 20 & 21 November 2025. Site visits were made on 17 September, and 6, 18 & 19 November 2025.
- 1.3 The application for the Order and the request for deemed planning permission (DPP) are to be determined by the Secretary of State for Transport (SoST), and the application for an open space certificate is to be determined by the Secretary of State for Housing, Communities and Local Government (SoSHCLG).
- 1.4 A pre-inquiry meeting (PIM) was held on 24 June 2025 to consider arrangements for the management of the case, including the submission of documents. There was no discussion of the merits of any parties' cases at the meeting. A note of the meeting ([Core Document \(CD\) 25.10](#)) was circulated to interested parties and placed on the inquiry website. The website can be accessed via the following link: [Cambourne to Cambridge - Gateley](#). It includes all core documents.
- 1.5 The SoST wishes to be informed whether all procedural requirements have been complied with². The Applicant had submitted a note concerning compliance with the statutory procedural requirements ([CD25-04](#)). This recorded that some notices had been removed by the Applicant's contractor one day before the closing date for objections. On being advised of this minor non-compliance with Rule 14 of The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006 (the AOP Rules), the Department for Transport (DfT) advised that no further action needed to be taken as the Applicant would not resist the late submission of objections as a result of removal of the notices.
- 1.6 AOP Rule 15 required the Applicant to serve a notice concerning the proposed Order on all those parties named in the book of reference (BoR). Subsequent to the date of the application, it came to light that additional entities had interests in the Order lands, and these were then notified³. We are satisfied that no prejudice was caused to the interests of any party by the circumstances in respect of AOP Rules 14 and 15.

¹ The respective roles of the GCP and the local authorities are explained in Mr J Baker's proof of evidence (PoE) ([CD26-01-APP-W1-1](#)), para 2.1.1; Appendix 1 to Mr J Baker's PoE ([CD26-01-APP-W1-2](#)); and the application letter ([CD1-01](#)), para 9-11.

² [CD25-01](#): the Secretary of State for Transport's second matter.

³ [CD25-04](#), para 16-20.

- 1.7 On the opening day of the inquiry, the Applicant advised that, whilst it had otherwise complied with the requirements for notification of the inquiry set out in Rule 13 of The Transport and Works (Inquiries Procedure) Rules 2004 (the IP Rules), it had not complied with Rule 13(6)(b) in that notices were not posted in the usual places for public notices two weeks beforehand. The DfT was notified of the situation, and, having considered the submissions of the Applicant ([CD29-10](#)), took the view that this was a matter for the appointed Inspectors⁴.
- 1.8 The Applicant had taken additional steps to publicise the inquiry, including publishing the date of the inquiry on its website (with a link to the inquiry website), notifying parties which had expressed an interest in the scheme of the date of the inquiry by email with a link to the inquiry website, issuing a press release, and publicising the inquiry on social media. Moreover, the length of the inquiry allowed any parties alerted to the inquiry by the late notice the opportunity to attend and participate. We therefore took the view that no prejudice had resulted from the failure to comply with Rule 13(6)(b), and ruled that the inquiry should not be adjourned to await expiry of the extended notification period.

The scope of the Order

- 1.9 The scope of the Order set out in the case details above is summarised from the application letter submitted to the SoST on 12 November 2024 ([CD1-01](#)). We have considered the scope of the Order as described in the application letter and set out in detail in the revised draft Order (below, para 1.12).
- 1.10 The draft Order ([CD-02h](#)) would permit a guided busway comprising one or more guidance configurations or modes⁵. Although the Environmental Statement (ES) included reference to a kerb guided design, the scheme illustrated on the drawings and the Applicant's Statement of Case⁶ (SoC) ([CD23-01](#)), and with few exceptions the evidence presented in writing and at the inquiry, was predicated on the proposed busway being a road-based sensor guidance mode. That means vehicles that can operate on a road and are guided wholly or mainly by means of sensors on the vehicles which provide the data to guide them⁷. The other modes the draft Order would permit would be road-based with side guidance and track-based with either sensor or side guidance; side guidance meaning that buses are guided wholly or mainly by wheels bearing outwards against a fixed apparatus. The proposed plans and sections do not illustrate either a track or any side guidance apparatus such as kerbs.
- 1.11 Consequently, we have considered the proposal on the same basis. Were one of the other modes to be selected over a road-based sensor guidance system, we are not confident that sufficient evidence has been presented or

⁴ Email dated 17 September 2025 from the Transport Infrastructure Planning Unit to the Inquiry Programme Officer.

⁵ By way of the definition of "guided busway" in Article 2, by reference to four of the modes prescribed in article 2(g), (h), (i) and (j) of the Transport and Works (Guided Transport Modes) Order 1992 (as amended) ([CD5-15](#)).

⁶ In particular Section 10.7, pp66 & 67.

⁷ Article 3 of the Transport and Works (Guided Transport Modes) Order 1992 (as amended): "road-based with sensor guidance" means a mode in which the vehicles - (a) are capable of operating on a road; and (b) are guided wholly or mainly by means of sensors on the vehicles which, by reference to the vehicles' external environment or to the receipt of electromagnetic information, provide data which is used to guide the vehicles ([CD5-15](#)).

evidence comprehensively examined at the inquiry to support those other modes, and there would be the potential for prejudice to the interests of other participants in the inquiry.

Proposed revisions to the draft Order and associated documents

- 1.12 In June 2025, ahead of the PIM, the Applicant submitted a revised draft Order ([CD1-02a](#)). The revised draft involved typographical alterations, corrections to plot numbers, and changes to protective provisions⁸. Subsequently, in September 2025 and prior to the opening of the inquiry, the Applicant submitted a further revised version of the draft Order ([CD1-02d](#)). These proposed revisions reflected agreement with the National Trust on the disapplication of the covenants previously contained in the Order, and with the Environment Agency and Cadent Gas Ltd on the form of protective provisions. Additionally, article 39 concerning offences in relation to the maintenance of the approved works has been deleted, and article 5 has been amended to ensure that the power to construct and maintain the works is clear and not inadvertently limited⁹. Prior to the closing of the inquiry, another revised version of the draft Order was submitted ([CD1-02h](#)). In this version the sole change is reference to the removal of plot 9-095 from Schedule 9 as its temporary acquisition is no longer required for work No 5¹⁰. The Applicant also acknowledged that in Schedule 1, the reference under work No 1 should, as elsewhere, be to a *guided* busway, and not simply to a busway. We consider that the Order could be modified to specify that known intention.
- 1.13 The BoR ([CD1-13.0](#)) was amended in August 2025 ([CD1-13.01](#)) to reflect two interests in the Order lands not originally identified (above, para 1.6). A further amended version of the BoR, addressing changes in several interests in land, was submitted prior to the closing of the inquiry ([CD1-13.03](#)). The parties concerned had previously been notified of the draft Order in respect of other land interests. The revised BoR also omitted two plots of National Highways land which are no longer required for the scheme¹¹. The works and land plans were amended to reflect the changes to the draft Order and the BoR ([CD1-12.01a](#)). Several plots are situated at Bourn Airfield, which we understand was sold by Messrs T, L & A Taylor to Juniper Propco (Bourn) Ltd in March 2025 (CD26-14 SUP-14). However, the BoR records Messrs Taylor as the freehold owners of plots at Bourn Airfield. The present owners have submitted representations and are aware of the Order Scheme. We consider that the apparent discrepancy could be addressed by a modification to the BoR.
- 1.14 None of the proposed modifications would materially alter the scope of the Order. We are satisfied that no prejudice would be caused to any parties' interests by consideration of the proposed modifications, and we have taken the proposed final version of the Order and the associated BoR and works and land plans into account in this report.

⁸ [CD1-02c](#), para 1.1.2 to 1.1.4. The proposed changes are listed in three tables.

⁹ The September 2025 amendments are explained in the letter of 12 September 2025 from Womble, Bond Dickinson to the Inspectors ([CD1-01a](#)), and set out in the Schedule of Changes version 02 ([CD1-02f](#)).

¹⁰ Schedule of Changes to the draft TWA0, version 03 ([CD1-02j](#)), table 1.1, revision 03.

¹¹ Plots 9-095 & 9-096: see [CD1-13.04](#).

Changes to the Applicant's witnesses

- 1.15 Ecological evidence on behalf of the Applicant had been prepared by Mr I Ellis of WSP. Mr Ellis was unable to attend the inquiry, and his evidence was adopted and presented by Mr P Whitby of The Ecology Co-op. Similarly, planning evidence for the Applicant had been prepared by Mr R Lewis of WSP, but was adopted and presented by Mr S Sensecall of Carter Jonas. Both Mr Whitby and Mr Sensecall provided supplementary evidence ([CD29-85](#) and [CD29-62](#)).

The report

- 1.16 This report contains a description of the land covered by the application and its surroundings, and outlines the key provisions of the Order scheme. There follows the gist of the representations of the parties, and our conclusions and recommendations. Sections 10-18 set out the material points of the parties' cases as they were presented and subject to concessions at the inquiry. They do not represent our views on the proposal, and do not form part of our conclusions. The representations upon which the summaries are based may contain assumptions or misunderstandings that were subsequently clarified during the inquiry. In the interest of transparency these have not necessarily been altered in the summaries of the parties' cases, but they are not reflected in our conclusions. As engagement and consultation relating to the Scheme have largely been undertaken by, or on behalf of, the GCP, that body and CCC are referred to interchangeably in the representations. Lists of appearances and documents submitted after the inquiry opened are appended to the report.

2. STATEMENT OF MATTERS

- 2.1 In August 2025, the Secretaries of State (SoS) issued a statement of matters¹² (SoM) ([CD25-01](#)) pursuant to IP Rule 7(6). The SoM sets out the principal matters about which the SoS particularly wish to be informed for the purposes of their consideration of the applications for the Order and for DPP under the Transport and Works Act 1992 (TWA1992), and the application for a certificate under section 19(1)(a) of the Acquisition of Land Act 1981 (ALA1981) in relation to the acquisition of open space land (open space certificate).
- 2.2 In relation to the application for the Order and DPP, these matters are:
- 1) The aims and objectives of, and the need for, the proposed Cambourne to Cambridge guided busway (the Scheme).
 - 2) Whether all statutory procedural requirements have been complied with.
 - 3) The main alternative options considered by CCC (the Applicant) and the reasons for choosing the preferred option set out in the Order, specifically:
 - a) The rationale for the preferred option and the alternatives

¹² The statement of matters supersedes an earlier version issued on 24 June 2025, itself superseding one of 22 May 2025.

- considered.
 - b) The cost of the scheme and overall benefits.
 - 4) The effect of the implementation, operation and maintenance of the scheme, specifically:
 - a) The effect on East West Rail (EWR) land safeguarded for the construction of a new railway between Bedford and Cambridge and the upgrading of the existing railway between Oxford and Bedford.
 - b) The effect on local residents, pedestrians, cyclists, and motorists.
 - c) The effect of the scheme on the environment, including biodiversity, habitats, and wildlife, with particular reference to Coton Orchard and Coton Orchard County Wildlife Site (CWS).
 - d) The effect of the scheme on the Green Belt.
 - e) The effect of the scheme on heritage assets, with particular reference to the grade I registered park and garden (RPG) of the American Military Cemetery at Madingley, Cambridge (American Cemetery).
 - 5) The effects of the scheme on statutory undertakers, statutory utilities and other utility providers, and their ability to carry out their undertakings effectively, safely, and in compliance with any statutory or contractual obligations and the protective provisions afforded to them.
 - 6) Having regard to the criteria for justifying compulsory purchase powers in paragraphs 12 to 15 of the Ministry of Housing, Communities & Local Government (MHCLG) Guidance on the Compulsory Purchase Process published in October 2024 and updated in January 2025 (the CPP Guidance)¹³:
 - a) Whether there is a compelling case in the public interest to justify conferring on CCC powers to compulsorily acquire and use land for the purposes of the scheme, including whether reasonable efforts have been made by the Acquiring Authority to negotiate the purchase of land by agreement.
 - b) Whether the purposes for which the compulsory purchase powers are sought are sufficient to justify interfering with the human rights of those with an interest in the land affected (having regard to the Human Rights Act 1998 (HRA1998)).
 - c) Whether there are likely to be any impediments to CCC implementing the scheme, including the availability of funding.
 - d) Whether all the land and rights over land which CCC has applied for are necessary to implement the scheme.
 - 7) Any other matters which may be raised at the inquiry which may be important and relevant to the SoS's decision.
- 2.3 In relation to the application for an open space certificate¹⁴, the SoM points out that:
- 8) The Order will be subject to special Parliamentary procedure unless the

¹³ Guidance on the Compulsory Purchase Process, MHCLG, January 2025, para 259.3, p145 ([CD8-28](#)).

¹⁴ Application for certificate regarding open space, CCC, November 2024 ([CD1-22](#)).

SoSHCLG gives a certificate in accordance with the provisions of s19 of the ALA1981.

- 2.4 For such a certificate to be issued, the SoSHCLG would need to be:
- 9) under s19(10)(a) ... satisfied that there has been, or will be given in exchange for the order land other land (the exchange land) which is not less in area and is equally advantageous to persons, if any, entitled to rights of common or other rights, and to the public, and that the exchange land has been or will be vested in the persons in whom the order land was vested, and subject to the like rights, trusts and incidents as attach to the order land.
- 2.5 The SoM describes (matter 10) the two plots of open space land lying to the east of M11 to be acquired¹⁵; one comprising an access track carrying a public bridleway and verges, the other comprising woodland. It describes the exchange land¹⁶ (matter 11) as two plots of agricultural land at Rectory Farm, Cambridge¹⁷.

3. THE ORDER LANDS AND SURROUNDINGS

- 3.1 Generally, the area through which the scheme would pass has a gently undulating character, with open countryside of predominantly large arable fields punctuated by villages that lie to the west of the built-up area of the City of Cambridge, and traversed by major transport routes including the M11 motorway and the A428.
- 3.2 The Order lands would accommodate a 13.6km¹⁸ long dedicated public transport busway, running from the eastern side of Cambourne to the western side of Cambridge. This would include presently undeveloped land and also partly, existing public and private roads. The proposed route is illustrated in Figure 1 below.
- 3.3 The topography of the area through which the route would pass is fairly level at the western end. Outlining the proposed route and Order lands from west to east, the scheme would follow a route composed of hardstanding and scrub in a gap flanked by existing housing estates situated between Stirling Road and Broadway on the eastern side of Cambourne. From there it would run into the former Bourn Airfield via the existing access point with Broadway. It would occupy land that is partly agricultural fields and partly on hardstanding along the line of a former runway until it would meet Wellington Way, an access road serving the Bourn Quarter employment area. For much of this section it would follow a straight alignment running parallel to the A428 which lies to the north behind a planted embankment.
- 3.4 The route would continue to follow the A428 with the Order lands along this section largely comprising the existing embankment planted with trees and shrubs. Immediately to the south along this section is an area of generally undeveloped land north of St Neots Road. The wider setting of the Order lands along this section is agricultural fields to the north of the A428, and

¹⁵ Plots 14-153 (479m²) and 14-154 (521m²) respectively.

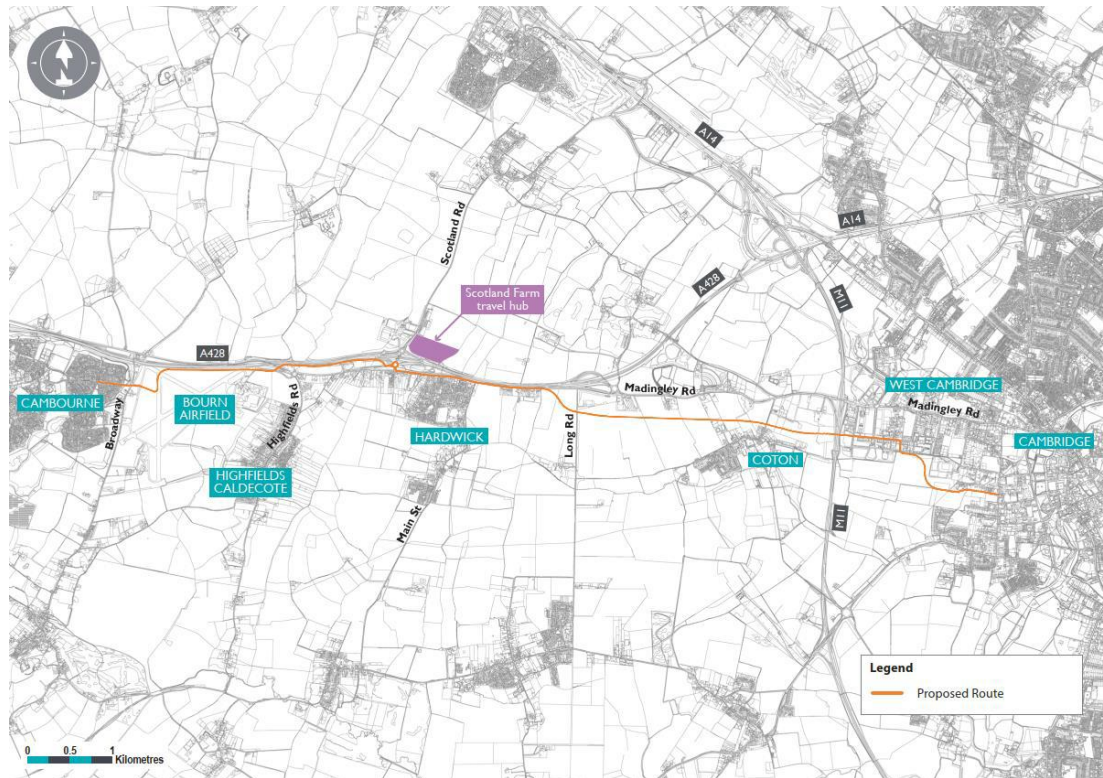
¹⁶ Plots 14-144b (480m²) and 14-144c (526m²) respectively.

¹⁷ The SoM also set out the position relating to the s19 application at the time of issue, listed as matter 12.

¹⁸ [CD1-10.01](#).

dispersed buildings lying between the settlements of Highfields Caldecote and Hardwick, beyond which the open countryside falls gently to the south. The location of the proposed travel hub¹⁹ at Scotland Farm is part of a large, level agricultural field surrounded by hedges, on the north side of the A428.

Figure 1: Proposed route of the scheme



Source: ES Main Report - Figure 2.5 ([CD1-10.01](#))

- 3.5 East of this location, the land on either side of the A428 and St Neots Road drops away gently to the north and south. This ridge becomes more pronounced to the east with the route of Madingley Road more or less occupying the high point of Madingley Hill²⁰ until the land levels out on the western approach to Cambridge.
- 3.6 To the east of the Scotland Road junction, in an on-road section of the route, the Order lands include the existing carriageway, footways and verges of St Neots Road where it delineates the northern edge of the settlement of Hardwick. Beyond Hardwick to the east, the Order lands also include agricultural fields either side of Long Road which the proposed route would cross as it swings southwards. The Order lands also include the carriageways and adjoining land around the junction of St Neots Road and Long Road, to the north of which lies the Madingley Slip Road Road-Side Verge CWS²¹ outside the Order lands. Beyond Long Road the scheme would occupy agricultural land where the proposed route would traverse the large arable fields which slope down from Madingley Road towards the village of Coton.

¹⁹ A park and ride facility.

²⁰ Also referred to as Whitwell Hill, e.g. [CD2-OB1-250](#).

²¹ [CD29-105](#).

- 3.7 The Cambridge American Cemetery, a grade I registered park and garden²² (RPG) cited in the Heritage List for England as the American Military Cemetery, is situated on the north side of Madingley Road, further to the east of the point where the route would deviate from the course of St Neots Road. Also situated on the north side of Madingley Road, immediately adjacent to the American Cemetery, is the Madingley Wood Site of Special scientific Interest (SSSI)²³ ([CD29-46](#)).
- 3.8 On the east side of Cambridge Road the route would pass to the north of the built-up part of Coton and the Coton Conservation Area. The landscape then changes from open fields to a more enclosed, wooded character and appearance. This includes Coton Orchard, where the Order lands include part of the Coton Orchard CWS²⁴ and land at Rectory Farm as the route approaches the M11 motorway which lies in a cutting at this point.
- 3.9 The Order lands include part of the Scrub East of M11 Verge City Wildlife Site²⁵ (CiWS). On the east side of the M11, a more urban environment emerges. The Order lands include the existing carriageway, footways and verges of Charles Babbage Road where their setting includes several commercial and institutional buildings separated by undeveloped plots at the west side of the West Cambridge Campus, and then to the more densely built-up east end, where extensive academic and residential buildings are set within parking areas. Much of this development is part of, or associated with, the University of Cambridge.
- 3.10 From the West Cambridge Campus, the route would turn south with the Order lands again incorporating existing agricultural land, and including part of the Coton Path Hedgerow CiWS²⁶. The proposed route would curve around University sports grounds²⁷ on one side with fields on the other. The Order lands include an area either side of Bin Brook (extending south along its course to the Gough Way housing estate) which the route would cross and would include a part of the Bin Brook CiWS²⁸. It would then continue on the line of an unmade track (known as Rifle Range Road or Rifle Range Track) alongside sports grounds to the south, with academic and residential buildings of Clare Hall along the north side. Here the route enters the historic townscape of the built-up area of the western side of Cambridge within the West Cambridge Conservation Area where the Order lands incorporate a short stretch of the existing carriageway and footways of Grange Road.
- 3.11 In the wider vicinity of the Order lands, the Eversden and Wimpole Woods Special Area of Conservation (SAC) is situated around 6.5km south of the western end of the proposed route²⁹. To the south of Highfields Caldecote are the Caldecote Meadows SSSI and the Hardwick Wood SSSI, 1.6km and 1.7km south of the Order lands respectively³⁰.

²² [CD26-01-APP-W2-2](#), pp7-12.

²³ [CD29-100](#), p43 and [CD29-46](#).

²⁴ [CD29-100](#), pp38-41.

²⁵ *ibid.*, pp24-31.

²⁶ *ibid.*, pp32-37.

²⁷ Plot 16-164a would include part of an existing pitch.

²⁸ [CD29-100](#), pp16-23.

²⁹ [CD1-11.05](#) and [CD29-100](#) pp3-15.

³⁰ [CD1-11.05](#).

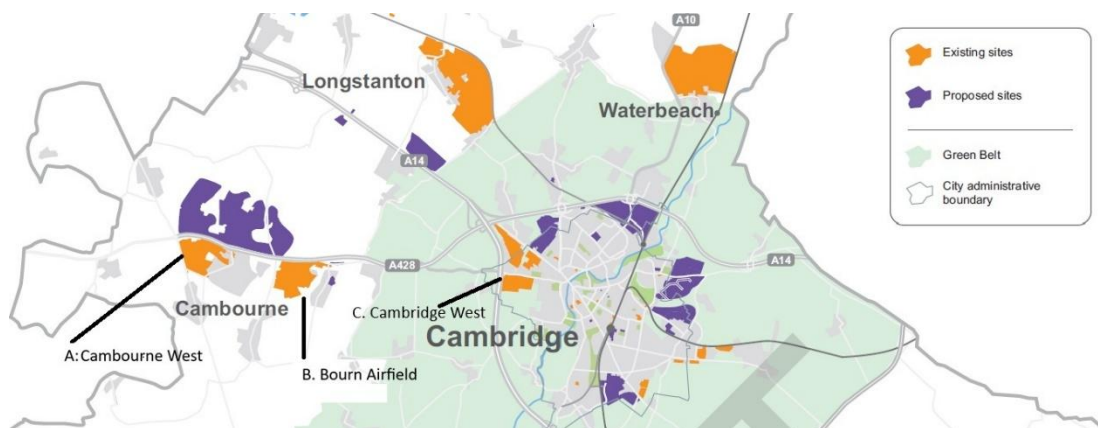
4. PLANNING HISTORY

- 4.1 The proposed Order Limits include land covered by a number of relevant planning permissions. The applicant and other parties have also made reference to other planning permissions for major development in the vicinity. These are illustrated on Figure 2 below.
- 4.2 Appendix A of the Applicant's Planning Statement ([CD1-15.01](#)) provides a list of relevant planning applications.

Stirling Way - Broadway Bus Link

- 4.3 The western most extent of the Order Limits includes an undeveloped corridor of land on the east side of Upper Cambourne. This is situated between housing at Vickers Way to the north and Handley Drive and Spitfire Road to the south. This currently provides an informal footpath between Sterling Way, Upper Cambourne and Broadway.

Figure 2: Location of strategic sites



Source: adapted from Draft Greater Cambridge Local Plan, Part 1 – Figure 1 ([CD29-71-2](#))

- 4.4 Outline planning permission with all matters reserved was granted for a bus link along this route between Sterling Way and Broadway in 2017³¹ ([CD4-02](#)), with all those reserved matters being approved in 2023³² ([CD4-03](#)). There has been no indication that any development has commenced on implementing this planning permission, nor that any subsequent planning permission has been granted. These matters are not in dispute, and in the absence of any evidence to the contrary, it would appear that the two year commencement time period³³, imposed as a condition on the Outline planning permission, has elapsed.

Bourn Airfield

- 4.5 The proposed busway route would continue on the east side of Broadway through the development site known as Bourn Airfield. Outline planning permission was granted in 2024³⁴ ([CD4-06](#)) for a new mixed-use village including around 3,500 dwellings, employment, retail, leisure and recreational

³¹ S/3329/16/OL, 27 January 2017.

³² S/4594/18/RM, 16 March 2023.

³³ This required commencement within two years from the date of the last of the reserved matters to be approved; S/4594/18/RM approved all reserved matters, and consequently the last, on 16 March 2023.

³⁴ S/3440/18/OL, 30 July 2024.

uses along with supporting green and access infrastructure. The latter included the "...first section of strategic public transport route...".

- 4.6 Part of one of the conditions (No 13) to which this planning permission was subject included a '500 dwelling limit'. This prevents more than 500 dwellings being occupied until the Cambourne to Cambridge busway (CtoC) Better Public Transport Project, *or an equivalent scheduled rapid mass transit passenger carrier service*, is operational between the development and Cambridge. The condition specifies that the busway project is made up of a public transport route between Cambourne and Cambridge, a new travel hub³⁵ off the A428/A1303, and new cycling and walking facilities.
- 4.7 Another condition (No 5) to which the planning permission is subject requires the development to accord with specified drawings. This includes an access and movement parameter plan ([CD4-04.04](#)) which illustrates the route for what it terms Segregated High Quality Public Transport, including Strategic Cycle Way, largely running adjacent to the northern site boundary with the A428, in a similar location to the proposed Scheme.
- 4.8 Amongst other requirements, a planning obligation ([CD4-09](#)) secured a financial contribution³⁶, payable in stages triggered by the occupation of specified numbers of dwellings, for the CtoC busway or an equivalent (set out in the same terms as condition 13 described at paragraph 4.6 above).

Cambourne West

- 4.9 Beyond the Order Limits, outline planning permission was granted in 2017³⁷ ([CD4-01](#)) for up to 2,350 residential units along with up to 6.25ha of employment uses, up to 1.04ha of retail, three schools and the associated highways, drainage, recreation and landscape infrastructure, on land west of Lower Cambourne. The substantive part of the site is situated approximately 2.5km west of the western end of the proposed scheme. The development is currently being implemented and identified as Cambourne West in the SCLP but is also known as West Cambourne.
- 4.10 This planning permission was subject to a planning obligation ([CD4-08](#)) which, amongst other matters, required the implementation and funding of a number of infrastructure projects³⁸. These included a requirement for the developer to provide the Broadway Bus Link outlined at paragraph 4.4 above, works to improve bus routes within and between the site and Stirling Way, and the improvement of pedestrian and cycle links along St Neots Road between Cambourne and Cambridge. The obligation also required a financial contribution, in instalments triggered by specific dwelling occupation thresholds being reached, to improve bus links between Cambourne and Cambridge City Centre through highway infrastructure improvements. Referred to in the obligation as the City Deal project, the infrastructure to be funded is intended to be the Order Scheme³⁹.

³⁵ essentially a park and ride facility.

³⁶ Set out in Schedule 7 of the obligation.

³⁷ S/2903/14/OL, 29 December 2017.

³⁸ Set out in Schedule 4 of the obligation.

³⁹ [CD29-121](#), para. 18; [CD29-122](#), para. 20.

University of Cambridge West Cambridge Site (West Cambridge Site)

- 4.11 To the east of the M11 the proposed busway route would pass along Charles Babbage Road which is the east-west spine road which runs through the West Cambridge Site⁴⁰, with the Order Limits extending northwards along the two main access roads which join with Madingley Road.
- 4.12 An outline planning permission was granted in 2024⁴¹ ([CD4-05](#)) on land to the south of Madingley Road, Cambridge (the West Cambridge Site) for over 380,000m² of academic and commercial/research institute floorspace with a nursery, retail, food and drink, assembly and leisure uses along with an energy centre and a data centre, with associated access, drainage and landscaping infrastructure.
- 4.13 A planning obligation ([CD4-10](#)) required⁴², amongst other obligations, a financial contribution paid towards the CtoC scheme, or another agreed strategic transport infrastructure scheme that would achieve the same or broadly equivalent transport benefits for the West Cambridge Site development. Another obligation safeguarded land for the CtoC scheme.

5. THE ORDER SCHEME

- 5.1 The Order Scheme would provide for the construction, maintenance and operation of a guided busway between Cambourne and Cambridge (Figure 1 above). It would extend from Sterling Way on the east side of Cambourne to Grange Road on the west side of Cambridge. Two sections of the route would use existing roads, about 1.9km of St Neots Road at Hardwick and about 0.5km of Charles Babbage Road within the West Cambridge Campus⁴³.
- 5.2 Taking account of existing services, the proposed bus strategy, put forward as part of the outline business case, envisages use of the guided busway in each direction by six services per hour between Cambourne and Cambridge City Centre (including services from and to St Neots and Huntingdon), two services per hour between Cambourne and the Cambridge Biomedical Campus (Biomedical Campus) to the south of the City, and an additional two services per hour during peak periods between the proposed park and ride (P&R) site at Scotland Farm and the Biomedical Campus⁴⁴. Additionally, there would be the opportunity for interchange at West Cambridge to facilitate travel between Cambourne and North Cambridge, including Cambridge Science Park. The routes through Cambourne and the City Centre, beyond the limits of the guided busway, have yet to be determined. The Applicant's Bus Strategy Report illustrates⁴⁵ intended routes into Cambridge from Cambourne and destinations further west and where routes are anticipated to diverge at West Cambridge. The Bus Strategy Report makes clear that the proposals have not been agreed with route operators⁴⁶.

⁴⁰ Also referred to as Cambridge West and the West Cambridge Campus.

⁴¹ 16/1134/OUT, 21 June 2024.

⁴² Set out in Schedule 2 of the obligation.

⁴³ The on-road section at Hardwick is shown on sheets 5-9 of the proposed site plans, and that at the West Cambridge Campus on sheets 14 & 15, CD1-16.04a.

⁴⁴ Outline Business Case – Appendix F, Bus Strategy Report, section 4 ([CD1-20.12](#)).

⁴⁵ *ibid.*, Figures 6 and 7, pp19 & 21.

⁴⁶ *ibid.*, section 2.

- 5.3 The proposed site plans and sections ([CD1-16.04a](#) & [CD1-16.05](#)) indicate that, where use would not be made of existing roads, the busway would comprise a carriageway similar in form to a typical road. It is envisaged that sensor guidance would be used in bus control, and notwithstanding that the draft Order does not preclude the possibility of side guidance kerbs⁴⁷, our consideration of the Scheme is based on a road-based with sensor guidance configuration (see para 1.10 & 1.11 above). These segregated sections of the busway would largely be flanked by landscaping, and parts would be set within cuttings or on embankments.
- 5.4 An emergency and maintenance access track would run alongside most of the length of the segregated busway: the track would be available as an active travel route, and is expected to be used by pedestrians and cyclists⁴⁸. Development works would also include: bus stops, a travel hub building and P&R site at Scotland Farm, lighting, bridges over the M11 motorway and Bin Brook, signalised junctions, the realignment of a section of St Neots Road at Hardwick, alterations to other highways, drainage basins and retention ponds⁴⁹. DPP is sought for the development which would be authorised by the Order⁵⁰.

Figure 3: Open Space and proposed replacement land



Source: Adapted from Special Category Land Plans – Sheet 1 of 1 ([CD1-12.03](#))

- 5.5 The Order would also provide for the compulsory acquisition of land and rights, the temporary use of land for construction purposes, street works, and the

⁴⁷ Applicant's closing submissions ([CD29-124](#)), para 350.

⁴⁸ SoC for the Applicant (CD23-01), para 8.2.6.

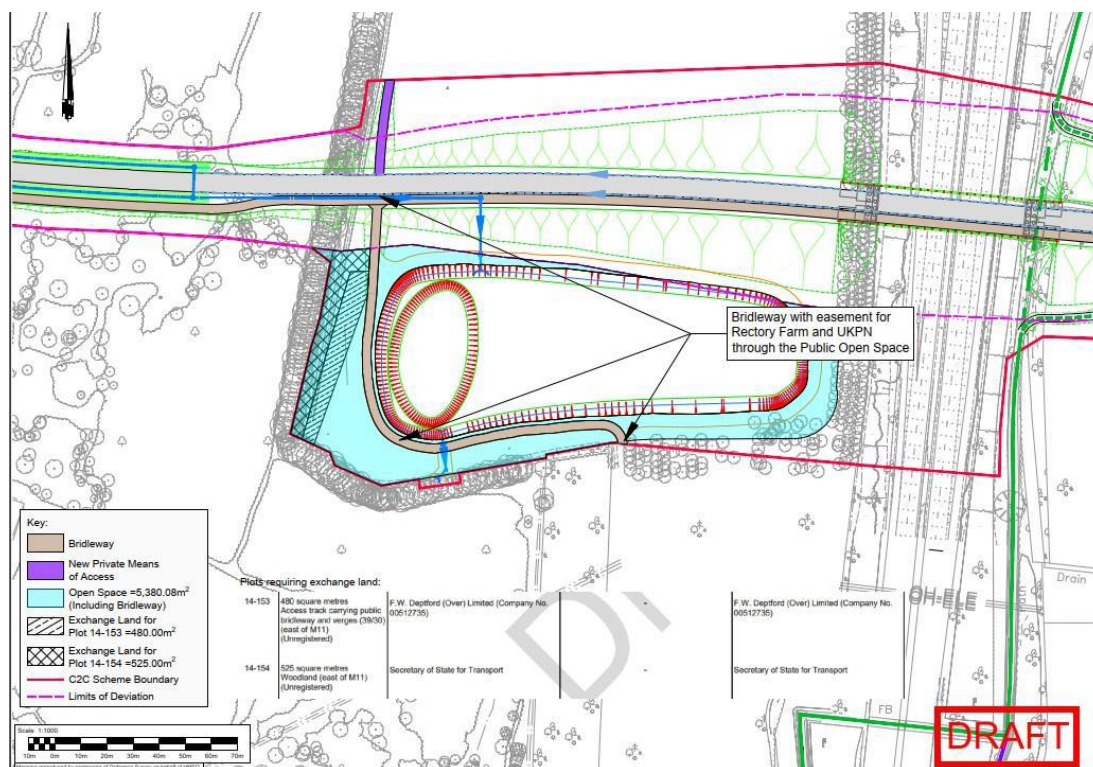
⁴⁹ See sheet 7 of the proposed site plans for the travel hub and P&R site, sheets 14 & 17 for the bridges, and sheets 9 & 10 for the realignment of St Neots Road, CD1-16.04a. Plans, elevations and sections of the bridges are at [CD1-16.06](#), with details of potential treatment of the embankments at the Brook bridge in Technical Memo – Bin Brook Retaining Solutions, WSP, October 2025 ([CD29-52](#)).

⁵⁰ The request for a direction as to DPP is at [CD1-14.01](#).

diversion of public rights of way.

- 5.6 On the east side of the M11, construction of the new bridge would result in the loss of two areas of open space⁵¹ (Figure 3 above). Exchange land is proposed to be provided on the west side of the motorway as part of a larger area of open space⁵² (Figure 4 below). The SoSHCLG has stated the intention to give a certificate which would avoid the need for the Order to be subject to special Parliamentary procedure⁵³ ([CD24-01](#)).

Figure 4: Indicative layout of replacement open space



Source: Application for certificate regarding open space – Appendix H ([CD1-22](#))

6. THE ENVIRONMENTAL STATEMENT

- 6.1 The application was accompanied by an ES ([CD1-10.01](#)), supported by a series of appendices ([CD1-10.02](#) to [-10.07](#)) including a non-technical summary ([CD1-09](#)), and technical reports (TR) ([CD1-11.01](#) to [-11.14](#)), dated October and November 2024. A scoping opinion had been received from the SoST in March 2022 ([CD1-10.05](#)).
- 6.2 The ES has subsequently been supplemented by three addenda providing additional environmental information. The ES and addenda have all been publicly available on the inquiry website providing the opportunity for interested parties to comment. The additional information provided in each addendum was initiated by the Applicant and was not the result of a

⁵¹ [CD1-12.01a](#), sheet 14 of the works and land plans, plots 14-153 & 14-154.

⁵² [CD1-12.01a](#), sheet 14 of the works and land plans, plots 14-144b & 14-144c. Appendix H of [CD1-19](#) shows an indicative layout of the open space including the exchange land.

⁵³ The application for a certificate is at [CD1-22](#), and the Secretary of State's Notice of Intention to issue a certificate is at [CD24-01](#).

- direction by the SoS⁵⁴ to supply it. The first (June 2025) (ES-A) ([CD1-10.06](#)), provided additional information in relation to veteran trees at Coton Orchard.
- 6.3 ES Addendum 2 and Clarifications (July 2025) (ES-A2) ([CD1-10.07](#)), sought to address points made by Clare Hall (OBJ-213) which raised concerns ([CD25-07](#)) about the adequacy of the ES. ES-A2 provided additional environmental information relating to the assessment of effects in respect of: the grade II* listed building; proposed flood prevention works; the noise assessment; consideration of alternatives; and, combined effects on Clare Hall college.
- 6.4 After the opening of the inquiry, and following further concerns raised by Clare Hall about the soundness and adequacy of the environmental impact assessment (EIA) process and the ES at a 'round table' session⁵⁵, ES Addendum 3 and Clarifications (November 2025) (ES-A3) ([CD29-86](#)) was submitted. ES-A3 provided additional environmental information relating to flood risk and visual impact assessment in the vicinity of Bin Brook, noise and vibration and a holistic consideration of effects of impact interactions at Clare Hall. In addition, it also provided a description and impact assessment in relation to the Conduit Head Conservation Area in Cambridge⁵⁶, part of which is within the 250m radius study area around the site adopted by the Heritage TR ([CD1-11.07.1](#)) and the ES, but which had not been included in the ES's original consideration of effects on designated heritage assets.
- 6.5 Although Clare Hall subsequently withdrew their objections ([CD28-03](#)), including those relating to the soundness and adequacy of the EIA process and the ES, those ES addenda nevertheless remain pertinent as part of the overall consideration of environmental effects of the proposed scheme.
- 6.6 Some parties making representations disagreed with some of the ES's conclusions or identified elements of the ES they considered were based on inappropriate evidence or assumptions. These included Cambridge Past, Present & Future and Coton Parish Council's (CPPF & CPC) contention that the carbon assessment in the ES failed to reach a reasoned conclusion on likely significant effects (LSE) by using outdated motor vehicle fleet composition data and what they considered to be a flawed methodology⁵⁷. Friends of the Cam (FotC) did not accept that the mitigation measures the ES relies upon to compensate for the loss of trees, wildlife and habitat, nor for the effects of carbon emissions, were sufficient⁵⁸.
- 6.7 The Applicant maintained that the ES is a legally adequate basis on which to appraise the effects of the scheme, and they refute CPPF & CPC's and FotC's arguments about the suitability of the data used, resulting conclusions and suitability of mitigation and compensation put forward to address LSE and other effects⁵⁹. These matters are dealt with in detail in the respective parties' cases below.

⁵⁴ Under Rule 17 of AOP Rules.

⁵⁵ 16 September 2025: [agenda](#).

⁵⁶ In Appendix 2.

⁵⁷ Including [OBJ-251 CPPF and CPC Closing Statement](#), [CD26-10-W5-1](#) and [CD26-10-W5-3](#).

⁵⁸ [CD26-07-1](#).

⁵⁹ Including at [CD29-124](#), [CD26-01-APP-W3-4](#) and [CD26-01-APP-W3-5](#).

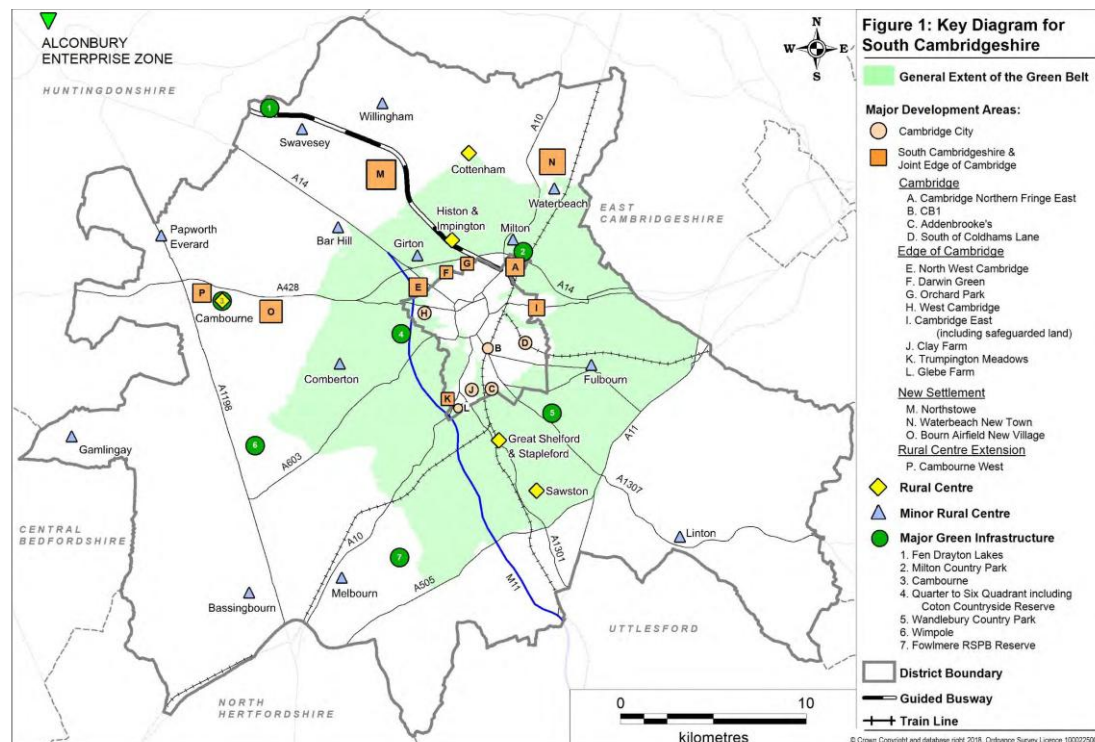
- 6.8 Nevertheless, we are satisfied that an EIA has been carried out in respect of the proposal in accordance with Rule 7, and that the ES includes the components and material specified in Rule 11 and Schedule 1, of the AOP Rules. Consequently, we consider that the ES provides an adequate basis for assessing the environmental effects of the Scheme. In considering the proposal, reaching our conclusions and arriving at our recommendations, we have taken into account all of the environmental information before us, including, but not limited to, the ES and its addenda.

7. POLICY CONTEXT

The Development Plan

- 7.1 The Development Plan includes the South Cambridgeshire Local Plan ([SCLP](#)) ([CD6-02](#)), the Cambridge Local Plan ([CLP](#)) ([CD6-01](#)), and the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036 ([MWLP](#)) ([CD6-03](#))⁶⁰. We refer below to those policies of most relevance to the Order Scheme proposals.

Figure 5: Key diagram for South Cambridgeshire



Source: South Cambridgeshire Local Plan – adopted 2018 ([CD6-02](#))

The Local Plans

- 7.2 CCiC and SCDC have worked together on the preparation of the two Local Plans, which establish a joint spatial strategy for the Greater Cambridge area⁶¹. The strategy aims to maintain Cambridge as a compact and dynamic city, located within the high-quality landscape setting of the Green Belt. New development is focussed in accessible locations in and around the City,

⁶⁰ Amendments to the Policies Map as a result of the adoption of the MWLP are shown on [CD29-104](#).

⁶¹ The spatial strategy is explained in section 2 of [CD6-01](#) and chapter 2 of [CD6-02](#).

for the most part on land which has already been removed from the Green Belt. Other areas of major development are proposed beyond the Green Belt in South Cambridgeshire where public transport improvements can be supported. Figure 5 above shows the extent of the Green Belt and the location of major development areas in both Districts.

- 7.3 Specific policies in the Local Plans concerning the Green Belt, the setting of Cambridge, major development areas, and sustainable transport give expression to the objectives of the joint spatial strategy. Much of the route of the proposed busway to the east of Hardwick and the site of the P&R facility are in the Green Belt as show in Figure 6 below. Policy 4 of the CLP and Policy S/4 of the SCLP both make clear that development in the Green Belt will only be approved in accordance with policy in the National Planning Policy Framework (NPPF).

Figure 6: Scheme boundary and the Green Belt



Source: reproduced from the Green Belt assessment – Appendix A ([CD1-18](#))

- 7.4 In the CLP, Policy 8 requires development on the urban edge of Cambridge to conserve and enhance the setting of the City, amongst other considerations. Policy 5 of the CLP and Policy T1/2 of the SCLP refer to the greater use of more sustainable forms of transport. The former policy refers to working with partners to secure the implementation of schemes which will improve linkages across the region and increase the use of sustainable modes for travel to and from Cambridge. The latter policy requires that larger developments demonstrate that opportunities for sustainable travel have been maximised.
- 7.5 CLP Policy 14 sets out general principles for areas of major change and opportunity areas, which include a requirement for necessary infrastructure and associated arrangements to support the development. West Cambridge is identified as an area of major change in CLP Policy 19, where the principal land uses are to be education, associated research establishments, and commercial research and development. An increase in density resulting in significant additional floorspace will be supported provided that, amongst other considerations, such a proposal includes a comprehensive transport strategy for the site, incorporating a sustainable transport plan to minimise reliance on private cars.
- 7.6 Policies SS/7 and SS/8 of the SCLP provide respectively for a new village at

Bourn Airfield and a linked village to Cambourne (Cambourne West), with the detailed policy requirements referring to the provision of good quality bus links. In the case of Bourn Airfield, the policy expects a segregated bus link from Cambourne and through the site to the junction of St Neots Road with Highfields Road, measures to ensure that a bus journey between Caldecote/ Highfields and the A428/A1303 junction is direct and unaffected by congestion, and the provision of high quality bus priority measures or a busway on or parallel to the A1303 between that junction and Queens Road in Cambridge. Insofar as Cambourne West is concerned, Policy SS/8 of the SCLP seeks a similar outcome for bus travel between Caldecote/ Highfields and the A428/A1303 junction, and high-quality segregated bus priority measures on the A1303 between its junction with the A428 and Queens Road.

- 7.7 Other policies of relevance include the following. CLP Policy 61 is concerned with ensuring the conservation and enhancement of Cambridge's historic environment, and SCLP Policy NH/2 with protecting landscape character. Significant adverse effects to health and quality of life should be avoided in accordance with CLP Policy 35, and policies in both local plans seek to safeguard air quality (CLP Policy 36, SCLP Policy SC/12). Sites of biodiversity importance should be protected (CLP Policy 69, SCLP Policy NH/5), and Policy NH/7 of the SCLP seeks to safeguard veteran trees. In the CLP, Policy 67 is concerned to avoid the loss of open space. Policy NH/3 of the SCLP is concerned with the protection of agricultural land: planning permission will not be granted for development which would lead to the loss of best and most versatile (BMV) agricultural land unless it is allocated for development, or sustainability considerations and the need for the development override the need to protect agricultural value.
- 7.8 The adopted amendments to the Policies Map show that the eastern end of the Order lands overlies part of a large sand and gravel mineral safeguarding area (MSA) and part of the route between the A1303 and Coton lies within a large chalk MSA⁶². Policy 5 of the MWLP is concerned with MSAs. Other than in certain specified categories (none of which include the development proposed by the Order Scheme), proposals within MSAs are only to be permitted where, amongst other considerations, there is an overriding need for the development.

Local Transport Policies

- 7.9 The Cambridgeshire & Peterborough Combined Authority Local Transport and Connectivity Plan LTCP ([CD6-09](#)) presents an approach which aims to promote alternative mobility solutions and to develop sustainable transport systems for the region. Buses are referred to as forming a fundamental part of the sustainable transport network for distances greater than can be made by active travel. Together with the supporting Bus Strategy ([CD6-11](#)), the LTCP seeks to achieve improvements to bus travel, including better bus infrastructure, and faster and more punctual journeys delivered with more effective bus priority measures⁶³.

⁶² [CD29-104](#), overview map J.

⁶³ [CD6-09](#), p28.

- 7.10 The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC) ([CD7-07](#)) of 2014 aims to support economic growth, with the backbone of this being a high-quality passenger transport network. On the St Neots and Cambourne to Cambridge corridor the focus in the short to medium term was expected to be on providing bus priority where buses are affected by congestion. Listed interventions include segregated bus links on the A1303 or an off-line alignment between the A428 and the M11.

National policy positions in respect of Cambridge

- 7.11 The City Deal ([CD7-02](#)), established in 2014, brought together CCiC, SCDC, CCC, the University of Cambridge, and, through the Greater Cambridge Greater Peterborough Enterprise Partnership, local businesses, colleges and research facilities. Economic success had contributed to a shortage of housing and significant transport congestion, and the City Deal was developed to deliver the infrastructure necessary to support further growth, supported by national and local funding streams. The backbone of the proposed strategy would be a transport network to link areas of population and employment within Cambridge and South Cambridgeshire. This network would include new high-quality public transport links into Cambridge on key corridors. Both Cambourne West and Bourn Airfield are identified as major development sites and West Cambridge as a major employment site⁶⁴.
- 7.12 The Case for Cambridge ([CD7-01](#)), published by the government in 2024, also refers to the success of Cambridge, which is described as one of the UK's foremost innovation centres. Challenges noted include pressured public transport and poor connectivity, and the document refers to planning for the long-term transport options to serve the City and link in with the wider region.
- 7.13 In his letter of October 2024, confirming the appointment of the Chair of the Cambridge Growth Company (CGC) ([CD7-43](#)), the Minister of State for Housing and Planning set out a series of priorities for the CGC, including developing the evidence base to support the development of an infrastructure-first growth plan, with specific reference to transport as part of the assessment of infrastructure requirements.

The emerging Local Plan

- 7.14 The Greater Cambridge Local Plan (GCLP) is being prepared for the administrative areas of CCiC and SCDC to cover the period 2024 to 2045 and beyond. A Regulation 18 version of the emerging Local Plan was approved for consultation in December 2025⁶⁵.
- 7.15 The strategy of the GCLP seeks to focus development within Cambridge, on the edge of Cambridge outside the Green Belt, and beyond the Green Belt. Insofar as the latter is concerned, major development continues to be proposed at Cambourne and Bourn Airfield. Policy S/CB provides for the continued growth of Cambourne, including mixed-use development at Cambourne West, and a new strategic site is proposed at Cambourne North,

⁶⁴ [CD7-02](#): map on page 4 showing housing and business growth areas.

⁶⁵ The Regulation 18 version of the draft Local Plan is at CDs 29-71-2 to 29-71-7. The resolutions approving the Local Plan for consultation are at [CD29-126-1](#).

which is intended to provide about 13,000 homes, 108,000m² of employment floorspace, together with other development (Policy S/CBN). Improvements to public transport must include integration of an EWR station with access arrangements by all modes, and integration of the CtoC busway. Policy S/BA retains Bourn Airfield as a strategic allocation: a new village is proposed, providing housing, employment floorspace and key services.

- 7.16 An extension of the City at West Cambridge is the subject of Policy S/WC. This policy provides for up to 370,000m² of academic, commercial research and development, and sui generis research floorspace, and supporting development. The site is referred to as a major hub for the University of Cambridge and research institutions, which provides an opportunity to create a vibrant innovation quarter. It is to be well-connected to the surrounding area, and the policy makes specific reference to the Cambourne to Cambridge public transport corridor being routed along Charles Babbage Road, which is within the West Cambridge site.
- 7.17 Major developments should be supported by high-quality public transport linking them to Cambridge and to major centres of employment (Policy I/ST). The vision for Greater Cambridge includes a requirement that new development must minimise carbon emissions and reliance on the private car.
- 7.18 The CtoC Busway Integration Report ([CD29-71-1](#)) forms part of the evidence base for the emerging GCLP. This report considers the potential extension of the busway, and points out that the full benefits of the scheme will only be realised if it is fully integrated with the form and function of the evolving settlement structure of Cambourne. The busway and EWR are expected to serve different locations within Cambridge, and a combination of EWR and the busway are required to provide the sustainable transport options to support sustainable growth and development at Cambourne⁶⁶.

Other policy documents

- 7.19 We have taken into account relevant sections of the NPPF and Planning Practice Guidance (PPG). On 16 December 2025, after the inquiry had closed, the government published a draft version of a revised NPPF, together with an associated consultation document. We have had regard to the content of the draft NPPF, noting proposed changes, but it is subject to consultation and does not have the status of established policy. For the avoidance of doubt, references in this report to the NPPF are to the December 2024 version, current at the time of writing.

8. AGREED MATTERS

- 8.1 Statements of common ground have been agreed between the Applicant and CCiC ([CD29-12](#)), SCDC ([CD29-13](#)), CPPF & CPC ([CD29-20](#)), the Environment Agency ([CD29-77](#)), and Cadent Gas ([CD29-91](#)). The Environment Agency and Cadent Gas have withdrawn their objections to the Order scheme. Matters covered in the other statements of common ground

⁶⁶ Cambourne to Cambridge (CtoC) Busway Integration Report ([CD29-71-1](#)), pp3 & 32.

are summarised in this section.

- 8.2 The statements of common ground between the Applicant and the two District Councils are similar in content. Both include the following as agreed matters:
- There is an urgent need for delivery of the scheme, which would unlock consented housing at Bourn Airfield and West Cambourne, future employment land at Cambridge West, and emerging housing allocations at Cambourne. The proposed route accords with adopted planning policy, subject to compliance with conditions.
 - The Order Scheme is consistent with the Local Plans and national policies, especially regarding sustainable transport, economic development, and climate goals. It supports strategic growth, and public transport access corridors crucial to the region's spatial development strategy.
 - The Scheme is inappropriate development in the Green Belt, but very special circumstances have been demonstrated. Harm would be minimised through landscape mitigation.
 - Mitigation strategies for biodiversity, including off-site biodiversity net gain, subject to compliance with the relevant conditions.
 - The Scheme results in less than substantial harm to heritage assets, and this harm is outweighed by public benefits. The approach to urban design, landscape mitigation and integration of the travel hub into the Green Belt landscape are agreed subject to compliance with conditions.
 - The use of hybrid-electric buses and other low-carbon features. The Applicant's greenhouse gas assessment methodology is robust, the approach to climate resilience is agreed, and the Scheme would encourage further commitments to water efficiency and lower carbon construction practices.
 - The proposed replacement open space would be in accordance with local and national planning policy.
 - Draft planning conditions.
- 8.3 In addition, the statement of common ground between the Applicant and CCiC agrees that the Scheme would play an important part in Cambridge's planned growth and economic standing. That between the Applicant and SCDC refers to the assessments concerning operational noise as agreed, with any residual impacts being acceptable. The Scheme would prioritise sustainable transport, reduce car dependency, improve connectivity, and improve active and public transport options.
- 8.4 In the statement of common ground between the Applicant and CPPF & CPC, it is agreed that there is a need to improve accessibility in the Greater Cambridge region to support economic growth, to deliver a sustainable public transport service between Cambourne and Cambridge, and to improve the quality of life within the surrounding area. A series of detailed areas of dispute are also recorded.
- 8.5 National Highways submitted representations in respect of the Order Scheme, including an objection to the compulsory acquisition of several plots ([CD2-OBJ-313.1](#) & [313.2](#)). An update on its position was provided during the course of the inquiry ([CD29-95](#)). It had been agreed that plots 9-095 and 9-096 were no longer required for the scheme. Land and rights in

respect of other plots are to be the subject of agreements with the Applicant. National Highways has also confirmed that an agreement to construct the M11 overbridge was completed on 3 October 2025 ([CD29-84](#)).

- 8.6 Anglian Water and Cambridge Water (AW&CW) submitted an objection to the Order Scheme ([CD2-Obj-271](#)). The Order lands overlap with an area intended for new pipelines from the proposed Fens Reservoir to a new service reservoir at Madingley, and also with part of the Grafham to Cambridge water transfer scheme which includes a new pipeline spur to the existing Madingley service reservoir⁶⁷. AW&CW referred to their objection as a holding objection, intended to allow for more detailed discussions facilitating the successful delivery of both the water and busway schemes.
- 8.7 During the inquiry, AW&CW provided an update on the position concerning their objection. Although agreement with the Applicant had not yet been reached, they were confident that that would be achieved soon after the close of the inquiry. At that point, AW&CW would be in a position to withdraw their objection, and it was anticipated that no amendments would be required to the draft Order directly⁶⁸.
- 8.8 Agreement has been reached between the Applicant and Ashcroft Veterinary Practice concerning the effect of the busway works on the existing layby outside the Practice's premises on St Neots Road at Hardwick⁶⁹. Sheet 8 of the proposed site plans indicates removal of the layby to accommodate the active travel path alongside the carriageway ([CD1-16.04a](#)). It is now agreed between the parties that both a loading bay and active travel path would be accommodated adjacent to the veterinary surgery, and the Practice has indicated that it will withdraw its objection⁷⁰.

9. OVERVIEW OF REPRESENTATIONS

The Order and DPP

- 9.1 The DfT, on behalf of the SoST, received 336 representations in respect of the Order. Many representations referred to the overall proposed scheme and works, rather than explicitly to the Order or to the request for a direction for DPP. However, it was implicit that many of these representations related to both. Of those, 309 objected, 16 supported and 11 made other representations about the proposal. Thirteen of these parties are statutory objectors.
- 9.2 In addition, three interested parties made representations following notice being given of the Inquiry. Two of those parties making representations, one in support⁷¹ and one objecting⁷², were represented at the PIM and subsequently gave evidence at the inquiry. A third⁷³ submitted a written objection during the inquiry which we decided to take into account under IP

⁶⁷ The plan at [CD29-42](#) shows the relationship between the Order lands and the water schemes.

⁶⁸ [CD29-110](#), page 1, final para.

⁶⁹ The existing lay-by to the front of the Practice's premises at No 169 St Neots Road can be seen on sheet 8 of the works and land plans ([CD1-12.01a](#)).

⁷⁰ Note on agreement reached with Ashcroft Veterinary Practice LLP ([CD29-116](#)). An indicative plan showing both a loading bay and active travel path is at appendix 1. The objection by Ashcroft Veterinary Practice is [CD2-Obj-01](#).

⁷¹ Juniper Propco (Bourn Ltd) (SUP-14).

⁷² Mayor of Cambridgeshire & Peterborough ([Obj-314](#)).

⁷³ Email from Ms Marchant, 12 November 2025 ([CD29-97](#)).

Rule 18(11) and to which the Applicant had the opportunity to make a written response^{74,75}. We do not consider that the interests of any party would be prejudiced by taking this objection into account.

- 9.3 By the close of the inquiry eight objections had been withdrawn⁷⁶, six of which were from statutory objectors. Our main considerations have taken this into account [20.1].

Open Space Certificate

- 9.4 Four representations were received in response to the SoSHCLG notice in respect of the application for an Open Space certificate under s19(1)(a) of the ALA1981. Three were from those objecting to the issuing of a certificate⁷⁷, with CCC (which is also the Applicant) offering no objections⁷⁸.

10. THE CASE FOR THE APPLICANT⁷⁹

- 10.1 There is near universal agreement that a reliable public transport service between Cambourne and Cambridge is needed. Meeting that need is a priority to realise government ambitions for growth in the area. There is little dispute that the Scheme would meet that need and there is no realistic and deliverable alternative means of meeting it. Therefore, the Order must be made to meet the need, to fulfil growth ambitions and to support current and emerging development plan strategy.
- 10.2 Not making the Order would undermine confidence in the government's ability to drive growth and it would send a negative signal to investors. To convince the SoST not to make the Order, objectors' cases must demonstrate that the harm or disadvantages of the Scheme are so significant and substantial that they would justify a decision preventing that need from being met, and justify disregarding national and local policy imperatives. None of the objections are close to providing such a reason.
- 10.3 Agreement has been reached with many parties with significant interests, including regulatory functions. These include the Environment Agency (18.3) and National Highways (18.14). The latter, who are supportive of the scheme ([CD29-124](#)), are in a particularly important position given that exercise of certain powers is dependent on their consent⁸⁰, and agreement has been reached in relation to the M11 overbridge⁸¹. Historic England do not object (18.6). Several other objections (detailed in section 18) have been withdrawn.

⁷⁴ CCC response, 14 November 2025 ([CD29-101](#)).

⁷⁵ Giving a total of 339 representations: 311 objections, 17 supporters and 11 other representations.

⁷⁶ [OBJ-148](#), [OBJ-164](#), [REP-13](#), [OBJ-213](#), [OBJ-238](#), [OBJ-247](#), [OBJ-250](#) and [OBJ-301](#).

⁷⁷ CPPF and two individuals ([CD24-03-1](#), [CD24-03-2](#) and [CD24-03-3](#)).

⁷⁸ [CD24-03-4](#).

⁷⁹ The Applicant's case is summarised principally from the closing submissions of Mr Cameron KC and Mr Henderson ([CD29-124](#)).

⁸⁰ See Article 23(2) and Part 8 of the draft Order ([CD1-02-0](#)).

⁸¹ Letter from National Highways, October 2025 ([CD29-84](#)).

Aims, Objectives and Need for the Busway

Drivers for change, objectives and aims

- 10.4 The key underlying drivers for change⁸², are:
- the A428 is a nationally important route forming part of the Oxford-Cambridge Arc which is a priority for growth;
 - much of the additional housing required to respond to population growth is planned to the west of Cambridge along the A428/A1303 corridor;
 - employment is growing rapidly in Cambridge and destinations on the edge of the City such as West Cambridge and the Biomedical Campus need effective transport connections from existing and future settlements;
 - the eastbound AM peak delay on the A1303 can see speeds 75% slower, and the westbound PM peak with speeds between 50%-75% slower, than the night-time average;
 - car ownership in Cambridge is high (85%, compared to national average of 74%);
 - current congestion will be exacerbated by levels of travel demand in and around Cambridge from housing and employment growth resulting in trip increases of around 29% in the AM peak, 31% in the PM peak and 38% during the interpeak period by 2036;
 - current congestion will also be exacerbated as commuting car trips in Cambridgeshire are predicted to grow by up to 14% in the AM Peak and 36% in the PM peak by 2036;
 - the rail network does not serve the movements along the A428/A1303 route;
 - the existing A428/A1303 is inadequate for walking and cycling modes into Cambridge; and,
 - congestion on the route means that current public transport services are unable to offer an attractive alternative to the private car.
- 10.5 They inform the Scheme objectives⁸³ which are to:
- achieve improved accessibility to support the economic growth of the Greater Cambridge region;
 - deliver a sustainable transport network/system that connects areas between Cambourne and Cambridge along the A428/A1303 corridor; and
 - contribute to enhanced quality of life by relieving congestion and improving air quality within the surrounding areas along the A428/A1303 corridor and within Cambridge City.
- 10.6 The objectives in turn lead to the Scheme aims⁸⁴ which are to:
- relieve congestion, particularly at peak times on the A1303 Madingley Road;
 - support economic growth, with the Scheme unlocking much of the new homes and jobs potential proposed in local plans;

⁸² Cambourne to Cambridge Better Public Transport Project - Outline Business Case: Strategic Case, January 2020, para. 8.1 ([CD1-20-5](#)).

⁸³ Statement of Aims, November 2024, para 4.1 ([CD1-04](#)).

⁸⁴ *ibid.*, para 4.2.

- deliver a sustainable transport system in the form of a new guided bus route with path for walkers, cyclists and horse riders and a P&R facility at Scotland Farm; and,
- enhance quality of life with improvements in air quality, a minimum of 10% (and an objective of at least 20%) biodiversity net gain (BNG), protecting and enhancing the natural, built and historic environment, making effective use of land and prudent use of natural resources, minimising waste, and assisting in the move to a low carbon economy.

10.7 It is necessary to deliver a reliable public transport service between Cambourne and Cambridge to deliver those objectives and aims in light of the drivers, with the majority of inquiry participants considering that advancing the aims and objectives is desirable.

10.8 Greater Cambridge is vital to the government's mission to kickstart economic growth as demonstrated by its clear support for the local plan strategy, as set out in the Case for Cambridge ([CD7-01](#)) and the appointment letter⁸⁵ of Peter Freeman as Chair of the CGC.

Development plan strategy

10.9 A central element of the local plans' strategy is promotion of strategic scale development at Cambourne, the location for two out of the three strategic scale developments identified in SCLP Policy S/6: Cambourne West and the new village at Bourn Airfield. Identified in CLP Policy 19⁸⁶ as an Area of Major Change, West Cambridge is promoted as an academic and employment centre of significant scale, and has planning permission.

10.10 The need for the Scheme is clear as there is no doubt that it is required to deliver the existing and emerging local plan strategy. There are few applications which benefit from such strong policy support.

Bourn Airfield

10.11 Unlocking the major development at Bourn Airfield is dependent on significant public transport improvements being delivered, including high quality bus priority measures or a busway on the CtoC route as demonstrated by Condition 13 on the planning permission⁸⁷ which prevents occupation of more than 500 of the 3,500 dwellings permitted until the Scheme is operational. SCDC & CCiC's planning witness, Mr Kelly, and the Applicant's planning witness, Mr Sensecall, were of the view that funders are unlikely to incur the significant early investment required for this site without the certainty that all the dwellings can be built. Objectors are unrealistic and incorrect to think that the terms of the planning condition could be changed by agreement.

Cambourne West

10.12 Similarly, SCLP Policy SS/8 in relation to Cambourne West requires the development to address the provision of high-quality segregated bus

⁸⁵ Letter from Minister of State for Housing and Planning, October 2024 ([CD7-43](#)).

⁸⁶ p 73 ([CD6-01](#)).

⁸⁷ S/3440/18/OL ([CD4-06](#)).

priority measures on the A1303 corridor⁸⁸.

West Cambridge

- 10.13 This is the type of development that makes Cambridge a focus of the government's growth ambitions and a proposal which would facilitate the in-person interactions Mr Kelly identified in examination in chief that lie at the heart of the Cambridge phenomenon. Key to its success is an integrated and sustainable transport strategy⁸⁹, and realising a development of this scale is dependent on the public transport service which the Scheme would provide.

Emerging Local Plan

- 10.14 The GCLP⁹⁰ seeks to meet the need for 73,300 additional jobs to support knowledge intensive employment, and a minimum of 48,195 new homes over the plan period (2024-2045) and beyond. Its strategy has been devised to meet these needs, whilst respecting constraints such as the Green Belt and taking advantage of the opportunities of existing and committed public transport proposals, including the Scheme, as illustrated in the GCLP's Strategic Vision for new settlements (see Figure 2). The strategy depends on early delivery of transport infrastructure of which the Scheme would be an essential part⁹¹.
- 10.15 Fulfilment of key GCLP policies is dependent upon the Scheme, including Policy S/CB⁹² (Cambourne) premised on the basis that the Scheme will be delivered and expanded, Policy S/CBN⁹³ (Cambourne North) also assumes integration of the proposed busway within the new development, and Policy S/WC⁹⁴ (West Cambridge) explains that connectivity is dependent on the Scheme.
- 10.16 Mr Kelly advised that there is absolute alignment between the Scheme and the local plan strategy. His conclusions are based on the detailed work that underpins the emerging GCLP including the Bus Integration Report⁹⁵ which explains that current network constraints mean that development at Cambourne will be subject to a vehicular trip budget⁹⁶. The Scheme is essential to enable the anticipated level of development to take place, whilst not exceeding the vehicular trip budget.

Transport need

- 10.17 As well as facilitating and supporting development plan policy the Scheme would meet the need to address delays and unreliability affecting traffic movements and bus services.
- 10.18 Do Minimum 2041 baseline transport conditions show that the transport

⁸⁸ part 12, criterion b., p80 ([CD6-02](#)).

⁸⁹ CLP para 3.74, pp76-77, ([CD6-01](#)).

⁹⁰ GCLP: Policy S/JH part 1, p49; para 2.88, p75; and, Figure 75 p256 (PDF 3), ([CD29-71-2](#)).

⁹¹ Mr Kelly XiC.

⁹² GCLP Policy S/CB part 12, p280 (PDF 27), ([CD29-71-4](#)).

⁹³ *ibid.*, Policy S/CBN part 38, criterion b, p266 (PDF 13).

⁹⁴ *ibid.*, Policy S/WC part 4, p231 (PDF 137).

⁹⁵ Cambourne to Cambridge (CtoC) Busway Integration Report - CtoC's Role in Catalysing Cambourne's Growth, September 2025 ([CD29-71-1](#)).

⁹⁶ *ibid.*, p7.

network is unable to accommodate vehicle movements. The Transport Assessment (TA) reports that volume to capacity figures for junctions in the study area demonstrate volume to capacity figures greater than 100% at 24 locations in the AM peak, 6 locations in the interpeak period, and 28 locations in the PM peak⁹⁷. On Madingley Road between the Madingley Mulch roundabout and the M11 junction, modelling predicts eastbound congestion in the AM peak and east and westbound congestion in the PM peak.

- 10.19 Both the model outputs based upon the F-series model⁹⁸, and the CPPF & CPC's inbound journey time information for 2024⁹⁹, show a significant variation in bus journey times on the A1303. These variations, from either source, and the consequent service unreliability, demonstrate the transport need for the scheme.
- 10.20 Most objectors accept the need for enhanced public transport provision. The CPPF & CPC's position demonstrates this. They agree with the scheme objectives¹⁰⁰. CCPF & CPC's transport witness, Mr Johnstone, accepted that an intervention is necessary, and that there was a policy requirement, in order to address bus delays between Cambourne and Cambridge, whether based on the 2019 figures or CPPF and CPC's 2024 figures. He accepted that the Scheme would meet the need, albeit preferring the CPPF & CPC alternative.
- 10.21 In cross examination CCPF & CPC's other transport witness, Mr Leigh agreed in principle there is a need for a reliable public transport service between Cambourne and Cambridge which requires an intervention to meet the need and achieve the Scheme aims and objectives. CCPF & CPC's planning witness, Mr Littlewood, confirmed that there is a compelling need to improve public transport between Cambourne and Cambridge, that the Scheme would meet that need, and that CPPF & CPC did not challenge the adopted local plan strategy¹⁰¹.
- 10.22 Other objectors took a similar view, including:
- The Mayor of Cambridgeshire and Peterborough (the Mayor) agrees that in order to facilitate the growth he supports at Bourne Airfield and Cambourne, that there is a need for a transport scheme in the form of the Scheme or an equivalent¹⁰².
 - Mr Davidson accepts the principle of a busway and that it is needed to serve the Cambridge West development¹⁰³.
 - The Coton Busway Action Group (CBAG) supports the initiative to provide better public transport links between developments west of Cambridge and employment and education opportunities in and around the City¹⁰⁴.
 - The Federation of Cambridge Residents' Associations considers that

⁹⁷ TA para 6.3.8, 6.3.10 and 6.3.12, pp31-33 ([CD1-25.01](#)).

⁹⁸ Cambourne to Cambridge Better Public Transport Project, Appendix B - Economic Case Addendum, November 2024, Table 4-4, p10 ([CD1-21.02](#)).

⁹⁹ Mr Leigh's PoE, Figure 13.1.1, PDF 66 ([CD26-10-W3-1](#)).

¹⁰⁰ Mr Littlewood XX.

¹⁰¹ Mr Littlewood XX, and Mr Littlewood's PoE para 6.3(i), p 13 ([CD26-10-W1-1](#)).

¹⁰² Mr Bristow XX.

¹⁰³ Mr Davidson XX.

¹⁰⁴ CBAG PoE, p3, ([CD26-06-1](#)).

improving public transport, including from Cambourne to Cambridge, should be a priority¹⁰⁵.

- Dr Green said that a busway to West Cambridge is desirable¹⁰⁶.

10.23 Mr Leigh suggested that, as the worst congestion is experienced in the AM peak, that there is no requirement for a two-way busway. However, this is inconsistent with the acceptance of a need for a reliable public transport service between Cambourne and Cambridge. A bi-directional segregated busway eliminates the possibility of interference from other road users, and thereby provides the greatest reliability¹⁰⁷. The agreed need for a reliable public transport system could not be met by a one-way only route. Even Mr Leigh recognises the difficulties with a one-way route and contemplates that further interventions may be necessary such as westbound at Madingley Mulch¹⁰⁸.

Whether All Statutory Procedural Requirements Have Been Dealt With

10.24 Procedural requirements in relation to making the applications have been complied with, as set out in the Applicant's compliance note ([CD25-04](#)), as have those in relation to the inquiry (with one exception, see para 1.7 and 1.8 above), with no substantive challenge from other parties.

Main Alternative Options Considered

10.25 Despite most objectors accepting the need to improve public transport between Cambourne and Cambridge, and that the Scheme would meet that need, a large number objected to the Scheme on the ground that there is a deliverable alternative which would achieve the scheme aims and objectives but cause less environmental harm. If there is no such deliverable alternative most of the objectors' cases fall away. In addition, the arguments against the route crossing agricultural land and a CWS in the Green Belt are also diminished. If there is a compelling need, and no alternative means of meeting that need, the benefits of the Scheme become overwhelming and outweigh the harm that would result.

Legal framework

10.26 The AOP Rules ([CD5-18](#)) specify at Rule11(1)(d) that the ES must include a *description of the reasonable alternatives studied by the applicant, which are relevant to the proposed works and their specific characteristics, and an indication of the main reason for the options chosen, taking into account the significant effects of the proposed works on the environment*. The purpose of this requirement to study alternatives and provide information about them is to inform the SoS's reasoned conclusion under s13B of the TWA1992, and is not about attaining a particular outcome. EIA is a tool, but it does not dictate an outcome, and the least environmentally harmful option need not be the chosen or consented option.

¹⁰⁵ Ms Blythe XX.

¹⁰⁶ Dr Green XX.

¹⁰⁷ A428 Study: Technical note 2 - Tidal Bus Lane Review, Atkins, May 2016, first para, p6 ([CD13-11](#))

¹⁰⁸ Cambourne to Cambridge: In-Highway Proposals for High Quality Public Transport Scheme for CPPF, February 2021, para 4, p21 ([CD7-10](#)).

- 10.27 The legislative framework does not require alternatives to be worked up in the same level of detail as the preferred option at the EIA stage¹⁰⁹. The reasons for choosing the preferred option over alternatives only need to be the main reasons¹¹⁰ and so a detailed working up of alternatives or the provision of a detailed side-by-side comparison is not a statutory requirement.
- 10.28 Beyond requirements of the TWA1992 and the AOP Rules, the principles that apply in planning applications are set out in a legal authority¹¹¹:
- the acceptability of any use in planning terms depends on whether it would cause planning harm judged according to relevant planning policies;
 - in the absence of conflict with planning policy and/or other planning harm, the relative advantages of alternative uses on the application site or of the same use on alternative sites are normally irrelevant in planning terms;
 - where an application proposal does not conflict with policy, or otherwise involves no planning harm, any alternative proposals would normally be irrelevant; and,
 - even in exceptional circumstances where alternative proposals might be relevant, vague schemes or those in early stages, and/or those that have no real possibility of coming about would not be relevant or, if they were, should be given little or no weight.
- 10.29 In terms of compulsory purchase, the principle of providing a reliable public transport service between Cambourne and Cambridge is generally accepted, so the issue is how that objective would be achieved¹¹². As a matter of judgment, any alternative means of achieving that objective put forward are to be considered when determining whether there is a compelling case in the public interest to justify the compulsory acquisition. Therefore, if an alternative scheme is not deliverable, viable, or feasible, as a matter of judgment it can be rejected as not providing an alternative means of achieving the objective. If an alternative scheme is deliverable, its advantages and disadvantages can be compared to the proposed scheme and a judgment made on whether that alternative would serve equally well in achieving the desired purpose after all relevant considerations, including cost and delay, have been taken into account¹¹³.

Rationale for the preferred option and the alternatives considered

- 10.30 There was no substantive challenge to the Applicant's evidence setting out the history of option selection and consultation. The analysis was detailed and extensive, including multiple rounds of consultation, with the output of that assessment being the proposed Scheme.
- 10.31 Some objectors argued that the Applicant's consideration of alternatives was deficient, in that an on-road alternative had not been assessed. On the

¹⁰⁹ in comparison to the earlier stage of strategic environmental assessment stage, see *R. (Buckinghamshire County Council) v Secretary of State for Transport* [2014] UKSC 3; [2014] 1 WLR 324, para 44 ([CD5-37](#)).

¹¹⁰ AOP Rule11(1)(d) ([CD5-18](#)).

¹¹¹ *R. (Mount Cook Land Ltd) v Westminster City Council* [2017] PTSR 1166, para 40 ([CD5-38](#)).

¹¹² *Hall and Another v First Secretary of State* [2007] EWCA Civ 612, para 20 ([CD5-39](#)).

¹¹³ *De Rothschild v Secretary of State for Transport* (1989) 57 P&CR 330, p341 (PDF 12) ([CD5-40](#)).

contrary, it is clear that on-road options have been considered, as accepted by many, including Mr Leigh in cross examination. For example, the 2017-2018 consultation included two on-road options on the A1303/Madingley Road¹¹⁴, one for an inbound nearside bus lane and the other a central tidal bus lane. The Applicant not only considered the principle of an on-road route, but the detail as well, as illustrated in the Madingley Road Options Technical Note¹¹⁵.

- 10.32 It is clear that the Applicant has undertaken a clear, transparent, and comprehensive consideration of alternatives, including on-road alternatives on the A1303, and the Scheme is the product of that extensive process. The requirements of AOP Rule 11(1)(d) are met in the ES, ES-A and ES-A2¹¹⁶.

Cost of the Scheme - funding

- 10.33 The anticipated cost of the scheme is £192,284,900, to be funded by City Deal monies together with contributions from dependent developments including Cambourne West, Bourn Airfield and West Cambridge¹¹⁷. No detailed evidence has been provided that the Scheme will not be funded and although Ms Gazeley sought to cast some doubt on funding, she did not question the fact that funding had been allocated to the GCP under the City Deal. It is clear that there are sufficient funds available to deliver the Scheme.

Business and economic case

- 10.34 As agreed by Mr Leigh in cross examination:
- the business case process provides the basis for investment decisions, not decisions on whether to make a TWA Order;
 - the economic case is one element of the business case;
 - the Value for Money Framework¹¹⁸ (VfM Framework) itself is not limited to monetised benefit costs ratios (BCRs); it requires a holistic approach; and,
 - the business case analysis is not a substitute for the overall planning balance; a monetary value is not placed on every element of the Scheme¹¹⁹.
- 10.35 Resolving all the detailed objectors' points about assumptions made in the economic case is unnecessary as the Scheme meets the strategic objectives of contributing to the growth of Cambridge in line with the existing and emerging local plan strategy. The key points are that funding is secured, the balance of benefits and harms cannot be captured fully in a BCR and the benefits far outweigh any harm.
- 10.36 The VfM Framework identifies three BCR metrics, initial, adjusted, and

¹¹⁴ Cambourne to Cambridge Consultation Report, Appendix E – Phase One Consultation Leaflet (2017 – 2018), March 2023, p9 ([CD1-06-06](#)).

¹¹⁵ Cambourne to Cambridge Better Public Transport Project, Madingley Road 'Quick-Win' Options Outline Technical Note, Mott MacDonald, May 2029, in particular para 3.4.1, p4 ([CD13-07](#)).

¹¹⁶ ES, in particular chapter 4, pp38-58 ([CD1-10.01](#)), ES Addendum, para 2.4 ([CD1-10.06](#)) and ES (Addendum 2 and Clarifications), section 5, ([CD1-10.07](#)).

¹¹⁷ Funding Statement, para 6.1, 6.2 and 6.3 ([CD1-07](#)) and Mr Baker's PoE, section 5.4 ([CD26-01-APP-W1-1](#)).

¹¹⁸ Value for Money Framework, DfT, May 2025, (VfM Framework) para 1.1.3, p4 ([CD8-32](#)).

¹¹⁹ See R (Save Stonehenge World Heritage Site) v. Secretary of State [2021] EWHC 2161 (Admin), para 232, p55 ([CD29-82](#)), relating to a DCO scheme to which a national policy statement applied.

indicative¹²⁰. Indicative impacts are the last stage of the assessment¹²¹ and are of particular importance as the Scheme would play a central role in facilitating development at Cambourne. The indicative BCR, at 1.8:1¹²², indicates that the scheme is medium value for money. The main objections to this analysis are on the basis of the use of a pre-COVID-19 transport model, implications of EWR and assumptions about the dependency of key developments on the Scheme.

Use of pre-COVID-19 transport model

- 10.37 CPPF & CPC consider that a new sub-regional transport model should have been developed to take account of post-pandemic travel conditions with Mr Johnstone's evidence¹²³ finding that a 'normal' or 'steady' state has now been reached. However, this was not supported by any substantive evidence in relation to the Cambridge sub region. Rather, the most up-to-date figures suggest that the bus passenger numbers have not returned to a steady state (there was a 31% increase in the existing guided bus passenger numbers from 2024 to 2025¹²⁴).
- 10.38 The Applicant's approach¹²⁵ was to test the materiality of uncertainties from post-pandemic conditions by applying the guidance in the DfT's TAG Unit M4¹²⁶. The issue is not whether different approaches could have been taken, but whether the Applicant's approach fell within a reasonable range of options.
- 10.39 TAG Unit M4 states that ideally analysts should consider rebasing their model in response to events such as the COVID-19 pandemic, but *since this can come at considerable cost and takes time to achieve, more proportionate approaches may be considered, as set out in Proportionate Update Process*¹²⁷. The Applicant selected one of the permissible options and, whilst others may take a different view, as long as the decision fell within the ambit of what was reasonable it cannot be criticised.
- 10.40 A proportionate and appropriate response in these circumstances is to avoid excessive re-working of models and will often be based upon applying broad sensitivity tests, which is what the Applicant did in applying a post model adjustment¹²⁸. The COVID-19 sensitivity test gave a lower value for conventional transport benefits but made no material difference to the overall value for money (producing an indicative BCR of 1.7:1¹²⁹). CPPF & CPC took an unduly narrow focus on the travel benefits to the exclusion of others.

¹²⁰ VfM Framework, para 4.4.3, p17 ([CD8-32](#)).

¹²¹ *ibid*, p18.

¹²² Cambourne to Cambridge Busway: Scheme Value for Money Technical Note, WSP, July 2025, Table 4, p4 ([CD9-32](#)).

¹²³ Mr Johnstone's PoE 2.09 ([CD26-10-W2-1](#)).

¹²⁴ Extracts from Transport update: Cambridge and South Cambridgeshire - COVID-19 transport impacts and recovery, June 2025, p8 ([CD29-09](#)).

¹²⁵ Cambourne to Cambridge Busway – Scheme Value for Money update Technical Note, July 2025 (VfM Technical Note), para 18 to 24 ([CD9-32](#)).

¹²⁶ TAG Unit M4 - Forecasting and Uncertainty, DfT, 2023 ([CD8-21](#)).

¹²⁷ *ibid.*, para 3.3.2, with guidance on proportionate accounting for COVID-19 is set out in Appendix B.3.

¹²⁸ VfM Technical Note, para 20 ([CD9-32](#)). Contrary to Mr Parker's closing submission, para 18 ([CD29-122](#)), that there was no evidence of any contemporaneous decision making, it is clear from this account, and reaffirmed by Mr Whitehouse's oral and written evidence, that this decision was made during the preparation of the business case.

¹²⁹ *ibid.*, para 23.

- 10.41 CPPF & CPC relied on the Introduction to the F-series model forecasting report¹³⁰. However, this notes that it improved the level of detail in areas of focus for current transport projects and added a 2019 current year validation to extend the life of the model until a new, as yet unspecified, base year could be created once COVID-19 disruption has settled to a new normal state. Although in cross examination Mr Johnstone accepted that TAG Unit M4 was relevant, he argued that the approach was not appropriate in schemes including compulsory purchase.
- 10.42 However, the purpose of the business case is to inform public sector investment decisions, and although the business case can be relevant, decisions on compulsory acquisition are based on much wider considerations. Given the part played by transport benefits in the overall economic case outputs, the Applicant's approach in following relevant guidance in TAG Unit M4¹³¹ and applying a post model adjustment¹³² was proportionate and reasonable.

Whether effects of EWR should have been modelled in the business case

- 10.43 Table A2 in TAG Unit M4 provides guidance on when future inputs should be included in the core scenario. A Development Consent Order (DCO) application for the relevant part of the EWR route has not been made yet. Following the guidance, EWR does not fall into the category of a scheme which should be part of the core scenario and therefore it was not appropriate to model EWR as part of that core scenario, a point agreed by Mr Leigh in cross examination.
- 10.44 CPPF & CPC also assert that EWR should have been part of an alternative scenario¹³³. However, TAG Unit M4 notes¹³⁴ it is important that analysis of alternative scenarios is proportionate and Table A2 makes it clear that inputs categorised as reasonably foreseeable or hypothetical *may form part of the alternative scenario*, but whether they are remains a matter of proportionality and judgment.
- 10.45 The application of TAG Unit M4 is not affected by the fact that the LPAs modelled the effect of EWR for the purposes of local plan preparation¹³⁵. They did so as an additional scenario, not as part of the baseline or core scenario, which was a matter of judgment, in different circumstances and for a different output. In any event, the Scheme and EWR are anticipated to be complementary with the former going to West Cambridge and the City Centre, the latter to Cambridge South and Central railway stations¹³⁶, a point made clear from the emerging GCLP and its evidence base. The Bus Integration Report is clear that both EWR and the Scheme are required to

¹³⁰ Cambridgeshire Sub-Regional Model 2 - F-series Model Forecasting Report, CCC, May 2022, p11 ([CD1-25-7](#)).

¹³¹ Section B3.4, p51 ([CD8-21](#)).

¹³² VFM Technical Note, para 20 ([CD9-32](#)).

¹³³ Mr Parker's closing submissions, para 28 ([CD29-122](#)).

¹³⁴ Para 5.1.2, p18 and Table A2, p48 ([CD8-21](#)).

¹³⁵ Mr Kelly, in response to Inspectors' questions.

¹³⁶ Mr Whitehouse's PoE, para 4.3.7 ([CD26-01-APP-W6-1](#)), see references to the Cambourne to Cambridge Outline Business Case: Appendix A - Strategic Case Addendum, para 7.2.12, p46 ([CD1-21-01](#)) and to the Independent Audit of Key Assumptions and Constraints - Cambourne to Cambridge Better Public Transport Project, Amey Consulting, May 2021, p72 ([CD8-27](#)).

support and facilitate sustainable growth¹³⁷. EWR Ltd have withdrawn their objection, stating that the Scheme would enhance public transport and facilitate sustainable development, outcomes which are aligned with the objectives of EWR (18.54-18.57).

- 10.46 The majority of the economic benefits that would flow from the scheme are derived from land value uplift. Changes to transport patterns as a result of other transport schemes such as EWR would have no impact on land value uplift¹³⁸, and sensitivity analysis¹³⁹ shows there would be no material impact on the value for money category. Consequently, it would not have been proportionate to model an alternative scenario accounting for EWR.

Development dependency – Cambourne West development

- 10.47 TAG unit A2.2¹⁴⁰ indicates that the issue of whether a development is dependent is not usually clear cut, that dependency is likely to occur where a development will breach a *reasonable level of service* on the transport network and that decisions regarding dependency are ultimately judgment based. In making a judgement the Applicant applied the correct criterion (the reasonable level of service point)¹⁴¹, contrary to CPPF & CPC's incorrect position¹⁴².
- 10.48 For the purposes of the business case, account was taken of the basis upon which planning permission for Cambourne West was granted¹⁴³ where the developer was required to make a financial contribution towards improvements to highway infrastructure to improve bus links from Cambourne to Cambridge¹⁴⁴. This planning obligation could only have been sought if it was necessary to make the development acceptable in planning terms (NPPF para 58). It follows that if a contribution is necessary to make a development acceptable then it must be dependent on the infrastructure to be funded, as confirmed by Mr Kelly in examination in chief who observed that the payment was necessary to mitigate the impacts of the development proposal that the Scheme would unlock. Consequently, the correct test was applied in carrying out the business case assessment and Cambourne West, like Bourn Airfield, is a development that is dependent upon the provision of the Order Scheme or its equivalent.

Development dependency – assumptions of house price and growth

- 10.49 The business case¹⁴⁵ relied upon an expert surveyor's report, prepared as part of the local plan evidence base, to arrive at house price value assumptions. Mr Leigh's figures were not based on the type of houses likely

¹³⁷ Cambourne to Cambridge (CtoC) Busway Integration Report - CtoC's Role in Catalysing Cambourne's Growth, September 2025, p32 ([CD29-71-1](#)).

¹³⁸ Mr Whitehouse's Rebuttal PoE, para 3.4.4 ([CD26-01-APP-W6-4](#)).

¹³⁹ Cambourne to Cambridge Outline Business Case: Appendix B - Economic Case Addendum, Table 4-13, p15 ([CD1-21-02](#)).

¹⁴⁰ TAG Unit A2.2 - Appraisal of Induced Investment Impacts, May 2025, para 3.2.2 and 3.3.2 ([CD9-50](#)).

¹⁴¹ Cambourne to Cambridge Outline Business Case: Appendix B - Economic Case Addendum, para 4.4.22, p17 shows this point being applied directly ([CD1-21-02](#)).

¹⁴² Mr Parker's closing submissions, para 34 and 35 ([CD29-122](#)).

¹⁴³ Strategic Economic Narrative & Economic Impacts Report: Outline Business Case - Appendix J, Mott MacDonald, January 2020, Table 8, p63 ([CD1-20.16](#)).

¹⁴⁴ s106 Agreement, land at Cambourne, December 2017, p82 ([CD4-08](#)).

¹⁴⁵ Economic Case Addendum, para 4.4.31, p19 ([CD1-21-02](#)).

to come forward on site and did not account for a new build premium. In any event, Mr Leigh accepts the figures in the Applicant's response to his assessment¹⁴⁶. These are that:

- with Bourn Airfield only, not including Cambourne West, the BCR is 1.5;
- with house prices adjusted down, the BCR is 1.3;
- with lower house price growth, the BCR is 1.3;
- for the BCR to fall below 1, multiple inappropriate assumptions would have to be made, such as considering only Bourn Airfield, and with house prices adjusted, and with nil future growth together; and,
- if a nil future growth sensitivity test is adopted¹⁴⁷, having regard to the range of figures in the MHCLG Appraisal Guide¹⁴⁸ it is also reasonable to consider the other end of the range which is 5.2% house price growth, resulting in a BCR of 3.2.

10.50 Those sensitivity tests demonstrate that the Applicant's analysis is robust. In order to depart from a medium value for money category, the Outline Business Case core scenario, unrealistic assumptions would have to be made and there is therefore no reason to reject the analysis set out in the business case.

Objectors' alternatives - considerations

10.51 Objectors argue that Green Belt, countryside, and nature conservation harms arising from the proposal would not be justified if there was a less harmful alternative. To be considered a true alternative, a proposal must meet the Scheme aims and objectives, and must be realistic and deliverable.

10.52 Mr Johnstone agreed in cross examination that proposals to alter an existing highway would only be deliverable if they are acceptable to the highway authority, applying its published policy set out in CCC's General Principles for Development¹⁴⁹. He accepted that the principles should be the starting point for any scheme design and that the relevant part of the A1303 is a strategic link to which the Design Manual for Roads and Bridges (DMRB) applies, as set out in in CCC Principles document (para 2.3(i)).

CPPF & CPC alternative

10.53 CPPF & CPC acknowledge that a scheme on Madingley Road which would not fit within the environmental constraints they set for themselves would have unacceptable consequences. A scheme which meets relevant safety and other standards cannot be accommodated within those constraints and an on-road alternative of that type cannot be delivered. Other on-road alternatives along that route which would not be bound by those constraints have not been presented, and must be considered as vague or inchoate.

¹⁴⁶ Described in Response to alternative scenarios for Land Value Uplift assessment, October 2025 (LVU assessment response) ([CD29-60](#)) as the Calculated BCR metric. The relationship between BCRs and Value for Money categories is set out in the DfT VfM Framework 2025 ([CD8-32](#)), table 5.1.

¹⁴⁷ Mr Parker's closing submissions, para 42 ([CD29-122](#)).

¹⁴⁸ LVU assessment response, Annex C ([CD29-60](#)).

¹⁴⁹ Cambridgeshire Highways Development Management - General Principles for Development, January 2023 (General Principles for Development) ([CD7-36](#)).

- 10.54 Initially the on-road solution was put forward as an interim solution while details of longer-term infrastructure schemes such as EWR, the Cambridge Autonomous Metro (CAM) network (which in 2021 included a route between Cambourne and Cambridge¹⁵⁰) and Girton Interchange, were worked out¹⁵¹. The CPPF & CPC are now promoting this alternative as a long-term solution rather than an interim one, which demonstrates its unsuitability.
- 10.55 The Assumption and Constraints Audit report¹⁵² noted that, although an in-highway scheme may provide an interim solution, it *did not invalidate the assumptions and constraints for the preferred option as a long-term solution to meet the growth in travel demand along the corridor*. The report acknowledged that the then preferred solution, which is now the Scheme, would be just such a longer-term solution to meet the growth in travel demand, something the CPPF & CPC alternative would not do.
- 10.56 An inbound central bus lane¹⁵³ configuration proposed in September 2024, is no longer promoted by CPPF & CPC. The Applicant's Engineering Assessment¹⁵⁴ found it would have been unsafe, and Mr Johnstone agreed in cross examination. An April 2025 configuration¹⁵⁵ relied upon the Active Travel England Route Cross Section Tool to justify its proposed lane widths, but that guidance does not apply to roads such as Madingley Road¹⁵⁶ and Mr Johnstone did not recommend its use.
- 10.57 The Applicant's Engineering Assessment not only criticised the CPPF alternative, but it also included an alternative concept design¹⁵⁷, demonstrating that the Applicant has carefully examined objectors' suggestions. They were not dismissed out of hand, but every effort was made to see whether difficulties could be overcome and whether with changes they might be deliverable, albeit the conclusion was that an on-road inbound bus lane option could not be delivered. The evolution of the CPPF & CPC alternative scheme demonstrates that despite various iterations, it does not comply with relevant standards and they have persisted in promoting an interim solution as a longer term one.

CPPF & CPC alternative - departures from standards

- 10.58 The most recent, August 2025, alternative was designed with environmental constraints set by CPPF & CPC's ecology and nature conservation witness, Mr Woodfield, rather than being designed to meet standards. Standards were only considered after the constraints had been set. This resulted in

¹⁵⁰ Cambridgeshire and Peterborough Local Transport Plan: Cambridgeshire Autonomous Metro (CAM) sub-strategy (LTP CAM sub-strategy) ([CD7-28](#)).

¹⁵¹ Cambourne to Cambridge: In-Highway Proposals for High Quality Public Transport Scheme, Mr Leigh for CPPF, February 2021, pp 2 and 21 ([CD7-10](#)).

¹⁵¹ General Principles for Development ([CD7-36](#)).

¹⁵¹ LTP CAM sub-strategy strategy ([CD7-28](#)).

¹⁵² Independent Audit of Key Assumptions and Constraints -Cambourne to Cambridge Better Public Transport Project, Amey Consulting, May 2021, p75 ([CD8-27](#)).

¹⁵³ Extract from Cambourne to Cambridge: In-Highway Proposals for High Quality Public Transport Scheme (revised), Mr Leigh for CPPF, September 2024, p3 ([CD7-09](#)).

¹⁵⁴ Cambourne to Cambridge (CtoC) Scheme: CPPF Alternative Scheme – Engineering Assessment, WSP, July 2025, (WSP Alternative Scheme – Engineering Assessment) para 3.3.43 and 3.4.6 ([CD9-31](#)).

¹⁵⁵ Alternative in-highway proposal for high quality Cambourne-Cambridge Public Transport Scheme, Mr Leigh for CPPF, April 2025 ([CD23-18-2](#)).

¹⁵⁶ WSP Alternative Scheme – Engineering Assessment, para 4.3.2 and 4.3.4, pp54 and 55([CD9-31](#)).

¹⁵⁷ *ibid.*, section 3.5, p35.

lane widths which are too narrow, and important features omitted, such as an appropriate hard standing between the bus lane and the active travel path. No cross sections were produced and the scheme is based on two-dimensional drawings which do not take account of levels, cross-falls and other aspects.

- 10.59 Based upon the CPPF & CPC's drawings¹⁵⁸ and the cross-sections¹⁵⁹ that he subsequently produced, the Applicant's engineering witness, Mr Lonergan tested the scheme against highway authority standards and identified multiple departures¹⁶⁰. In cross examination, Mr Johnstone said he had no reason to doubt that analysis.
- 10.60 CPPF & CPC argue that specifying a lower speed on the route would overcome some of those departures. However, the characteristics of the road mean that the approach is unlikely to be acceptable. Even if it were implemented, other major departures would remain, including the omission of 1m hard strips, sub-standard verge, footway and lane widths, the latter reduced from 3.65m¹⁶¹ to 3.25m, and inadequate stopping sight distances. Further, Mr Johnstone advised that the level of the road would have to be lowered, particularly in the vicinity of Madingley Wood, an issue not considered by CPPF & CPC in any detail.

CPPF & CPC alternative - effect on designated heritage assets

- 10.61 There would be an adverse impact on the significance of the American Military Cemetery RPG. Mr Littlewood accepted that the scheme would cause less than substantial harm to the significance of that designated heritage asset, adjusting his initial assessment of the degree of that harm from very low¹⁶² to low in oral evidence. His analysis assumes that no land covered by the RPG designation would be required in the alternative scheme.
- 10.62 The RPG extends to the road and includes the grassed semi-circular area at the Cemetery entrance¹⁶³ part of which would be lost¹⁶⁴, even on CPPF & CPC's unrealistic assumptions. That area appears to be part of the land given to the United States government¹⁶⁵ and which is subject to an international treaty between the British and United States governments, irrespective of whether or not that land forms part of the highway. Even if the area of land required by their scheme did not include part of the RPG, its location at the Cemetery entrance means it forms an important part of its setting. Taking appropriate lane widths, hard strips, land required to build up verges and so on into account, it is not possible to add a bus lane to the existing carriageway without intruding on the treaty land and without

¹⁵⁸ Mr Johnstone's PoE, Appendix 5, pp88-94 ([CD26-10-W2-1](#)).

¹⁵⁹ Appendices to Mr Lonergan's Rebuttal PoE, Appendix D to Appendix 1, pp37-40 ([CD26-01-APP-W8-5](#)).

¹⁶⁰ *ibid.*, Appendix C to Appendix 1, pp34-35.

¹⁶¹ Not the 3.6m referred to by Mr Parker in his oral addition to para 78 of his closing submissions ([CD29-122](#)); see Fig 3-5, p28 in WSP Alternative Scheme – Engineering Assessment ([CD9-31](#)).

¹⁶² Mr Littlewood's PoE para 7.5, p16 ([CD26-10-W1-1](#)).

¹⁶³ Appendices to Mr Wilson's PoE, p11 ([CD26-01-APP-W2-2](#)).

¹⁶⁴ Fig DW5, p69, of Mr Woodfield PoE ([CD26-10-W4-1](#)) shows part of the grassed area and a tree as habitat lost. That point stands even if that area falls within the highway as shown on the Applicant's boundary overlay maps, Sheet 1 ([CD29-89](#)).

¹⁶⁵ Map attached to diplomatic note dated 21 June 1954, from Deputy Prime Minister, Sir Anthony Eden, to the United States Ambassador regarding the official status of Cambridge American Cemetery, p11 ([CD1-06.16](#)).

causing a material degree of harm to the RPG itself, its setting, and the setting of the grade II* listed Memorial and Attached Walls, Steps and Pool Surround. There would also be less than substantial harm to the grade II* listed Madingley Mill¹⁶⁶.

- 10.63 The fact that the wall component of the listed building acts as a boundary does not prevent development outside the boundary from affecting the listed building's significance through development within the setting, contrary to the suggestion from CPPF & CPC in answering Inspectors' questions that the listed building's heritage value is on the north side of the wall.

CPPF & CPC alternative - M11 overbridge

- 10.64 The solution for the M11 overbridge on their drawings is not supported by CPPF & CPC's witness, with Mr Johnstone saying in cross examination that he would not deliver a scheme on the basis set out in the Applicant's cross sections and that such a scheme was undeliverable and unsafe¹⁶⁷, agreeing with the Rectory Farm Bridge Options Report¹⁶⁸ findings that the design would lead to a higher risk of accidents and greater congestion. Mr Johnstone said that everyone with the requisite expertise who has considered those alternative proposals for the M11 overbridge considers them to be unsafe. He suggested addressing the issue by providing an additional bridge. However, he accepted that such a bridge does not form part of the CPPF & CPC's alternative scheme, and that the impact, land required, construction feasibility or any environmental impact of such a bridge had not been assessed.
- 10.65 In its closing submissions¹⁶⁹, CPPF & CPC ignored Mr Johnstone's evidence that their own scheme was unsafe, relying instead on an unsubstantiated assertion that adjustments to signals and the off-slip would resolve the point on the Rectory Farm Bridge Options Report. However, rather than supporting their case, the Report actually corroborates Mr Johnstone's view on the absence of a safe option which does not involve an entirely new bridge or extensive widening of the existing one. The preliminary nature of the work in the Report is clear as are the many unresolved issues it identified, including the absence of any agreement or meaningful discussion with National Highways.

CPPF & CPC alternative - deliverability

- 10.66 Even on CPPF & CPC's own evidence, their alternative scheme is incapable of being delivered and is not realistic. There is no evidence on the cost of their alternative. Mr Leigh's cost¹⁷⁰ was based on a figure of £37.7m, which is a partial cost derived from the Applicant's Options Appraisal report: that

¹⁶⁶ Mr Wilson's PoE, para 6.2.9 & 6.2.10, p65 ([CD26-01-APP-W2-1](#)).

¹⁶⁷ Mr Johnstone XX.

¹⁶⁸ A428 Cambourne to Cambridge Option Study - Rectory Farm Bridge Options Report, Atkins, June 2016. p16 ([CD9-36](#)).

¹⁶⁹ Mr Parker's closing submissions, para 80 ([CD29-122](#)).

¹⁷⁰ Mr Leigh's PoE Appendix A p7 (PDF 39) ([CD26-10-W3-1](#)).

does not include works west of the Madingley Mulch roundabout¹⁷¹, and so cannot be relied upon. It is not possible to assess the extent of the harm to the Madingley Wood SSSI and the American Cemetery as neither a scheme compliant with applicable standards (with appropriate lane widths), nor the construction effects of creating a new road by reducing levels, have been assessed. It is uncertain how, or whether, the M11 overbridge issue can be addressed.

- 10.67 Relying on the Comberton Greenway proposals would not provide an alternative to the need for an active travel route between Cambourne and Cambridge given its route which would not even go as far as Hardwick¹⁷².
- 10.68 Consequently, the CPPF & CPC alternative, around which many other objectors have coalesced:
- would not meet the Scheme objectives;
 - would not be feasible in engineering terms;
 - would be unsafe (on their own evidence);
 - lacks robust assessment of ecological impacts for the actual works that would be needed, both to deliver a new bridge over the M11 and to “lower” the entirety of the road;
 - would harm the significance of the designated heritage assets at the American Cemetery;
 - cannot comply with the Development Plan as it is undeliverable;
 - has an unknown cost; and,
 - would inevitably take longer to provide than the proposed busway by at least five years.
- 10.69 The fact that some Green Belt harm might be avoided or lessened is of little relevance, as their scheme would be unsafe and undeliverable. The Applicant’s evidence demonstrates that their on-road alternative scheme would not provide equivalent transport benefits¹⁷³ which were considered as part of the option appraisal process.
- 10.70 Any alternative scheme could only begin to be considered once a decision has been made on this application. Should a decision then be taken that an alternative scheme be advanced, a consultation process would follow, and after that a decision on a preferred route and scheme would have to be made. The necessary consents would then have to be obtained, including from National Highways. A compulsory acquisition process would have to be followed in order to provide a new bridge over the M11 at least. It is implausible to suggest that the CPPF & CPC alternative could be delivered within a similar timescale to the Order Scheme.
- 10.71 Contrary to the Applicant’s case, even if it were accepted that the CPPF & CPC alternative is capable of being delivered, it is not possible to be satisfied that their scheme would meet the area’s travel demands and need associated with the long-term growth aspirations. Consequently, it is not a true alternative. Those growth aspirations are based upon placing a cap on

¹⁷¹ That part east of the Madingley Mulch roundabout together with the Scotland Farm park and ride: Cambourne – Cambridge Better Public Transport Project: Options Appraisal Report (Part 2), Mott MacDonald, December 2028 (Options Appraisal Report pt2), para 4.2 ([CD1-20.08](#)).

¹⁷² Comberton Greenway public engagement brochure, GCP, 2022, p2 ([CD29-15](#)).

¹⁷³ Low Cost and Do Something options in Options Appraisal Report pt2, Table 25, p85, ([CD1-20.08](#)).

vehicular trips (the trip budget approach) which relies upon the delivery of the Scheme, and this alternative would not provide the long-term infrastructure which Mr Kelly advised in examination in chief is required to deliver the paradigm shift in travel behaviour.

Objectors' alternatives – re-alignment of off-road busway at Coton

- 10.72 Mr Littlewood's argument that the busway should follow a curved alignment west of Cambridge Road¹⁷⁴ is not supported by any detailed analysis that it would be feasible nor that it would improve farming viability. The Applicant considered a realignment on the other side of Cambridge Road at Coton Orchard but that was found to have wider environmental impacts and would have been inferior on operational and safety grounds (see 10.160 below). This alternative cannot be given any weight.

Objectors' alternatives to Rifle Range Track

- 10.73 Some objectors suggested that Adams Road would be a preferable route leading to Grange Road than the section that would run along Rifle Range Road. Both the Rifle Range Road and Adams Road options for the busway route were fully appraised in the Option Appraisal Reports¹⁷⁵. As shown in section 5 of ES-A2 ([CD1-10.07](#)) these appraisals found that Rifle Range Road was the better option (since the CAM proposals were abandoned) and Adams Road would not be a preferable nor an equally advantageous means of securing the Scheme objectives taking account of factors including delay.

Mayor's alternatives

- 10.74 The Mayor accepts that there is a need for a public transport scheme to serve the growth planned for Camborne and Bourn Airfield. Although he said there were a range of alternatives in addition to the CPPF & CPC scheme, other than saying in cross examination that light rail should be examined and that a strategy was being devised, no details of any deliverable alternatives, or that strategy were provided. In his closing submissions he asserted only that the busway *may be* incompatible with future policy ... *if* the policy is to build a light rail network¹⁷⁶.

Conclusion on alternatives

- 10.75 As there is a pressing need to provide the Scheme, there is no alternative scheme proposed that would meet the identified need, be deliverable, have advantages over the Scheme such as lower cost or less environmental impact, and not lead to an undue delay.

Effect of the implementation, operation and maintenance of the Busway

Ecology - general

- 10.76 There is limited evidential dispute about the technical assessment of the Scheme's impacts beyond that on trees and local wildlife sites. Apart from

¹⁷⁴ Mr Littlewood's PoE, para 7.35 to 7.39, pp22-23 ([CD26-10-W1-1](#)).

¹⁷⁵ Cambourne – Cambridge Better Public Transport Project: Options Appraisal/Assessment Reports, Parts 1, 2 and 3, Mott MacDonald, February and December 2018, November 2029 ([CD1-20.07](#), [CD1-20.08](#) & [CD1-20.09](#)).

¹⁷⁶ Mr Graham's closing submissions, p3 ([CD29-119](#)).

construction impacts on terrestrial invertebrates, there would be no significant effects on protected species, and no long-term ones, nor any significant effects during operation¹⁷⁷. Those construction impacts would only be short-term and at a local scale. The ecological effects would be acceptable in national and local policy terms¹⁷⁸.

Eversden and Wimpole SAC and bats

- 10.77 The evidence demonstrates that the Scheme would not adversely affect the integrity of the SAC, a conclusion reached by Natural England whose advice should be given significant weight as an expert national agency. Impacts of the Scheme are acceptable in local and national policy terms¹⁷⁹. Mr Woodfield confirmed in cross examination that he did not seek to contradict Natural England and considered adverse effects on the SAC to be unlikely. Although CPPF & CPC considered that the proposed bat hop-over mitigation would be ineffective for species other than barbastelle bats, the Applicant's Technical Note 2 demonstrates a low collision risk for other bat species even without mitigation¹⁸⁰ and Natural England raised no concerns on this point in light of that Note. The Applicant's Technical Note 5¹⁸¹ addresses the CPPF & CPC's issue about the suggestion of increased collision risk for barbastelle bats¹⁸².

Coton Orchard CWS

- 10.78 The ES assessed a significant residual effect at county level on the Coton Orchard CWS¹⁸³, a conclusion that Mr Woodfield agreed with¹⁸⁴. The Applicant's assessment is that as a formerly intensively managed orchard approaching the end of its life, whilst it may now be managed in a low intensity manner, its habitat structure, being the key defining feature, remains that of an intensive orchard. Mr Woodfield's argument about the extent to which Coton Orchard should be considered a priority habitat based on whether it consists of the defined characteristics of a traditional orchard or an intensively managed orchard, does not affect the ES assessment, but is a narrower argument relating to BNG (see 10.87 below).

Other county and city wildlife sites

- 10.79 The busway would not have a significant effect on any other wildlife sites within the Order Limits; Coton Path Hedgerow CWS, Bin Brook CiWS and Scrubland east of the M11 CiWS. Mr Woodfield disputed the assessment in the ES on the Coton Path Hedgerow CWS. However, he considered the unmitigated impact rather than the methodology in the ES. The ES methodology is consistent with AOP Rule 11(1)(c) which expressly requires mitigation measures to be identified in an ES. His 1% loss threshold assessment of significance was inconsistent with the ES methodology. The

¹⁷⁷ Mr Ellis PoE, para 1.1.116 to 1.1.120, 1.1.141, p16 & 18 ([CD26-01-APP-W13-1](#)).

¹⁷⁸ In particular NPPF para 187(a) and (d), 193(a) and (b), CLP Policies 69 and 70 and SCLP Policies NH/4 and NH/5.

¹⁷⁹ In particular NPPF para 187(a) and (d); 193(b) and 195, CLP Policy 69 and SCLP Policy NH/5.

¹⁸⁰ 'MYSOP' and 'BLE' columns in Table1, Appendix 4.3 p5 (PDF 158) of Technical Note 2, Bats and Collision Exposure, July 2025 ([CD26-01-APP-W12-2](#)).

¹⁸¹ Technical Note 5, CtoC Response to O'Malley barbastelle behaviour paper, November 2025 ([CD29-103](#)).

¹⁸² Increasing canopy cover elevates vehicle collision risk for barbastelle bats (*Barbastella barbastellus*) at roads, O'Malley *et. al.*, 2025 ([CD29-102](#)).

¹⁸³ ES Technical Report 5: Ecology, Table TR5-11-1, p85 ([CD1-11.05](#)).

¹⁸⁴ Mr Woodfield PoE, para 5.2.3, p22 ([CD26-10-W4-1](#)).

ES correctly considers whether there would be any loss of plant species for which the CWS was designated, which there would not be¹⁸⁵.

Veteran trees

- 10.80 Three veteran trees at Coton Orchard, T6, T7 and T8 are within the Order Limits, and are at the heart of the issue, which in the context of the extent of the Scheme as a whole is limited. The Scheme would not result in their loss or deterioration, nor of the other veteran trees, T5, T9 and T10, on the edge of the Order Limits, or those beyond¹⁸⁶. Notwithstanding the Applicant's case, even if there were any loss or deterioration of the six veteran trees within or on the edge of the Order Limits, there are wholly exceptional reasons in this case (see 10.191 below), and without prejudice a compensation strategy¹⁸⁷ has been secured on a worst-case scenario basis.
- 10.81 During the route selection process, a course slightly to the north of that proposed¹⁸⁸ was considered and consulted upon. That more central route through the Orchard would have avoided the veteran trees. Neither Ms Gazeley nor CPPF supported the option and, taking views into account, it was concluded that it would not provide any environmental or landscape advantages, and would have been inferior on operational and safety grounds (ES-A, [CD1-10.06](#)). This demonstrates that a robust route selection process was undertaken and it is not possible to avoid the veteran trees.
- 10.82 The Applicant's arboriculture witness's, Mr Allder's, expert judgement is that the proposed translocation of trees T6, T7 and T8 would not result in their loss or deterioration. The proposed timing of their preparation and translocation is consistent with the proposed Scheme programme. There has been no expert arboricultural evidence to the contrary, and despite Ms Gazeley challenging the effects and success of translocation, her evidence was not credible and cannot be afforded any weight, relying as it did on references that it transpired did not exist.
- 10.83 In any event Mr Allder's evidence was not, as claimed, based on a single case study but on his experience and interactions with Ruskins who are experienced, specialist tree translocation experts. It was not necessary for Ruskins to visit the site given that they could rely on Mr Allder's survey and expertise. The black mulberry tree example cited by Mr Allder was similar in age and size to the Coton Orchard trees and is an informative case study irrespective of whether it is a veteran.
- 10.84 Conversely, Ms Gazeley's reliance on emails from Mr Newman of Civic Trees does not undermine Mr Allder's evidence. Mr Newman could not be questioned, it is unclear if he has any expert qualifications, only a selection of correspondence was provided with Ms Gazeley unwilling to provide the full series, there is no evidence that Mr Newman considered the ES or Mr Allder's evidence and, unlike Mr Newman's approach, Mr Allder's is more

¹⁸⁵ ES Technical Report 5: Ecology, para 6.2.12, p52 ([CD1-11.05](#)).

¹⁸⁶ See Images 1 and 2 in Mr Allder's PoE, p6 ([CD26-01-APP-W4-1](#)).

¹⁸⁷ ES Technical Report 14, Appendix TR14.2 – draft Veteran Tree Mitigation (including Compensation) Strategy ([CD1-11.14.03](#)) and Suggested condition 150 ([CD29-96](#)).

¹⁸⁸ See Figure 2-3, p14, ES-A ([CD1-10.06](#)).

precautionary.

- 10.85 Trees T5-T10 are covered by a tree preservation order (TPO), but their amenity value would be unharmed either by remaining in place or being translocated, and compensated for by additional tree planting. In any event, removing trees protected by a TPO is legally permissible to facilitate development under a deemed grant of planning permission¹⁸⁹. The impact on veteran and other trees would be in accordance with NPPF paragraph 193(c) and Local Plan policies¹⁹⁰.

BNG

- 10.86 The Scheme would deliver at least 10% BNG, secured by a condition¹⁹¹, with an aspiration for greater gain, but even 10% makes the Scheme acceptable and delivers a benefit which should be afforded significant weight. The applicant is committed to delivering that level of BNG in line with the Biodiversity Supplementary Planning Document¹⁹² (SPD), even though it is not a statutory requirement¹⁹³, and this would accord with NPPF paragraph 187(d) which does not specify any particular level of BNG to be achieved.
- 10.87 The initial BNG metric is provisional. The proposed BNG planning condition would require a revised metric and this would ensure that it accurately reflects the detailed design of the busway and that any omissions in the initial metric, such as individual trees in Coton Orchard, are accounted for. This means that even if Mr Woodfield's criticisms are correct, including habitat classification at Coton Orchard (see 10.78 above), they are inconsequential.
- 10.88 Given its size, the availability of all required habitat and hedgerow biodiversity units and being within the Applicant's ownership, the Lower Valley Farm site could provide enough units even for Mr Woodfield's pessimistic assessment (which the Applicant does not accept), with the CCiC owned Sheep's Green scheme providing water course units. There is no risk that Sheep's Green units will be used up by other projects as it will be prioritised for GCP schemes and units only released if at least 20% BNG has been attained¹⁹⁴. As the sites are owned by the County and City Councils there is no need for legal agreements.
- 10.89 Mr Woodfield's calculations were not a fair and objective assessment of the Scheme overall as he only considered a snapshot of the Scheme at the off-road component around Coton¹⁹⁵ which omitted components of on-site

¹⁸⁹ Regulation 14(1)(a)(vii) of the Town and Country Planning (Tree Preservation) (England) Regulations 2012.

¹⁹⁰ CLP Policy 71 and SCLP Policy NH/7.

¹⁹¹ Suggested condition 15 ([CD29-96](#)).

¹⁹² Greater Cambridge Shared Planning Biodiversity SPD, February 2022, para 5.5.21, p46 ([CD 7-12](#)).

¹⁹³ The relevant provisions of the Environment Act 2021 (EA2021) (which inserted Schedule 7A into the TCPA1990) have not been brought into force for cases where planning permission would be deemed to be granted under s90 of the TCPA1990 such as this application, and any consent would therefore not be subject to the statutory condition in para 13(2) of Schedule 7A TCPA1990; see the transitional provisions in regulation 2 of the EA2021 (Commencement No.8 and Transitional Provisions) Regulations 2024 ([CD5-23](#)).

¹⁹⁴ See GCP Infrastructure Programme Biodiversity Net Gain Approach report and decision summary, November 2025 ([CD 29-93-1](#) and [CD 29-93-2](#)).

¹⁹⁵ Mr Woodfield's PoE, para 5.3.2, p on PDF p26 ([CD26-10-W4-1](#)).

compensation elsewhere such as at Scotland Farm¹⁹⁶.

- 10.90 Contrary to Mr Woodfield's argument, the Applicant's bat witness, Ms Reason was clear that there was sufficient habitat within and beyond the Scheme to maintain the favourable conservation status of the bat population even in the absence of mitigation¹⁹⁷. The Scheme would create an on-site uplift in barbastelle bat foraging habitat (from 25ha to 37ha)¹⁹⁸ and there is no difficulty relying on this planting for both the BNG calculation and bat foraging habitat, as there is no requirement for a protected species licence in this case. Along with other methodological difficulties, overall Mr Woodfield's approach incorrectly inflated the habitat units required.
- 10.91 Even if the required biodiversity units could not be found offsite, BNG can still be delivered in accordance with the proposed condition by purchasing biodiversity credits, the cost of which Scheme contingencies could cover, thus in all scenarios according with local and national policy¹⁹⁹.

Carbon - benefits

- 10.92 Based on the latest F-series traffic model and recent data from the May 2025 TAG data book, the Scheme would have a beneficial net carbon impact with a carbon saving of 7,055 tonnes of CO₂ equivalent (tCO₂e)²⁰⁰, and even on the more recent alternative methodology²⁰¹ there is still a benefit. This is a benefit which should be afforded limited positive weight²⁰².

Carbon – extrapolation of data for appraisal years beyond 2050

- 10.93 Guidance for calculation of carbon impacts in this case is the recent and up-to-date Local Transport Quantifiable Carbon Guidance²⁰³ (QCG). The Applicant's environmental impact witness, Mr Saunders correctly adopted its default approach at paragraph 7.46 where *data for appraisal beyond 2050 can be held constant up to the end of the assessment period (extrapolated horizontally)* rather than its alternative approach (which was only added to the latest version of the QCG after Mr Saunders' assessment), where *the annual change between the final two modelled years could be applied beyond the final modelled year if considered appropriate*.
- 10.94 Using the alternative approach would extrapolate electric vehicle uptake to the impossible position of over 100% at the end of the assessment period, and in the expert judgement of Mr Saunders this approach was not appropriate. There need to be strong reasons to depart from guidance, particularly in this case as the QCG is a government publication from August

¹⁹⁶ Description of landscaping in Design and Access Statement, p44 ([CD 1-17](#)).

¹⁹⁷ Ms Reason's PoE para 7.4.1, p23 ([CD26-01-APP-W12-1](#)).

¹⁹⁸ Appendices to Ms Reason's POE, Appendix 3.2 p12 (PDF 43) ([CD26-01-APP-W12-2](#)), and also Mr Whitby XiC.

¹⁹⁹ NPPF para 187(a) and 193(a), SCLP Policy NH/4 and the Greater Cambridge Biodiversity SPD.

²⁰⁰ See Column 4 in Table 1 of the Carbon Assessment Update in Appendix C to Mr Saunders' PoE, p19 ([CD26-01-APP-W3-2](#)).

²⁰¹ See final column in Table 3 in Applicant's Carbon assessment responses Technical Note, WSP, October 2025 (Carbon assessment responses TN), p13 ([CD 29-63](#)).

²⁰² Climate and Greenhouse Gas Benefits entry in benefits and harms summary table in Mr Sensecall's Supplementary Note, p15 ([CD 29-62](#)).

²⁰³ Scheme level simple demand forecasting section Local Transport Quantifiable Carbon Guidance, DfT, August 2025 (QCG) pp76–79 ([CD8-41](#)).

2025, since when no material changes in circumstances have occurred.

- 10.95 CPPF & CPC's carbon witness's²⁰⁴, Professor Hirst's, challenge to the Applicant's carbon saving figure concerned how post-2050 data had been extrapolated. Her approach was based on the QCG strategic planning stage section dealing with the estimation of *current and future emissions at an area-wide level without intervention*²⁰⁵. However, as set out in the scheme development stage section of the QCG, the busway project requires a site-specific assessment with intervention, and not an area wide assessment without intervention which is of no assistance.
- 10.96 As well as relying on other inappropriate sections of the QCG, her use of the DfT's common analytical scenarios (CAS) conflicts with the QCG which requires the TAG data book to be used²⁰⁶ as CAS presents many different scenarios of varying probability. Relying on the 2030 ban on the sale of combustion vehicles to support using CAS is an error because the TAG data book takes this into account²⁰⁷. Professor Hirst's application of CAS in a straight line until 100% electric vehicle use is reached and then extrapolating it horizontally thereafter is an approach in direct conflict with the example in the QCG²⁰⁸.

Carbon - date of the TAG data book used for the original ES assessment

- 10.97 Professor Hirst has misunderstood the nature of carbon assessment modelling where difficulties with realism are inherent when projecting so far into the future. Rather, it is important to use the most appropriate forecast which is directly relevant to the project. Professor Hirst did not identify an alternative appropriate methodology, and her approach was directly contrary to the QCG without good reason. On the other hand, the Applicant provided information which satisfies the legal requirements of the ES with the methodology in the QCG, representing current knowledge and methods of assessment according with AOP Rule 11(2)(b).
- 10.98 Even if there were an error in the ES arising from whether or not the correct TAG data book was used to inform it, Mr Saunders presented an up-to-date assessment using the May 2025 TAG data book²⁰⁹. Calculations in the ES would not materially differ had the November 2022 TAG data book been used²¹⁰ and the same conclusion of a minor beneficial effect would result.
- 10.99 Professor Hirst asserted that the November 2022 TAG data book should have been used with the E-Series traffic model. The initial carbon assessment in the ES used the E-series traffic model. However, if an updating process had been undertaken, then that process would not have

²⁰⁴ Prof Hirst's evidence was not impartial expert evidence from a professional witness and she is not an expert in the assessment of project level carbon emissions; closing submissions of Mr Cameron KC and Mr Henderson, para 225 ([CD29-124](#)).

²⁰⁵ See para 11 of Professor Hirst's Response to WSP "Carbon assessment responses 14/10/2025" note ([CD29-66](#)) relying on para 3.25 of the QCG which is in the Estimating current and future emissions at an area-wide level without intervention section.

²⁰⁶ QCG para 7.41 and especially 7.46, p78 ([CD8-41](#)).

²⁰⁷ TAG data book may 2025 at A1.3.9, see Note 2 ([CD 8-42](#)).

²⁰⁸ QCG Figure 7-2, p79 ([CD8-41](#)).

²⁰⁹ See Column 4 (Difference between May 2023 assessment and updated assessment using 2025 TAG data book) in Table 1 of the Carbon Assessment Update in Appendix C to Mr Saunders' PoE, p19 ([CD26-01-APP-W3-2](#)).

²¹⁰ Carbon assessment responses, para 34, p7 ([CD 29-63](#)).

artificially constrained itself only to one component of the carbon assessment. Rather, it would have also used the F-series traffic model, consistently with the other later assessments within the ES²¹¹ and there would have been no material change²¹². Suggesting that only a partial update would have been carried out, as CPPF & CPC did²¹³, is unrealistic.

- 10.100 Mr Saunders explained in cross examination that the TAG data book which was right at the time was used for the carbon assessment in the ES and that there were no subsequent material changes.
- 10.101 The Carbon assessment responses note²¹⁴ explained: that it would not have been proportionate in the circumstances to use the November 2022 TAG data book; that traffic modelling derived user emissions were not updated on the basis of proportionality; and, using the Forthcoming Changes version of TAG data in advance of the actual updates to the TAG data book is not good practice.
- 10.102 The Applicant's approach to proportionality accords with the principles in the TAG Proportionate Update Process guidance²¹⁵. This explains that the publishing of Forthcoming Changes to TAG is to give certainty to scheme promoters to plan work on implementing changes. However, it does not require those changes to be adopted, rather a step which should be taken only if it is considered appropriate to do so. The decision as to whether an assessment should be updated as a result of TAG data book changes is a decision for the promoter, based on the principle of proportionality with a scheme specific assessment required.
- 10.103 The Guidance indicates that the case not to adopt the latest evidence would be stronger if certain circumstances can be shown. These include in this case: that the changes were not material to the decision at hand; if the risk of successful legal challenge is low; and, there is no, or only a very low, risk of damage to the reputation of the analysis because the reasons for not updating are easily understood and it is a matter that has no material effect. The decision not to update the carbon assessment was correct.
- 10.104 Even if the busway were to be a net emitter of carbon, it is a strategic fit with relevant local transport policy²¹⁶, and that policy is itself focussed on decarbonisation²¹⁷, circumstances where the QCG indicates that a net emitting scheme can be acceptable²¹⁸. Furthermore, the National Networks National Policy Statement (NNNPS)-is a material consideration and expressly refers to TWA1992 applications²¹⁹, the materiality in this case is particularly apparent because specific provision is made in respect of roads

²¹¹ The TA in the ES was based on the F series model; see para 5.2.1, p27 ([CD 1-25.01](#)).

²¹² Applicant's Carbon assessment response Technical Note, para 34, p7, and also see Column 3 (Updated assessment using TAG [November] 2022) in Table 1, Appendix C to Mr Saunders' PoE, p19 ([CD26-01-APP-W3-2](#)).

²¹³ Mr Parker's closing submissions, para 49 ([CD29-122](#)).

²¹⁴ Carbon assessment responses TN, para 8, 33 and 32, pp2 & 7([CD 29-63](#)).

²¹⁵ *ibid.*, para 1.2.3, 1.3.1, 1.3.2 and 1.3.4, p 32.

²¹⁶ As explained by Mr Baker in his POE ([CD26-01-APP-W1-1](#)) and as Mr Littlewood accepted in XX.

²¹⁷ CPCA Local Transport and Connectivity Plan, CPCA ([CD6-09](#)) at p6 (see penultimate item in ticked list), p7 (see final bullet point) and p9 (first two paragraphs under heading 'Reduce Environmental Impacts').

²¹⁸ QCG para 8.24, p57 ([CD8-41](#)), if the scheme is a 'strategic fit' with 'the outcomes identified as necessary to decarbonise local transport'.

²¹⁹ ([CD8-09](#)) para 1.9, p8, see also the NPPF para 5.

and buses as a form of public transport²²⁰. The NNNPS provides that the approval of schemes with residual carbon emissions is allowable and can be consistent with meeting net zero where emissions would not have a material impact on the ability of the government to achieve its statutory carbon budgets²²¹.

10.105 In this case, as accepted by Mr Littlewood in cross examination, even the worst-case carbon emissions from the Scheme (31,754 tCO₂e, being 0.0016% of the 4th Carbon Budget)²²² would not have such a material impact. This is a real-world approach, recognising that some schemes which may be highly beneficial, but for instance have high embodied carbon in construction and therefore remain a net emitter, should not be rejected out of hand, rather a balanced approach has to be taken. The Scheme complies with national and local policies in this respect²²³.

Heritage assets

10.106 The ES and accompanying Heritage Statement, ES-A2, ES-A3 and the Applicant's heritage witness's, Mr Wilson's evidence, present a comprehensive assessment of the Scheme's impacts on heritage assets, including those where there would be harm²²⁴. In all those cases it would be at the low end of the spectrum of less than substantial harm. There would be no change or harm to the Conduit Head Conservation Area²²⁵ [6.4].

10.107 Given the separation distances, the intervening vegetation and buildings, and the topographical change, the proposed busway would not harm the significance of either the RPG or the listed building at the American Military Cemetery, nor the nearby grade II* listed Madingley Mill.

10.108 There would be harm to the significance of the Grade II* listed Clare Hall (the Erskine Building²²⁶) only as a result of changes in its setting, an assessment that Historic England agreed with (see 18.6 below). Historic England subsequently sought clarity about the Scheme's interface with the Erskine Building along Rifle Range Road. Mr Wilson confirmed²²⁷ that the busway would not affect the physical fabric of the Erskine Building's canal (drainage conduit) features, including both the original feature that is outside of the Order Limits and the later part that is within the Limits, leaving no matters of concern outstanding with Historic England.

10.109 There would be less than substantial harm to the significance of:

- Elmside (grade II listed)
- 48 Grange Road (II)

²²⁰ *ibid.*, para 2.7, p12.

²²¹ *ibid.*, para 5.42, p63.

²²² ES Technical Report 6: Greenhouse Gases Table TR06-5-4, p14 (CD 1-11.06).

²²³ NPPF para 164 to 166, CLP Policy 29 and SCLP Policies CC/1 and CC/3.

²²⁴ ES Technical Report 7: Heritage and Archaeology (including Historic Environment Desk Based Assessment), ES Appendix TR7.1: Heritage Statement (CD1-11.07.02) with harm to additional assets identified in Mr Wilson's PoE (CD26-01-APP-W2-1). Also, the West Cambridge Conservation Area Appraisal, 2011 (CD18-03).

²²⁵ ES-A3 Para 6.1.12, p35 and Appendix 2, PDF 52 to 54 (CD29-86).

²²⁶ To avoid confusion in this report; an informal name to differentiate the designated heritage asset recorded as *Clare Hall, University of Cambridge* on the National Heritage List, from Clare Hall, the Cambridge University college and the college grounds within which it is situated along with a number of other college buildings.

²²⁷ Mr Wilson's PoE para 6.4.1 to 6.4.19, pp69 to 72 (CD26-01-APP-W2-1).

- Schlumberger Gould Research Centre (II*)
- West Cambridge Conservation Area
- Coton Conservation Area

Other designated heritage assets would not be harmed. There would be minor harm by way of effects to the settings of non-designated heritage assets known as former lodges to Childerley Hall and Leslie Barnet House (5A and 5B Herschel Road).

10.110 The ES identifies seven groups of archaeological assets where there is the potential for major adverse, and therefore significant, effects²²⁸. However, with the proposed mitigation of investigation and recording, the ES considers that there would be a negligible residual effect²²⁹.

10.111 The less than substantial harm to designated heritage assets would be outweighed by the Scheme's benefits, a situation that would remain even if the extent of harm to the Erskine Building were to be greater than Mr Wilson considered.

Landscape

10.112 The Applicant's landscape and visual impact assessment²³⁰ (LVIA) predicts that there would be no significant effects on landscape character at Year 15, with only one out of the 37 visual receptors assessed (R19 – users of public right of way (PROW) 55/2) predicted to experience a significant effect, which would be a local one confined to around 700m of the PROW between Coton School and Madingley Road²³¹. Effects would be mitigated both during construction by way of the Code of Construction Practice (CoCP) and Local Environmental Management Plan (LEMP), and during its operation through the design of the busway and its landscaping²³². The technical assessment in the LVIA is robust and correct, confirming that landscape and visual impacts would be acceptable and accord with local and national planning policy²³³.

10.113 Mr Littlewood disagreed with some aspects of the LVIA, but he confirmed that he was not a landscape architect and did not challenge the LVIA's methodology, accepting that it was consistent with GLVIA 3²³⁴. Although objecting to the low sensitivity the LVIA gave to the landscape around Coton, he accepted in cross examination that this low value was consistent with, and a correct application of, the LVIA²³⁵. In light of the methodology on magnitude used in the LVIA, he accepted that it was applicable to areas of any size²³⁶ whereas he had originally criticised the use of landscape character areas as a landscape receptor given their size and what he

²²⁸ Listed in Table 9-1 of the ES, [CD1-10.01](#)).

²²⁹ ES Appendix TR7.1: Heritage Statement, p 99 ([CD1-11.07.02](#)).

²³⁰ ES Technical Report 8: Landscape ([CD1-11.08.01](#)), this includes reference to the Greater Cambridge Landscape Character Assessment, Chris Blandford Associates, 2021 ([CD18-02](#)).

²³¹ Mr Carolan's PoE para 4.4.11, p8 ([CD26-01-APP-W5-1](#)).

²³² *ibid.*, para 4.3.1 to 4.3.9, pp6 & 7.

²³³ NPPF para 131, 136 and 153, CLP Policies 8, 34, 55, 56, 57 and 59 and SCLP Policies SC/9, HQ/1, HQ/2, NH/2, NH/13 and CC/6.

²³⁴ Guidelines for Landscape and Visual Impact Assessment 3rd ed., 2013 ([CD18-22](#)).

²³⁵ ES Appendix TR8.1: Landscape and Visual Assessment Methodology, Table TR8.1-2-1, p4 ([CD1-11.08.2](#)).

²³⁶ *ibid.*, Table TR8.1-3-1, p10, for example see the bullet points in "high" which are not dependent on geographical extent.

alleged was a consequential diminution in magnitude of effect.

- 10.114 Mr Littlewood's contention that the busway would appear very obvious and discordant in the landscape in views from Red Meadow Hill²³⁷ was not an opinion based on a transparent methodology, in conflict with GLVIA 3 (p62). With reference to the photomontages²³⁸, he confirmed that a viewer would be unable to see the road.

Green Belt

- 10.115 Although the Scheme would be a local transport infrastructure which can demonstrate a requirement for a Green Belt location, there would be some harm to the openness of, and the purposes of including land within, the Green Belt, and consequently there would not be an exception under NPPF paragraph 154. The Scheme would therefore be inappropriate development in the Green Belt. However, impacts on the openness and purposes of including land within the Green Belt (including the Cambridge specific Green Belt purposes) would be moderate at worst, even on a precautionary 'parcel by parcel' assessment²³⁹, and much reduced when considered in a more orthodox approach against the Green Belt as a whole. Very special circumstances would exist because the harm to the Green Belt and other harm arising from the busway would be clearly outweighed by other considerations, consequently complying with national and local Green Belt policy²⁴⁰ (see 10.192 below).
- 10.116 At a strategic level the Scheme would assist in protecting the Green Belt by supporting existing and emerging local plan strategies which allocate land for development largely beyond the Green Belt²⁴¹. For this strategy to succeed, people must be able to move between homes beyond the Green Belt, including Cambourne to places of work in the City, something the Scheme would directly facilitate in a sustainable way.
- 10.117 Any future development proposed in the Green Belt would be subject to a separate development management process, meaning that there would be no direct relationship between the busway and future inappropriate development in the Green Belt which some objectors are concerned about. By facilitating development beyond the Green Belt to provide a sufficient supply of land to meet the area's needs, the busway is likely to make it easier for the local planning authorities to resist development within the Green Belt.
- 10.118 Any public transport scheme to connect Cambourne and Cambridge in an efficient way needs to traverse the Green Belt at some point and there is no alternative which would avoid it, including CPPF & CPC's. That such public transport improvements are required by adopted and emerging development plan policies illustrates why this issue is not unsurmountable, and why the very special circumstances balance lies in favour of the

²³⁷ Mr Littlewood's PoE, para 7.22, p19 ([CD26-10-W1-1](#)).

²³⁸ ES Technical Report 8, Appendix TR8.3, Landscape and Visual Photomontages, Fig 8.6, View 22, pp14-15 ([CD1-11.08.4](#)).

²³⁹ Confined to two parcels, one including the Travel Hub and the other on the outskirts of the City; Green Belt Assessment, Table 8-1, pp55-56 ([CD1-18](#)).

²⁴⁰ NPPF para 153, CLP Policy 4 and SCLP Policy S/4.

²⁴¹ Mr Kelly XiC and SCLP Fig on p9 and para 2.45 to 2.48, p31 ([CD6-02](#)).

Scheme (see 10.192 below).

Flooding

- 10.119 The Scheme would not give rise to any significant flood risk effects, and any adverse effects would be negligible. The Flood Risk Assessment²⁴² (FRA) identified potential impacts in three areas: smaller watercourse crossings; increased surface water runoff; and the proposed Bin Brook crossing. A small area in the eastern extent of the Order Limits is located within Flood Zone 3. Assessment has shown that the crossings of smaller watercourses would not result in any increased flood risk; and that there would be no increase in surface water flood risk to the surrounding areas or the busway itself. Mr Sadler's concerns about land drainage would not result in increased flood risk and the ES concludes that there would be a neutral effect on land drains²⁴³. In practical terms, there would be swales and drainage features installed on both sides of the busway where it would cross the Sadlers' land²⁴⁴.
- 10.120 The Applicant has undertaken extensive modelling of potential effects on Bin Brook which has been reviewed by the Environment Agency over more than two years, resulting in the Agency withdrawing its objection (see 18.3 below) and concluding that the Applicant's model is appropriate and sufficiently robust to support the FRA in meeting the NPPF requirements on flood risk. The Agency's advice should be given significant weight and there is no cogent reason for it not to be followed.
- 10.121 The modelling confirms that the Scheme would result in only very minor increases in the extent of flooding²⁴⁵. There would be minimal changes in flood depth, a minimal (0.8%) increase in flood depth in channel and a similar pattern of out of bank maximum modelled water level within the Order Limits. Outside of the Order Limits there would be minimal reductions in flood depth in areas that are already inundated. Consequently, the Applicant has demonstrated that the busway would be safe for its lifetime and would not increase flood risk elsewhere, including for residents of the Gough Way estate, circumstances that mean that the sequential test does not need to be applied in light of recent changes to the PPG²⁴⁶.
- 10.122 Even if the sequential test did apply, it would be passed as there is no sequentially preferable alternative at the eastern end of the proposed route. An alternative route on Adams Road would pass through areas at the same risk of flooding as the Scheme route would, on the corners of Adams and Grange Roads and further west, immediately to the south of Charles Babbage Road²⁴⁷.
- 10.123 As the Scheme would provide wider sustainability benefits to the community that would outweigh the flood risk, including by way of improved travel by sustainable modes and as a result of a modal shift in transport choices, the

²⁴² ES Appendix TR13.1: Flood Risk Assessment, October 2024, para 5.1.1, 5.4.2 and 5.6.1, pp35 and 39 ([CD1-11.13.02](#)).

²⁴³ ES Technical Report 13: Water Table TR13-5-2, p18 ([CD 1-11.13.01](#)).

²⁴⁴ Proposed Site Plans, Sheet 11 ([CD1-16.04a](#)).

²⁴⁵ Mr Southon's PoE, para 3.3.5, 3.3.6 and 3.3.7, pp11-12 ([CD26-01-APP-W9-1](#)).

²⁴⁶ Mr Sensecall's Supplementary Note, para 5.33, p12 ([CD 29-62](#)).

²⁴⁷ Mr Southon's Rebuttal PoE, pp10 & 11 ([CD26-01-APP-W9-4](#)).

exception test is satisfied. Consequently, the Scheme would be acceptable and accord with local and national planning policy on flooding²⁴⁸.

Noise and vibration

- 10.124 Through the ES and the Applicant's noise witness's, Mr Lewis', evidence²⁴⁹, a robust and precautionary assessment has been presented concluding that there may be significant effects during construction at three locations (three dwellings adjacent to the travel hub on Scotland Road, a dwelling adjacent to the A428, and two properties at Clare Hall on Hershel Road closest to the location of the proposed Bin Brook bridge). However, this is a worst case scenario with multiple levels of in-built precaution, particularly that baseline monitoring was conducted in areas considered representative of the lowest sound levels that would occur and that the construction assessment assumed unrealistically prolonged and intense periods of activity. Mitigation would be secured through the CoCP and the LEMP.
- 10.125 All operational effects would be below both the Lowest Observed Adverse Effect Level (LOAEL) and the Significant Observed Adverse Effect Level (SOAEL), an outcome that would be secured by a proposed condition to restrict bus movements at certain times. Consequently, there would be no adverse effects for the purposes of NPPF paragraph 198 and noise effects would be acceptable in respect of local and national planning policy²⁵⁰.
- 10.126 The ES reports no significant vibration effects to residential occupiers being expected from construction, but vibration-sensitive equipment in a number of University facilities could be affected, requiring a more detailed assessment when a construction programme is produced²⁵¹.

Air quality

- 10.127 The Scheme would not give rise to any significant effects during construction (dust, PM_{2.5}, PM₁₀ and NO₂) or during operation (NO₂, PM_{2.5} and PM₁₀)²⁵². Although construction impacts would be adverse, the ES concludes that the effects would be negligible, short-medium term, temporary and not significant, even on a cumulative basis²⁵³.
- 10.128 Operational effects would be mixed, with both beneficial and harmful effects, but overall would be beneficial with three times as many receptors experiencing a decrease in concentrations of NO₂, PM_{2.5} and PM₁₀ as those who would experience an increase, when comparing scenarios with and without the Scheme²⁵⁴. This overall beneficial effect would be as a direct consequence of the busway, and in particular as a result of modal shift. It would not be a result of other, unrelated, changes such as in fleet

²⁴⁸ NPPF para 173 to 175 and 178–179, CLP Policy 32, SCLP Policies CC/4, CC/7, CC/8 and CC/9, and Cambridgeshire Flood and Water SPD, 2018 ([CD 7-14](#)).

²⁴⁹ ES Technical Report 1: Acoustics ([CD1-11.01](#)), and Mr T Lewis's PoE ([CD26-01-APP-W11-1](#)), Appendices ([CD26-01-APP-W11-2](#)) and Rebuttal PoE ([CD26-01-APP-W11-4](#)).

²⁵⁰ NPPF para 187 and 198, Noise Policy Statement for England ([CD15-06](#)), CLP Policy 35 and SCLP Policy SC/10.

²⁵¹ ES Technical Report 1: Acoustics, para 5.2.3, 5.2.5 and 6.1.3, pp14 and 29 ([CD1-11.01](#)).

²⁵² Mr Saunders' PoE, para 6.2.6, p26 ([CD26-01-APP-W3-1](#)).

²⁵³ ES Technical Report 2: Air Quality para 5.1.26 and 5.3.11, pp23 &26 ([CD1-11.02](#)).

²⁵⁴ Mr Saunders' PoE, para 6.2.8, p26 ([CD26-01-APP-W3-1](#)) and ES Technical Report 2: Air Quality para 6.1.4, p27 ([CD1-11.02](#)).

composition²⁵⁵.

10.129 Particular concerns of residents (see 10.133 below) do not change the position and are not based on any technical evidence which contradicts the ES. Overall, the Scheme would deliver an air quality benefit, a consideration to which substantial weight should be afforded, and air quality effects would be acceptable having regard to local and national planning policy²⁵⁶.

Pedestrians, cyclists and motorists

10.130 The Applicant's survey of public footpath (FP) 55/2²⁵⁷ running between Coton and Madingley Road shows very low levels of usage in June (when walking is most attractive, but still term time) with most of this use at the weekend, and objectively it cannot be considered as well used. There would be no impact on school children, if any use the route, particularly having regard to the provision of an at grade crossing²⁵⁸ and the future safety process²⁵⁹ which would be carried out.

10.131 The TA did not identify any unacceptable adverse effect on the junction of Cambridge Road and Madingley Road²⁶⁰, nor on any of the junctions within Coton. Proposed bus stops in residential locations, such as Cambourne, Bourn Airfield and Hardwick, would mean that local residents could access the busway more easily there than by driving to Coton. The proposed P&R facility would have ample car parking. Consequently, concerns about antisocial parking are unrealistic.

Ashcroft Veterinary Practice

10.132 The Applicant has proposed a solution²⁶¹ which would allow a layby to be provided on St Neots Road to facilitate deliveries to Ashcroft Vets which, along with other measures, was confirmed as overcoming their objections (see 17.32 below). The solution can be delivered without making changes to the Order²⁶².

Local residents

10.133 The principal risk relating to a resident's specific concern about the impact of dust and emissions to air on health (see 17.46 below), would be during the construction stage. The resident has been considered as a receptor²⁶³ as their property lies within the coverage of the Applicant's dust risk assessment which considers all human receptors within 350m of the Order Limits²⁶⁴. Their property falls entirely within this assessment area. Three

²⁵⁵ ES Technical Report 2: Air Quality para 3.2.5 and 6.1.4, pp 11 & 27 ([CD1-11.02](#)), the assessment is a do nothing versus do something comparison in the same modelled year (2041), thus isolating the effect of the Busway.

²⁵⁶ NPPF para 198 and 199, CLP Policy 36 and SCLP Policy SC/12.

²⁵⁷ Appendix A to Mr Saunders' PoE, pp3-14 ([CD26-01-APP-W3-2](#)).

²⁵⁸ Proposed Site Plans, Sheet 12 ([CD1-16.04a](#)).

²⁵⁹ Under the Railways and Other Guided Transport Systems Regulations ([CD5-19](#)), see Mr Lonergan's PoE, Sections 5.9 and 5.10 pp14-16 ([CD26-01-APP-W8-1](#)).

²⁶⁰ TA, p14 ([CD1-25.01](#)).

²⁶¹ Letter from GCP to Ashcroft Veterinary Practice, 20 October 2025 ([CD29-69](#)).

²⁶² Note on Ashcroft Veterinary Practice, removal of National Highways plots, Work No1 and implications for the Order and application documents, section 1 ([CD29-118](#)).

²⁶³ Mr Saunders RX.

²⁶⁴ ES Technical Report 2: Air Quality para 3.1.6, p9 and Appendix L, Figure 1: Construction Dust Assessment (PDF 106) ([CD1-11.02](#)).

receptor locations close to their property were included in a modelled assessment of air emissions²⁶⁵. The dust risk assessment identified only a low risk to human health, and the modelled assessment identified only a negligible impact²⁶⁶, neither of which are significant.

10.134 There would be a future specific risk assessment for their property.

Mitigation would be secured by way of conditions providing for:

- the CoCP securing all the mitigation measures in the ES;
- the LEMP, components of which would include monitoring by qualified environmental management staff in respect of soil stripping specifically and air quality more generally²⁶⁷; and,
- if the local planning authorities consider it necessary, there would be control over the location of the haul road such that a location to the south of the Order Land, and therefore more than 100m from their property, could be secured.

10.135 Although relied on in the resident's representations, the Applicant does not consider that the provisions of the Equality Act 2010 (EA2010) apply to either the decision-maker or to the Applicant as promoter (as distinct from the Applicant as operator) in this case. The Applicant reserves its position as to whether the resident falls within the remit of s6 of the EA2010.

10.136 Nevertheless, assuming that both the duties in s20 of the EA2010 apply and that the resident falls within the scope of s6 of the EA2010, a decision to make the order and to issue a direction granting planning permission would in any case comply with all three components of the duty to make reasonable adjustments under s20(3),(4) and (5) of the EA2010. This would be for the following reasons:

- S20(3) - There is no provision, criterion or practice which puts the resident at a substantial disadvantage in relation to the busway in comparison with a person who is not disabled; there would be no unacceptable adverse impacts for any human receptors, including the resident;
- S20(4) - The resident's concern is about dust and emissions, not any physical feature for the purposes of this provision, and as such there is compliance with this duty; and,
- S20(5) - The resident's concern is not about the provision of auxiliary aids, and as such there is compliance with this duty.

Therefore, even if a duty to make reasonable adjustments arose, that duty has been complied with in this case.

The Sadlers

10.137 Mr R Sadler asserted²⁶⁸ that the public sector equality duty (PSED) under s149 of the EA2010 placed a duty on the Applicant to engage with a disabled landowner and that the Applicant was in breach of that duty. However, s149 imposes a duty *to have regard*, not a duty to consult or a duty to achieve a particular outcome.

²⁶⁵ *ibid.*, p108.

²⁶⁶ *ibid.*, Table TR2.5.3, p22 and para 5.1.26, p23.

²⁶⁷ CoCP, para 4.4.1, p17 and para 5.2.1, p22 ([CD1-26](#)).

²⁶⁸ Mr R Sadler's closing submissions, section6, p4 ([CD29-121](#)).

10.138 Further, not only were GCP aware of the family member's disability, they consulted appropriately with Mr R Sadler, his brother and their appointed agents, acting on behalf of the disabled family member. The Applicant's property witness's, Mr Franklin's, evidence expressly refers to revised design drawings which included crossing points designed to comply with disability access standards²⁶⁹. This shows GCP's awareness of the family member's disability during interactions. Therefore, the PSED has been complied with.

Conclusion on local residents, pedestrians, cyclists and motorists

10.139 The busway would generally deliver benefits to local residents, pedestrians, cyclists and motorists through the transport, and wider, benefits that would be delivered.

EWR

10.140 Given that EWR Ltd now propose a tunnel (see 18.56 below) thereby avoiding any risk of conflict with the route and have withdrawn their objection, effects on safeguarded land are no longer a matter of concern and the Scheme would have no adverse impact on EWR. EWR Ltd support the principle of the Scheme and see it as being aligned with the objectives of EWR. It is clear from EWR Ltd's position and from the emerging Local Plan that the Scheme and EWR are complementary projects.

Water Framework Directive (WFD)

10.141 The Applicant's position is:

- A scoping and screening exercise²⁷⁰ concluded that two surface water bodies had the potential to be affected by the Scheme, the Bin Brook and the Old West River.
- Regarding those potential effects, the Environment Agency²⁷¹ and the Applicant agreed that these risks can be designed out during the detailed design stage which would be ensured as the Environment Agency would require compliance with the WFD through the Flood Risk Activity Permit application required for the works near to these two surface water bodies²⁷².
- This agreement would be secured as a result of the detailed design being subject to approval under two proposed conditions, with the Applicant also content with a new condition to ensure that the detailed design provides compliance with the WFD²⁷³.
- These principles are of particular importance for large scale infrastructure which is subject to EIA, such as the Scheme, because planning permission for these schemes can lawfully be granted at a

²⁶⁹ Mr Franklin's Rebuttal PoE, para 2.5, p4 ([CD26-01-APP-W7-4](#)) and Appendices to Mr Franklin's Rebuttal PoE, pp62 and 72 ([CD26-01-APP-W7-5](#)).

²⁷⁰ ES Technical Report 13, Appendix TR13.2 - Water Framework Directive Screening and Scoping Assessment ([CD1-11.13.03](#)).

²⁷¹ Statement of common ground between Environment Agency and CCC, Table 2.1.1, p2, entry for 11/04/2023 ([CD29-77](#)).

²⁷² WFD Screening and Scoping Assessment, para 4.1.1, p21 ([CD1-11.13.03](#)).

²⁷³ Possible WFD condition, p6 [Inspectors' comments on CD-96 - Possible conditions in respect of request for a direction for deemed planning permission](#), 19 November 2025.

stage where the detailed design has not been completed²⁷⁴. In such a case the decision-maker can leave the detailed design, within approved parameters, to be addressed by a separate regulatory process.

- As the Flood Risk Activity Permit application process is a separate statutory process under the Environmental Permitting (England and Wales) Regulations 2016 to which the Gateshead line of authorities applies²⁷⁵, in this case:
 - The SoST is entitled to have regard to the Flood Risk Activity Permit application under the Permitting Regulations as a statutory regulatory regime outside of the planning system.
 - The SoST does not need to duplicate the control under that separate regime.
 - The SoST should assume that the Permitting Regulations and the Environment Agency will operate effectively, consistently with the agreement that has already been reached with the Applicant.

10.142 Consequently, in these circumstances, the SoS can be satisfied that there would be compliance with the WFD and, specifically, that there would be no adverse deterioration in either the Bin Brook or the Old West River surface water bodies.

Conclusion

10.143 The effects of the implementation, operation and maintenance of the Busway would be acceptable.

Statutory Undertakers, Statutory Utilities and Other Utility Providers

10.144 The Scheme would not have an adverse effect on statutory undertakers, statutory utilities or other utility providers, nor their ability to carry out their undertakings effectively, safely and in compliance with any statutory or contractual obligations²⁷⁶. Protective provisions have been incorporated into the Draft Order where necessary²⁷⁷, there are no objections from undertakers, and no substantive dispute on this matter.

Compulsory Purchase

Extent of land to be acquired

10.145 The limits of deviation shown on the works and land plans are sufficient to allow the construction of the busway along with essential components including the travel hub, maintenance track, bus stops, bridges and ancillary work for mitigation. In this case affected landowners have not tended to challenge the precise extent of land to be acquired, rather the dispute is whether or not there is a compelling case in the public interest for

²⁷⁴ R. (Associated Petroleum Terminals (Immingham) Limited) v Secretary of State for Transport [2025] EWHC 1992 (Admin), para 49 ([CD29-99](#)).

²⁷⁵ Gateshead Metropolitan Borough Council v Secretary of State for the Environment [1995] Env. L.R. 37, in particular pp49-50 ([CD29-98](#)).

²⁷⁶ Mr Lonergan's PoE, para 5.18, pp26-27 ([CD26-01-APP-W8-1](#)).

²⁷⁷ Schedule 12, pp72 to 113. Parts 1 and 2 deal with general provisions, Parts 3 to 9 providing for named undertakers ([CD1-02-0](#)).

the Scheme and in particular the route proposed.

*Plot 16-179*²⁷⁸

10.146 Acquisition of this parcel of land, comprising around 2.66ha of agricultural land, grassland and the river, bed and banks of Bin Brook to the west of Grange Road, in its entirety is necessary in order to provide flood storage capacity and to ensure that this capacity continues to be available, under the Applicant's control and safe from adverse land use or management changes. This is a proportionate approach in an area with a history of flooding.

Emergency and maintenance track

10.147 Objectors questioned whether the proposed emergency and maintenance access track can properly be considered as a matter ancillary to the construction or operation of the busway. This raises two issues; whether the inclusion of the track falls within the ambit of s1(1) of the TWA1992 and whether there is a compelling case in the public interest for compulsory acquisition of the land required to provide the busway running surface and the track.

10.148 S1(1) of the TWA1992 empowers the SoST to make an order relating to, or to matters ancillary to, the construction or operation of a transport system of specified kinds, including as proposed in the Order Scheme at (d) a system using a mode of guided transport²⁷⁹. This includes those systems which would be authorised by the Order which would be: road-based with sensor guidance; road-based with side guidance; track-based with sensor guidance; and, track-based with side guidance²⁸⁰.

10.149 It is envisaged that road-based sensor guidance would be used but the Order leaves open the possibility of the busway being track-based. A track-based system with side guidance requires an emergency and maintenance access track, as provided on the system currently in operation in and around Cambridge. Therefore, as the Order makes provision for track-based guidance, and it is accepted that an emergency and maintenance access track is required for such a system, there is no issue.

10.150 If, however, the above approach is not accepted, it is necessary to consider whether an emergency and maintenance access track would be ancillary to, and not whether it would be required or necessary for²⁸¹, a sensor-based busway proposal, although it would be both ancillary and necessary²⁸².

10.151 Maintenance and emergency vehicles support the provision of the bus service and there can be no doubt that a track to enable them to do so would be ancillary to the provision of a busway. Without the emergency and maintenance access track a reliable bus service cannot be provided as

²⁷⁸ Works and Land Plans, Sheet 17 ([CD1-12.01a](#)).

²⁷⁹ Prescribed by Article 2 of the Transport and Works (Guided Transport Modes) Order 1992, as amended ([CD5-15](#) and [CD5-16](#)).

²⁸⁰ See the definition of 'guided busway' in Article 2(1), p6 ([CD1-02-0](#)).

²⁸¹ CPPF & CPC SoC, para 7, p3 ([CD23-18-1](#)) and Mr Littlewood XX.

²⁸² Four main reasons are set out in Mr Lonergan's PoE, para 5.14.6 to 5.14.9 p21 ([CD26-01-APP-W8-1](#)), Mr Littlewood XX said he did not doubt reasons 1-3, Mr Lonergan XiC emphasised the need for a maintenance and emergency access track to ensure service reliability.

maintenance and emergency vehicles would have to use the same running surface as the buses, and therefore the track would also be necessary.

- 10.152 Assuming that it is accepted that a track would be ancillary to the provision of a busway, it then needs to be considered whether there is a compelling case in the public interest to justify compulsory acquisition of land to provide the busway and ancillary track. All the benefits which would be derived from the busway and track, including the active travel provision (for which CPPF & CPC says there is a need²⁸³), can be considered at that stage.

Compelling case in the public interest

- 10.153 There is widespread acceptance of the need to provide a reliable public transport service between Cambourne and Cambridge, and therefore it is clear that there is a compelling case in the public interest that a public transport scheme be provided. There is little or no dispute that the Order Scheme would meet the Scheme objectives and that agreed need. As there is no deliverable alternative scheme that could meet that need, there is a compelling case for the Scheme including the emergency and maintenance access track.

- 10.154 Notwithstanding the Applicant's case, even if it were found that there was an alternative route, and even if that alternative would serve equally well to achieve the desired purpose, it would still be necessary to apply the compulsory purchase order principles and consider other matters, including delay²⁸⁴. In doing so, there would still be a compelling case in the public interest to make the Order, given the delay that would occur if the Order were not made and the whole process of route selection had to start again. Such a delay may be as long as 10 years according to Mr Freeman, but even a 5 years delay would still be unacceptable given the pressing need to support the local plan strategy.

Remaining objections from statutory objectors

Ms Gazeley, Houston Crest Ltd and Coton Orchard Ltd (OBJ-52, 13)

- 10.155 If the Applicant's submissions are accepted, then there is a compelling case in the public interest to secure land in Coton Orchard to provide the busway. With the provision of a crossing point vehicles of a size used in an orchard would be able to cross the busway, thereby limiting impacts on fruit cultivation and management of the orchard. In this case, as with the other objectors below, Mr Franklin's PoE confirms that an invitation to negotiate is still open²⁸⁵.

J and WR Sadler (OBJ-102, 15)

- 10.156 The Applicant accepts that the initial engagement log²⁸⁶ was not accurate and that no draft heads of terms were sent in 2023²⁸⁷ which is regrettable.

²⁸³ As argued in Mr Littlewood's PoE, para 7.28, p21 ([CD26-10-W1-1](#)).

²⁸⁴ De Rothschild v Secretary of State for Transport (1989) 57 P&CR 330, p341 (PDF 12) ([CD5-40](#)).

²⁸⁵ Mr Franklin's PoE, para 6.12, 6.80, 6.99, 6.128 & 6.147 ([CD26-01-APP-W7-1](#)).

²⁸⁶ Appendices to Mr Franklin's PoE, Appendix J Sadler Engagement & Correspondence Log, p42 ([CD26-01-APP-W7-2](#)) and Appendices to Mr Franklin's Rebuttal PoE, Appendix A Engagement Log, pp4-17 ([CD26-01-APP-W7-5](#)).

²⁸⁷ Mr Franklin XiC.

In 2022 and 2023 the Applicant's agent engaged with the Sadlers' agent, and discussions included consideration of sale of land by private treaty²⁸⁸. Discussions continued until the Sadlers made their objection. The inaccuracy does not undermine the point that there was prolonged engagement with the Sadlers and there has been no failure to follow guidance on taking reasonable steps to purchase land by agreement.

10.157 Mr Franklin explained the steps taken to ascertain the position of the family burial site, with a surveyor visiting in July 2024 after the Sadler family provided two different references on different occasions²⁸⁹. The route proposed would avoid the burial site which the Applicant's survey identifies would be at the toe of the proposed embankment. It could be designed to avoid the location and appropriate treatment provided²⁹⁰, showing appropriate respect.

10.158 The proposed site plans²⁹¹ show that crossing points of about 6.1m (20') in width would be provided, allowing most vehicles to cross, but requiring the header on a combine harvester to be removed. However, that would be no different to when a combine harvester enters the highway from a field gate and the crossing provision would be adequate. If there were to be any adverse impact on farming practices, the appropriate remedy is in the application of the compensation code.

10.159 Reasonable steps were taken to attempt acquisition. It was Mr R Sadler and not the Applicant, who closed off the path to acquisition by agreement. Concerns relating to crossings and the burial site have been addressed. There is a compelling case in the public interest to acquire the Sadlers' land for the Scheme.

CPPF (OBJ-251, 12)

10.160 The argument for introducing a curved alignment over CPPF's land (10.72) was to improve farming viability, although Mr Franklin does not consider that it would do. Nevertheless, the appropriate remedy if there would be any adverse impact on farming practices lies in the application of the compensation code. There is no reason to modify the Order to introduce such a curve and there is no evidence that CPPF would not be able to use the land as a nature reserve in the future²⁹².

PX Land Ltd (OBJ-252, 14)

10.161 PX Land Ltd supports the Scheme overall and has no objections to the use of land for a proposed travel hub for which they are prepared to grant a lease²⁹³. It is agreed that the mechanism for resolving the dispute about the impact on drainage arising from survey work is the dispute resolution clause in the agreement between the parties. There is no objection to the provision

²⁸⁸ Email from CBRE to Bidwells, 5 May 2023 in Appendices to Mr Franklin's Rebuttal PoE, Appendix E – May 2023 Henry Church & Bidwells minutes, p361 ([CD26-01-APP-W7-5](#)).

²⁸⁹ Minutes of meeting 27 January 2020, and email from Mr R Sadler to H Church and W Gullett 14 May 2024 in Appendices to Mr Franklin's PoE, Appendix H Sadler Family Burial Location Correspondence, pp33 and 37 ([CD26-01-APP-W7-2](#)).

²⁹⁰ Mr Franklin XiC.

²⁹¹ Proposed Site Plans Sheets 11 and 12 ([CD1-16.04a](#)).

²⁹² Mr Parker's closing submission, para 59 ([CD29-122](#)).

²⁹³ Mr Peck XX.

of electric vehicle charging points on the P&R site, subject to appropriate negotiation and payment. These issues relate to compensation and/or access agreements.

- 10.162 In addressing their concerns, adequate mitigation to address the visual and noise intrusion of the Scheme on adjacent residential properties is proposed, in particular in the form of tree planting²⁹⁴ and there is no evidence to indicate that there would be any adverse noise intrusion. Mr Franklin's proof of evidence (para 6.143 to 6.147) demonstrates that reasonable steps were made to seek agreement for acquisition by negotiation, and PX Land Ltd's proposal of a structure in relation to a particular leasehold interest also demonstrates a material degree of engagement. This is sufficient to fulfil and satisfy paragraph 2.2 of the CPP Guidance ([CD8-28](#)).

The Spearing Family (OBJ-67, 18.30)

- 10.163 The Spearing Family's concerns about severance, and the wider compensation issues, are matters covered by the compensation code. Mr Franklin explained that provision has been made for access to the remaining parcels of land²⁹⁵.

The Jenkins Family (OBJ-68, 18.26)

- 10.164 The Jenkins Family do not object in principle to the Scheme but question the extent of the land to be taken at Childerley Lodge, albeit not identifying which land they consider is not required. The Scheme requires sufficient land to overcome significant constraints in this vicinity, including the A428, private residences, a junction with St Neots Road, and variations in ground level²⁹⁶. Insofar as plots 4 014A and 4 014B are concerned the Jenkins Family have been included in the BoR entries as they have interests under a transfer²⁹⁷.

Anglian Water Services Ltd (AWSL) (OBJ-271, 18.23)

- 10.165 AWSL state that they have no objection in principle to the detail provided by the Applicant in relation to alignment, layout or other design details.
- 10.166 Part 5 of Schedule 12 to the draft Order makes provision for the protection of AWSL, and Part 6 of Schedule 12 includes protective provision for South Staffordshire Water (who own Cambridge Water). Those protective provisions would protect AWSL's interests, particularly below ground infrastructure connected with the Madingley Service Reservoir and future pipelines connected with the Fens Reservoir and Graffham to Rede scheme. As a result, the Order Scheme would have no adverse impact on AWSL's interests. However, discussions between the Applicant and AWSL are in progress with a collaboration agreement being worked on, the outcome of which it is hoped would allow the withdrawal of their holding objection²⁹⁸ in

²⁹⁴ ES Appendix ES1, item 12, p3 ([CD1-10.02](#)).

²⁹⁵ Franklin XiC and Proposed Site Plans Sheet 9 ([CD1-16.04a](#)); access off the busway east of Basin 9, and access off Long Road.

²⁹⁶ Applicant's SoC, para 14.6.2, p112 ([CD23-01](#)).

²⁹⁷ *ibid.*, para 14.6.6, p113.

²⁹⁸ *ibid.*, para 14.27.2, p131, and Anglian Water/Cambridge Water update 20 November 2025, p2 ([CD29-110](#)).

which case the provisions would not be necessary.

Land to be acquired where the objection has been withdrawn

10.167 Taking Clare Hall (OBJ-213, 18.37) as an example of a party that have withdrawn objections and agreed to sell land or interests, they have interests in six plots. None of these are held as freehold. Clare Hall are tenants, occupiers or have the benefit of an easement. To deliver the Scheme, it is necessary to acquire a sufficient interest in each plot, irrespective of whether an objection has been withdrawn. There is a compelling case in the public interest to acquire all such plots.

Compulsory purchase - conclusion

10.168 Where agreement cannot be reached, the Applicant considers that compulsory purchase is justified. There is a compelling case in the public interest, having regard to the identified need for the busway, the benefits of delivering the Scheme and absence of a preferable, viable and deliverable alternative route.

10.169 There may be an interference with some landowners' or occupiers' human rights. However, given the nature of the land being acquired, which is principally farmland, this interference would be with rights protected under Article 1 of the First Protocol²⁹⁹. Such interference would be lawful and proportionate, having regard to the relatively small amount of land taken, the steps taken by GCP to mitigate that land take, and the need for, and benefits of, the Scheme.

10.170 There are no impediments to the delivery of the busway once compulsory acquisition has occurred as GCP are demonstrably committed to the project and the required funding has been secured. In all the circumstances there is a compelling case in favour of the Scheme, and compulsory acquisition is necessary to deliver the busway.

Section 19 Acquisition of Land Act 1981 (ALA1981)

10.171 Article 36 of the draft Order provides that the replacement open space land (see 5.5 above) would be made available as open space in accordance with s19(1)(a) of the ALA1981, with the details of the layout secured under a proposed condition. The Applicant's Open Space Assessment³⁰⁰ focuses on the quantitative and qualitative criteria in ALA1981 s19(1)(a).

10.172 The CPP Guidance points out that land offered in exchange may not offer the same advantages; but the advantages offered may be sufficient to provide an overall equality of advantage.

The quantitative test

10.173 The replacement open space land would measure 1,006m², marginally greater in size than the 1,004m² open space plots they would replace³⁰¹. The proposed area meets the quantitative criteria, a fact not disputed by

²⁹⁹ As set out at Part II of Schedule 1 to the Human Rights Act 1998.

³⁰⁰ Open Space Assessment, Appendix 10 of Application for certificate regarding open space ([CD1-22](#)).

³⁰¹ Open Space Assessment, Table 4-5, p25 (PDF209) and para 5.8.7, p37 (PDF 221) ([CD1-22](#)).

any objector.

The qualitative test

10.174 Assessing the quality of the open space plots using CCiC's Open Spaces and Recreation Strategy concluded that the quality of the open space plots was generally poor, with areas covered in scrub and unusable for recreation, a poor standard of access which was not inclusive for all, evidence of litter, a low level of use (a distinct issue from how well used or not the footpath running through it is), no management measures for dog fouling and limited passive surveillance³⁰². Dr Sutton corroborated the concerns about the existing vegetation's effect on usability and the presence of litter in cross-examination.

10.175 A site selection process was undertaken, involving both a long list of nine sites and a shortlist of three, with the three subject to a further qualitative assessment again using the Open Spaces and Recreation Strategy³⁰³. The best performing site was chosen, and a series of qualitative enhancements were also identified³⁰⁴. The particular advantage of the selected site compared to the other shortlisted sites was its accessibility; its location close to the busway and maintenance track would allow for easy pedestrian, cyclist and equestrian access and would ensure interconnection, via the maintenance track, with the surrounding footpath and bridleway network from both sides of the M11³⁰⁵. In terms of quality the replacement open space land would form part of a wider area which would be the subject of enhancement and improvement³⁰⁶.

10.176 The replacement open space land would provide an overall equality of advantage. In particular:

- its location is at least as equally advantageous in terms of accessibility and improvements in the quality of the access path rendering the replacement open space land more accessible to all;
- It would benefit from at least as good, if not better, natural surveillance from the adjacent maintenance track;
- It would be laid out in a manner more conducive to public recreation, for example omitting the impenetrable scrub on the existing open space plots; and,
- It would be located further from the M11 and the greater separation distance is likely to result in a reduction in adverse noise impacts on users.

It follows that the qualitative criteria is also met. All the objections related to the quality of the replacement open space land.

Objections

10.177 In cross-examination, Dr Sutton accepted that each part of her objection had been overcome, with concerns about use of the existing footpath and

³⁰² *ibid.*, Appendix D: Quality assessment of existing open space site No 2, final column. (PDF 246-247) and Appendix E land to east of M11 - removal of area of tree planting 2013 (PDF 249-250).

³⁰³ *ibid.*, para 5.6.3 to 5.6.9, p34 (PDF 218).

³⁰⁴ *ibid.*, para 5.8.8 to 5.8.10, p34 (PDF 221) and Appendix H: Indicative layout of replacement open space (PDF 258).

³⁰⁵ *ibid.*, para 5.6.16 & 5.6.18, p35 (PDF 219).

³⁰⁶ *ibid.*, Appendix H: Indicative layout of replacement open space (PDF 258).

biodiversity being separate issues not related to the qualitative criteria. Following cross-examination Mr Littlewood accepted that surveillance would be provided by, and access to it provided from, the maintenance track and that there would be a benefit being further from the M11. Part of Mr Littlewood's suggested alternative location for replacement land is already used by the public and would therefore be inappropriate to be used as exchange land³⁰⁷ and it was a parcel that was assessed and rejected through the long listing process³⁰⁸. As Dr Green declined to answer any questions on his objection it should be afforded much reduced weight, and in any event relevant matters were repeated by the other objectors.

Conclusion

- 10.178 None of the objections can be maintained following cross-examination and in light of the Applicant's evidence. All of the criteria in section 19(1)(a) of the ALA1981 Act are met and a certificate should be granted.
- 10.179 Although planning policy is a separate consideration to the application for a certificate, the proposal complies with relevant policies. The replacement open space land would be at least equal in terms of quantity and quality, and is in a suitable location, and therefore in compliance with NPPF paragraph 104(b). For the same reasons, it would comply with SCLP Policy SC/8(a). There would be no conflict with the "short walk" provision in CLP Policy 67 given the exception in CLP paragraph 7.48 ([CD6-01](#)) because the replacement open space land would be more accessible, especially having regard to the quality and inclusivity of the access from the maintenance track. The impact of the Scheme on public open space would be acceptable.

The Overall Balance

Policy framework

- 10.180 The existing and emerging local plan strategies are built on, and dependent on, the Scheme. The Scheme accords with this policy framework as it would unlock permitted and planned development in existing and emerging allocations, and it also complies with the suite of environmental and development management policies in terms of its impacts.
- 10.181 Two minerals safeguarding areas lie within the Order Limits³⁰⁹. However, as there is an overriding need for the development and the nature of the development makes prior extraction unfeasible, the Scheme would comply³¹⁰ with MWLP Policy 5. Consequently, the proposal complies with both the adopted and emerging Development Plans read as a whole.
- 10.182 Because neither the decision to make the Order nor to issue a direction granting DPP would be a determination to be made under the planning Acts, s38(6) of the Planning and Compulsory Purchase Act 2004 would not apply

³⁰⁷ Guidance on the Compulsory Purchase Process, MHCLG, January 2025, para 259.3, p145 ([CD8-28](#)).

³⁰⁸ Site G and Site F on Open Space Assessment, Appendix F: Map of long list of potential replacement open space sites (PDF 252) ([CD1-22](#)).

³⁰⁹ Planning Statement para 6.3.6 & 6.3.7, p67 ([CD1-15.01](#)).

³¹⁰ The development proposed does not fall within one of the exceptions listed in para (a) to (h) of MWLP Policy 5, but demonstrates accordance with criterion (i).

to either³¹¹. However, as the development would accord with an up-to-date development plan as a whole it engages NPPF paragraph 11(c) and therefore national policy dictates that it should be approved without delay.

10.183 The growth of Cambridge is a national priority, and the Scheme would directly assist in unlocking that growth. The Scheme aligns with national ambitions set out in the Case for Cambridge as recently reaffirmed by the Minister, and the Scheme would directly assist in meeting this national priority. This is a critical factor, and the Scheme's benefits are at a local, regional and national scale whereas its adverse effects are generally at a local or, in the worst case, county level, an important disparity demonstrating that the Scheme is favoured in the planning balance.

Weight that should be afforded to harm

10.184 Harm:

- Impacts on Coton Orchard - significant weight. The ES identified a significant environmental effect at a county scale as a result of the impacts on the Orchard as although there would be no loss of or deterioration to veteran trees, there would be some adverse ecological impacts. The mitigation hierarchy has been followed in respect of these impacts.
- Other biodiversity impacts - limited weight. There would be no significant environmental effects, and the vast majority of other biodiversity effects would be of a very limited extent.
- Temporary landscape effects from construction - significant weight. Significant effects would be observed by residents on Scotland Road, Whitwell Way, and Herschel Road, as well as footpath users near Coton and the M11. However, these would be for, at worst, a two year period and in reality substantially less.
- Permanent landscape effects from the presence and operation of the busway - limited weight. Much of the route would cross transport-influenced terrain, and there would be no significant permanent landscape effects with only a single significant permanent visual effect. As mitigation would take effect over time, it would reduce impacts further.
- Noise and vibration effects - significant weight. The temporary effects from construction would be significant in three locations, at Childerley Gate, Scotland Road and Bin Brook, but there would be no permanent adverse effects.
- Loss of agricultural land - limited weight. 39ha of BMV agricultural land would be lost, but the dispersed nature of this loss would not render it a strategic loss, especially in the context of the continued availability of BMV land and the mitigation secured.

Weight that should be afforded to benefits

10.185 Benefits:

- Unlocking housing growth - substantial weight. Unlocking development permitted, particularly at Bourn Airfield and Cambourne

³¹¹ R. (Samuel Smith Old Brewery (Tadcaster)) v Secretary of State for Energy and Climate Change [2012] EWHC 46 (Admin), para 79 ([CD5-33](#)).

West, as well as future growth in the emerging plan, would not only be a local benefit but also a key part of delivering the nationally important growth for Cambridge. The Scheme's catalytic role in enabling strategic development is reflected in a net land value uplift attributable to it of £222 million, (£184 million after taking account of transport external costs), in 2010 prices³¹².

- Unlocking employment growth - substantial weight. The Scheme would improve labour market access in Cambridge and directly facilitate expansion of West Cambridge as a major employment area by providing direct, reliable and attractive public transport links to the closest area of major housing growth at Cambourne.
- Support for the adopted and emerging spatial strategy - substantial weight. The Scheme is an essential building block of sustainable placemaking and future-proofed connectivity in an area undergoing rapid change.
- Transport - substantial weight. The busway would result in quicker and more reliable journey times, facilitate modal shift and help to address the congestion within and around the City which is a recognised threat to the national objective of growing Cambridge.
- Two specific transport benefits need to be recognised and given weight individually as interventions that would be central components in delivering the necessary modal shift: Scotland Farm travel hub – significant weight; and, the active travel path – significant weight.
- Air quality improvements - substantial weight. There would be an overall improvement in air quality as a result of the Scheme.
- Carbon - limited weight. The Scheme would deliver a net reduction in carbon emissions.
- BNG - significant weight. At least 10% BNG would be delivered in a nature depleted region, in circumstances where there is no applicable statutory target.

Objectors' specific points - CPPF & CPC

10.186 No objector has presented a robust planning balance exercise. No weight can be afforded to the CPPF & CPC alternative as it would be unsafe and undeliverable, nor could any weight be afforded to any variation or refinement of their alternative. It has not been worked up, there is no identified solution for the deliverability constraints, including the need to cross the M11, with subsequent later suggested solutions being off the cuff and unsupported by technical evidence.

10.187 Even if it was considered that the technical deficiencies in the CPPF & CPC alternative could be overcome, that its ecological and heritage impacts were acceptable, and that the delay required to deliver it could be ignored, a deliverable scheme could not be confined to the current highway boundary and it is almost inevitable that the UK's international treaty obligations would be breached. Even if a scheme could be confined to the current highway boundary, there remains at the very least a substantial risk that the works would intrude into the treaty land, a scenario that it is unlikely

³¹² VfM Technical Note, Table 3, p3 ([CD9-32](#)) and Cambourne to Cambridge Better Public Transport Project: Appendix B - Economic Case Addendum, Table 4-17 p23 ([CD1-21.02](#)).

that the SoST could realistically countenance.

Objectors' specific points – the Mayor

10.188 The Mayor said that if the busway was authorised and constructed, and subject to considering impacts on other services, he is not going to dig his heels in and reject it³¹³, and he was careful to say that he has not yet determined his position on whether he would franchise³¹⁴ a route on the proposed busway. He was clear in his oral evidence that he could not make a decision now.

10.189 As and when the busway is open for traffic, a decision on its own merits will have to be made as to whether routes using the busway will be franchised. Whatever his ambitions for a new policy may be, the Mayor is yet to properly understand or grapple with how those ambitions will, realistically, deliver the growth that he supports and that the government has stated is a national priority. Any decision should be based on his clear and realistic position in oral evidence, not the hypotheticals posed in closing submissions.

Heritage balance

10.190 The Scheme would result in less than substantial harm to a number of designated heritage assets, at the lower end of the spectrum. Great weight should be given to this harm. However, this harm would be outweighed by the public benefits. The heritage balance lies in favour of the Scheme.

Irreplaceable habitats

10.191 The Applicant's case is that the busway would not result in the loss or deterioration of any veteran trees. However, without prejudice, as the public benefits of the Scheme would clearly outweigh the loss or deterioration of habitat, and a suitable compensation strategy would be provided, this would be one of the wholly exceptional reasons for the loss of veteran trees within paragraph 193(c) of the NPPF: orders under the TWA1992 are given as an example of such circumstances in the accompanying footnote 70. The benefits would be of a markedly greater magnitude and number when weighed against the effects on veteran trees.

Green Belt and the overall planning balance

10.192 At worst there would be moderate harm to the Green Belt by reason of inappropriateness and impact on Green Belt purposes. Other harms are generally of a low magnitude, with the worst harm (impact on Coton Orchard) a county level effect. The benefits are at a local, regional and national level, compared to harms confined to a local level. Overall, the benefits clearly outweigh the harm. The very special circumstances balance (NPPF para 153) is passed, and given its breadth it stands as a proxy for the overall planning balance: therefore, for the same reasons the overall planning balance weighs in favour of the Scheme.

Implications of not making the Order

³¹³ Mr Bristow XX.

³¹⁴ The Cambridgeshire and Peterborough Combined Authority Area Franchising Scheme for Buses 2025 ([CD29-31-1](#)).

10.193 If the Order were not to be made in the hope that something better may come along, apart from the severely detrimental impact on investor confidence, this would lead to further delay in meeting the acknowledged need and undermine the local plan strategy. Even on Mr Leigh's evidence in cross-examination the delay is likely to be at least 5 years for the works on the A1303, and that is without taking account of the time it would take to secure the necessary approval for, and to then build, a new bridge over the M11.

10.194 Given the fact that the extant and emerging local plan strategy is built upon the Scheme, and given the fragility of investor confidence, it would be disastrous if the Order were not made. There can be no doubt the benefits far outweigh any harm.

Conclusion

10.195 There is very strong national and local support for the delivery of the busway. This reflects the demonstrable need for improved infrastructure to help unleash Cambridge's economic potential and to allow the Local Plan strategy to be fulfilled. The Scheme meets that need and delivers a package of very substantial benefits. There is no viable or deliverable alternative capable of meeting that need. As is inevitable when public transport infrastructure is to be provided, the scheme would result in some negative effects, but those impacts are far outweighed by the Scheme's benefits.

10.196 Cambridge is a key contributor to the government's mission to secure and foster growth. The Scheme is a prime example of an infrastructure led growth initiative in that key location, and it would be contrary to the core of the government's mission not to make the Order. The Order and a direction that planning permission be deemed to be granted should be made and a section 19 open space certificate issued.

11. THE CASE FOR CAMBRIDGE CITY AND SOUTH CAMBRIDGESHIRE DISTRICT COUNCILS³¹⁵ (REP-09)

Introduction

11.1 The Scheme is critically important to the delivery of adopted development plan policy and the future expansion of Cambridge in line with the spatial strategy, demonstrating a strong strategic need for the Scheme. Taking into account the mitigation measures which would be secured through the Order and planning conditions, the relatively low level of residual planning harms is outweighed by this need and by the significant public benefits. Objectors generally agree with the pressing and compelling need for, at the least, a Scheme to improve public transport between Cambourne and Cambridge.

11.2 The Councils' decision to support the Scheme in this Inquiry process has been taken independently of their involvement on the GCP Executive Board and on the basis of a thorough review of the environmental information supporting the Scheme and extensive discussions with the Applicant regarding mitigation and planning conditions.

³¹⁵ The District Councils' case is summarised principally from the closing submissions of Ms Drabkin-Reiter ([CD29-123](#)).

- 11.3 With regard to the business case, the Councils do not make any separate case or tender any evidence, but adopt the Applicant's position as presented to the inquiry. However, they emphasise that the business case, including the benefit-cost ratio, while pointing in favour of the Scheme, is just one factor to take into account when determining whether the Order should be made and DPP granted. Overall, having regard also to the wider context including the drivers for growth and the continuation of the direction of travel in the emerging GCLP for the Councils' longstanding spatial strategy, there is a compelling case for making the Order.

Critical growth drivers

- 11.4 There are a number of critical growth drivers for the Scheme which demonstrate why it is a key component of the spatial strategy for Greater Cambridge.

Infrastructure-led approach

- 11.5 An infrastructure-led approach underpins the spatial strategy in the adopted and emerging development plans and is key to ensuring the sustainable growth of Cambridge while retaining the aspects that make it so attractive to residents and workers, including its identity as a compact, historic city with a robust Green Belt edge. This approach aligns with the vision-led approach to transport solutions advocated by the NPPF. Transport infrastructure, including public transport and active travel provision, should be deployed proactively through strategic measures such as the Scheme to deliver modal choice and mode share.
- 11.6 This infrastructure-led approach is crucial for ensuring the sustainable growth of Cambridge, by avoiding the need to release additional large-scale sites from the Green Belt for housing, and thereby retaining the overall openness and permanence of the Green Belt. After development on the edge of Cambridge, new settlements, beyond the Green Belt, are the next most sustainable location for growth³¹⁶. High-quality public transport connections from those settlements to services and employment in Cambridge which are capable of supporting long-term growth are necessary in order for such a strategy to be sustainable.
- 11.7 The adoption of an infrastructure-led approach in Greater Cambridge is evident from and has been informed by the TSCSC. That strategy includes policies to enhance public transport capacity, including on the Cambourne to Cambridge corridor (above, para 7.10). At the inquiry, the Mayor of Cambridgeshire & Peterborough explained that he supported delivery of the growth envisaged in the Local Plans, and that anticipated by the formation of the CGC.
- 11.8 The impact of not taking an infrastructure-led approach, and failing to approve the Scheme in advance of further proposed growth in the Cambourne to Cambridge corridor, is a risk to the ability of Cambridge to grow successfully without increased congestion and carbon emissions, negative effects on employees' and existing residents' quality of life, and

³¹⁶ [CD6-02](#), para 2.18, p19; [CD6-01](#), para 2.30 & 2.31.

reduced attractiveness of the City to businesses and employers.

Delivering the spatial strategy: enabling housing growth and economic development

- 11.9 The Scheme is essential for delivering the existing spatial strategy and unlocking development provided for in the adopted Local Plans, in particular at Cambourne West and Bourn Airfield. The Scheme would enable the implementation of these allocations in a sustainable way. The allocations are an essential part of the spatial strategy and are based on and consistent with the Scheme coming forward. Moreover, the busway would represent a high-quality public transport offer which would be desirable to residents, and which would contribute to the delivery of a meaningful shift away from private car use³¹⁷.
- 11.10 With regard to Bourn Airfield, the wording of the site allocation and the terms of the planning permission show a clear dependency of development on the Scheme. Policy SS/7 of the SCLP makes specific reference to requirements for significant improvements to public transport, including the provision of high-quality bus priority measures or a busway on or parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge. Condition 13 of the permission ([CD4-06](#)) prevents the occupation of more than 500 dwellings until the Scheme or an equivalent scheduled rapid mass transit passenger carrier service is delivered. Given the reasoning behind the imposition of the condition and the wording of Policy SS/7, it is considered unlikely that any application for a fresh permission without the condition would be successful.
- 11.11 The development at Cambourne West also displays a clear dependency on the Scheme. Policy SS/8 of the SCLP includes a requirement for high-quality segregated bus priority measures on the A1303 between its junction with the A428 and Queens Road, Cambridge, and direct, segregated high-quality pedestrian and cycle links to West Cambridge, Papworth Everard, Caxton and Bourn. These requirements were taken forward in the planning agreement for Cambourne West, which includes obligations requiring contributions to be provided towards the Scheme at specific trigger points based on the number of units occupied, the delivery of a segregated bus and active travel link between the Bourn Airfield development and Cambourne to enable the Scheme to continue onwards to Cambourne, and highway improvement measures to facilitate bus movements within Cambourne and the Cambourne West development³¹⁸. That infrastructure is both necessary to deliver successful development at Cambourne West and could not have been taken into account as a reason for granting planning permission if it were not necessary to make the development acceptable in planning terms.

Innovation clusters, superconnectivity, and supporting research and innovation growth

³¹⁷ Mr Kelly in examination in chief, and responding to questions from Mrs Postgate and the Inspectors.

³¹⁸ [CD4-08](#), schedule 4, sections C1-C3.

- 11.12 Cambridge has an innovation ecosystem which depends on high levels of connectivity to enable in-person encounters to drive economic outcomes. Its success as a leading international centre for science derives from those in-person encounters which include facilitating working relationships between students and early career researchers, Nobel Prize winners, academia and business. That in turn relies on a supply of talent and the ability to accommodate that talent within an easy and reliable commuting distance of the main science hubs and employment centres in Cambridge.
- 11.13 Following the grant of planning permission for over 380,000m² of academic and commercial floorspace at West Cambridge (above, para 4.12), this location is a substantial innovation district and, at the inquiry, was described by the Chair of the CGC as one of the biggest growth areas for employment in Cambridge. The emerging GCLP recognises the relationship between the Scheme and the West Cambridge development, and envisages that the Scheme will influence further growth there. The relationship between employment development at West Cambridge and the Scheme is further strengthened by the large increase in housing proposed at Cambourne in the latest version of the emerging Local Plan, which increases the potential for employees at West Cambridge to live in the Cambourne to Cambridge corridor and use the Scheme to travel to work.

Meeting needs of communities and social inclusion

- 11.14 The Scheme would play an important role in supporting social inclusion and reducing inequalities. The existing level of public transport access in the Cambourne to Cambridge corridor has an adverse impact on opportunities for those who do not own a vehicle. In this context, the reliability of journey times into Cambridge is essential, for example, for enabling school and sixth form students from Cambourne to take up work and work experience opportunities in Cambridge. The Scheme would also facilitate the provision of, and access to, more affordable housing for those working in Cambridge, increasing the opportunities for those with more limited means to take advantage of the success and economic growth of Cambridge.

The Case for Cambridge and ambitions of government

- 11.15 The Scheme is also important to facilitate the role for Cambridge envisaged by the government through the establishment of the CGC, which, as stated in the letter of appointment of its Chair, is expected to build on and go further than local plans, in terms of scale, ambition and timescale³¹⁹. The national ambitions for Cambridge amplify the need for early investment in and implementation of infrastructure such as the Scheme, which will also provide greater certainty and confidence for investors. Furthermore, the unlocking of development at Cambourne West and Bourn Airfield by the Scheme will be a springboard for further development in the western corridor, that in turn will be hardwired into the wider City ecosystem through the high-quality public transport connection made by the Scheme. The Scheme would also assist with connectivity in respect of the Oxford-Cambridge Arc of which Cambourne to Cambridge forms the eastern end, and which has influenced ambitions for growth at Cambourne, Bourn Airfield

³¹⁹ [CD7-39](#), p4.

and the wider area west of Cambridge.

The emerging Greater Cambridge Local Plan

- 11.16 The policies of the emerging Local Plan carry limited weight due to their early stage of preparation, but greater weight can be given to the direction of travel of the Cambridge spatial strategy towards growth in new settlements outside the City's historic core and surrounding Green Belt, and connected by high-quality public transport corridors. That direction was determined in the late 1990s, and has been continually affirmed in the Councils' development plans since then. The emerging Local Plan confirms the continued strong protection of the Cambridge Green Belt in planning policy, and the reliance on growth in settlements outside it, connected by public transport infrastructure through the Green Belt.
- 11.17 Whilst there has been concern that the Scheme would lead to pressure for development in villages and the Green Belt, there is no basis for the Councils to pursue a strategy that would involve such piecemeal development. Insofar as water scarcity is concerned, there is a process in place to mitigate potential risks arising from the levels of abstraction and water demand required to facilitate the development identified in the Plan. That process includes plans to transfer new supply from Grafham in 2032 and a new Fens Reservoir from 2036 onwards and the phasing of development in line with those measures. Any impact of water supply constraints on future development coming forward in the Cambourne to Cambridge corridor would be a matter to be considered through the planning application process for those developments.
- 11.18 The emerging Plan relies on both the Scheme and EWR to support the delivery of housing and employment growth in the Cambourne to Cambridge corridor. Given the likely scale and significance of development at Cambourne North, it is no longer appropriate to rely on a single piece of public transport infrastructure to connect Cambourne and Cambridge. The importance of the Scheme to the emerging planning policy and site allocations for the Cambourne to Cambridge corridor is emphasised in the Busway Integration Report, which forms part of the evidence base for the emerging Plan (above, para 7.18). The report notes that the busway would play a vital role in connecting existing and future development to key destinations in Cambourne and Cambridge, including employment areas, education, and healthcare, but that the full benefits would only be realised if it is fully integrated with the form and function of the evolving Cambourne settlement and with EWR. EWR and the Scheme are complementary: both, in different ways, will help people to live in Cambourne without needing a car.

Compliance of the Scheme with planning policy

- 11.19 The Councils undertook a comprehensive review of the application and supporting material including the ES, and concluded that the submissions were appropriate to allow them to reach conclusions on the heritage and Green Belt balances and the overall planning balance. The overall compliance of the Scheme with the Development Plan and the limited nature of the residual planning harms justifies the Order being made and planning permission being deemed to be granted regardless of whether there may be

a better or less harmful proposal which could be delivered instead. This is not the kind of exceptional case where the level of harm requires the alternative proposal put forward by CPPF & CPC to be taken into account as a matter of law as an obviously material consideration. Even if it is taken into account, it should be given little to no weight for the reasons given below (para 11.21) and those provided in the Applicant's oral and written evidence.

The CPPF and Coton PC alternative

- 11.20 The Councils consider that the process undertaken by the Applicant for the consideration and development of options has been thorough and lawful, and is sufficient to support the decision to promote the Scheme. On the basis of the evidence provided by the Applicant the Council's view is that the Scheme does achieve the objectives required of it.
- 11.21 As they do not present independent evidence on the matter, the Councils rely on and adopt the Applicant's evidence on the CPPF & CPC alternative. This is particularly in relation to reliability of service; the deliverability, feasibility and safety implications of the proposed changes to Madingley Road; the resultant harms to the Madingley Woods SSSI and the heritage significance of the American Cemetery; and the further delay to the implementation of public transport improvements that would result from a refusal to make the Order and direct that planning permission be deemed to be granted.

Conclusion

- 11.22 The Scheme is critically important to enable the delivery of adopted Development Plan policy and the future expansion of Greater Cambridge in a sustainable and equitable way. The identified planning harms can be minimised appropriately through mitigation schemes and planning conditions, such that the resulting level of residual harm is low and is outweighed by the significant public benefits that the Scheme would bring.

12. THE CASE FOR CAMBRIDGE PAST PRESENT AND FUTURE, AND COTON PARISH COUNCIL³²⁰ (OBJ-251)

Introduction

- 12.1 CPPF is a civic, environmental and heritage charity which advocates for the responsible and sustainable development of Cambridge to protect the City's important built heritage and the best of the surrounding countryside. The charity owns over 120ha (300 acres) in the vicinity of Coton, which was purchased to protect the countryside setting of Cambridge and the villages of Coton, Grantchester and Madingley from development³²¹. CPPF presented evidence at the inquiry jointly with CPC.
- 12.2 CPPF & CPC agree that there is a need to meet the objectives set for the Scheme: to improve accessibility in the Greater Cambridge region to support economic growth, to deliver a sustainable public transport service

³²⁰ CPPF & CPC's case is summarised principally from the closing submissions of Mr Parker ([CD29-122](#)).

³²¹ Mr Littlewood's PoE ([CD26-10-W1-1](#)), para 1.3 & 3.1. The plan at [CD29-54-2](#) shows the extent of CPPF's land holding in the vicinity of Coton.

between Cambourne and Cambridge and to improve the quality of life within surrounding areas. However, the Scheme put forward has not been justified by the evidence.

- 12.3 Their concerns relate to that section of the proposed busway between St Neots Road to the west of the Madingley Mulch Roundabout and Grange Road³²². The proposal is of considerable concern because it would involve the compulsory purchase of land, including land owned by CPPF and held for the specific purpose of protecting the setting of the historic village of Coton and the countryside setting of the historic City of Cambridge, and it would cause significant ecological harm, in addition to harm to landscape, the Green Belt and other environmental harms. Very special circumstances to justify harm to the Green Belt are lacking.
- 12.4 There is an alternative to the off-line busway which would, subject to refinement through detailed design:
- Be effective in meeting the objectives of the Scheme.
 - Be feasible in engineering terms.
 - Be safe.
 - Cause substantially less harm to ecological receptors.
 - Comply with national policy in respect of heritage assets.
 - Comply with relevant Development Plan policy.
 - Be less harmful in Green Belt, landscape and visual effect terms.
 - Be significantly less costly.
 - Be deliverable in a comparable time-frame, and be aligned with the build-out of the development at Bourn Airfield.

Claimed transport benefits

- 12.5 The Scheme can only be justified if it would enable the operation of an improved bus service. The transport benefits claimed are a reduction in journey time from Cambourne to Cambridge in the morning peak of 16 minutes; facilitating 8,800 additional daily bus passengers; and improved bus service punctuality³²³. These claimed benefits depend on a comparative analysis between the bus service facilitated by the do minimum infrastructure and the service facilitated by the busway using the E-series and F-series of the Cambridge Sub-Regional Model (CSRM).
- 12.6 The E and F-series of the transport model suffer from fundamental limitations. Based on census data from 2011 and traffic counts taken in 2015 and 2019, they do not account for the fundamental change in travel patterns which occurred after 2019 as a consequence of the COVID-19 pandemic. The shortcomings in the CSRM have been identified in a report produced for the Cambridgeshire and Peterborough Combined Authority (CPCA), which also recognised that it would by 2023 be possible to collect data representative of the post-pandemic period³²⁴. The government has also made its position clear in respect of the need to account for the after-

³²² See proposed site plans, sheets 9-17, ([CD1-16.04](#)). The closing submissions refer to the section of concern as the off-line busway between the Madingley Mulch roundabout and Grange Road, but the busway would not connect with the roundabout, leaving the existing road to the west of it.

³²³ [CD1-21.02](#), table 4-4, para 4.3.3 & 4.4.1.

³²⁴ [CD29-08](#), para 3.1.10, 3.1.11 & 4.4.

effects of the pandemic in transport assessments. Its TAG Unit M4 sets out the DfT's view that the suppression of travel demand relative to a pre-pandemic projection of demand at this time should be appropriately represented in transport analysis, and emphasises that this is particularly important in appraisal and analysis supporting transport investment decisions³²⁵.

- 12.7 The Applicant has sought to account for the effects on travel demand of COVID-19 by reference to a sensitivity test³²⁶. The extent of that sensitivity test, however, is merely to assess the effect of 10% fewer cars and light goods vehicles (LGV) on the network. Such an assessment does not comply with the TAG Unit M4, and is an inadequate basis for carrying out the transport analysis which is necessary for a scheme of this nature.
- 12.8 TAG Unit M4 provides guidance as to how to account for the effects of the pandemic on travel demand. Paragraph B.2.2 provides that *to account for COVID-19 related changes, trip matrices based before the beginning of the pandemic should ideally be rebased, or if this is not possible, an appropriate adjustment applied to model inputs or outputs in a proportionate way*. Here, it clearly would have been possible, at some point after the pandemic and before November 2024, to have rebased trip matrices to capture post-pandemic travel patterns.
- 12.9 In any event, the adjustment to the model considered by way of the sensitivity test was deficient. The Guidance makes clear that where model rebasing is judged not to be practical, analysts should *assess the extent of the divergence of travel patterns and volumes from pre-pandemic projections, using the best available data and evidence. If it is clear COVID-19 has had an impact on travel, this should be represented using an appropriate change in travel demand across the trip matrix, considering trip purpose and patterns as appropriate, and apply this to produce an updated core forecast*³²⁷.
- 12.10 Instead, a global adjustment of a 10% reduction in cars/LGVs was made to the model. Although identified by the TAG as the simplest way of applying adjustment, it also presents the most risk to the model results and appraisal, as the model has effectively not used the change in travel patterns³²⁸. The Guidance makes clear that such a method should only be considered if quick, proportionate decisions need to be taken, so long as the risks to analytical assurance are explicitly highlighted. In this case, there was no imperative for a quick decision to be taken.
- 12.11 It cannot be contended that it was not proportionate in the time available and at limited cost to undertake the most detailed analysis possible of the claimed travel benefits. The use of compulsory purchase powers cannot be justified where the evidence in support of the claimed transport benefits of the Scheme is so inadequate.
- 12.12 There is data to suggest that the congestion issues that would affect buses

³²⁵ TAG Unit M4 – Forecasting and Uncertainty, DfT, November 2023 ([CD8-21](#)), para B.1.1.

³²⁶ [CD9-32](#), para 18 to 24, tables 6 & 7.

³²⁷ [CD8-21](#), para B.3.2.

³²⁸ *ibid.*, para B.3.4 & 3.

in the do-minimum scenario have improved significantly post-pandemic, such that the journey time and reliability benefits claimed for the Scheme are considerably overstated. Analysis of bus journey times on Madingley Road demonstrates that delays in 2024 were nowhere near as severe as they were in 2019³²⁹. The Scheme is forecast to attract 8,800 new daily passenger trips³³⁰. If all of the 2,000 car parking spaces and 300 bike parking spaces at the P&R facility are taken up, giving 4,600 daily bus trips, the Scheme is expected to otherwise give rise to 4,200 daily additional trips from elsewhere. That is a highly ambitious forecast, and one which is impossible to analyse meaningfully in a post-pandemic world without up-to-date travel data, and which will not come about unless there are real and material transport benefits from the Scheme.

- 12.13 Unless the Scheme reduces bus journey times and their variability between Cambourne and Cambridge, its primary purpose to increase bus patronage will not be achieved. It is vital that the decision as to whether to make the Order is based on adequate post-pandemic data in order to understand whether enough people would travel on buses using the Scheme to ensure new development at Cambourne and Bourn Airfield would not result in a severe degradation in the performance of the road network.

Failure to assess the potential effects of EWR on the benefits of the Scheme

- 12.14 The potential effects of EWR were excluded from the TA, the Applicant's position being that EWR was not committed and had no guaranteed funding or delivery programme³³¹. There is therefore no evidence as to the possible effects of EWR on the need for, and benefits of, the Scheme. However the government re-affirmed its commitment to EWR in June 2025 as part of the Spending Review, committing £2.5 billion to that scheme³³². CPPF & CPC contend that EWR would significantly curtail the benefits of the Scheme, principally because anyone wishing to travel between Cambourne and the Biomedical Campus or the CB1 Business District would be more likely to use the train than the bus.
- 12.15 While there may be some residual benefits for those wishing to travel between Cambourne and the villages to the west of Cambridge and the West Cambridge Campus, those reduced benefits would need to be properly understood before any decision is made as to whether they would justify the Order. The balance of benefits and harms would be fundamentally different in a world in which EWR provides a faster and more reliable journey between Cambourne and Cambridge, unaffected by the principal source of delay and unreliability on that journey, which is congestion within Cambridge.
- 12.16 Although the Applicant made the point that EWR was not required to be modelled as part of the core scenario, it should have been modelled as an alternative. Unit M4 of the TAG points out that the uncertainty log should highlight all sources of uncertainty that are likely to affect the traffic/patronage, revenues and delivery of scheme benefits, which may

³²⁹ [CD26-10-W3-1](#),, appendix A, para 4.1.1 to 4.1.3 and figures 1 to 4; [CD29-75](#), table 1.

³³⁰ [CD1-21.02](#), para 4.3.3.

³³¹ [CD1-25.01](#), para 5.4.1.

³³² [CD26-10-W2-1](#), para 3.05.

include transport schemes³³³.

Claimed economic benefits

- 12.17 The Applicant seeks to justify the Scheme by reference to wider strategic and economic benefits. In particular, it is claimed that the Scheme would unlock a considerable amount of housing development at Cambourne West and Bourne Airfield. In economic terms, the benefit claimed for the land value uplift, taking into account costs, as a result of that housing delivery (£184 million in discounted 2010 prices) is significantly greater than the forecast user transport benefits (£71 million)³³⁴.
- 12.18 It is considered that the land value uplift benefits are overstated, and that the Applicant has not properly assessed and presented the uncertainty associated with them. In particular, the Applicant has overstated the amount of development that is dependent upon the Scheme for its delivery: 850 dwellings at Cambourne West and 3,000 dwellings at Bourn Airfield.
- 12.19 The Applicant has not provided evidence that it has carried out the recommended dependency test, as described in Appendix A of TAG Unit A2.2³³⁵. It is considered that there is nothing in the evidence to justify any assertion that the delivery of dwellings at Cambourne West or Bourn Airfield without the Scheme would breach a reasonable level of service on the transport network. There is no explanation as to why 850 dwellings at Cambourne West are claimed to be dependent on the Scheme. Apart from condition No 13 of the planning permission for Bourn Airfield (CD4-06), there is no post-pandemic transport analysis which demonstrates that, in transport terms, the development would be dependent on the Scheme. As to development to the north of Cambourne referred to in the emerging Local Plan, that development is premised upon, among other things, the delivery of a new railway station at Cambourne as part of the EWR scheme³³⁶.
- 12.20 In terms of the amount of land value uplift claimed, CPPF & CPC contend that the Applicant has adopted an overoptimistic approach. The input of gross development value takes account of the assumed house price per dwelling, and the land value uplift assessment is based on an average house price of £506,051 at 2024 prices to which an annual 2.2% real (inflation-adjusted) house price increase has been applied. This gives a gross development value estimate of £672.07 million for both Cambourne West and Bourn Airfield³³⁷.
- 12.21 These two inputs are uncertain. Whereas the Applicant's assessment of house prices is based on an estimated average value of residential land (giving an average house price of £506,051), actual average house prices are lower at around £420,000 - £430,000³³⁸. In terms of house price growth, the Applicant's 2.2% historical annual increase, used to project forward to the completion of build-out, is based on nine years' data to January 2023,

³³³ [CD8-21](#), para 2.2.13.

³³⁴ [CD1-21.02](#), para 4.4.52, tables 4-12 & 4-17.

³³⁵ [CD9-50](#), appendix A, section A2.

³³⁶ [CD29-71-4](#), para 3, 34, 38 & 3.3.7.

³³⁷ [CD1-21.02](#), para 4.4.32.

³³⁸ *ibid.*, the Applicant's house price figure is at para 4.4.31, and CPPF & CPC's figure is at [CD 26-10-W3-1](#), para 4.4.8.6.

whereas Land Registry data for South Cambridgeshire over a full decade to July 2025 gives a negative annualised growth rate of 0.4%³³⁹.

- 12.22 If the dwellings at Cambourne West are removed and a lower average house price and 0% house price growth are assumed, the land value uplift associated with the Scheme would give a BCR of just 0.5³⁴⁰. Even if 2.2% house price growth is assumed, the BCR for the Scheme would only be 1.1. These scenarios are realistic possible outcomes, and demonstrate that the economic benefits are highly sensitive to relatively minor changes in the assumptions underlying the inputs. The economic benefits which are said to justify the Scheme are highly uncertain, and the economic case for the Scheme is speculative.

Carbon benefits

- 12.23 The carbon assessment for the ES failed to use the correct TAG data book for the composition of the vehicle fleet with regard to electric and petrol/ diesel vehicles. That is important since the carbon savings claimed derive to a significant extent from the number of kilometres driven by petrol/diesel cars which would be saved by virtue of the Scheme. The data set used (accessed on 3 November 2022) was taken from the May 2022 TAG data book³⁴¹, but at the time an updated TAG data book (dated November 2022) was available. DfT guidance on forthcoming change to TAG made clear that, where work was due to report after November 2022, work should be undertaken using the updated values or guidelines if appropriate³⁴². The updated data book should have been used.
- 12.24 The carbon assessment calculated carbon savings for a single future model year (2036) and applied these savings to every subsequent year in the assessment period³⁴³. The combination of this method and the use of outdated fleet composition assumptions means that the -5,020 tCO₂e saving given in the ES is based on an assumption that electric vehicle uptake would only reach 27% by 2085. Such a result is unrealistic, especially given that even the outdated May 2022 TAG data book assumed electric vehicle uptake of 44% by 2050.
- 12.25 Using the correct data would have demonstrated significant carbon emissions, because the updated TAG data book projects a much more rapid take up of electric vehicles than did the May 2022 data book. A reasonable extrapolation by CPPF & CPC's witness, Professor Hirst, found net emissions of approximately +10,000 tCO₂e³⁴⁴.
- 12.26 An updated carbon assessment by the Applicant, using the most recent TAG data book dated May 2025 applied to the CSRM F-series Model, suggested that the Scheme would give rise to a reduction in carbon of -7,055

³³⁹ Applicant's LVU sensitivity test analysis and real house price growth note, 3 November 2025 ([CD29-94](#)): the Applicant's house price increase is at para 3 of the note of 3 November 2025. In CPPF & CPC's closing submissions, reference is made to a negative growth rate of 0.6%, recorded in the note. However this document, in the note of 16 October 2025, shows a negative growth rate of 0.4% in the figures on p3.

³⁴⁰ [CD29-60](#), table - estimated and calculated indicative BCR metrics - on p3.

³⁴¹ [CD1-11.06](#), footnote 13.

³⁴² [CD29-66](#), appendix B, PDF page 11.

³⁴³ [CD29-63](#), para 12.

³⁴⁴ [CD29-66](#), table 1.

tCO₂e³⁴⁵. There is no clear explanation for the large increase in calculated carbon recovery when changing from the CSRM E-series to the F-series model.

- 12.27 A further assessment using a method allowed in later DfT Local Transport QCG (August 2025 – CD8-41) demonstrated that the reduction in carbon would be just -1,446 tCO₂e with projected payback in 2084³⁴⁶. Even that carbon saving assumes that the take up of electric vehicles would increase until 2050, and thereafter remain constant at 82% of the fleet for the remainder of the assessment period³⁴⁷. That assumption is unrealistic.
- 12.28 The sensible way to apply the Local Transport QCG is to extrapolate the trend in electric vehicle take-up between the final two modelled years (2041 and 2050) until such time as take-up reaches about 100%. A further approach would be to use alternative data, such as that provided in the CAS data book, which gives electric vehicle uptake of 99% by 2050³⁴⁸. Either way, the small carbon saving of -1,446 tCO₂e which the Applicant predicts would be eliminated, demonstrating that the Scheme would be a net carbon emitter.

Access and maintenance track

- 12.29 There is no requirement for the Scheme to be accompanied by an access and maintenance track and the compulsory purchase of the land required to deliver it is not justified. The construction of this track increases the land take required by around 30%, with a commensurate increase in environmental and other harms.
- 12.30 There is no reason why maintenance and emergency vehicles could not use the busway itself. It is likely that emergency vehicles would use the busway rather than the track, which would be separated from the busway by ditches, trees and other landscaping. So far as maintenance is concerned, the Applicant's highways witness accepted that it was possible that maintenance could be carried out using the busway, subject to disruption to services. Such disruption is likely to be minimal, as the number of buses travelling along the busway would be very low in comparison with vehicle movements on other roads.
- 12.31 An active travel path is not a matter related to a busway, and that function of the track would not, in isolation, fall within the scope of the powers for which an Order may be made. Further, CPPF & CPC maintain that the benefits of an active travel path alongside the busway are limited. There is a more attractive active travel route, known as the Comberton Greenway, which is currently being constructed as far as Hardwick³⁴⁹. This route could be extended to Bourn Airfield through Highfields Caldecote by the upgrading of existing public bridleways, and without the need for the acquisition of land. It would provide a more direct route between Cambourne, Bourn Airfield and West Cambridge and would avoid a steep incline on Madingley

³⁴⁵ [CD26-01-APP-W3-2](#), appendix C, table 1.

³⁴⁶ [CD29-63](#), table 3.

³⁴⁷ *ibid.*, para 61.

³⁴⁸ [CD29-66](#), para 11.

³⁴⁹ [CD26-10-W1-1](#), para 7.28 to 7.30.

Hill.

CPPF & CPC alternative

- 12.32 There is an alternative, in-highway, scheme which extends between St Neots Road, immediately west of the Madingley Mulch Roundabout, and the Madingley P&R junction with the A1303³⁵⁰. Subject to refinement through detailed design, this alternative would be less harmful in environmental terms, cheaper and deliverable in a timeframe comparable to that of the Order Scheme, and aligned with the build-out of Bourn Airfield.
- 12.33 The alternative would deliver upon the objectives for the Scheme, and would fulfil the relevant planning policy requirements. Policy SS/7 of the SCLP (in respect of Bourn Airfield) requires the provision of high-quality bus priority measures or a busway on or parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge (above, para 7.6). Similarly, Policy SS/8 of the SCLP, in relation to the Cambourne West allocation requires high-quality segregated bus priority measures on the A1303 between its junction with the A428 and Queens Road, Cambridge (above, para 7.6). These requirements would be met by the alternative to the Order Scheme. It is considered that a scheme which includes the CPPF & CPC alternative would also fulfil the requirements of the emerging Local Plan allocations.
- 12.34 Insofar as the Bourn Airfield development itself is concerned, the proposed alternative would fulfil the requirements of both condition 13 of the outline planning permission and an associated planning obligation, which both refer to the Scheme or an equivalent scheduled rapid mass transit passenger carrier service (above, paras 4.6 & 4.8).
- 12.35 The alternative would deliver benefits over and above the Order Scheme³⁵¹. It would include an inbound bus lane towards Cambridge, but not an outbound bus lane, as that would not be required³⁵².
- 12.36 The CPPF & CPC alternative would be less environmentally harmful than the Order Scheme. It would avoid any impact on the openness of the Green Belt, involving a minor widening of an existing road corridor. It would avoid the impacts on landscape character caused by the Scheme. It would avoid significant impacts on Coton Orchard, and the need for compensation for damage to three other designated local wildlife sites. It would avoid any impact on veteran trees, protected species, including bats³⁵³ and the other species which would be affected by the Scheme, and would avoid any impact on the Madingley Wood SSSI. So far as bats are concerned, it is the case that the mitigation proposed to address the impact on bats, in the form of bat hop-overs is unproven³⁵⁴.
- 12.37 In respect of biodiversity net gain, the metric calculation upon which the results submitted with the application were based, was defective in a

³⁵⁰ The general arrangement for this alternative scheme is shown on plans C-001 to C-003 in appendix F of [CD26-10-W2-1](#).

³⁵¹ [CD26-10-W3-1](#), appendix A, section 3.6.

³⁵² *ibid.*, para 4.2.1 to 4.2.12 & section 4.2.14.

³⁵³ [CD26-10-W4-1](#), section 6.1.

³⁵⁴ *ibid.*, para 6.1.10 & 6.1.11.

number of significant ways³⁵⁵, not least insofar as it omitted to account for individual tree loss. To deliver a net gain, off-site habitat units would need to be purchased. The purchase of such units would give rise to a significant additional cost to the project. The Applicant's ecology witness accepted in cross-examination that to account for the habitat units required to mitigate individual tree loss alone, the additional cost could be in the order of £1 million. The delivery of a net gain would be easier and cheaper to deliver by way of the alternative proposal.

- 12.38 In terms of the heritage impacts of the CPPF & CPC alternative, it would avoid harm to the Coton Conservation Area and to the listed building Memorial at the American Military Cemetery on Madingley Road. It would cause some harm to the setting of the Cemetery RPG, but the evidence of the Applicant's heritage witness was that any harm to the heritage significance of both assets as a result of the loss of some of the verge between the current carriageway and the boundary hedge of the Cemetery would be less than substantial. The public benefits of the alternative Scheme would outweigh that level of harm.
- 12.39 The CPPF Alternative would not encroach beyond highway land along the boundary of the cemetery, and there would be no injury to any of the rights or obligations contained within the letter from the British government to the American government concerning the cemetery³⁵⁶.
- 12.40 The alternative would be preferable in terms of its carbon impacts, and there would be no impact on BMV agricultural land. It is also important to take into account any proposals which the landowner has for its own land, and here CPPF has plans to use its land as a nature reserve³⁵⁷.
- 12.41 It is accepted that the alternative would involve the need for some departures from DMRB standards, but such departures from standards are not, in principle, unusual, and are part of the DMRB process. Departures D01 – D05 all relate to the same cross-section and would involve the approval of reduced lane and verge widths³⁵⁸. In conjunction with the reduction in speeds to 40mph, the provision of reduced lane widths from 3.65m to 3.25m was safe and the reductions in lane widths and speed limits were complementary and self-enforcing.
- 12.42 This scheme could be delivered subject to disruption and cost. It could be built in sections using overnight/weekend working where possible. It would likely be possible to maintain two-way flows of traffic during the construction period. The construction of an entirely new carriageway would reduce maintenance requirements for the new road, and the cost is expected to be significantly less than for the Order Scheme.
- 12.43 The CPPF & CPC alternative could be delivered in its entirety within five years of the date of the decision on the Order Scheme, and parts could come forward sooner. The Applicant's estimate for the Order Scheme is that it would come into operation two and a half years after any decision by the

³⁵⁵ *ibid.*, appendix DW6.

³⁵⁶ [CD1-06.16](#), PDF pages 8-11.

³⁵⁷ [CD26-10-W1-1](#), para 3.1.

³⁵⁸ [CD26-01-APP-W8-5](#), appendix C to the report at appendix 1, page 34.

Secretary of State³⁵⁹, although this does not account for construction of the section through Coton Orchard which could not commence before November 2028, given the need for the preparation works for the transplantation of the veteran trees³⁶⁰. There would be no undue delay in the delivery of the alternative proposal.

Public open space

12.44 If the Secretary of State agrees that the maintenance track is not required, there would be no public access to the proposed replacement open space³⁶¹. If an access were provided solely via the new bridge, then the proposed replacement public open space would not be a good location to encourage public access and dwell time because it would be an isolated area with a balancing pond and no surveillance. Land owned by CPPF on the east side of the M11 would be preferable as replacement open space for the following reasons:³⁶²

- It would not be part of the construction area, therefore access would not be restricted, and there would be no health and safety risks.
- It would be part of a larger green space, providing added benefits for the public and nature.
- Access to the land would not require provision of an access and maintenance track.
- There would be no sustainable drainage pond, with its associated health and safety risk.
- There would be natural surveillance from the M11, helping to reduce the risk of anti-social behaviour.
- The arable land could also serve as a habitat creation project.
- It is on the same side of the motorway as the land which would be lost.

Conclusion

12.45 The Secretaries of State are invited to find that the Order should not be made, the request for DPP be refused and the application for the public open space certificate dismissed; or, alternatively, that the maintenance and access track should be removed from the scope of the Order and permission for it refused.

13. THE CASE FOR Ms GAZELEY, COTON ORCHARD Ltd AND HOUSTON CREST PROPERTIES Ltd³⁶³ (OBJ-52)

Introduction

13.1 Houston Crest Properties owns a parcel of land to the north-east of Coton

³⁵⁹ Based on the target completion dates given in [CD 1-21.04](#), table 2-1.

³⁶⁰ The Applicant's arboricultural witness in XX.

³⁶¹ See plan at [CD1-19](#), appendix H.

³⁶² Mr Littlewood's PoE ([CD26-10-W1-1](#)), para 8.5 & 8.6. The plan on page 26 shows the location of the two areas of land.

³⁶³ The case for Ms Gazeley, Coton Orchard Ltd and Houston Crest Properties Ltd is summarised principally from the closing submissions of Ms Gazeley ([CD29-120](#)) and her PoE ([CD26-02 OBJ-52](#)).

and between Cambridge Road and the A1303³⁶⁴. The north-west part of this land is occupied by a garden centre, and the remainder by Coton Orchard Ltd. The proposed busway would run through the orchard, approximately on a west-east line between Cambridge Road and land at Rectory Farm³⁶⁵. Ms Gazeley is a resident of Coton who has roles with both Houston Crest Properties and Coton Orchard.

Coton Orchard

- 13.2 Coton Orchard is a CWS, and is described in the citation as a traditional orchard³⁶⁶, a priority habitat under the UK Biodiversity Action Plan, and Cambridgeshire's largest traditional orchard. Within the orchard 111 plant species have been documented and it also contains a variety of wildlife³⁶⁷.
- 13.3 The orchard has not been sprayed with pesticides for nearly 30 years. Soil health has been restored, and continuity of habitat maintained. It is a working landscape, shaped for biodiversity. In accordance with Natural England's standards for a traditional orchard, new plantings are spaced generously to allow full canopy development and ecological maturity. Cider and perry varieties of tree have been introduced, and *Malus sieversii* (the ancestor of the domestic apple tree) to strengthen genetic resilience. The rows are arranged in a fixed north-east to south-west orientation because of wind and sunlight, with wide access corridors which also act as foraging routes for wildlife.
- 13.4 The proposed busway would cut through the rows of fruit trees, sever access, and make part of the site unworkable. Bisecting the orchard would irreparably damage its structure and function. Loss of viability would affect stewardship.

Veteran Trees

- 13.5 Twelve veteran Bramley apple trees have been identified within Coton Orchard, all of which are covered by a TPO. Six of these trees are within the Order Limits³⁶⁸. It is proposed to protect three of the veteran trees which are at the edges of the Order Limits (T5, T9 & T10) and to move the other three trees (T6, T7 & T8). Root pruning of those trees, prior to moving, could not begin until 2026 or 2027, with transplanting in 2028 or 2029. But a veteran tree cannot be dug, dragged or replanted without deterioration. Its survival depends on mycorrhizal networks, soil structure and hydrology formed over many decades. The moment translocation is proposed, deterioration is inevitable. Mature fruit trees are considered to be at high risk of unsuccessful relocation as they are fragile and not resilient³⁶⁹.
- 13.6 The NPPF makes clear that development resulting in the loss or

³⁶⁴ See plan at [CD29-40](#).

³⁶⁵ Sheets 13 & 14 of the proposed site plans and of the works & land plans show the relationship of the busway to land occupied by Coton Orchard Ltd.

³⁶⁶ Coton Orchard CWS citation and map ([CD29-76](#)).

³⁶⁷ Ms Gazeley's PoE ([CD26-02 OBJ-52](#)), p4.

³⁶⁸ Mr Allder's PoE ([CD26-01-APP-W4-1](#)), para 2.5 & 2.6 and image 2. The position of the trees is shown on the tree survey plan at appendix 1 to the proof (in CD26-01-APP-W4-2). The trees are covered by the SCDC (Coton Orchard, Cambridge Road, Coton) Tree Preservation Order No TPO/01/2025 ([CD-37](#)).

³⁶⁹ Email dated 3 October 2025 from D Newman of Glendale Countryside Ltd to Ms Gazeley, in Ms Gazeley's supplementary note on translocation of fruit trees ([CD29-64](#)).

deterioration of irreplaceable habitats (including veteran trees) should be refused unless there are wholly exceptional reasons. There are no wholly exceptional reasons. The proposal is a local bus scheme, in an area served by existing routes, and it does not reach the Biomedical Campus or South Cambridge, where the greatest demand lies. It is not a nationally significant infrastructure project.

- 13.7 The Applicant accepts that, taking account of mitigation, the adverse effect on Coton Orchard CWS would be significant at a County scale³⁷⁰. Planting young trees and tending them until they are veteran is not compensation. A sapling cannot replace hollow limbs, cavities, fungal webs or seasonal food plants relied upon by the species present today. Nor would BNG credits at Lower Valley Farm³⁷¹ recreate a century-old orchard mosaic habitat.

Operation of the Orchard and Cultural Landscape

- 13.8 Ms Gazeley's father bought the orchard in 1996 to preserve it, and to pass on something meaningful to future generations. Apart from the garden centre, the site was returned to low-intervention management. The orchard provided shelter to Austrian Jews fleeing persecution, an act which is marked by the Anne Frank sapling.
- 13.9 Coton Orchard Ltd is financially robust. Fruit is supplied on a commercial basis to local cider-makers. Revenue comes not only from fruit sales, but also from the sub-letting of buildings to the garden centre. Fruit is also made available non-commercially to the community, including food banks and charities. The orchard hosts educational visits, and community events are supported on the site including Blossom Day, Apple Day and Wassail, which are free and open to the public.

Need for the Proposal

- 13.10 There is agreement that public transport could and should be improved. But that does not justify this route or this scheme. Cambourne already has regular bus services linking it to Cambridge, St Neots and beyond. It is considered that CCC has not provided evidence about where people actually want or need to go, or how this scheme would serve those journeys better than improvements to existing roads and services. There is no clear account of how buses would proceed into Cambridge beyond Grange Road, and there would not be direct access to Addenbrooke's Hospital, post-16 education in Cambridge or Cambridge Science Park. The Mayor of Cambridgeshire & Peterborough has made clear that he cannot guarantee that any bus service would ever run on the proposed route³⁷². His duty is to meet the needs of the whole region, and not one corridor. Neither the Applicant nor GCP has the power to run or franchise bus services.

Availability of Funding

- 13.11 CCC has a projected budget deficit of reportedly over £40 million, and the

³⁷⁰ Mr Whitby's supplemental PoE ([CD29-85](#)), para 13 & 15.

³⁷¹ Mr Ellis's PoE ([CD26-01-APP-W13-1](#)), para 1.1.145 to 1.1.148. The report GCP Infrastructure Programme Biodiversity Net Gain Approach to the GCP Executive Board, 6 November 2025 ([CD29-93-1](#)) refers to compensatory provision at Lower Valley Farm at, para 4.7 to 4.9.

³⁷² The Mayor's statement of evidence ([CD26-11 OBJ-313](#)), para 5b & 7-13.

GCP's own budget forecasts a cashflow deficit reaching £185 million by 3030-31, beyond the lifetime of the City Deal, and potentially beyond the lifetime of the Applicant if proposals for local government reorganisation proceed. Central funding is not guaranteed, especially when there is competition from new rail infrastructure such as the Cambourne station on the EWR link³⁷³. Moreover, the economic case for the Scheme places the BCR at between 0.43 and 0.48³⁷⁴. The SoST must be satisfied that a scheme is properly funded, financially prudent and capable of delivery. On the current figures, that assurance is not yet available.

Infrastructure Conflict

- 13.12 Land at Madingley Hill is identified for a service reservoir linked to the Fens Reservoir project³⁷⁵. The corridor for a possible overflow pipeline to Bin Brook would be in conflict with the route of the proposed busway. The busway would also cross the planned route of the EWR link³⁷⁶, construction of which could cause disruption to the Scheme.

Alternatives

- 13.13 Development at Bourn Airfield is not contingent on the busway, since the relevant condition on the planning permission also provides for an equivalent scheduled rapid mass transit passenger carrier service (above, para 4.6). Modest and timely improvements would enable the A1303 to carry more buses and cyclists. A single bus lane and better signals would lead to reliable services without harming the landscape.

Safety

- 13.14 The Applicant was responsible for building the existing Cambridge busway where there have been serious accidents³⁷⁷. The proposed route cuts across walking and cycling paths, creating conflict between people and vehicles. The addition of fencing would narrow verges and worsen visibility.

Carbon Arithmetic

- 13.15 It has been claimed that the Scheme, involving the felling of trees at Coton Orchard, would deliver a net reduction in carbon emissions. However, a net reduction of approximately 5,000 tCO₂e over 60 years³⁷⁸ would represent a minimal saving. Moreover, it is noted that Professor Hirst (for CPPF & CPC) stated that the Scheme would be a net emitter of carbon (above, para 12.28).

Compulsory Acquisition

- 13.16 Essential elements of the Scheme remain undefined, in this case the guidance system to be used. As such the case for compulsory purchase is

³⁷³ You Said, We Did – Autumn Update, East West Rail, November 2025 ([CD29-109](#)), section 4.10.1.

³⁷⁴ Cambourne to Cambridge Better Public Transport Project: Outline Business Case – Economic Case ([CD1-20.02](#)), para 13.4 & 13.5. Ms Gazeley's closing submissions refer to the higher BCR as being 0.5, but the adjusted figure in the report is 0.48.

³⁷⁵ The plan at [CD29-42](#) shows the overlap of the Order Limits with Anglian Water projects.

³⁷⁶ You Said, We Did – Autumn Update, East West Rail, November 2025 ([CD29-109](#)), section 4.10.2.

³⁷⁷ Ms Gazeley's PoE ([CD26-02 OBJ-52](#)), pp15 & 16.

³⁷⁸ Cambourne to Cambridge Environmental statement ([CD1-10.01](#)), para 10.3.4.

incomplete, and also potentially contrary to statutory and policy expectations. Land must be required for the purposes of the Scheme for compulsory acquisition powers to be used. In this case the operational foundations of the busway have not sufficiently developed to enable the SoST to reach a proper judgement on the case for granting the Order, nor be satisfied that the land is both necessary and proportionate to the public benefit identified³⁷⁹. Without the support of the transport authority, no bus services will run on the proposed route, and without the services, the Scheme cannot deliver its claimed public benefit.

Conclusion

- 13.17 The Applicant's proposed off-road route for the busway offers too little and at too high a cost. It would cause irreversible harm without less damaging alternatives having been exhausted. That is not a proportionate response to transport challenges.

14. THE CASE FOR J & WR SADLER³⁸⁰ (OBJ-102)

- 14.1 J & WR Sadler (the Sadlers), and other members of their family, farm an area of land on the south slope of Madingley Hill lying between Madingley Road to the north, and Whitwell Way, Coton, to the south³⁸¹, and have done so for four generations. This includes Crome Lea Business Park, the three homes of family members, with different generations living to the north and south of the proposed busway route which would traverse the three main fields of the holding. Part of the farmland is owned by the Sadlers, and part leased from another party. The Sadlers are statutory objectors.
- 14.2 Part of the land is covered by a covenant³⁸² dating from the 1950s to give greater protection from urban development to the countryside lying to the south of Madingley Road including Madingley Hill, the highest point west of Cambridge. The Sadlers consider themselves lucky to be custodians of this small part of the countryside. They are pro-development, understand the need for public transport and fully support better access to education and employment. Nevertheless, the Scheme raises serious concerns in respect of its impact on the family farm, the environment and the community.

Landscape, Biodiversity and Visual Impact

- 14.3 The broad Scheme corridor would plough over the top of one of the most beautiful rural landscapes in Cambridgeshire, fundamentally eroding the unique character of Madingley Hill and its surroundings. It would be a tarmac road which could be seen from some distance. It would harm high quality Green Belt land and threatens to cause irreversible harm to the unique and valuable natural environment through disruption of established wildlife habitats, particularly Coton Orchard. The Scheme is inconsistent with the government's commitment to achieving net-zero emissions and

³⁷⁹ CPP Guidance ([CD8-28](#)).

³⁸⁰ J & WR Sadler's case is largely summarised from the Sadlers' objection letter of 31 January 2024 ([CD2-OBJ-102](#)), Mr R Sadler's PoE and appendices ([CD26-05-1](#), [CD26-05-2](#)), Mr R Sadler's Speaking Notes ([CD29-78](#)) and Mr R Sadler's closing submissions ([CD29-121](#)).

³⁸¹ The extent of land and location of properties is illustrated on Plans L1 and L2 in Appendix L to Mr R Sadler's PoE, pp61-62 ([CD26-05-2](#)).

³⁸² See [CD3-02](#).

protecting natural resources, when there is an alternative, cost-effective scheme that would deliver similar benefits.

Family Burial Site

- 14.4 In 1992 the ashes of Mr J Sadler's parents were buried in a very special and peaceful place on their land which they had farmed until they passed away; a location with views across open countryside and the City of Cambridge that they selected together. The site is where Mr J Sadler wishes to be laid to rest. When meeting GCP representatives they were led to believe that the busway would pass over, or near to, the burial site, and that it would be the family's responsibility to relocate the ashes.
- 14.5 Concerns were raised repeatedly with assurances given that the burial site would not be within the proposed busway, although this transpired to mean not within the actual busway carriageway as opposed to the overall Order land. The GCP later suggested the ashes could be left just outside the boundary, but moving the boundary line a short distance would not resolve the issue³⁸³. This is not how a public authority should treat persons whose land and family history lie in the path of its decisions.

Impact on Farm, Severance and Safety

- 14.6 The Scheme would sever the entire family farm, cut off two family homes from the other, limit access to the farmyard, and make it difficult for a disabled family member to visit their grandchildren.
- 14.7 On an average day, the family would pass across the proposed busway route thirty times, at a location that enables them to pause, sit on a memorial bench to take in the views, and respectfully acknowledge the burial site. Although raised many times, the GCP has not provided a design solution demonstrating how these movements across a busway with buses travelling at speed would be safely maintained. Nor did they provide any comfort that the Sadlers' route could continue to be used, and that any passing point would be suitable for disabled users.
- 14.8 Despite these concerns, a passing point was shown in the most inconvenient location which would have meant a 40-minute delay to visit the burial site and make farming the land difficult and impractical. Then, after agreeing to provide two passing points, one of those has been withdrawn without explanation. Plans have been hard to read, with no proper explanation. The Applicant has failed to properly assess the impact of severance on the farming operation, let alone propose a workable mitigation strategy.
- 14.9 The proposed busway section between Cambridge Road, Coton and Comberton Long Road would be long, straight, unfenced, unlit, and without intersections. These are similar design conditions that have resulted in repeated vehicle intrusions, including by joyriders and stolen vehicles, and fatal accidents on the existing guided busway track; incidents serious enough that CCC were prosecuted by the Health and Safety Executive.

³⁸³ A site meeting in July 2024 subsequently confirmed that the ashes lie within 7m of the land to be acquired, Mr R Sadler's PoE, para 76 ([CD26-05-1](#)).

Creating another isolated, unprotected, high-speed corridor, would inevitably create problems. This is not a speculative concern but a foreseeable risk and the Sadlers would have to be the first to respond should an incident occur on the section as it would run right through the farm. CCC cannot later claim that it was unaware of the risk.

Alternatives

CPPF & CPC alternative using A1303 Madingley Road

- 14.10 With a limited budget and a great deal of unpaid work, a detailed and viable alternative route has been prepared by CPPF & CPC. This would deliver similar journey times and capacity to the Scheme proposal, but would cost considerably less, and avoid cutting across the slope of Madingley Hill and the destruction of Coton Orchard. It can be delivered much quicker than the Scheme and has wide community support, but has been largely ignored.
- 14.11 There is sufficient land alongside the A1303 to allow the existing road to be widened for a bus lane where the boundary of Madingley Wood is set back by around 8m. This strip has been left unmaintained allowing several small trees and shrubs to become established, yet the GCP considered that these trees are more valuable than the trees at Coton Orchard, covered by a TPO, that would be removed to accommodate the Scheme. A tree survey was requested to support their position, but GCP confirmed that the strip had not been surveyed. In any event a bus lane would act as a buffer to the Wood.
- 14.12 The Sadlers have offered a narrow strip of land along the opposite side of the A1303 to facilitate the alternative on-road alignment opposite Madingley Wood. Although another landowner also owns land opposite the Wood, the realistic choice is obvious for them too; either a 45m wide corridor severing their land under the Applicant's Scheme, or a minimal boundary strip of verge (which the landowner is probably unaware it owns) that may or may not be required under the CPPF & CPC alternative. A responsible landowner would choose the latter. The Sadlers would also be willing to provide space on their land for a temporary construction compound for an alternative scheme along the A1303, which would materially reduce the construction period and minimise disruption.
- 14.13 The American Cemetery already receives buses pulling into the grounds from the A1303 every 10-15 minutes safely and without difficulty. A carefully designed pedestrian and cycle route past the entrance would strengthen its role as a place of reflection and learning. There is an existing cycle route running alongside the A1303 and a further cycle route/bridleway is being upgraded directly south of the proposed route to improve green connectivity into the City.
- 14.14 The Applicant considers the CPPF & CPC alternative should be disregarded for lack of detail, but it provides far more detail than the proposed Scheme does. There has been no credible evidence from a civil engineer or a principal contractor to support any suggestion that it would take too long for the CPPF & CPC alternative to be built; rather there is pressure to accept the Applicant's flawed scheme based on opinion.

- 14.15 The Applicant's position essentially amounts to: *even though the Scheme is flawed, environmentally harmful, and not supported by proper consultation, it must be approved as there is no plan B*. The obstacles to the CPPF & CPC alternative are not insurmountable, but perfectly manageable through cooperation and competent planning. An on-road solution for this short, section, combined with use of the northern corridor (see para 14.16) is entirely feasible.

Other routes and services

- 14.16 There are already publicly funded, fast, reliable and direct transport spines giving access to education and employment in the form of the A428/A14 upgrade and the guided busway from Orchard Park serving Cambridge Regional College, Cambridge Science Park and Cambridge North (with links to the City Centre, and soon Cambridge South). These are faster, with more certain journey times than the Scheme would provide.

Proposed Park and Ride facility

- 14.17 The Applicant has not explained who will use Scotland Farm P&R facility. It is difficult to expect that anyone would park there given it would be a half hour cycle ride to the City Centre³⁸⁴, when it is so much quicker to cycle into the City Centre from the existing Maddingley Road P&R site.

EWR

- 14.18 The Chancellor has confirmed that EWR will be delivered. It will provide a direct route between Cambourne and Cambridge, and accelerating its delivery would provide a more integrated and future proofed transport solution for Cambridge and the surrounding area. There would be a duplicating of infrastructure and the expense of the proposed busway, and EWR has not been taken into account in assessing the Scheme. EWR carries support from the business community, something the Scheme has failed to achieve.

Need, Demand and Economic Case

- 14.19 The Scheme would carry up to eight buses an hour³⁸⁵, but four would be traveling from Cambridge out to Cambourne, a direction which is not anticipated to suffer from congestion. The Scheme would effectively create a dedicated busway for four buses an hour, at huge cost.
- 14.20 The current and growing cost estimates for the Scheme are disproportionately high compared to the alternative option. Public funded infrastructure projects are required to demonstrate good value for money using the DfT's BCR, with a figure below 1 classified as 'poor' and not providing good value for money. The BCR for the Scheme scored 0.43, well below the threshold. Furthermore, the BCR calculation is based on a valuation that is 15 years out of date. Adding cost inflation over the 15 year

³⁸⁴ The proposed park and ride facility is intended to provide transfer to buses.

³⁸⁵ The Cambourne to Cambridge Better Public Transport Project - Outline Business Case: Strategic Case, January 2020 ([CD1-20.05](#)), proposes up to 10 services per hour on three direct express services: Cambourne to Cambridge City Centre (6 per hour); Cambourne to the Biomedical Campus (2 per hour); and Scotland Road Park and Ride site to the Biomedical Campus (2 per hour during peak periods).

period would diminish the 0.43 figure further and worsen the financial case.

- 14.21 The data that has been used to assess the merits of the Scheme appears to be out of date and inconsistent. It fails to take account of: post-pandemic working practices; the closure of the P&R facility east of the M11; EWR connectivity to Cambridge, Bedford, Milton Keynes, and Oxford; upgrades to the A14; and the carriageway duelling between Cambourne and the A1. A project of this significance should use data sets from one year alone, and as up to date as possible, rather than the data sets used which were from two different years, both predating the COVID-19 pandemic. There is no evidence to suggest that the proposed Scheme will deliver value for money or achieve the anticipated return on investment.
- 14.22 The Applicant refers to the West Cambridge site in justifying the Scheme. However, West Cambridge is not, nor is intended to be, a conventional commercial business park for general occupation but is focused on academic and research facilities led by the University. This is coupled with the University's masterplan for providing thousands of key worker homes for staff at nearby Eddington, which in addition also has postgraduate accommodation. West Cambridge is being planned in a way that reduces external commuting, directly undermining the Applicant's claim of unmet demand for public transport to the site from Cambourne.

Consultation and Engagement with GCP

Adequacy of consultation and engagement relating to land acquisition

- 14.23 The Sadlers were left out, ignored, and denied the early and meaningful engagement the law requires, not being provided with proper meetings, never given clear information, and never engaged in meaningful negotiation.
- 14.24 Between 2014 and March 2024, there were only two informal meetings with the GCP, at neither of which were the Sadlers professionally represented. The GCP has acknowledged that no agendas or minutes exist for these meetings in 2020 and 2021, having previously ignored requests for copies of minutes.
- 14.25 The Applicant has confirmed that no meaningful realignment of the proposed route could be considered after it was fixed in March 2023. However, consultation took place only after key decisions had been made. This raises a fundamental question of whether the Applicant's land agents were aware of this design freeze at the first formal meeting with the Sadlers in April 2024. If they were, failing to disclose this was misleading, and if not, the engagement process was flawed.
- 14.26 The Applicant did not issue an early formal notification letter to explain the Scheme, the statutory process, or landowners' rights. The Applicant asserts that public exhibitions held between 2015 and 2021 were an adequate substitute for direct engagement with landowners. However, such exhibitions or general consultations cannot replace proper formal dialogue with those whose land could be subject to compulsory acquisition.
- 14.27 There was no continuity with the different agents acting on the Applicant's behalf and no coherent engagement strategy, undermining any suggestion

of an ongoing dialogue. There is a stark disparity in the Applicant's dealings with the Sadlers compared to that of institutional landowners including colleges and the University, as illustrated by the records in the Applicant's engagement logs.

Reliability of Applicant's records and evidence

- 14.28 The Applicant has accepted that a record of an e-mail from Mr R Sadler in a draft statement of common ground³⁸⁶ was incorrect and that the email did not exist. The most serious issue was inaccurate evidence. The Applicant's Sadler Engagement & Correspondence Log³⁸⁷ recorded that Heads of Terms were sent from the Applicant's agents to the Sadlers' agents in February 2022. When giving oral evidence, Mr Franklin (the Applicant's property and land witness) confirmed that Heads of Terms were not sent on that date, nor in May 2022. When pressed by the Applicant's advocate, Mr Franklin suggested they were sent in August 2024 before confirming it was 31 October 2024³⁸⁸.
- 14.29 This incorrect entry in the log gave the appearance of early negotiation and implied that particular land agents were representing the Sadlers in respect of land acquisition, whereas those agents were only engaged to act for the Sadlers in respect of a discrete piece of survey work.
- 14.30 The most serious inaccurate entry asserting that Heads of Terms had been issued, when in fact they were not, sits at the centre of the Applicant's claim of early negotiation.
- 14.31 Mr Franklin attempted to present a picture of constructive dialogue, however significant parts of his oral evidence diverged from the factual record in ways that cannot be reconciled with what actually occurred. It is difficult to place any weight on his wider evidence.
- 14.32 These are not procedural oversights; they are structural failings. All parties are entitled to expect that key evidential material has been properly checked before it is relied upon. The Rules require that reasonable efforts be made to acquire land by agreement before seeking compulsory purchase powers, and a process that records negotiations that never occurred cannot satisfy this requirement. The evidence before the inquiry, including the Applicant's own documents, admissions of its witness, and the absence of any meaningful negotiation, shows that statutory requirements have not been met.
- 14.33 The Applicant may argue that the errors in their engagement record are minor, that the inaccurate entries are not important, or that shortcomings in consultation can be excused by the scale and history of the project. However, none of that is compatible with the statutory framework. The Applicant has failed in its duty to make reasonable efforts to acquire land by agreement, in its duty to maintain accurate records of engagement, and in its duty under the EA2010 to consult a disabled landowner. These duties are

³⁸⁶ Appendix C to Mr R Sadler's PoE, pp11-18 ([CD26-05-02](#)). No version of a statement of common ground between the parties was submitted into the Inquiry.

³⁸⁷ Appendix J to Mr Franklin's PoE, pp41-44 ([CD26-01-APP-W7-2](#)).

³⁸⁸ Closing Submissions of Mr R Sadler, p.2 ([CD29-121](#)).

not optional and they are not retrospective. Taken together - the fabricated records, the lack of any records of meetings before April 2024, the mishandled burial site, and the complete absence of disability engagement - it is clear that there has been no meaningful negotiation or engagement before the Applicant sought compulsory purchase powers.

Other Matters

- 14.34 At the inquiry the Applicant sought to portray Mr R Sadler as uncooperative by referring to an incident when he did not permit intrusive investigations in respect of a separate GCP initiative, the Comberton Greenway. No meeting or explanation was offered in advance of the request and this temporary refusal was not in opposition to greenways, but to seek clarity following the experience of the GCP's mistakes and misunderstandings associated with the burial site.
- 14.35 It subsequently transpired that the greenway route would follow an existing bridleway and not require any of the farm's land, but this showed that there could be a constructive outcome once proper communication occurred. There would be no unnecessary loss of Green Belt and no costly digging at public expense. This demonstrates that when there is proper engagement with landowners and they are treated fairly, better, cheaper, and less harmful solutions emerge.
- 14.36 The same pattern has occurred with the proposed Scheme route. Where it is easy, the Applicant uses the existing corridor; where it becomes difficult, instead of working within the highway and with landowners, the route diverts off onto private land in the Green Belt, even where the established route remains viable.

Conclusion

- 14.37 The world has changed over the past five years; the proposed Scheme is out of touch and does not fulfil the brief of today. Its long-term environmental impact would harm the quality of life for those affected. Greater engagement with local communities is essential to ensure their needs are adequately addressed, but in the case of the proposal, engagement failed at every level.
- 14.38 The GCP has a duty to pause and reconsider this project, so that together with the Sadlers they can deliver a solution that would protect the environment, respect local communities, and ensure public funds are used wisely.

15. THE CASE FOR THE MAYOR OF THE CAMBRIDGESHIRE AND PETERBOROUGH COMBINED AUTHORITY³⁸⁹ (OBJ-313)

- 15.1 The Mayor's approach is pro-growth and pro- new transport infrastructure, however he considers that the Scheme is an outmoded proposal which does not provide value-for-money and does not align with the direction being set for local transport policies. The proposal should be rejected as uncertain,

³⁸⁹ The Mayor's case is summarised principally from the closing submissions of Mr Graham ([CD29-119](#)) and the PoE of Mr Bristow ([CD26-11](#)), ([CD29-19](#)).

expensive and backward.

15.2 The Mayor's concerns include:

- That he cannot guarantee the assumed bus service levels would be viable, nor give assurances that bus services would be permitted to operate on the route, under future bus franchising³⁹⁰ arrangements;
- The reliability and safety of the proposed guidance technology is uncertain;
- The Scheme would have an unacceptable impact on the local landscape (particularly Coton Orchard), damage to which is unnecessary as an alternative scheme with similar transport benefits is possible; and,
- The Scheme does not align with the Mayoral priority to deliver a light rail network for the Cambridge area.

Bus franchising

- 15.3 There are good reasons to believe that the busway might be incompatible with the Mayor's approach to bus franchising. The Mayor leads the CPCA, which is the Local Transport Authority. Rather than the Applicant or the GCP, the CPCA sets strategic transport policies for the region including developing the new Greater Cambridge Transport Strategy (GCTS). The Mayor intends to proceed with bus franchising³⁹¹, with an independent review underway to consider the most appropriate franchising model. Implementation of a franchising scheme is anticipated to be April 2028, before the Scheme would be completed.
- 15.4 Routes from Cambourne to Cambridge that would be franchised will already exist. For new routes using the proposed busway to be created, an operator would need to apply to the Mayor for a service permit and satisfy any conditions set down. Two criteria, in particular, could present a problem for any service permit applications. Any non-physical guidance technology proposed would need to be proven for safety reasons, which is not the case for the Scheme as presented. Even existing busways which have physical guidance have had safety issues which have seen the Applicant fined and required to install fencing along their routes. These existing routes have an ongoing problem with unauthorised access, a problem that could be far greater given that the design of the proposed Scheme is in effect a road.
- 15.5 Competition is another potentially problematic criterion, as a new route should not undermine the financial viability of franchised routes, including those between Camborne to Cambridge. Although those routes have yet to be specified, any service operating on the proposed busway would have an impact on other routes.

Assumed demand for bus services

- 15.6 The Applicant's assumptions for demand should be treated with caution, and this could reduce the number of viable bus services using the Scheme. The

³⁹⁰ Where local authorities determine the details of bus services to be provided and typically bus operators provide services under an appropriate contract, with no other bus services operating in a franchised area without the agreement of the franchising authority.

³⁹¹ [CD29-31-0](#), [CD29-31-1](#), [CD29-31-2](#) and [CD29-31-3](#).

Mayor points to CPPF & CPC evidence that access charges may not be good value for money for bus operators, services to the Biomedical Campus would be quicker via a bus lane on Madingley Road and the M11, services to north Cambridge would be faster via the A428 and A14, and services to central and east Cambridge may well be quicker via the A428, A14 and Milton Road.

Mayoral powers

- 15.7 The Applicant and the GCP have sought to downplay the Mayor's powers relative to the Board of the CPCA. However, as service permit applications will be determined by the Mayor alone, it is far from clear that he would allow the busway to operate as intended. Even if safety concerns could be addressed and overcome, there is significant uncertainty about the frequency of any permitted services and the overall routes that they would follow.
- 15.8 The Applicant assumes that guided buses would continue from the busway to serve various locations in Cambridge. But one plausible outcome could be that new bus services would only be permitted to operate on the busway itself, between Stirling Road and Grange Road. Another could be that even this could have an adverse effect on franchised routes, and the busway would not be used at all.
- 15.9 The Mayor has been clear that he wishes to develop a light rail network for Cambridge. Through the CGC, work has already begun with the CPCA on a mass rapid transit study, funded by the DfT, which would be modelled in the GCTS. The Scheme is at odds with this ambition as it would not form part of light rail services and could also cost more to build than light rail tracks. A busway could only be converted to light rail at further, significant cost, if indeed its geometry and route would even be appropriate for light rail. Although a busway is arguably compatible with the existing LTCP produced by the Mayor's predecessor, the whole local framework is set to change.
- 15.10 The English Devolution and Community Empowerment Bill ([CD29-31-4](#)), which the Mayor anticipates will receive Royal Assent in summer 2026³⁹², would abolish CCC and give the Mayor considerably enhanced powers, including in relation to the CPCA Board. As the Applicant would no longer exist by April 2028, the Board is likely to have just two constituent councils from that point with all transport decisions taken on the basis of a simple majority vote, and with the Mayor having a casting vote and a veto. The LTCP will be able to be subject to review or replacement on the basis of these new voting arrangements.

Transport policy

- 15.11 The Mayor will have sole responsibility for setting local transport policies from summer 2026, including the GCTS ([CD29-31-3](#)). In the intervening period this will model different transport interventions across different growth scenarios, using the updated Cambridge and Peterborough Combined Authority Transport Model (CaPCAM).

³⁹² The English Devolution and Community Empowerment Act 2026 received Royal Assent on 30 April 2026.

Modelling

- 15.12 The Applicant, the GCP, the CPCA and the CGC³⁹³ all agree that the updated CaPCAM model is the right one for assessing local transport changes and showing the interrelationships between different interventions which will include the impact of EWR on demand for bus services from Cambourne to Cambridge, the effect of which has not been modelled for the Scheme. The CGC also intends significant growth beyond the emerging Local Plan and the GCTS work may result in substantially different results to the modelling presented at the inquiry, within months rather than years.
- 15.13 The GCTS may undermine any justification for the busway, through the inclusion and testing of other transport interventions, including mass rapid transit solutions. A busway may therefore be incompatible with the conclusions of the GCTS and the approach it adopts; if the policy is to build a light rail network, it makes no sense to build a busway, which would be difficult and expensive to convert to light rail and might be in the wrong place.

Value for money

- 15.14 Irrespective of the above, the busway would still offer poor value-for-money. It has a poor underlying BCR and calculations should not include proposed development at Bourn Airfield. It is possible to change the planning condition and obligations relating to that development and altered transport patterns following the pandemic, with lower road usage, provide strong grounds for such a change. That development would still be being built out when EWR is complete, carrying passengers to Cambridge South and Cambridge at high speed.

Alternatives

- 15.15 The Applicant has not fully explored the CPPF & CPC alternative which would cost the taxpayer less, be delivered sooner and save Coton Orchard from significant harm. Valued habitats should only be compulsorily purchased and built upon as a last resort when all other reasonable options have been exhausted, and this is not the case in the Cambourne to Cambridge transport corridor, where other short and longer-term options are available.
- 15.16 Immediate alternatives may also exist (including use of existing roads mentioned at 15.6 above) and it is unfortunate that, for the purposes of the inquiry, the CPPF & CPC alternative scheme was subject to the same evidential tests at the inquiry as the Scheme, when the proposers lack the resources of the GCP and the Applicant. The CPCA itself lacks the resources of the GCP in this respect and as the Mayor has only been in office for six months, it has not been possible for detailed feasibility work on on-road options to be completed (which will be begun as part of the GCTS work), and the Mayor believes such alternatives are plausible.
- 15.17 Initially conceived as an unspecified, mass rapid transit connection to a tunnel forming part of a Cambridge Autonomous Metro (CAM), the busway

³⁹³ [CD29-41](#) provides a useful reference to the interrelationship of existing local authorities and partnership bodies to one another.

would now essentially serve West Cambridge, if it ever took buses at all: the Scheme is a route to a tunnel that does not exist and would not connect to a mass rapid transit network. Buses running at a reduced frequency and without the envisaged connectivity would render the cost unjustifiable with maintenance costs difficult or impossible to recoup. Any bus that got beyond the end of the busway would find itself in the same, as yet unresolved, traffic and congestion problems in central Cambridge.

Supporters' rationale

- 15.18 No-one is actually enthusiastic about the busway: the Scheme's supporters recognise the need to do something, and the Scheme is that "something". Supporters feel obliged to keep going with the Scheme given the time taken to get to this stage rather than thinking again. The GCP feels obliged to proceed with busways because they are all it has left before its time is up. These factors do not make the Scheme a good idea, and safety concerns and the potential impact on franchised routes, mean the Scheme could be constructed but never allowed to carry a passenger service, rendering it a £200m white elephant. Despite the time and effort spent on the proposal, it would fail to 'get Cambridgeshire and Peterborough moving'.

16. THE CASE FOR PX FARMS LTD AND PX LAND LTD³⁹⁴ (OBJ-252)

- 16.1 PX Farms Ltd and PX Land Ltd have interests in land in Dry Drayton. Part of this land, between Scotland Road and the A428, is proposed as the location of the P&R facility³⁹⁵. The companies have no objection to the objectives of the Cambourne to Cambridge Order and the use of their land for this purpose, although more land has been identified than is reasonably required for the P&R facility. It is also considered that the provision of charging facilities for electric vehicles is a revenue generating proposal which is outside the objectives of the Scheme.
- 16.2 The main objection to the use of compulsory purchase powers is that the Applicant has not made sufficient or reasonable steps to seek agreement for acquisition by negotiation. Moreover, the plans fail to incorporate adequate mitigation to reduce the visual and noise intrusion of the Scheme on the adjoining residential properties and the adverse impact of additional traffic on the adjoining residential and agricultural occupiers and businesses.
- 16.3 As a consequence of the proposal, PX Land and its associated companies had incurred professional costs of £105,000 by the time of the inquiry. These costs have been incurred in respect of negotiations with GCP and CCC, including on access and damage suffered to the land, and to address the formal compulsory purchase procedure itself.
- 16.4 Damage has been caused to the land due by archaeological digs which have disrupted drainage. Despite an express provision of the licence requiring GCP to rectify any damage caused to the land within the term of the lease and before July 2024, no work has been undertaken, and GCP have stated that it has no intention to carry out works for some 2 to 3 years.

³⁹⁴ The case for PX Farms Ltd and PX Land Ltd is summarised principally from the closing submissions of Roythornes LLP ([CD29-112](#)).

³⁹⁵ See sheets 7 of the proposed works and land plans ([CD1-12.01a](#)) and sheet 7 of the site plans ([CD1-16.04a](#)).

- 16.5 It is considered that GCP and CCC have not engaged constructively in negotiations and have used the threat of the additional costs and delay that would be incurred by PX Land Limited should the issue of compensation become the subject of proceedings before the Upper Tribunal (Lands Chamber). The Applicant is not using compulsory purchase powers as a tool of last resort, but rather a means to unreasonably pressurise PX Land Ltd to accept terms for the acquisition of the land on terms that are less favourable than those which would be achieved for the market value of the land as if sold by a willing seller, ignoring the fact that the acquisition would be compulsory.

17. THE CASES FOR OTHER PARTIES WHO APPEARED AT THE INQUIRY

Juniper Propco (Bourn) Ltd³⁹⁶ (SUP-14)

- 17.1 Juniper Propco (Bourn) Ltd is the owner of Bourn Airfield. The company is a joint venture partnership between Homes England, Greycoat Real Estate, and Oaktree Capital Management. The partnership has been formed to realise the development potential of strategic sites for the delivery of new homes. Juniper is the master developer, and intends to deliver £115 million of investment towards infrastructure for the development, including the proposed route for the busway across the site. In addition, Juniper will contribute £20 million towards the wider cost of funding CtoC under the terms of planning obligations. Those who live and work on the Bourn Airfield site in the future would benefit from high-quality public transport.
- 17.2 Outline planning permission was granted for 3,500 new homes at Bourn Airfield in 2024 (above, para 4.5 -4.8). The planning application was prepared and determined in a policy context which included a commitment to significant improvements to public transport, including a segregated bus link to Cambourne and bus priority measures or a busway on or parallel to the A1303. The CtoC Scheme would contribute to the delivery of these improvements and to the creation of a sustainable new settlement.
- 17.3 The Bourn Airfield site would initially be served by a new western access and egress point off Broadway. This would provide early access to the site and accommodate the dedicated route that would be constructed to provide the segregated bus link into Cambourne. Applications have been made for changes at the western access to align with the CtoC Scheme, and work is underway to discharge conditions prior to commencement of works at the access.
- 17.4 These early works would facilitate access to the first phase of development of new homes, and in due course the provision of the dedicated route for the CtoC busway. The expected trajectory for the delivery of new homes on a cumulative basis is:
- By the end of 2027, 50 new homes
 - By the end of 2028, 200 new homes
 - By the end of 2029, 475 new homes
 - By the end of 2030, 650 new homes

³⁹⁶ The case for Juniper Propco is summarised principally from the statement submitted by Lichfields ([CD26-14 SUP-14](#)).

- By the end of 2035, 1,000 new homes.

This trajectory demonstrates the importance of the timely delivery of the CtoC Scheme for the development of Bourn Airfield.

- 17.5 Juniper recognises and supports the national and international importance of Cambridge, notably as a centre for technological innovation and biomedical research, and the role of additional infrastructure and housing in supporting its future growth and development. Juniper strongly supports the CtoC project, and the transport, economic, social, and environmental benefits which would flow from it. These benefits are of local, regional, and national significance.

North Newnham Residents' Association³⁹⁷

- 17.6 The Residents Association fully supports the plans for the busway. The need for the expansion of housing and associated facilities in the region is noted, but such development cannot be accommodated in Cambridge without damaging the character of the City and its protected open spaces. Therefore, the Association's submissions on the 2018 Local Plan emphasised support for development in necklace villages with good public transport links.
- 17.7 Good public transport is vital to ameliorate the congestion around Cambridge and to limit the effects of climate change. To be attractive, however, public transport needs to be reliable and efficient, which requires its segregation from general traffic. The existing guided busways have already proved their worth in this regard. The proposed busway would have the additional advantage of providing support for active travel. The alternative form of traffic management based on road pricing and congestion charging is considered unattractive.

The Federation of Cambridge Residents' Associations³⁹⁸ (OBJ-309)

- 17.8 The Federation is a citywide grassroots civic organisation with close links to Cambridge villages and interest groups.
- 17.9 Many residents strongly object to the off-road section of the busway between Madingley Mulch and West Cambridge. While they agree that improving public transport should be a priority, they do not think that this proposal is the best use of money.
- 17.10 This route would not make journey times to Cambridge much shorter, and it terminates in Grange Road. There is no clarity on how people would be able to get from there to major employment destinations or Cambridge's sixth form colleges, but this would inevitably involve further journeys through congested streets in the City Centre, adding to congestion there. It does not take into account current road usage data or evolving working and commuting patterns, especially the changes since the pandemic.
- 17.11 The off-highway route would destroy Coton Orchard, a CWS, East Anglia's

³⁹⁷ The case for North Newnham Residents Association is summarised principally from its SoC ([CD23-03-REP-03-SoC](#)).

³⁹⁸ The case for the Federation is summarised principally from the speaking notes of Ms Blythe ([CD29-26-0](#)).

largest remaining ancient orchard, and the eighth largest in the UK. It would also harm the Green Belt, and some of the UK's best farmland at a time of growing anxiety about food security. It would harm some of the best views and the setting of one of the UK's premier heritage cities, and urbanise the attractive rural and historic village of Coton.

- 17.12 It is considered that there has been no qualitative assessment of the heritage impact of this scheme. Yet the Thames Landscape Strategy for the Arcadian Thames (CD29-26-3) makes it clear that the heritage relationship between people and their landscape is significant. A recent heritage ecosystems impact assessment study by the University of York and University of Cambridge entitled *A Pilot study of East West Rail's preferred alignment Route E (Cambourne to Cambridge), South Cambridgeshire* (CD29-26-2) suggests that integrating heritage ecosystem perspectives into planning decisions is crucial to address the transport project's negative impacts on local relationships with the environment. The study found that a community's lived experience of a landscape is just as significant as the technical aspects of assessing the impact of large infrastructure projects, and, if this relationship is damaged or broken, it can have lasting consequences.
- 17.13 Many residents consider that the real reason for the harmful busway scheme is land value uplift, benefitting the owners of land which has low value without planning permission. Transport improvements increase the viability and value of the housing on their sites. However there is concern about the impact of employment led housing growth on water supply and sewage disposal.

Coton Busway Action Group (CBAG)³⁹⁹ (OBJ-143)

- 17.14 CBAG was formed in 2015 when it became apparent that the GCP was considering an off-road busway route that would bisect Madingley Hill and Coton Orchard and require an additional bridge over the M11. CBAG fully supports the initiative to provide better public transport links between developments west of Cambridge with employment and educational facilities in and around the City. However, along with many other organisations and individuals, CBAG strongly advocates the adoption of an alternative scheme that includes an on-road section from Madingley Mulch to the M11. The alternative route would cause minimal environmental damage, save tens of millions of pounds, and provide more direct journeys to key destinations.

Failure to appraise alternative routes

- 17.15 The GCP has failed to appraise proposals for alternative routes, including one for an inbound bus lane from Madingley Mulch to the West Cambridge site. The alternative promoted by CPPF & CPC demonstrates that it is possible to fit an on-road segregated bus lane largely within the A1303 boundary and to avoid any impact on either Madingley Wood SSSI or the American Cemetery. The GCP and CCC have failed to acknowledge the countywide and national significance of Coton Orchard, and of the southern aspect of Madingley Hill as productive farmland and a setting for the

³⁹⁹ The case for CBAG is summarised principally from its PoE ([CD26-06-1](#)) and summary PoE ([CD26-06-7](#)).

American Cemetery. Analysis of The City Deal/ GCP's decisions since 2014 indicates a preference for the proposed Scheme which is considered to have led to a flawed outcome.

Poor choice of route

- 17.16 The requirement is only for an inbound route to the City, and only for the morning rush hour. There is no problem, inbound or outbound, outside this period. The main centres of employment and education are the Biomedical Campus, CB1 and CB2 (near the main train station), City sixth-form colleges, and the science and business parks on and around Milton Road and to the north of the City. The GCP's off-road Scheme would not provide easy bus journeys to any of these. The only centre of employment that would be efficiently served by the off-road route is the West Cambridge site, but that can be served equally effectively by the alternative in-highway route proposed by CPPF & CPC.
- 17.17 It has been claimed that the off-road route would reduce journey time by 2–3 minutes, but this is inconsequential in the context of the whole journey from Cambourne to Cambridge. Moreover, the delays that would be faced by passengers arriving in Grange Road would not only cancel out that saving but would increase the total journey time considerably. A further problem with the GCP Scheme is the restricted configuration of the junction with Grange Road, which, it is considered, would prevent buses turning left and travelling along Grange Road to the City Centre via Northampton Street.

Impact of EWR

- 17.18 The preferred route for the rail line includes a new station at Cambourne and a direct link to the new Cambridge South station⁴⁰⁰. This rail line would serve the people of Cambourne more efficiently than the CtoC busway. Although the EWR scheme has government support, the GCP has not taken any meaningful account of the impact of the new rail line on the busway Scheme. An EWR consultation document states that the rail line will offer a 15 minutes journey from Cambourne to Cambridge South station, which is adjacent to the Biomedical Campus, whereas travel by bus through the congested centre of Cambridge would add considerably to the estimated journey time of 29–32 minutes from Cambourne to Grange Road.
- 17.19 The outline business case indicates an adjusted BCR of 0.5:1⁴⁰¹. If EWR is taken into account, then the BCR will be reduced. Confirmation of EWR going ahead would add the significant risk of the busway becoming underused and underperforming, or even redundant – at which point any benefits, and the BCR, would be non-existent or minimal at best.

Environmental impact

- 17.20 The off-road section of the busway would have a great environmental impact. It would:
- have unacceptably high levels of infrastructure carbon associated

⁴⁰⁰ Extracts from EWR 2024 consultation document, Appendix 3-3 to CBAG's PoE (in [CD26-06-04](#)).

⁴⁰¹ Cambourne to Cambridge Better Public Transport Project, Outline Business Case, Appendix B – Economic Case Addendum ([CD1-21.02](#)), para 2.4.2.

- with its construction.
 - destroy much of Coton Orchard.
 - bisect wildlife corridors and fragment priority habitats.
 - impose unacceptable disruption and urbanisation on the village of Coton.
 - cut through Green Belt and despoil some of the most attractive and valued countryside views and walks around Cambridge.
 - compromise the setting of the American Cemetery.
- 17.21 It is calculated that the off-road route would take 57 years to break even on carbon. By contrast, the alternative in-road highway scheme proposed by CPPF & CPC would have a very small fraction of the infrastructure carbon associated with the off-road scheme because it does not involve the construction of a new road and motorway bridge.
- 17.22 Coton Orchard is the largest traditional orchard in Cambridgeshire. It has been undisturbed by ploughing or pesticides for more than 30 years, and comprises a valuable mosaic habitat of fruit trees, meadow, hedgerows, wild scrub and copse. This habitat would be fragmented by the Scheme, and the harm cannot be compensated for by planting on and off the site.
- 17.23 Cambridgeshire has one of the lowest proportions of priority habitat in England (less than 10%), one of the lowest percentages of land designated for nature, and the second lowest proportion of woodland cover (4.8%)⁴⁰². The Boulder Clay Woodlands to the west of Cambridge are identified in the Cambridge Nature Network Report as a priority area within a nature recovery network⁴⁰³. The protection and further establishment of ecological networks and corridors are proposed. These networks and corridors are vital to the survival of species, enabling them to forage and breed; without them populations become isolated which in turn renders them more vulnerable to stresses and threats and to reduced genetic diversity. Connectivity is crucial, but the off-road busway would cut across the priority area and sever two wildlife corridors⁴⁰⁴.
- 17.24 Coton is a quiet, unspoilt village, bounded by Coton Countryside Reserve to the south and east and Coton Orchard to the north. The Scheme includes the construction of a large bus stop at the edge of Coton, which would inevitably attract commuter parking and lead to congestion around the village. Additionally, the off-road busway would run close to the school, severing a well-used footpath that children currently walk along, safely and away from traffic. It would be necessary to cross two lanes of traffic, a cycleway, and pedestrian paths, turning a safe route into a complicated and hazardous journey.
- 17.25 The few elevated and relatively unspoiled areas of Cambridgeshire are particularly precious. As such, the landscape to the west of Cambridge has long been protected by local planning policy and is an area of great significance. Walks up Red Meadow Hill to the south of Coton and up the rise towards Madingley to the north, offer some of the most unspoiled views

⁴⁰² The Cambridge Nature Network Final Report, 2021, The Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire ([CD26-06-5](#)), section 1.1, p1.

⁴⁰³ *ibid.*, sections 2.1, p9 & Section 3.7, p17.

⁴⁰⁴ *ibid.*, map 2.

around Cambridge. The off-road busway would cut through this rural landscape and be visible from the elevated viewpoints, completely changing its character.

- 17.26 Cambridge American Cemetery is the only permanent American World War II cemetery in Britain. The site at Madingley was chosen for its natural beauty and commanding views. It provides a suitably contemplative space for reflection and remembrance. Introducing a tarmac busway across the south side of Madingley Hill would be a significant disruption to its setting.

Poor value for money

- 17.27 The proposed busway is estimated to cost £160-200 million. The assertion of £680 million in economic benefits is not considered to be credible, especially when compared to the on-road option's lower costs of approximately £60 million and comparable travel time savings. This alternative would have a BCR of about three times that of the proposed Scheme.

Friends of the Cam (FoTC)⁴⁰⁵ (OBJ-203)

- 17.28 FoTC is a consortium of concerned organisations and individuals, with about 3,600 registered supporters. Its aim is to defend the Cam and its tributaries from pollution and over-abstraction, which is pursued through education, direct action, policy advocacy, and celebration of the rivers. The Group is concerned about both the short-term state of the river, and its longer-term sustainability. Hence it is concerned with any activity which would compromise the health of the river and all who depend on it.
- 17.29 Cambridge and its surroundings cannot support the projected growth which the CtoC busway is designed to promote, and which is implied by land-value uplift: it is considered that sufficient water resources do not exist for currently approved development, nor will they in the near to medium term future. In an area which is not expected see the completion of a new reservoir for about 12 years, and where the chalk aquifer is already dangerously low and over-abstracted, this poses a serious limit to growth. East Anglia is the region in the UK with greatest water scarcity.
- 17.30 A fixed route busway is likely to generate more car-driving to reach the small number of stops; moreover, the route is not planned to extend into the centre of Cambridge, nor its most popular destinations such as the hospital/Biomedical Campus, schools and colleges, and business parks, thereby necessitating transport changes. Building a fixed-route roadway which would only serve its own limited bus service would be wasteful and would use a large amount of carbon emitting cement, which would further increase the County's carbon emissions. FoTC are concerned about the biodiversity damage that the CtoC Scheme would cause, and do not accept that mitigation measures would compensate for the loss of trees, wildlife and habitat, nor for the carbon emissions.
- 17.31 FoTC fully agrees that there is a need for the provision of an accessible, flexible, and affordable public transport network so that people may move

⁴⁰⁵ The case for FoTC is summarised principally from Ms Buckingham's speaking notes ([CD29-38](#)).

between the various villages and towns in Cambridgeshire. It supports CPPF's & CPC's alternative proposal to use the existing road network. This has a better chance of reducing car use as the routes would serve more villages, and could be available much more quickly: it would also be likely to be cost-effective.

Ashcroft Veterinary Practice⁴⁰⁶ (OBJ-01)

- 17.32 Ashcroft Veterinary Practice is located on the route of the busway at St Neots Road, Hardwick. The Practice had objected to the loss of lay-bys along this part of St Neots Road to accommodate the active travel path, which would cause difficulties with access and parking. It is now agreed between the parties that both a loading bay and active travel path would be accommodated adjacent to the veterinary surgery, and the Practice has indicated that it will withdraw its objection (above, para 8.8, 10.132).

The Campaign to Protect Rural England – Cambridge & Peterborough Branch⁴⁰⁷ (OBJ-308)

- 17.33 The Cambridge & Peterborough Branch of the Campaign to Protect Rural England (CPRE-C&P) opposes the busway, which is seen as offering poor value for money, destroying valuable areas of the countryside, and creating unnecessary carbon emissions. The CPRE supports CPPF & CPC's alternative scheme for buses, coupled with further measures to reduce traffic in Cambridge, particularly at rush hour, and radical improvement of cycle routes.
- 17.34 The busway proposal emerged within the complex local governance structure comprising CCiC, CCC, SCDC, East Cambridgeshire District Council, the GCP and CPCA. Governance is being rationalised to an extent with elections in May 2027 for two unitary authorities. However, the GCP and the CPCA would remain. The Mayor, who leads the CPCA, will therefore retain responsibility for the Local Transport Plan. The CPRE-C&P believes that a comprehensive plan delivered by a responsible and accountable single Transport Authority is the right way forward.
- 17.35 The Cambridge growth phenomenon involves shifting jobs, housing and water from elsewhere in the country to the Cambridge area. Dependent on a jobs-led growth model, it creates a vicious cycle of housing shortages and rising house prices. Essential building should be spread across the country taking jobs to where they are most needed, and in areas where water is plentiful. The idea that scientific expertise has to be physically located in large clusters is outdated.
- 17.36 The minimising of emissions should be the starting point for planning. It is considered that those linked to the proposed alternative scheme would be far less.

Gough Way Residents Association⁴⁰⁸ (OBJ-175)

⁴⁰⁶ The Practice's case is summarised principally from its objection ([CD2-OBJ-01](#)) and the Applicant's note on the agreement with the Practice ([CD29-116](#)).

⁴⁰⁷ The CPRE-C&P's case is summarised principally from Professor Booth's speaking notes ([CD29-79](#)).

⁴⁰⁸ The Residents Association's case is summarised principally from Ms Fry's speaking notes ([CD29-80](#)).

- 17.37 The Gough Way estate is located to the south-west of Rifle Range Road, a short distance from the eastern end of the proposed route of the busway. Residents are in favour of improved public transport, but are strongly opposed to the busway which offers little benefit.
- 17.38 Flood risk has always been a major concern, but it is acknowledged that the Environment Agency has withdrawn its objection. However, an on-road route would avoid the cost of raising the busway above flood levels in the form of the Bin Brook bridge and embankment. The visual impact of this bridge is a concern to Gough Way residents.
- 17.39 Residents are opposed to the busway joining the highway network at any point on Grange Road. At the Rifle Range Road junction (which the busway is proposed to use), Grange Road is narrow, visibility is poor, and there is a school entrance opposite. There is concern about conflict with pedestrians and cyclists both on Grange Road, which is heavily used by cyclists, and on Rifle Range Road itself, which is narrow.
- 17.40 The onward journey from Grange Road to the City Centre would be no quicker than existing buses due to congestion. The Order Scheme offers no solutions to City Centre congestion, and does not fit the CPCA Bus Strategy (2023) which aims to deliver a fully integrated bus network with improvements to the whole journey. The proposed busway would not integrate well with wider transport strategy and schemes such as EWR and bus franchising. It has a low BCR, and should be rated as poor.
- 17.41 The intended carbon saving of 5,000 tonnes is a minor benefit. Moreover, the busway would harm valued habitat and countryside. Use of the existing corridor would also avoid the cost of two new bridges.

Other Interested Parties⁴⁰⁹

- 17.42 Representations were made at the inquiry by and on behalf of a number of local residents. A supporter of the Scheme and resident of Adams Road expressed concern about the possible use of Adams Road as an alternative to the Rifle Range Road at the eastern end of the busway route. Adams Road is reported to be one of the busiest cycle routes in Cambridge, and it also provides access to a number of premises, including a university sports ground. It would be unsuitable to accommodate additional traffic from the busway.
- 17.43 Other residents raise a range of objections to the Scheme. The bridge over Bin Brook, together with its embankments, would increase flood risk to the Gough Way estate, with the use of Adams Road or Wilberforce Road avoiding this potential problem. Concern is expressed about the consultation process, with reference to the way in which responses were treated, and the scoring of options.
- 17.44 Grange Road is not a suitable point for the busway to end. It is an important local route, used by cyclists and pedestrians. The road is not a

⁴⁰⁹ The representations are summarised principally from the proofs of evidence of Mr Strauss ([CD26-13-1](#)) and Dr Green ([CD26-03](#)), the SoC of Mr Davidson's ([CD23-12-1](#)) and Mr Sullivan ([CD23-23](#)), Mr Burford's statement ([CD26-15](#)), and the speaking notes of Ms Postgate ([CD29-27](#)), Ms Fyfe ([CD29-28](#)), Mr Singleton ([CD29-70](#)), Dr Sutton ([CD29-83](#)), and Mr M Baker ([CD29-81](#)).

main artery, and has been designed to discourage through traffic with the use of traffic calming measures. Those buses which would run on the busway comprise through traffic and are expected to be full-size: they should be carried by the main roads. Moreover the turns into and out of the busway at the Grange Road junction would be very tight and unsuitable for buses.

- 17.45 The Scheme would not provide access to the Biomedical Campus, nor to the science park and regional college on the north side of the City. Instead of this expensive and destructive project, bus services should be more frequent and better marketed with simple fare structures. These measures would increase ridership, helping the services to be more reliable. The busway would do nothing to solve the problem of central Cambridge traffic. Car use in the City should be disincentivised, and the bus network grown on existing roads. A better option would be that proposed by the CPPF & CPC. The A1303 has sufficient space for a bus lane: buses destined for Addenbrooke's Hospital and the Biomedical Campus could travel there via the M11, and those heading for the science and business parks could use the A428 and the A14.
- 17.46 Dust from the development is likely to have a harmful impact on the health of a vulnerable resident and the living conditions of nearby residents. Under the EA2010, the GCP has a duty to make reasonable adjustments to avoid substantial disadvantage, and the Human Rights Act 1998 requires that private and family life and a person's home be respected. If the Scheme is to proceed, the route of the busway should be moved to a position at least 100m from the garden of a vulnerable resident, in accordance with the Institute of Air Quality Management's (IAQM) threshold of significant impact⁴¹⁰. Other adjustments requested include the location of the busway in a cutting with a barrier of vegetation between it and the garden of that person, and a risk assessment to enable an understanding of the specific risks to health.
- 17.47 The traffic-light crossing of Cambridge Road, and the parking associated with the provision of a bus stop would cause traffic problems at Coton. This crossing and that of the public footpath between the school and Madingley Road would also pose a risk to the safety of pedestrians. The busway would cut across a number of other pedestrian and cycle routes. Construction of an enlarged reservoir at Madingley Hill, proposed by AW&CW (above, para 8.6), would conflict with the route of the busway. The busway would divide and damage the natural environment of Coton Orchard, with an adverse impact on biodiversity and ecology.
- 17.48 It is considered that the proposal would only result in a small increase in land values. Other approaches would have a better BCR, as they would provide similar benefits at a lower cost. The proposal does not align with the principles of sustainable and inclusive transport.
- 17.49 Insofar as the effect on open space is concerned, the land proposed to be taken is publicly accessible, tree-lined and is part of a CiWS. It is used and enjoyed extensively by pedestrians and cyclist as part of a route between

⁴¹⁰ See table 3 of Guidance on the assessment of dust from demolition and construction, IAQM, 2024 ([CD29-25-1](#)).

Coton and West Cambridge. However, the land offered in exchange is part of an inaccessible field, with no footpath, no equivalent trees and hedgerows, and no biodiversity. Even if access were provided it would be of little value since it would lead nowhere useful for the public. It is not equally advantageous to the public.

- 17.50 One objector argued that, although the busway would be an important transport facility, it was incomplete and the proposals for its use were not clear. Services should run to Cambridge station to the east and to St Neots station to the west. A bus station in the commercial centre of Cambourne would be expected, but is not proposed. A train station is proposed outside Cambourne, beyond the A428, which is a barrier to movement. If the EWR were to follow the former railway line, busway services could be extended to a station on the A1198 to the south of Cambourne.
- 17.51 An objector alleged that there were failures in governance of the project, and that these undermined the basis for the Order. Although there is a substantive difference between auditing project processes and assessing the merits of specific route alignments, there appears to have been confusion in this regard. Concerns about whether an inbound option had been evaluated were not addressed, and it is considered that decisions were taken by CCC and the GCP which suffered from insufficient evidence and a lack of scrutiny. Concern was also raised about the influence on the project of the University of Cambridge, which is a partner in the GCP. A key element of any project is the evaluation and mitigation of risk, but it is not clear if there has been a proper review of safety in the development of options.

18. THE CASES FOR PARTIES WHO MADE WRITTEN REPRESENTATIONS⁴¹¹

- 18.1 As objections to the amount of compensation to be paid cannot be taken into account in the decision on a TWA order⁴¹², representations from parties with land interests relating to the amount of compensation sought or offered, and the factors influencing the calculation of compensation, have not been included in the summaries.

Statutory and Official Bodies⁴¹³

The Department for Transport: Group Property Team⁴¹⁴ (REP-06)

- 18.2 The Team points out that there are registered and unregistered interests in the crown land schedule in which the DfT have an interest. Discussions with the Applicant were ongoing and no formal decision had been taken as to whether consent may be given to include those interests within the Order. Attention is drawn to the SoST's sponsor and oversight role in protecting the transport network (namely NH and EWR).

⁴¹¹ The cases of parties making written representations are summarised principally from representations which are in the CD2 series of core documents ([CD2 - Interested Parties' responses](#)). The cases of those parties who made written representations and subsequently appeared at the inquiry are included in the summaries in Sections 11 to 17 of the Report.

⁴¹² [Transport and Works Act Orders: a brief guide, 2023](#), which adds that disputes on these matters are dealt with outside the TWA process.

⁴¹³ As defined in s2 of the IP Rules.

⁴¹⁴ Letter of 8 January 2025 ([CD2-REP-06](#)).

The Environment Agency (OBJ-301)

- 18.3 The Agency withdrew an earlier objection⁴¹⁵ to the proposal on flood risk grounds (8.1 above). The Agency initially advised the Applicant at pre-application stage that their Bin Brook flood model was unsuitable and, as a model was not submitted at the statutory consultation stage, the Agency were unable to determine whether concerns had been resolved. However, following reviews of the model, whilst some technical issues remain⁴¹⁶, the Agency consider that it is acceptable for assessing flood risk and making decisions in the area of interest having regard to the scale and nature of the proposed development.
- 18.4 Based on the Agency's review of the Applicant's Bin Brook Model Report (v1.4) and Flood Risk Assessment⁴¹⁷ (FRA), the modelling work is sufficiently robust to support the FRA in meeting the NPPF requirements on flood risk. The model outputs show negligible reductions in flood depth outside the red line boundary, limited to small reductions in some locations, with all increases contained within the site. These changes are within acceptable tolerances, do not materially increase flood risk to third parties, and demonstrate that the proposed development can be made safe for its lifetime.
- 18.5 On this basis, the FRA satisfies the second limb of the NPPF Exception Test⁴¹⁸ by evidencing that the Scheme would not increase flood risk elsewhere. With regards the first limb, the wider sustainability benefits of the Scheme are set out elsewhere in the application. Nevertheless, the FRA should continue to seek opportunities for net reductions in overall flood risk wherever practicable, in line with the NPPF.

Historic England⁴¹⁹ (REP-08)

- 18.6 Historic England agree with the scope and methodology used to assess the potential impact on the historic environment from the proposal which would lie within the wider setting of a number of designated heritage assets, noting that the eastern end of the proposal lies within the West Cambridge Conservation Area, with a caveat relating to the grade II*listed building of Clare Hall designed by Ralph Erskine (the Erskine Building) at Clare Hall College (see 18.8 below).
- 18.7 Any adverse impact of the proposal on designated heritage assets would be minimal, and Historic England agree with the Applicant's assessment that the level of harm to designated heritage assets would be at the lower end of the range of 'less than substantial harm' in NPPF terms, and that it could be satisfactorily weighed against the public benefits of the proposal. Historic England has no objection to the application on heritage grounds.

Historic England - Grade II listed Erskine Building*

- 18.8 However, there appears to be a discrepancy between the details shown in

⁴¹⁵ Letter of 8 January 2025 ([CD2-OBJ-301](#)).

⁴¹⁶ Set out in detail in letter of 19 August ([CD28-01](#)).

⁴¹⁷ ES Appendix TR13.1: Flood Risk Assessment ([CD1-11.13.02](#)).

⁴¹⁸ Para168.

⁴¹⁹ Letter of 8 January 2025 ([CD2- REP-08.1](#)) and 8 August 2025 ([CD2-REP-08.2](#)).

some of the submitted drawings. Therefore, the potential impact of the proposals on the significance of the grade II* listed Erskine Building may have been overlooked.

- 18.9 The proposal would necessitate the heavy remodelling of the current track along Rifle Range Road with broad grass verges to accommodate the busway and flanking path adjacent to the Erskine Building. This might require physical alterations to the drainage conduit on the south edge of Erskine Building, with associated changes to the access routes to the college. Such alterations would have a direct physical impact on an important aspect of the listed building, and the potential to cause harm to its significance.
- 18.10 In particular, this impact would be to the rainwater drainage system which is an explicit part of the building's architectural expression, and to the open and uncontrolled access to the south of the building, whose radical permeability is in deliberate contrast to the more formal arrangements on the north side, both key aspects of Erskine's designs. However, there is insufficient detail on the drawings to determine whether physical works to the drainage conduit would be necessary.
- 18.11 Even if the proposed remodelling of Rifle Range Road would avoid such physical impacts, changes in this location have the potential to cause harm to the significance of the listed building by altering its setting.
- 18.12 The proposed sections suggest that the busway might be fenced on both sides. If this is the case, this would compromise the physical and visual permeability of the Clare Hall site on its south side, along with the introduction of level changes, barriers, insensitive surfacing materials, road furniture or other clutter, and consequently harm the significance of the listed building by altering the character of its setting. The proposed treatment of the line of semi-mature lime trees is also unclear; were they to be felled, this could also cause harm to the significance of the listed building through the alteration of its setting.
- 18.13 This harm to significance cannot be fully assessed until detailed designs are brought forward, but this could fruitfully be addressed at this current stage in the planning process. The potential harm to significance could probably be avoided or mitigated through careful design, but given the insufficient clarity about the details of the works to judge their impact, it is suggested that the Applicant provides more detailed design drawings for this part of the route.

National Highways (OBJ-313)

- 18.14 Initially National Highways representations included an objection to the compulsory permanent acquisition of several plots comprising its operational land (above, para 8.5), and raised concerns about construction risks associated with the Scheme's close proximity to the A428, and risks associated with detailed design⁴²⁰. They subsequently confirmed that they had agreed protective provisions in the Order with the Applicant⁴²¹. A

⁴²⁰ Letter of 8 January 2025 ([CD2-OBJ-313.1](#)).

⁴²¹ Letter of 16 September 2025 ([CD29-05](#)).

Position Statement⁴²² later confirmed that NH remained supportive of the Scheme and they provided an update on discussions with the Applicant in respect of land interests which it is proposed to transfer by agreement.

Natural England (REP-11)

- 18.15 Natural England primarily had concerns about the potential effects on barbastelle bats, which are a European protected species and a conservation priority both locally and nationally. Barbastelles are one of the most light-averse bats, with light pollution considered to be a limiting factor for the species. The territorial nature of barbastelles means that impacts to even one bat's foraging site or commuting route could have implications for the rest of the colony. Barbastelles are present in both the Madingley Wood SSSI and the Eversden and Wimpole Woods SAC.
- 18.16 Concerns relate to the loss of potentially important foraging habitat and food sources, maintaining connectivity of bat habitat within the wider landscape and direct mortality of bats by being hit by buses or swept into their backdraught.
- 18.17 As the Scheme is close to Madingley Wood SSSI and within the 10km Impact Risk Zone of the Eversden and Wimpole Woods SAC, this makes the landscape particularly important for this species. As the population at Madingley Wood is on the opposite side of the proposed busway to the SAC it is the population most at risk of severance, with the genetic health of one barbastelle colony dependent on that of the colonies around it. As the Madingley Wood population is almost definitely functionally linked to the Eversden and Wimpole Wood SAC population, given the proximity and likelihood of shared autumn swarming sites (at currently unknown locations), the health and survival of the Madingley Wood population is therefore important for maintaining genetic diversity to support the SAC population.
- 18.18 Trees within Coton Orchard CWS offer more shelter and shade than most surrounding habitat. Given its proximity to Madingley Wood SSSI it is likely to provide particularly useful foraging habitat during poor weather, at dusk and at dawn, en-route to other foraging areas.
- 18.19 A number of concerns and actions were identified⁴²³. These included that: the Applicant's Statement to Inform Habitats Regulations Assessment Statement ([CD1-11.05](#)) was not robust enough in respect of consideration of bat foraging habitat and likely effects on the colony from collisions; particular attention should be paid to mitigating the effects of lighting and to the detailed design of crossing points; and, further surveys were necessary in relation to Coton Orchard CWS and crossing points. Mitigation was identified in the form of reducing the speed limit for buses through Coton Orchard and adjoining scrub/woodland to 30mph, particularly during hours of dusk, darkness and dawn, which would allow bats and barn owls more reaction time to reduce the risk of collisions and backdraught effects.

⁴²² Email of 12 November 2025 ([CD29-95](#)).

⁴²³ Letter of 8 January 2025 ([CD2-REP-11](#)).

- 18.20 Having engaged with the Applicant⁴²⁴ and received further information from them, Natural England subsequently confirmed a series of points in a Position Statement ([CD29-07-0](#)). Natural England is satisfied that sufficient regard has been given to the identification of foraging areas and the potential for Coton Orchard CWS to be a valuable foraging habitat, and the assessment of impacts on bats.
- 18.21 Natural England agree that bat collision risk is acceptable, subject to securing appropriate mitigation, and are content with the mitigation proposed, notably that to be employed where bats may cross the busway. This is subject to Natural England being consulted on the final mitigation design, informed by the results of the thermal imaging surveys, and particularly in relation to lighting, noise and landscape treatments, as well as on the adoption of an appropriate bat monitoring strategy. Natural England have amended draft conditions to secure the mitigation⁴²⁵.
- 18.22 Given the low risk of collision, the Scheme should not materially add to existing levels of natural and anthropogenic mortality, nor compromise the favourable conservation status of the Eversden & Wimpole Woods SAC. Natural England are therefore able to conclude that, provided the necessary mitigation measures are implemented, there would be no adverse effect on the integrity of the Eversden & Wimpole Woods SAC as a result of the Scheme.

Persons With Interests in Land to be Acquired Under the Order⁴²⁶ - Statutory Objectors Who Have Maintained their Objection

Anglian Water Services Ltd and Cambridge Water (AW&CW) (OBJ-271)

- 18.23 AW&CW⁴²⁷ have no objections in principle to the Scheme, however they have maintained a holding objection whilst negotiations with the Applicant continue (see 8.6 and 8.7 above).
- 18.24 The Order Limits lie immediately adjacent to existing Cambridge Water infrastructure at the Madingley Service Reservoir site⁴²⁸ into which there are existing below ground infrastructure connections. The Order Limits overlap with an area of land proposed for a new public water supply connection pipeline from the proposed Fens Reservoir into a proposed new service reservoir at Madingley. This is being progressed as part of the expected application for a DCO for the Fens Reservoir, promoted jointly by AW&CW. The Order Limits also overlap with land proposed for AW&CW's Grafham to Cambridge water transfer scheme, which includes a new pipeline spur to the existing Madingley Service Reservoir, being progressed as a planning application⁴²⁹.
- 18.25 AW&CW have been working to develop and define both projects further, and wish to ensure that all of these schemes, if consented, can be successfully

⁴²⁴ Record of engagement between NE and the Applicant, 15 September 2025 ([CD29-07-1](#)).

⁴²⁵ Draft Planning Conditions 8, 9, 18, 19 & 21, 15 September 2025 ([CD29-07-2](#)).

⁴²⁶ Whether by agreement or compulsory purchase.

⁴²⁷ AWSL is the statutory sewerage undertaker and Cambridge Water is the statutory water undertaker for the area through which the Scheme would run.

⁴²⁸ See Sheet 10 of the Works and Land Plans, November 2025 ([CD1-12.01a](#)).

⁴²⁹ See the Applicant's plan showing the overlap of the Order Limits with AW&CW projects ([CD29-42](#)).

delivered without impediment or delay. Whilst agreement has not yet been reached with the Applicant, there have been positive negotiations during the application and inquiry periods. Consequently AW&CW are confident that agreement will be reached shortly after the close of the inquiry, prior to the SoS making a decision. AW&CW anticipate withdrawing their holding objection at that stage, and that no amendments would be required to the draft Order. At that time they will confirm the position to the SoS as soon as reasonably practicable.

*M Jenkins, J Poulton, P Heath and C Cumming (the Jenkins Family)*⁴³⁰
(OBJ-68)

- 18.26 The Jenkins Family do not object in principle to the proposed Scheme, however they object to the particular detail of the layout of the proposed busway in relation to residential properties they own at Childerley Gate⁴³¹. Insufficient explanation and justification has been provided for the extent of land to be acquired very close to those two properties, Childerley Lodge and its garden, and land to the rear of Chapelgate. Elements of the Scheme could be carried out with a reduced amount of permanently acquired land in these locations.
- 18.27 Limited detail has been provided of the impact on the existing and proposed infrastructure in the form of roads, drains, services and future transport routes. Although access to these properties would be restored on the existing basis upon completion of construction, the properties would be close to the proposed busway and St Neots Road intersection which may impact on traffic flows and accessibility. The busway would run very close to the A428, which already has extensive drainage systems to move excess water away promptly. The busway would significantly impact these systems, which may cause flooding to the properties.
- 18.28 The application for the Order is occurring at the same time as consultations and drafting of an application for a DCO for the EWR project. If approved as designed, the implementation of EWR would impact on the proposed busway and the A428, and have significant impacts on the Childerley Estate. There appear to be areas of potential conflict over land acquisition, access rights and temporary acquisition of land for works for the busway and EWR with little practical evidence of collaboration and alignment of interests between those two projects which is demonstrated by the separate consultations and schemes taking place. There may be opportunity for co-operation that would create a more beneficial and less damaging transport arrangement, which could provide better value-for-money for the public purse.
- 18.29 There remains a query about Plots 4-041a and 4-041b which appear to be part of St Neots Road and not owned by the landowners⁴³².

*C & H Spearing and H Deane (the Spearing Family)*⁴³³ (OBJ-67)

⁴³⁰ Letter of 2 January 2025 ([CD2-OBJ-68](#)).

⁴³¹ Immediately south of the A428, adjacent to the junction of Highfields and St Neots Roads, see Sheet 4 of the Works and Land Plans, November 2025 ([CD1-12.01a](#)).

⁴³² The landowners are recorded as Tenants and Occupiers in the BoR, November 2025 (CD1-13.03).

⁴³³ Letter of 31 December 2024 ([CD2-OBJ-67](#)).

- 18.30 The Spearing Family have land interests to the east of Hardwick, in the vicinity of the junction between St Neots and Long Roads, and land to the south of Madingley Road⁴³⁴. All of their remaining land, which historically has been farmed by the family, would be affected by the Scheme.
- 18.31 The proposal to compulsory acquire only select areas of the land holdings and leave other areas isolated without any access is unacceptable; the proposal is to only acquire 5.91 acres out of a total holding of more than 14 acres. This would result in the effective loss of the majority of the family's land in both locations; land for which the family have future plans and wish to keep in the family.
- 18.32 The proposed busway route would cut off the majority of the land to the south of Madingley Road from its existing access track leading off the A1303. The current plans are therefore inadequate for landowners and would require a junction, tunnel or vehicle bridge to be built to access land of just some 3 acres. However, the whole route should be moved further south to avoid needlessly bisecting the land. A family member's ashes are scattered on the land and the family wish to engage with the SoS, the Applicant and GCP to formally discuss this highly sensitive matter.
- 18.33 The proposed route would undoubtedly mean loss and further fragmentation of natural habitats in the area, including the loss of trees and mature hedgerows. Assurances are required that any proposed mitigation does not amount to 'greenwashing'.
- 18.34 The approach of the Applicant, the GCP and their agents towards the family over the past years has been disorganised and disappointing. The land bordering Hardwick Road and Long Road was not initially included in the plans for the proposed bus route, but was recently and suddenly included without any direct approach or engagement. This, and multiple confidential documents sent to incorrect addresses, despite informing all stakeholders many times of the family's correct addresses, is unacceptable.

Persons With Interests in Land to be Acquired Under the Order - Statutory Objectors Who Have Subsequently Withdrawn Their Objections

Cadent Gas Ltd⁴³⁵ (OBJ-148)

- 18.35 Commercial terms with the Applicant have been agreed and formalised by way of a completed agreement. There is now no disagreement with the Applicant and the previous objection and representations are withdrawn, and no weight should be placed on any of the withdrawn representations.

Cambridge University Rugby Union and Association Football Trust Ltd⁴³⁶ (OBJ-238)

- 18.36 The Trust have reached agreement with the Applicant and withdrawn their objection.

⁴³⁴ See Sheets 9, 10 and 11 of the Works and Land Plans, November 2025 ([CD1-12.01a](#)).

⁴³⁵ Letter of 12 November 2025 ([CD28-06](#)).

⁴³⁶ Email of 10 November 2025 ([CD28-04](#)).

Clare Hall (OBJ-213) originally objected⁴³⁷

18.37 Clare Hall originally objected on grounds of:

- the effect of the Scheme on the Grade II* listed Erskine Building in respect of harm to its setting and loss of fabric as a result of the Scheme abutting its south elevation;
- whether the flood risk sequential test has been addressed adequately and whether the exception test has been met;
- the effect of the Scheme on Clare Hall as a world class academic research institution, in particular effects of operational noise on its tranquil, noise-free environs which are integral to its academic residential and research function, and on their development plans for student accommodation and a new auditorium; and,
- concerns about the soundness of the ES in respect of those noise and heritage impacts.

18.38 Clare Hall have subsequently come to an agreement with the Applicant that addresses their concerns sufficiently such that Clare Hall are no longer pursuing any of the arguments advanced in their objection which is withdrawn⁴³⁸, as are their proofs of evidence and all other representations submitted in support of their objection.

18.39 An important element of the settlement with the Applicant that has allowed the withdrawal of their objection is the Applicant's promotion of a draft planning condition that would restrict bus movements during the nighttime in order to limit and mitigate operational noise impacts from bus movements on nearby residents or occupiers. This would prevent buses operating on the busway between 0000 and 0600 and, to the east of Charles Babbage Road, restrict bus movements to no more than 9 per hour between 0600 and 0700, and 2300 to 0000, unless they are fully electric buses.

18.40 Clare Hall point out that promotion of this condition by the Applicant is a crucial element of the withdrawal of Clare Hall's objection and is required to limit the impact of operational noise on the College during the nighttime. It is requested that when considering this condition its importance to Clare Hall should be recognised by the Panel and, should the Panel recommend that the Order be made and DPP be granted, Clare Hall requests that this condition is included.

The National Trust (OBJ-250)

18.41 The Trust is party to two restrictive covenants⁴³⁹ on land on Madingley Hill included within the Order Limits⁴⁴⁰. These were put in place to protect the rural character of the area, preserve the well-loved views to and from Cambridge and to prevent the area being damaged by urban sprawl. Coton

⁴³⁷ Letter of 7 January 2025 ([CD2-OBJ-213](#)), and Note to Inspectors of 19 June 2025 ([CD25-07](#)).

⁴³⁸ Letter of 29 October 2025 ([CD28-03](#)).

⁴³⁹ [CD3-01](#) and [CD3-02](#).

⁴⁴⁰ See Sheets 10, 11, 13 and 14 of the Works and Land Plans, November 2025 ([CD1-12.01a](#)).

Orchard is considered to be especially significant on the grounds that orchards are characteristic of rural landscapes.

- 18.42 The Trust have withdrawn their objection⁴⁴¹. As a result of negotiations following the Trust's objection⁴⁴² to the proposed Order, they have come to an agreement with the Applicant that, should the Order be made, it commits the Applicant to the creation of 'orchard character' at Coton Orchard instead of merely replacing a specific quantity of trees via BNG and allows the Trust to better influence the detailed plans for the development going forward, protecting the covenants⁴⁴³ on affected land to the best of their ability. The agreement also extends to the disapplication of the Trust's covenants insofar as they relate to the Scheme and it is therefore no longer necessary to include any disapplication of the National Trust covenants within the draft Order. Article 55 (Disapplication of agreements restricting use of land) of the draft Order ([CD1-02-0](#)) should be removed in its entirety.
- 18.43 Nevertheless, the Trust maintain some concerns regarding the Scheme and welcome and support the Woodland Trust's objection to the development (18.119 - 18.123 below) who are best placed to comment on the impact of the Scheme on the veteran trees and the habitats they provide at Coton Orchard.

Other Persons with Interests in Land to be Acquired under the Order

Bedlam Farming Company Ltd and Chivers Farms Ltd (REP-13)

- 18.44 They withdrew earlier comments⁴⁴⁴ as their concerns were addressed through the process of agreeing heads of terms for an Option Agreement.

St John's College⁴⁴⁵ (REP-04)

- 18.45 The College are concerned about an increased potential for flooding of their property adjacent to the Bin Brook, which is downstream of the proposed bridge. This is in light of Clare Hall's additional flood risk modelling indicating that the Scheme would increase flow rates of the Bin Brook and increase flood levels at locations downstream including St John's College, despite the Applicant's FRA advising that there is no requirement for mitigation measures. The Applicant's modelling should be reviewed to identify any mitigation measures necessary.

T, L & A Taylor⁴⁴⁶ (SUP-12)

- 18.46 The Taylors owned the Bourn Airfield site when they made their representation: this site is anticipated to be the first of the major joint venture development projects led by lead developer Juniper Propco. The

⁴⁴¹ Letter of 9 September 2025 ([CD28-02](#)).

⁴⁴² Letter of 8 January 2025 ([CD2-OBJ-250](#)).

⁴⁴³ Which include the provision that *No timber or timberlike trees shall without the previous written consent of the Trust be felled lopped topped cut removed or replaced by other species or by a different mixture of species or any different distribution of species* (CD2-OBJ-250, CD3-01 and CD3-02).

⁴⁴⁴ Emails of 7 January ([CD2-REP-13](#)) and 10 November 2025 ([CD28-05](#)).

⁴⁴⁵ Email of 7 January 2025 ([CD2-REP-04](#)).

⁴⁴⁶ Email of 5 March 2025 ([CD2-SUP-12](#)).

Taylors support the Scheme for the reasons Juniper Propco have stated (see 17.1 above).

- 18.47 The proposed busway is of particular importance for the future growth and continued success of Cambridge and the sub-region and the national importance of the area is recognised by government. Both the Scheme and development of Bourn Airfield would help deliver the objectives set out in SCLP Policy S/2, as detailed in the Bourn Airfield New Village SPD⁴⁴⁷. Those living and working in the New Village would benefit from the high quality public transport network required by local plan policy and the SPD, and the Bourn Airfield development clearly assists in the business case and justification for the busway project.
- 18.48 The busway route has been fully incorporated into the Bourn Airfield masterplan and parameter plans that form part of the outline planning permission, and the required framework travel plan will demonstrate how its implementation and operation would run alongside housing delivery. The two projects would dovetail and, given their spatial and functional relationship to one another, it is important to ensure that there are no gaps or uncertainties in the conditions attached to the outline planning permission and those drafted for the Scheme.
- 18.49 Juniper's anticipated housing delivery trajectory demonstrates the importance that timely delivery and first operation of the Scheme has for the Bourn Airfield development. This aligns with the understanding that the Applicant aspires to progress with the busway project promptly.

*The University of Cambridge*⁴⁴⁸ (SUP-05)

- 18.50 The University supports the proposal. The opportunity to change the transport offer in Cambridge should not be missed. Future generations will be thankful for decisive action to deliver the proposed busway.
- 18.51 The vast majority of students, and over 70% of staff, use sustainable modes for their journey to study or work, but this is reducing due to the gradual erosion of punctuality and reliability of bus services, as a result of limited infrastructure provision across the city region.
- 18.52 For those who live outside of Cambridge, this percentage is considerably lower, and it is anticipated that more staff will be travelling from outside Cambridge in the future. Congestion along the A428/Madingley Road corridor, along which 20% of staff living outside of the City travel, has a major impact on productivity, health and well-being of staff and the environmental quality of operational sites. Despite a number of initiatives, those staff have limited sustainable transport options available to them. Unlocking the growth potential of Cambridge depends upon the provision of realistic opportunities for walking, cycling and public transport, including interchange between all modes.
- 18.53 This corridor is in need of investment in critical transport infrastructure and

⁴⁴⁷ Bourn Airfield New Village - A Spatial Framework & Infrastructure Delivery Plan, Supplementary Planning Document, 2019 ([CD7-15](#)).

⁴⁴⁸ Letter of 7 January 2024 ([CD2-SUP-05](#)).

the proposed busway would provide this. The GCP's investment in transport infrastructure along the A428 corridor would support existing and future investment by the University and others, and help ensure that Cambridge remains a growing and sustainable centre of excellence and a world leader in higher education and research fields. It would help the City nurture growing industries, facilitate further expansion of its knowledge-based economy, and help bring the City's expertise to communities across its hinterland, whilst retaining the City's high quality of place which supports its standout economic success. It is essential for the University and local authorities to deliver on their proposed commitment in the forthcoming years and decades.

Other Supporters

East West Railway Company Ltd (EWR)⁴⁴⁹ (OBJ-247)

- 18.54 EWR now advise that they strongly support the principle of the Scheme. The project aims to enhance public transport and facilitate sustainable development at key strategic development sites within the Greater Cambridge region. These are outcomes which are very much aligned with the objectives of EWR. Having entered into an agreement with the Applicant that addresses their earlier concerns, they have withdrawn their holding objection⁴⁵⁰ as well as their request for a draft planning condition.
- 18.55 The EWR project aims to deliver a passenger railway connection for communities between Oxford and Cambridge by upgrading, refurbishing and bringing back into use the railway between Oxford and Bedford, and building brand new railway infrastructure between Bedford and Cambridge. The link between Oxford and Bicester is already in place, remaining construction work on the first connection stage is underway, with services expected to commence running soon. Work is ongoing to bring forward services between Oxford and Bedford from 2030, and the third stage, for which a DCO will be sought, would complete the link to Cambridge.⁴⁵¹
- 18.56 The proposed busway route crosses the planned route of EWR on land that has been safeguarded by the SoS for the new railway between Croxton and Toft⁴⁵². In this location the railway lines are proposed to be situated in a mined tunnel, about 1.5km long. This would cross beneath the route of the proposed busway, the A428 and the northeast corner of Bourn Airfield.
- 18.57 Putting in place suitable arrangements to manage the interface between the two projects effectively will be essential to ensure that the Scheme does not prejudice the delivery of EWR, whilst minimising costs and disruption to both projects, transport users and local communities. However, previously proposed to be constructed using a cut and cover method, EWR have changed their proposal for crossing the A428 and Bourn Airfield to a mined tunnel. EWR advise that as well as being cost efficient, the mined method

⁴⁴⁹ Letter of 14 November 2025 ([CD28-07](#)).

⁴⁵⁰ Letter of 8 January 2025 ([CD2-OBJ-247](#)).

⁴⁵¹ Summarised from EWR's SoC ([CD23-09-01](#)).

⁴⁵² In particular Sheet 5 of the consultation Route Section Plans, November 2024 in Appendix 4 to EWR SoC, p5 ([CD23-09-04](#)) and Maps SG-83 and SG-84 in EWR Safeguarding Map, November 2024 in Appendix 2 to EWR SoC, pp10-11 ([CD23-09-03](#)).

would avoid the need for road disruption including the temporary re-alignment of the A428, St Neots Road, local roads and the proposed busway, and would have lower development and environmental impacts⁴⁵³.

*Madingley Road Area Residents' Association*⁴⁵⁴ (SUP-13)

- 18.58 The Association supports the views of the neighbouring North Newnham Residents' Association (see 17.6 above) who expressed their full support of the Scheme. This is due to the need to establish good public transport links to the 'necklace' villages around Cambridge to support development of housing and associated facilities, and to ameliorate congestion of roads into Cambridge.

Other interested parties

- 18.59 Other parties expressing support included a SCDC councillor and a number of individuals. They identified a number of points including that the proposed busway would offer a faster route, offer sustainable travel choices and ease congestion whilst not spoiling views from the American Cemetery. Public benefits of improved public transport would outweigh disbenefits, including to affected landowners. Even if it is supported as the 'least bad option', in this particular case the Scheme is for the greater good and should proceed, despite the loss of trees.
- 18.60 Cambourne has no safe cycle route to Cambridge and is not included in the Greenways plans, so the proposal is essential to provide the public transport links that Cambourne needs and deserves. The Scheme would also provide a good walking and cycling route for residents in north Hardwick and the proposed development at Bourn Airfield. As an alternative, the Comberton Greenway cycle route is awkward to access via a narrow and busy road, unless starting a journey in Hardwick or Old Bourn. The proposal has the advantage of providing support for active travel including cycling and walking, and this would help preserve well-established and very busy cycling routes in Cambridge by making them safer and improving journey times.
- 18.61 The Scheme would connect communities and support growth. There is a clear need for more housing in the city-region, but it cannot be accommodated in Cambridge itself without seriously damaging its character and open spaces. The policy of developing a 'necklace' of villages as the focus for development is appropriate but must be supported by good public transport links to be successful. Public transport needs to be reliable and efficient to be attractive, and this requires segregation from general traffic. Busways and priority routes for buses are an excellent way to achieve this. Segregated guided busways have already proved their worth in this regard in and around Cambridge, and the proposed Scheme would be equally as successful.
- 18.62 Cambridge is an ever-growing successful technical-industry city. Cambourne and points between are important residential districts crucial to housing the

⁴⁵³ You Said, We Did Autumn Update, EWR, November 2025, table 1 p31, pp31 and section 4.10.2, pp94-96 ([CD29-109](#)).

⁴⁵⁴ Email of 26 February 2025 ([CD2 SUP-13](#)).

workers for the industries that make Cambridge the growing success it is, and they need better transport links to support this.

- 18.63 Cambourne residents have been overwhelmingly positive about the plans for the busway, both in terms of the busway itself and the cycle route that would go alongside it, and want to see it built. Improving transport links to Cambridge from Cambourne is consistently one of the most important matters that residents raise with their district councillors.
- 18.64 Cambourne's population has expanded rapidly and is much younger than that of the region and country as a whole, with significantly higher numbers of young people aged under 25, and far fewer older people aged 60 and above. Thousands more homes are planned which would further expand the population. Cambourne's working population is heavily focussed on Cambridge and needs to be able to travel easily into the City. Young people need to be able to travel into the City for education, social activities and access to public services and retail facilities.
- 18.65 In the absence of a cycleway element, residents in Cambourne would still not have a safe and direct cycle route into Cambridge, which would represent a failure of planning and service provision for those residents in light of the thousands of new homes to be built at Bourn Airfield and in Cambourne.
- 18.66 The Greater Cambridge region is rapidly developing and growing, and the decision to focus housing growth on the new towns has provided protection for villages in the area. To tell Cambourne residents that they cannot have the off-road rapid transport busway and cycleway that the Scheme promises, in light of the size of the town and its planned expansion, would not be right, and would require residents using cars for many more years to get into Cambridge.
- 18.67 This would contrast with other new towns being developed around Cambridge which have appropriate public transport provision. Northstowe new town has direct access via an existing busway and cycle route, and the Waterbeach new town development will benefit from the Greenway cycle route and direct train line access through the moving of the railway station. There is an expectation that those living in Cambourne should benefit from the same quality of transport link via a busway that residents in Northstowe enjoy.
- 18.68 Cambourne must not continue to face being a place where others are happy to see thousands more houses constantly being built to protect the existing villages from unwanted development but then not allow residents to have the necessary public transport links that come with building new towns.
- 18.69 Proposed links to the expanding West Cambridge Campus site are very positive and would divert traffic from roads, reduce congestion and help those from outside the City to access job and other opportunities in Cambridge more easily and cost effectively. The route's avoidance of Adams Road, which is very heavily used by students and staff on bicycles throughout the day, is welcomed as sustainable active travel would otherwise conflict with buses. The proposed route should be extremely safe in itself, and reduce issues on other roads. The proposed route would

enable buses to get to Grange Road from West Cambridge more quickly than other possible routes. The use of Rifle Range Road for the busway would do the least damage to the general environmental setting of the City.

- 18.70 Opponents have exaggerated the harm the Scheme would cause and the feasibility of an on-road alternative. There would be insufficient space for a cycleway in the on-road alternative, with constraints of the SSSI and American Cemetery, as well as mature trees which would face removal should the route not follow the proposed off-road route. The removal of these trees in order to build a lesser project represents significant environmental damage.
- 18.71 Opponents of the Scheme oppose anything new and do not represent the views of Cambridge residents or workers. The ancient orchard would not be missed, it has not been harvested for decades, with apples left to fall and rot, and the 100 year old Bramley apple trees can only be expected to fruit for a few more decades.

Other Representations

Dry Drayton Parish Council^{455,456} (REP-02)

- 18.72 The Council is disappointed that the Scheme does not include definitive provision for access to the Scheme by villagers from Dry Drayton, either by non-motorised transport, or any additional bus service linking the village, and also for the residents of nearby Bar Hill, to the proposed travel hub at Scotland Farm. It would be about 3km (1.9 miles) from the most distant part of the village and the direct route along Scotland Road has no footpath and is unsafe for cyclists. Although the Parish Council have initiated a scheme for 40mph speed limits on roads approaching the village, they have been informed that the open nature of Scotland Road through Scotland Farm means that a speed limit buffer zone on its own is unlikely to successfully reduce vehicle speeds.
- 18.73 There is no provision for traffic calming at the proposed travel hub, particularly at the northern end of Scotland Farm. Speed data recorded by the Parish Council show that Scotland Farm is the worst location for vehicles exceeding the speed limit. Although new traffic signals may assist in reducing speeds of vehicles approaching from the A428, traffic calming is also required at the northern entrance to Scotland Farm, particularly considering projected increases in traffic flow, but no provision for such mitigation is proposed as part of the travel hub plans.

Pippa Heylings MP for South Cambridgeshire⁴⁵⁷ (REP-05)

- 18.74 There is an urgent imperative to deliver much-needed public transport links for young people and families in Cambourne and other communities in the constituency whilst protecting the character of villages and conserving the environment. Constituents have highlighted the need for improved transport links between Cambourne and Cambridge. The lack of public transport

⁴⁵⁵ Email of 7 December 2024 ([CD2-REP-02](#)).

⁴⁵⁶ Dry Drayton Parish and village are situated west of Cambridge, between St Neots Road and the A14, to the east of Madingley Parish.

⁴⁵⁷ Letter of 8 January 2025 ([CD2-REP-05](#)).

leaves people isolated and has a particular impact on young people's post-16 opportunities, including their options and opportunities for sixth form and technical colleges, apprenticeships or jobs. Clean, green, reliable, fast and affordable travel is key to improving access to education and jobs, and meeting climate targets.

- 18.75 However, constituents have also raised significant concerns about the environmental impacts of the busway. The adjustments that have already been made to the proposed route to avoid impacts on Madingley Wood SSSI and the American Cemetery are noted and appreciated. However, concerns remain on the impacts to wildlife habitats, particularly the off-road section of the proposed busway including through Coton Orchard.
- 18.76 It is critically important that the public can be fully assured that all options for this transport link have been thoroughly considered and assessed, and that the balance between societal and environmental concerns have been transparently and adequately achieved to secure greater public confidence. All possible steps to avoid and reduce damage to wildlife habitats and the environment need to be taken. If there are possible changes to the off-road route that could minimise harm to wildlife habitats, including the number of trees affected in and around Coton Orchard, these should be the focus of the inquiry.

*Martin Grant Homes*⁴⁵⁸ (OBJ-255)

- 18.77 The principle and objectives of the Scheme are supported and it would be enhanced by their North Cambourne proposals. A travel hub at North Cambourne would complement the Scheme by creating opportunities to expand the proposal, providing an interchange between the busway and an EWR station, and integrating active travel across the existing and proposed communities to help form a cohesive, single settlement. They object to the omission of suitable enabling infrastructure within the Scheme for that future North Cambourne travel hub.

*Royal Mail*⁴⁵⁹ (REP-07)

- 18.78 Their postal sorting and delivery operations rely heavily on road communications and so are sensitive to changes in the capacity of the highway network where disruption and delays can create a significant risk to their ability to meet statutory obligations and comply with regulations.
- 18.79 Consequently, any Construction Traffic Management Plan (CTMP) should include requirements: that they be notified at least one month in advance of any proposed road closures, diversions, alternative access arrangements and working hours; that, where possible, contractors liaise with them at least one month in advance to identify and make available alternative highway routes for operational use; and, that the CTMP includes a mechanism so that they are informed about works affecting the local highways network, particularly with regards to their distribution facilities in

⁴⁵⁸ Martin Grant Homes advise that they are promoting a residentially led, mixed-use development on land to the north of side of A428 and Cambourne; North Cambourne in a letter of 8 January 2025 ([CD2-OBJ-255](#)).

⁴⁵⁹ Representation of 8 January 2025 ([CD2-REP-07](#)).

Cambridge⁴⁶⁰.

Other representations

- 18.80 Two representations from individuals, neither objecting to nor supporting the proposal, included the following issues.

Other representations - onward routes in Cambridge

- 18.81 The application documents do not explain how buses using the busway would integrate with the transport network once they reach Grange Road in Cambridge. There are extensive traffic calming measures along the road and the introduction of the guided buses would have a negative impact on the current use of the road.

Other representations - effects of, and on, traffic, cycling and walking on Scotland Road and in Dry Drayton

- 18.82 Concerns were raised about the effects the proposed Scotland Farm travel hub would have on Dry Drayton, both during construction and in the long term. Through traffic in Dry Drayton has already increased since the completion of the A14 improvement works, and the large capacity car park proposed at the travel hub would be likely to increase this. However, there is no reference in the application documentation showing how this has been analysed, nor how any additional problems would be mitigated. Planning conditions are required to control construction traffic going through Dry Drayton and must be enforced. It was also unclear if buses would stop at the travel hub or whether users would have to walk over the A428 footbridge to catch a bus in Hardwick.
- 18.83 The TSCSC identified a need for direct, segregated and high-quality pedestrian and cycle routes between Cambridge and villages, including Dry Drayton. Consequently, the Scheme must also ensure that safe and adequate pedestrian and cycle facilities are provided between the busway and Dry Drayton in line with the NPPF's requirement⁴⁶¹ that development should *give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas*. Speed restrictions alone would be insufficient and a shared cycleway and footpath alongside Scotland and Oakington Roads would provide the safe and pleasant facility that has been provided for cyclists and pedestrians on feeder roads implemented as part of the A14 improvements.

Other representations - alternatives

- 18.84 The advantage of buses is their flexibility as they can operate in environments that heavy rail and light rail cannot, quickly starting and stopping operations almost anywhere. However, a busway has heavy rail construction costs with motorway sized land requirements. The public would switch modes more readily if the alternative transport mode were rail or light rail, particularly if it is electric, but not buses, especially diesel. Therefore, light rail or ultra-light rail alternatives should be considered

⁴⁶⁰ Illustrated on p 2 [CD2-REP-07](#).

⁴⁶¹ Para 117.

instead. Trams do not have to be standard gauge, nor does a dual track, permanent way have to be installed initially and so may be more acceptable to those objecting on environmental grounds. Overhead electrification is the optimal installation, but battery vehicles could be used at the outset to keep costs down.

Other Objectors

Ancient Tree Forum⁴⁶² (OBJ -282)

- 18.85 Britain's population of ancient and veteran trees are of international significance. They are iconic features of the English landscape and they echo the lives of past generations of people in ways that no other part of the natural world is able to do. Coton Orchard is East Anglia's largest remaining ancient orchard and the eighth largest in the UK.
- 18.86 The assertion that the Orchard's trees are mostly 'young' is inaccurate; the majority are mature or veteran trees with the 12 original 1922 Bramley trees having been recorded in the Woodland Trust Ancient Tree Inventory. The loss of these trees is unacceptable and would have very significant adverse impacts. Veteran fruit trees are recognised as irreplaceable habitats due to their age, biodiversity value, and the unique ecosystems they support, they are part of our local heritage and hold historical and cultural importance.
- 18.87 The loss of the veteran trees has not been properly justified by the GCP, would contradict the principles of sustainable development, would be contrary to NPPF para 193c, and would be contrary to the objectives of the Environment Act 2021. The BNG Statutory Instrument mandates the protection of such irreplaceable habitats to ensure biodiversity net gain. The SoS is urged to consider alternative solutions that would avoid the need to fell the trees such as the on-road alternative following the A1303 which has never been properly assessed by the GCP.

Barton Parish Council^{463,464} (OBJ-258)

- 18.88 The Council support the need for greater public transport into the City centre, but there are existing roads that should be used for buses with direct links to different areas of Cambridge, at significantly less cost to public spending and to the environment. The resulting environmental damage of the proposed route through Green Belt, farmland and an ancient orchard cannot be overstated.
- 18.89 The Scheme's destination at Grange Road does not make sense for a proper, integrated, high-capacity transport system, and is unsuitable for the following reasons. It has a 20mph speed limit, with multiple speed cushions and chicanes. A large proportion of existing users of Grange Road are pedestrians and cyclists, a significant number of whom are children. Increasing the number of buses would increase danger to pedestrians and cyclists. Existing motor vehicle traffic on Grange Road already results in

⁴⁶² Email of 8 January 2025 ([CD2-OBJ-282](#)).

⁴⁶³ Email of 8 January 2025 ([CD2-OBJ-258](#)).

⁴⁶⁴ Barton Parish is situated west of Cambridge, to the south west of Coton parish and between the parishes of Comberton and Granchester.

congestion and gridlocks during peak times. The width of the road prevents adding a separate cycle route and it does not have the capacity for additional buses. Grange Road is not sufficiently close to the City Centre, nor to any business districts, and evidence has not been seen to suggest that most people living along the A428 corridor want to travel to this part of Cambridge and end their journey there. Connections to onward public transport links are unclear.

- 18.90 Existing roads have the capacity for extra buses and could connect through villages and on into Cambridge. These are: along Huntingdon Road; the existing bus route along Madingley Road to the P&R facility; and, through Hardwick, Toft, Comberton and Barton and then a direct connection to the Biomedical Campus on the South of the City via Barton Road. EWR will serve additional residents from Cambourne in the future.
- 18.91 Rather than spending public money on a superfluous route, it would be better spent on increasing bus numbers along these existing routes, on increasing greener transport options and in creating a mass public transport scheme which would be appropriate for the next hundred years, avoiding the environmental cost of the proposal.

*Bedfordshire and Luton Orchard Group*⁴⁶⁵ (OBJ-80)

- 18.92 The Group consider that the proposal relies on out of date and incomplete data on traffic use and habitat studies; new surveys are necessary. It fails to protect rare and valuable habitat and is unnecessarily damaging to the environment, in particular Coton Orchard which supports a huge variety of species, many rare and endangered given their specificity to veteran orchard habitat. This habitat loss cannot be mitigated; rather only conservation and succession planting can maintain this habitat value. This Scheme does not represent value for money to taxpayers, whilst good value would be obtained in an alternative route using existing transport corridors which would avoid the habitat loss.

Cambridge Connect^{466,467} (OBJ-224)

- 18.93 They support development of a new public transport route to the west of Cambridge, but one that that would follow a fully or mostly segregated alignment immediately adjacent to, or co-aligned with, the A428 on the section between Hardwick and the Girton Interchange. This alternative route would go under the M11 then via Eddington and the West Cambridge Campus into the City⁴⁶⁸ (A428/Girton route). It would avoid Green Belt land surrounding Coton.
- 18.94 The proposed route would have unacceptably high impacts on Green Belt and the highly valued rural landscape, including heritage landscapes associated with the American Cemetery, Coton and Coton Orchard, and their attendant wildlife and ecology. The proposed route conflicts with local

⁴⁶⁵ Email of 2 January 2025 ([CD2-OBJ-80](#)).

⁴⁶⁶ Representation of 7 January 2025 ([CD2-OBJ-224](#)).

⁴⁶⁷ Introduce themselves as a non-profit-making initiative, originally formed as a company aiming to promote a strategic and sustainable approach to public transport in Cambridgeshire, emphasising an integrated and multi-modal approach to meeting transport needs.

⁴⁶⁸ Illustrated in Figure 1, p 5 [CD2-OBJ-224](#).

and national Green Belt and high landscape value protection policies. It would unnecessarily sever and further fragment the landscape and ecology of the Coton Countryside Reserve, Coton Orchard and National Trust lands on Madingley Hill. The impacts are unnecessary as likely viable alternatives exist, but have not yet been adequately considered.

- 18.95 The alternative A428/Girton route, called for by Cambridge Connect since 2016 and supported by the Local Liaison Forum, was wrongly screened out of consideration at an early stage in the process, and has never been given detailed consideration by the GCP nor put forward for public consultation. Although there was some consideration of a route to the north-east of the Cemetery, analysis excluded a A428/Girton route.
- 18.96 A report by consultants i-Transport commissioned by CPC in 2021 (i-Transport report) identified the A428/Girton route as a potentially viable option that would perform as well as the proposed Scheme in relieving congestion, particularly on the A1303 with the potential to tie into Girton Interchange improvements. The i-Transport report found that the alternative would perform better than the proposed Scheme in the environmental 'Contribution to Quality of Life' and equally well in 'Scheme Deliverability' criteria, as well as being a good fit with policy.
- 18.97 An independent audit⁴⁶⁹ acknowledged this alternative route as potentially viable, possessing some merit and although likely to perform less well on cost and other performance metrics, would potentially score higher on environmental and social impact ones. The advice of the audit was not taken and no detailed analysis of the alternative option carried out, nor put to public consultation. Without a detailed work-up of the alternative A428/Girton route option and a robust cost-benefit analysis against the proposed Scheme, the decision to proceed with the guided busway proposal is only based on assumptions about relative merits of financial against environmental and social benefits. In any event, cost alone should not be the sole or primary arbiter as to whether a particular alternative option is viable or desirable.
- 18.98 To avoid or mitigate the impacts of major transport interventions it is especially important to fully consider alternatives in the light of the continuing and increasing erosion of Cambridge's Green Belt in the context of a rapidly growing population, and the need to address biodiversity loss and climate change. However, in not adequately considering potentially viable alternatives the GCP failed in their obligation to follow due process before proceeding with the harmful alignment of a major public transport route.
- 18.99 The SoST is requested to refuse the application. Should proposals to construct a new public transport route to the west of Cambridge continue to be brought forward, the SoST is requested to support due consideration of the alternative route proposed by Cambridge Connect in a full and robust analysis by the appropriate authorities to ensure that decisions are based on full and proper evidence.

⁴⁶⁹ Independent Audit of Key Assumptions and Constraints - Cambourne to Cambridge Better Public Transport Project, Amey Consulting, 2021, p69 ([CD8-27](#)).

Cambridge & South Cambridgeshire Green Party⁴⁷⁰ (OBJ-38)

18.100 The Scheme would be very high cost, harming Green Belt land, including an ancient orchard, when a cheaper, more cost-effective alternative proposed by CPPF would avoid Green Belt harm but has not been considered or consulted on by GCP. The controversial section of the busway between Madingley Mulch roundabout and the M11 was only consulted on once, in 2018. The on-road options were preferred by 57% of respondents, with the off-road option by only 33%. A Local Liaison Forum consistently objected to the off-road scheme, significant local objections that have been ignored.

Cycling UK – Ely local representative⁴⁷¹ (OBJ-77)

18.101 The Scheme would harm Coton Orchard and its CWS. Tree loss would not be compensated for by the replanting proposed. Cambourne car owners will be more likely to use EWR which would have bike carriages and serve the Biomedical Campus. The BCR is low and would be lower still factoring in EWR. Car commuters are unlikely to change modes due to the time it would take to drive to, and wait for buses at, the P&R facility. Adding bus priority measures and bus lanes, along with an active travel route, to existing infrastructure along the A1303 at much lower cost than the Scheme, has not been appropriately assessed by GCP. If a new transport system is needed, a light rail system with bike carriages to support commuting would be a more appropriate solution. The proposed route would not be one chosen for light rail.

Madingley Parish Council^{472,473} (OBJ-197)

18.102 The Council objects to the proposal's effects on the footpath running between Coton School and Madingley Road, opposite the American Cemetery. This is a popular path, used by children who attend Coton School but live in Madingley and popular with walkers and runners since it links up with other paths in surrounding villages, as confirmed by consultation responses the Parish Council received from users responding to signage proposals associated with the footpath. The Parish Council urges that the footpath is not closed permanently but that a safe crossing place is provided, as has been done with other busways. Any other footpaths the GCP is hoping to close permanently should also remain open once the busway construction work is complete.

Needham Research Institute^{474,475} (OBJ-285)

18.103 There is insufficient evidence in the Applicant's flood modelling to demonstrate that the Scheme would cause no impacts of increased flood risk to third parties, and it could thus be in contravention of NPPF para 170. A full understanding of the scale of impact on the Institute's premises is not possible as the images provided have been symbolised to remove the first

⁴⁷⁰ Correspondence of 13 December 2024, ([CD2-OBJ-38](#)).

⁴⁷¹ Email of 2 January 2025, ([CD2-OBJ-77](#)).

⁴⁷² Email of 7 January 2025, ([CD2-OBJ-197](#)).

⁴⁷³ Madingley Parish is situated west of Cambridge, immediately to the north of Coton Parish.

⁴⁷⁴ Letter of 8 January 2025, ([CD2-OBJ-285](#)).

⁴⁷⁵ The Institute's building is situated to the north of the Order Lands on the corner of Sylvester and Hershel Roads, Cambridge, immediately adjacent to Bin Brook downstream from the proposed bridge.

10mm of impact. It is unclear if the modelling has used an Environment Agency approved model or has been approved by the Environment Agency. Consequently, the Applicant should demonstrate that modelled results show nil impact to a 1mm resolution downstream of the proposed bridge on the Bin Brook and provide a review of peak flow rates through Bin Brook, particularly through the proposed new bridge structure.

*Pesticide-Free Cambridge*⁴⁷⁶ (OBJ-190)

- 18.104 The Group supports Coton Orchard which has grown fruit for decades without the use of pesticides, something very unusual for an orchard of this size and age. This is worth preserving given the evidence for links between pesticides and chronic health conditions, the biodiversity crisis and the disproportionately negative impact pesticide exposure can have on people with allergies and hypersensitivities. These alone would be strong reasons to switch the busway away from Coton Orchard and Green Belt and run it instead along existing roads as CPPF propose.
- 18.105 The proposed busway would cause environmental and climate harm, destroying areas of natural habitat including Coton Orchard CWS as well as precious Green Belt. Run-off from the proposed busway would discharge into Bin Brook, a globally rare chalk stream habitat. Biodiversity in the veteran fruit trees, many over 100 years old, and scrub and meadow habitat would be lost forever, at a time when species are being lost at an unprecedented rate, and this would not be compensated for by planting even thousands of saplings.
- 18.106 The Applicant's estimates are that vegetation loss from the construction of the Scheme would result in the release of 10,145tCO₂e of sequestered carbon stored in vegetation, and even with newly planted trees this would lead to a decrease in sequestration of 1,910tCO₂e. Greenhouse gas emissions from construction are estimated at 29,130tCO₂e, but the saving from a shift to bus use is expected to only yield a reduction in emissions of 4,500tCO₂e over 60 years. The Scheme is estimated to cost in excess of £200m, yet it promises to save only minutes of journey time. In a biodiversity and climate emergency, the proposal is a major step in the wrong direction, with CPPF showing there is a far less environmentally damaging and cheaper on-road alternative.

South Newnham Neighbourhood Forum^{477,478} (OBJ-114)

- 18.107 Given the fundamental changes in traffic flows in and around Cambridge since the COVID-19 pandemic, using pre-pandemic traffic data to evaluate the proposed busway is likely to be fundamentally flawed. New data should be used to assess the proposal and make the investment decision. By joining central Cambridge's traffic at Grange Road, buses would be subject to the same congestion and delays experienced by current bus services and, despite the investment, this would not result in a material improvement in the quality of service.

⁴⁷⁶ Email of 7 January 2025, ([CD2-OBJ-190](#)).

⁴⁷⁷ Letter of 4 January 2025 ([CD2-OBJ-114](#)).

⁴⁷⁸ The Forum advise that its was designated to draft a Neighbourhood Plan for South Newnham, which is the area of Cambridge south of Barton Road and the roads off it on the north side, but excluding Grange Road.

- 18.108 Between the villages of Madingley and Coton, the proposed route would irretrievably damage the landscape of Madingley Hill and extend the adverse impact of Cambridge City into the surrounding villages. The proposed route through Coton Orchard CWS would inevitably have a long-term adverse effect on local biodiversity and wildlife and should be reconsidered with less environmentally damaging options explored in considering climate change and declining biodiversity.
- 18.109 Creative alternative options should be explored such as a new public transport route with bus lanes and public transport provision beside the A1303, very possibly at a lower overall project cost than the proposal, but which has not been properly considered. Now that EWR is being developed, there is no longer a requirement for the proposed busway, which is an inappropriate use of public money.
- 18.110 The flood modelling provided does not show adequate evidence to support the claim that the Scheme would cause no increased flood risk to those living adjacent to Bin Brook and upstream of the proposed bridge, contrary to NPPF paragraph 170. In particular properties on the Gough Way estate, as well as on Barton Road, have already been flooded by Bin Brook in the past, and may be put at increased risk.
- Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire*⁴⁷⁹
(OBJ-46)
- 18.111 The Applicant has failed to select the option that avoids significant adverse impacts on the natural environment. The proposed route passes through 4 local wildlife sites, including fragmenting existing habitats in the most significant one, Coton Orchard CWS, where the Scheme would result in the loss of 20% of the site area and a minimum of three irreplaceable veteran apple trees. The Scheme would result in the loss of 16% of the Scrub East of M11 CiWS and 5% of the Coton Path Hedgerow CWS. This demonstrates that the design of the Scheme has not properly applied the first, 'avoidance', stage of the mitigation hierarchy and is thus fundamentally unsustainable.
- 18.112 The scrub and orchard habitat loss would harm a range of species including red and amber listed birds⁴⁸⁰, and scarce invertebrates and flora, as well as indirect impacts on other priority species such as Barbastelle bats which fly across the route from roost sites in Madingley Wood SSSI. Six other bat species have been recorded, and the Applicant's proposed mitigation measures need to be corroborated by an independent bat specialist.
- 18.113 As the Scheme passes through a known hotspot for great crested newts (GCN) in West Cambridge, with two ponds nearby likely to support the protected species, a traditional approach to GCN species licencing should be undertaken as opposed to using the District Licencing Scheme which is proposed. New ponds should be created in locations that connect to other

⁴⁷⁹ Email of 19 December 2024, ([CD2-OBJ-46](#)).

⁴⁸⁰ The Trust notes that bird surveys on one or two years, however thorough, only provide a snapshot of the species that may use a site and the surveys undertaken in 2022 and 2024 have not recorded all of the red and amber listed species previously recorded, with notable absences of Lesser Spotted Woodpecker, Turtle Dove, Spotted Flycatcher and Woodcock.

suitable habitats on either side of the proposed busway to maintain the local distribution of GCN. The full detail of impacts on species biodiversity will need to be fully assessed by independent ecologists.

- 18.114 Consultees were not able to review or analyse the findings within the Applicant's original spreadsheet version of the Defra Biodiversity Metric, and the assessment of the Scheme against the BNG principles is considered to be inaccurate. The Scheme fails: Principle 1, by not applying the mitigation hierarchy in respect of effects on habitat, ancient trees and priority species; Principle 2, as the loss of ancient trees does not avoid losing biodiversity that cannot be offset elsewhere; and, Principle 5, in the absence of an off-site biodiversity solution, the Scheme delivers a minimal (less than 5%) net gain in habitats, a net loss in hedgerows (15.15%), and fails to meet the habitat trading rules of the Defra biodiversity metric.
- 18.115 Further, without a published biodiversity offsetting scheme, it is unknown whether Principle 6, to achieve the best outcomes for biodiversity, Principle 7, to be additional, Principle 8, to achieve a net gain legacy, or, by not providing the original Metric, Principle 10, to be transparent, would be met. No detail is included on how the desired 20% BNG would be delivered which is unacceptable as costs of delivering the BNG and managing it over at least 30 years must be included. The consequences of approving the Scheme without it could result in BNG commitments being diluted at a later stage.
- 18.116 If the Scheme were to go ahead the route through Coton Orchard should be amended and impacts on all of the identified ancient and veteran trees avoided. At least 20% BNG should be achieved with new habitats and landscaping being of sufficient size and well-located to ensure effective management for a minimum of a 30 year period post development. Any off-site BNG should be located in the Boulder Clay & Woodlands Priority Area of the Cambridge Nature Network, within which the Scheme sits. Details of the BNG scheme should be provided at the earliest opportunity and be available for public scrutiny before an examination of the Scheme and there must be an independent assessment of all species surveys, and proposed mitigation and compensation measures.
- 18.117 Ecological harm from this scheme could have been avoided by upgrading existing road infrastructure. Had provision been made in the recently completed A14 scheme for an interconnecting junction between the A428 East and M11 South at the Girton Interchange then buses would have been able to quickly enter Cambridge without delays at the south turn onto the M11. There would then have been no need for the Scheme.
- 18.118 The proposal should be re-evaluated in the light of confirmation that EWR will go ahead: it is questioned whether two high cost transport options are needed. The end point at Grange Road is not a destination for any major workplaces or education locations, and congestion in the City Centre would be made worse by the onward journeys created by this scheme. Transport for Cambourne residents could be improved with cheaper and simpler options such as an improved peak hour bus service to Royston and North Cambridge.

The Woodland Trust^{481,482} (OBJ-294)

- 18.119 The Trust objects on the basis of the loss and deterioration of at least six veteran trees, which are recorded on the Trust's Ancient Tree Inventory, and wider harm to the local environment. Veteran trees are irreplaceable habitats, as set out in both the NPPF and NE's and the Forestry Commission's standing advice⁴⁸³, which should be considered as the government's position with regards to development impacting on veteran trees. They must be protected from loss, deterioration or harm, and any development resulting in the loss of a veteran tree should not be taken forward unless there are wholly exceptional reasons, such as infrastructure projects where the public benefit would clearly outweigh the loss or deterioration, and a suitable compensation strategy exists⁴⁸⁴.
- 18.120 Where a proposal involves the loss of irreplaceable habitats, net gain for biodiversity cannot be achieved. Where there is a wider population of veteran trees within close proximity, as at Coton Orchard, there is a greater likelihood of rare species associated with decaying wood habitat, aging bark and old root systems, for instance specialist wood decay fungi and invertebrates, being present. This means that harmful deterioration of the wider habitat can occur where development is sited in close proximity to such trees, as outlined in British Standards⁴⁸⁵ (BS), as well as the harm caused by the loss of three of the trees themselves.
- 18.121 Due to the characteristics of veteran trees, which contain significant amounts of dead wood, there would be increased pressure to manage retained ones near the busway in an intensive manner in the interests of health and safety, than would be the case where veteran trees are not located next to such infrastructure. This would lead to demands for the removal of deadwood, which would lead to loss of habitat importance and potential for the decline of the tree or its removal, as explained in veteran tree management guidance⁴⁸⁶.
- 18.122 Given their susceptibility to construction damage and development, the BS emphasises particular care being taken with adequate space allowed for mature, over-mature and veteran trees' long-term retention and maintenance. It is unclear whether the Applicant intends to provide a buffer area for the retained trees based on the standing advice's calculation or a root protection based on a smaller ratio of the trees' diameter, capped at a maximum, calculated on the BS approach. Consequently, the Trust cannot determine whether the root protection areas of retained veteran trees would be adequately protected from encroachment in either construction or operation phases.

⁴⁸¹ Letter of 8 January 2025 ([CD2-OBJ-294](#)).

⁴⁸² The Trust's objection also included detailed commentary on, and critique of, the Applicant's approach to the evaluation of trees at Coton Orchard and their findings at that time that only two trees were veteran trees, set out in the Applicant's ES Appendix TR14.1 Coton Orchard Veteran Tree Review ([CD1-11.14.02](#)). However, subsequent to the Trust's objection and the publication of ES, the Applicant's arboricultural witness confirmed that twelve trees were veteran trees ([CD26-01-APP-W4-1](#)), including all six trees of particular concern to the Trust.

⁴⁸³ Ancient woodland, ancient trees and veteran trees: advice for making planning decisions, Natural England and Forestry Commission, January 2022.

⁴⁸⁴ NPPF para 193 c) and footnote 70.

⁴⁸⁵ British Standard BS5837:2012 - Trees in relation to design, demolition and construction.

⁴⁸⁶ Ancient and other veteran trees: further guidance on management, 2013 ([CD19-01](#)).

18.123 In its present form, the Scheme should not be taken forward on account of the harm to these irreplaceable habitats.

Other Interested Parties' Objections

18.124 Over three hundred objections were received from individuals, including four councillors sitting on SCDC and/or CCC. These raised a range of issues on the following grounds.

Benefits and need

18.125 Including that:

- The busway would not actually improve bus journey times to, and particularly from, Cambridge, or if it would do, any improvement would be marginal compared to overall journey length.
- The Scheme would only be of benefit for a limited time during school term time and the morning peak in the direction of Cambridge as at other times of the day and year there is little or no congestion on existing routes nor for outbound traffic from Cambridge.
- Only the University and their developments at West Cambridge and Eddington would benefit from the Scheme, and not the wider community.
- Since the COVID-19 pandemic and a change in work practices with people working at home more and/or travelling at different times of the day, there has been much less congestion such that there is no longer a need for a separate busway to avoid congestion.
- The destinations to be served by the route do not reflect demand which is for destinations to the north of Cambridge including Cambridge Science Park, Cambridge Business Park and Cambridge Regional College, and to the south, including the Biomedical Campus which travellers would use EWR to get to when it is operational.
- Existing public transport provision, services and/or infrastructure is adequate.
- There cannot be a compelling case in the public interest to justify compulsory acquisition of land as a viable on-road route has not been considered in detail.
- The existing P&R facility at Madingley Road is sufficient and the proposed Scotland Road facility would be unnecessary.
- Traffic levels on St Neots Road in Hardwick do not affect busses whereas the current poor frequency and reliability of buses on the route is the issue leading to poor patronage.
- The CO₂ emissions reduction of the busway would be very small, would only be achieved at the end of long period of increased emissions during which time local councils are aiming to achieve net zero and the overall net benefit would be a very small fraction of total transport emissions in South Cambridgeshire.
- Assumptions in greenhouse gas modelling can lead to uncertainties leading to a 10% variation which could mean that as the level of predicted benefits are so limited, no actual benefits may result.
- The majority of anticipated carbon benefits would not be delivered directly by modal shift enabled by the busway but by general traffic emissions which would improve over time without the Scheme.

Cost and value for money

18.126 Including that:

- A BCR of 0.5 is so low it should have ruled the project out and does not appear to meet the DfT's criteria for supporting the Scheme.
- The BCR for the Scheme will be even lower now that EWR has been confirmed.
- The costings are out-of-date and experience suggests the project will go over budget.
- Other cheaper, more cost-effective routes should be pursued.
- Money saved by pursuing a cheaper on-road route could be invested in a more effective tram or light rail transport solution.
- Public money would be better spent on other priorities such as health or maintaining and refurbishing existing public infrastructure.

Adequacy of information and assessment

18.127 Including that:

- The justification of the Scheme is inadequate being based on out-of-date transport modelling, out of date public transport use data, and out of date private vehicle use data in terms of overall use, routes and times of travel, including using pre-COVID-19 data.
- The proposal does not assess the impact of increased traffic, both during construction and when the Scheme is in operation, including that travelling to the proposed Scotland Farm travel hub, through villages including Dry Drayton and Madingley.
- The assessment of heritage impacts is flawed and inadequate, particularly as the Heritage Statement only considers individual heritage assets and not strategic heritage considerations. Those considerations should include the landscape setting of Cambridge as a University City of potentially World Heritage Site significance, in particular in relation to changing the relationship between the western edge of the City and its setting that would result from the proposal.
- Flood risk to Gough Way estate has not been properly addressed in the application.
- The Applicant's flood modelling is incomplete and inadequate, being too narrowly focused and not accounting for up and down stream effects, ignoring the first 10mm of water and not taking a nearby stream into account.
- The consultation process has been used by an academic at Cambridge University in their lectures as an example of biased statistic science.
- The results of public consultation, including seeking views about alternative routes, appears to have been ignored.

Flood risk

18.128 Including that:

- The proposed bridge and embankment at Bin Brook, and hard surfaces in West Fields, would increase the risk of flooding, both upstream affecting properties and residents on Gough Way estate and on Barton Road, and downstream affecting other parts of the City.

- The increased flood risk would make it more difficult to insure and sell properties, particularly in light of previous flooding events, including those at Gough Way.
- The Scheme does not accord with the NPPF's sequential test as the proposal could be steered to areas with a much lower risk of flooding.
- Using alternative on-road routes at the east end of the project, such as Adams or Madingley Roads, would avoid the need to build in the floodplain.

Biodiversity, wildlife and habitats

18.129 Over two fifths of objectors opposed the Scheme due to effects on Coton Orchard, as well as other biodiversity effects including that:

- The Scheme would harm habitats and species in several CWSs and CiWSs.
- There would be adverse effects on Callow Brook, a headwater that runs through Dry Drayton.
- Run-off from the busway would harm the rare chalk stream habitat of Bin Brook.
- There would be harmful effects on the historic Coton Orchard, and its wildlife habitats, and the loss of veteran trees would be unacceptable.
- Cambridge's West Fields are a valuable habitat for plants, animals and birds and would be harmed by the Scheme.
- As well as designated wildlife sites, the busway would bisect, cut through and otherwise fragment and harm wildlife corridors which cross the route.
- There would be biodiversity and visual harm through the loss of many trees along the whole route, not just at Coton Orchard.
- There would be interference with aquifers and chalk streams.
- Proposed mitigation would be insufficient to compensate for habitat loss, especially trees.
- Experience of other infrastructure schemes in the vicinity is that mitigation will not be implemented or would be unsuccessful.
- The proposal does not adhere to the mitigation hierarchy as harm has not been avoided as the first stage but the Scheme has proceeded direct to the mitigation stage.

Historic environment

18.130 Including that:

- The busway would harm the significance of designated heritage assets including listed buildings in Coton, the Coton Conservation Area and the West Cambridge Conservation Area, the listed Erskine Building at Clare Hall and the listed Memorial and the RPG at the American Military Cemetery.

Effects of proposed Scotland Farm park and ride/travel hub

18.131 Including that:

- There is no indication how construction traffic routes would be enforced and there is a risk of damage and deterioration of road surfaces in surrounding settlements if construction traffic is diverted through them.

- Construction traffic followed by increased vehicles when the Scheme is in use, would have an adverse impact on air quality, noise levels, pedestrian and cycle safety and residents' quality of life in small villages such as Dry Drayton.
- Harmful effects of increased traffic will not be mitigated as no traffic calming or speed restrictions are proposed on Scotland Road or in Dry Drayton.
- The bus services at the P&R facility would not be accessible by residents in Dry Drayton and other villages as there would be no safe foot or cycleway linking it to the north.
- The location of the travel hub does not align with other infrastructure including EWR, worsening congestion, and thereby defeating the Scheme's purpose.
- The benefits of the P&R could be delivered without the busway.

Effects along St Neots Road, Hardwick

18.132 Including that:

- Construction will cause harmful effects to residents through disturbance and disruption that they have experienced before with works to the A428.
- Construction could affect vital hospital trips required by disabled residents whose driveways lead to St Neots Road.
- Mature trees along St Neots Road and the benefit they provide in forming a visual barrier between homes and the A428 would be lost.
- The removal of all the laybys which can currently accommodate around 80 vehicles, combined with parking and waiting restrictions proposed on the carriageway will prevent staff, customers and delivery vehicles servicing business and social visitors, deliveries and post serving residential properties.
- The loss of laybys could be avoided by locating the active travel route on the north side of St Neots Road.

Pedestrian, cycle, equestrian and highway safety

18.133 Including that:

- The junctions and crossing points would create a risk to pedestrians and cyclists including those using public footpaths or bridleways that would be crossed by the route.
- The existing guided busways have been found to have safety issues resulting in fatalities and the prosecution of CCC by the Health and Safety Executive, with the subsequent erection of safety barriers along the routes.
- The Scheme ignores the safety and accessibility needs of the many horse riders in this countryside area, unlike other routes which incorporate public bridleways and safe crossings.
- The road layout would be hazardous for the exceptionally wide farm vehicles and heavy goods vehicles, including those delivering grain to Comberton.
- The existing cycleway provision is sufficient.
- Rifle Range Road is too narrow to provide a safe pedestrian and cycle route alongside.

Effects in and around Grange Road, Cambridge

18.134 Including that:

- There is no information about if and how bus services would continue or connect with other services once the busway reaches Grange Road.
- Grange Road would be an inappropriate location for services to terminate being remote from employment and other destinations.
- Grange Road is heavily used by cyclists and pedestrians, many of whom are children given the number of schools in the area and additional buses would have an adverse effect on their safety.
- The projected additional 16 buses an hour would increase congestion on Grange Road.

Green Belt and landscape effects

18.135 Including that:

- The route would harm Green Belt on both sides of the M11 and harm the countryside more generally.
- The proposed route, particularly that between Hardwick and the M11 would be harmful to the landscape of the area including the south slopes of Madingley Hill, urbanising the setting of Coton, and the orchard landscape of Coton Orchard.
- The West Fields are also Green Belt and they are part of the 'lungs' of the City, whose openness and character would be harmed by the busway.
- The proposed embankment at Bin Brook would be particularly intrusive visually and harm openness.
- The busway would be intrusive in important views in the area including views of Madingley Hill, of Coton and of the City of Cambridge.
- The proposed bridge over the M11 would enable the University to expand into the Green Belt on the west side, harming and reducing the Green Belt.

Greenhouse gasses and CO₂

18.136 Including that:

- Loss of trees will release large amounts of stored carbon.
- If a kerb guided busway is implemented this would require a large amount of concrete for construction which in turn would create harmful CO₂ emissions.

Other effects and issues

18.137 Including that:

- The route would make it more likely that there is new development within the countryside around bus stops along the route, further harming the Green Belt and landscape quality of the area.
- The proposal would result in the loss of prime agricultural land at a time when the UK should be growing more food.
- The proposal would have an adverse effect on the delivery and

construction of EWR.

- Whilst the proposal seeks to promote Cambridge as a great place to live and work the harmful effects of the Scheme would undermine the attributes that make it special.
- Although proposed as a busway its configuration would allow it to be used as a general-purpose road.
- The proposed location of a bus stop outside Coton would be inconvenient and could lead to the existing service which uses a more convenient stop being withdrawn.
- If the busway must be adjacent to Coton, there should be two bus stops, one at either end of the village.
- The proposed busway junction on Cambridge Road north of Coton would compound existing traffic queuing in the area.

Alternative solutions

18.138 Including that:

- The proposal would be unnecessary with the proposed EWR rail link between Cambourne and Cambridge.
- A scheme using or running alongside the north side of the A428 would avoid disturbance to residents and businesses in Hardwick and, if combined with a junction improvements at the Girton Interchange with the A14 and M11, would provide faster bus routes to destinations to the north and south of the City and avoid any congestion on Madingley Road.
- A tram or light rail system would carry more passengers and would be preferable.
- Other countries concentrate public transport into corridors, and this Scheme should take a similar approach and follow existing transport corridors into Cambridge rather than creating an additional one.
- The Comberton Greenway will provide a much better cycle and walking route from the west into Cambridge, creating a more pleasant route with more gentle gradients. Along with the CPPF & CPC alternative it would support development at Bourn Airfield with much less harm than the Scheme.
- Some respondents considered the use of Adams Road rather than Rifle Range Road would be less environmentally harmful in terms of landscape, wildlife habitats and Green Belt. Conversely, others considered that using Adams Road would harm pedestrian and cycle safety, whilst objecting to other aspects of the proposal.

The CPPF & CPC alternative proposal

18.139 Almost a third of objectors preferred an on-road alternative along Madingley Road for reasons including that it would:

- Provide a better and more appropriate solution to the issues that the Scheme seeks to address.
- Be cheaper.
- Be far less harmful to biodiversity, wildlife and habitats in general, and to Coton Orchard CWS and its veteran trees in particular.
- Provide a more direct route to destinations in north and south Cambridge including business parks and the Biomedical Campus.

18.140 Many respondents were keen to point out they recognise the need for, and support the provision of, better, faster and/or more reliable public transport services in and around Cambridge, including to and from Cambourne, along with improved walking and cycling connections for surrounding towns and villages to the City Centre. Rather, it is particular aspects of the proposal and its route that they object to, particularly the environmental effects of the off-road routing east of Hardwick, the overall cost of the Scheme, the level of public benefit that would be gained from the investment, and how alternatives have been considered which is the focus of their objections. Some respondents noted that the busway and the proposed route were opposed by many of the public in consultations and considered that their views and the consultation results had been ignored.

19. POSSIBLE CONDITIONS

- 19.1 Potential conditions that could be imposed should a direction for DPP be granted were discussed at the inquiry. The Applicant's request for DPP included a schedule of draft conditions ([CD1-14.01](#)). Statements of common ground between the Applicant and both SCDC ([CD29-13](#)) and CCiC ([CD29-12](#)) each included an agreed schedule of draft conditions, which were the same in both statements. A revised schedule of draft conditions ([CD29-96](#)) was provided by the Applicant in advance of the inquiry discussion, and they subsequently provided revised drafts of particular conditions⁴⁸⁷ ([CD29-115](#)) following the discussion (referred to hereafter as draft conditions).
- 19.2 The Applicant's position is that the legislation relating to any grant of DPP would not require their express written agreement to be given to the terms of any pre-commencement conditions that the SoS may be minded to impose. However, should it transpire that there is such a requirement, they nevertheless provided their written consent ([CD29-113](#)) to those pre-commencement conditions set out in their draft schedule⁴⁸⁸.
- 19.3 Natural England provided a position statement ([CD29-07-0](#)) during the inquiry with particular reference to bats, their habitats and mitigation of effects from the proposal. This included a schedule of relevant amended draft conditions⁴⁸⁹ they advised had been jointly drafted with the Applicant ([CD29-07-2](#)).
- 19.4 Prior to withdrawing their objection, the Environment Agency explicitly supported the imposition of particular suggested draft conditions and requested that they be consulted on any details submitted to discharge them ([CD2-OBJ-301](#)). They recommended that a separate condition be imposed in respect of potential piling effects on groundwater quality as opposed to relying on such details being included in a condition relating to LEMP(s) as the applicant's draft condition proposed.

⁴⁸⁷ In respect of biodiversity net gain, and the detailed design of the busway, its associated structures, means of access and the Scotland farm Travel Hub.

⁴⁸⁸ Albeit that should the wording or terms of any such condition differ from the draft, that would not avoid requirements for any pre-commencement conditions' text and reasons to be agreed in writing by the Applicant, should there be a legal requirement to do so.

⁴⁸⁹ In respect of: a Code of Construction Practice; Local Environmental Management Plan(s); the location, layout, scale and external appearance of the scheme; and, operational lighting.

- 19.5 Although they withdrew their objection, Clare Hall made reference to a draft condition put forward by the Applicant in an agreement that those two parties reached⁴⁹⁰ ([CD28-03](#)). This condition sought to restrict the times and numbers of bus movements with the aim to limit operational noise impacts on the college during the night, which Clare Hall considered to be a crucial element of the withdrawal of their objection.
- 19.6 In contributing to the conditions round table session, an interested party, requested that should DPP be granted, conditions should ensure a number of specific measures in relation to the prevention, management and mitigation of effects of construction and operational dust on human health in the vicinity of their property. These included requiring that the construction haul road be situated to the south of any construction area in the vicinity of the property and that such an arrangement should extend for around 100m to the west of the property. They requested that landscaping should include the planting of semi-mature, indigenous, evergreen trees along the boundary of their property in the vicinity of the proposed route. They also requested that air monitoring apparatus be situated within their property two months prior to, and during, construction.
- 19.7 Paragraphs 20.312 to 20.319 below sets out our considerations with regard to all suggested draft conditions and, should the SoS decide to make a direction to grant DPP, Annex 1 provides a schedule of conditions that we recommend should be imposed.

⁴⁹⁰ This was a private agreement between those parties and not provided to the Inquiry.

20. PANEL'S CONCLUSIONS

- 20.1 Having regard to the matters about which the SoS wish to be informed [2.2] and the representations submitted, we have identified the following main considerations in this case:
- i) The aims and objectives of, and the need for, the proposed Cambourne to Cambridge guided busway.
 - ii) The main alternative options considered by CCC, and the reasons for choosing the preferred option set out in the draft Order.
 - iii) The effect on East West Rail land safeguarded for the construction of a new railway between Bedford and Cambridge and the upgrading of the existing railway between Oxford and Bedford.
 - iv) The effect on local residents, pedestrians, cyclists and motorists.
 - v) The effect of the Scheme on the environment, including flood risk, nature conservation, the character and appearance of the area, and carbon emissions.
 - vi) The effect of the Scheme on the Green Belt.
 - vii) The effect of the Scheme on heritage assets, with particular reference to the grade I registered park and garden of the American Military Cemetery at Madingley, and the grade II* listed building of Clare Hall, University of Cambridge.
 - viii) The effects of the Scheme on statutory undertakers, statutory utilities and other utility providers.
 - ix) Whether the Scheme is consistent with guidance on the compulsory purchase process.
 - x) Whether the exchange land is equally advantageous to the open space land to be acquired, and whether it is appropriate for a certificate to be granted in accordance with the provisions of section 19 of the Acquisition of Land Act 1981.
- 20.2 Our conclusions are structured to reflect the main considerations. We have attributed weight to our findings in accordance with the following scale:
- Great
 - Substantial
 - Moderate
 - Limited
 - Little

References to earlier paragraphs in this report are in square brackets.

The Aims and Objectives of, and the Need for, the Proposed Cambourne to Cambridge Guided Busway (matter 1)

- 20.3 Greater Cambridge is home to one of the world's most prestigious academic institutions in the University of Cambridge, and to the largest biotechnology cluster in Europe. It has a knowledge-based economy, and is an important centre of research and innovation [7.12]. Greater Cambridge, comprising the districts of Cambridge City and South Cambridgeshire, has a rapidly growing economy and population, and the government and the County and District Councils, recognising the area's economic significance, wish to encourage continued growth [10.1, 11.6].

- 20.4 There is a tension between further growth of the City and safeguarding the important qualities of its historic character, compact form, and setting within an open landscape. In consequence, the spatial strategy for Greater Cambridge, embodied in the two Local Plans, envisages the development of settlements beyond the Green Belt, often referred to as the necklace villages [7.2]. Fundamental to achieving that form of growth in a sustainable manner is the provision of infrastructure for the necklace villages, including that needed to provide transport connections to services and jobs in Cambridge [7.4-7.6]. The role of transport connections is particularly important in an innovation ecosystem, which, as the inquiry heard from the District Councils, depends on high levels of in-person encounters to drive forward innovation [11.12]. That spatial strategy is carried forward in the emerging GCLP [7.14], which is being prepared to cover the period 2024 to 2045. Whilst the draft Local Plan was subject to consultation in the period following the inquiry and carries limited weight, its content clearly indicates an intended continuation of the established policy position.
- 20.5 Policies in both Local Plans seek to increase the use of sustainable modes of travel [7.4], and the LTCP supports the spatial strategy, presenting an approach which aims to develop sustainable transport systems for Cambridgeshire & Peterborough [7.9]. From Cambourne to Cambridge, there are major development sites at Cambourne West, Bourn Airfield, and West Cambridge. Policy requirements there refer to sustainable transport, with specific mention of bus travel at the former two sites, expected to involve a combination of a segregated bus link/ busway and bus priority measures [7.57.6]. It is clear that the further growth of Greater Cambridge, which has Government support, as evidenced by the City Deal established in 2014, and subsequently by The Case for Cambridge in 2024 [7.11, 7.12], is predicated on the provision of sustainable transport infrastructure to secure a mode shift from travel by private car.
- 20.6 Moreover, provision of the busway would satisfy requirements of the planning permission for Bourn Airfield and the planning agreement for Cambourne West. A condition on the planning permission prevents the occupation of more than 500 dwellings at Bourn Airfield until the busway or an equivalent scheduled rapid mass transit passenger carrier service is operational [4.6], and similarly a planning obligation attached to the planning permission for Cambourne West requires provision of bus links at the western end of the route and a financial contribution to the improvement of bus links between Cambourne and Cambridge [4.10]. Consequently, the Scheme would directly facilitate the implementation of these major development proposals.
- 20.7 The proposed busway would extend over about 13.6km between Cambourne and Cambridge, for the most part on a segregated route [5.1]. It has been put forward to deliver the infrastructure improvements and achieve the modal shift necessary to support the spatial strategy on the west side of Cambridge. This is clear from the first two objectives established for the Scheme, which are to achieve improved accessibility to support the economic growth of Greater Cambridge, and to deliver a sustainable transport system connecting areas between Cambourne and Cambridge along the A428/A1303 corridor. A third objective is to contribute

to an enhanced quality of life by relieving congestion and improving air quality along that corridor and within the City⁴⁹¹.

- 20.8 The aims for the Scheme, which are more detailed, derive from the objectives, and reiterate the role of the busway in supporting economic growth, delivering a sustainable transport system, and enhancing the quality of life⁴⁹². In addition to expected improvements in air quality, the Scheme should deliver an overall minimum of 10% BNG, protect and enhance the natural, built and historic environment, and assist in moving to a low carbon economy. The A428/A1303 corridor is a well-used route into and out of Cambridge, and suffers from congestion at peak times, affecting the reliability of existing bus services [10.4]. The provision of a segregated track for much of the route of the busway would improve reliability of bus services and shorten journey times. In so doing it is intended to facilitate a modal shift from use of the private car [10.185]. Accordingly, a fourth objective for the Scheme is to relieve congestion.
- 20.9 The busway Scheme would have social, in addition to economic benefits. An improved public transport service along the corridor to the west of Cambridge would improve access to education opportunities in Cambridge [11.14], and it would also facilitate access to affordable housing for people working in the City.
- 20.10 The Government has expressed its support for the EWR project, which would provide a link between Oxford and Cambridge [18.55]. It is intended that a station would be built at Cambourne, and the line would provide a substantial element of public transport infrastructure on the western side of Cambridge. Whilst there has been criticism that the busway would unnecessarily duplicate the railway in catering for journeys between Cambourne and Cambridge [12.15, 18.125], the Applicant⁴⁹³, the District Councils and ERW [10.45, 11.18, 18.54] all see these two public transport links as complementary rather than competitive. The busway would support use of the railway by providing a link between Cambourne and other places to the west of Cambridge, including the major development site at Bourn Airfield.
- 20.11 There is broad support for the objectives to promote the growth of Greater Cambridge and to underpin this growth with a sustainable transport system, including from parties who do not agree that the Order Scheme should be the way forward. Suggested alternatives are considered in the following sub-section of this report (paras 20.44-20.53). A few parties contest the need to pursue growth. The FoTC maintain that the Cambridge area cannot support the projected growth, and raise particular concern about the availability of water resources [17.29]. The CPRE-C&P argues that the Cambridge growth phenomenon involves moving jobs, housing and water from elsewhere in the country to the Cambridge area, and that essential building should be spread across the country, taking jobs to where they are most needed in areas where water is plentiful [17.35]. Notwithstanding these concerns, it is the established position in both national and local

⁴⁹¹ The Cambourne to Cambridge Order, Statement of Aims (CD1-04), para 4.1.

⁴⁹² The Cambourne to Cambridge Order, Statement of Aims (CD1-04), para 4.2.

⁴⁹³ The Applicant's closing submissions (CD29-124), para 88.

policy intentions to encourage growth in Greater Cambridge (above, para 20.4, 20.5), and the contrary position carries little weight in considering the merits of the Order Scheme.

- 20.12 The Order Scheme is proposed to underpin the spatial strategy for Greater Cambridge, to contribute to sustainable growth in the area by the provision of major public transport infrastructure. Notwithstanding objections to the draft Order, there is widespread support in the representations for the improvement of public transport on the west side of Cambridge⁴⁹⁴. We conclude that the aims and objectives of the Order Scheme are consistent with relevant transport and planning policies, and that there is a need for a scheme capable of achieving a marked change in transport usage with associated social benefits.

The main alternative options considered by CCC, and the reasons for choosing the preferred option set out in the draft Order (matter 3)

Alternatives considered during evolution of the Scheme

- 20.13 Recognition of the need to address transport constraints in Greater Cambridge is of long-standing. In 2014, the TSCSC included as an objective: *to enhance accessibility to from and within Cambridge and South Cambridgeshire (and beyond the strategy area)*. Subsequently, the spatial strategy enshrined in the Development Plan set out the aim to maintain a compact city, with major new development proposed for accessible locations in and around Cambridge and in locations beyond the Green Belt where public transport improvements could be delivered [7.2]. The principle of achieving significant public transport improvements between Cambourne and Cambridge is consistent with, and fundamental to, the existing and emerging spatial strategy.
- 20.14 The TSCSC advocated interventions on the St Neots and Cambourne to Cambridge corridor, including: segregated bus links on the A1303 or an off-line alignment between the A428 and the M11, provision of a P&R on the A428 between Cambourne and the A1303, and A1303 busway/ high-quality public transport infrastructure to serve Bourn Airfield/ Cambourne⁴⁹⁵.
- 20.15 Alternative proposals were subsequently considered for the A428/A1303 corridor, during a process which involved stakeholder engagement and consultation, and commenced with an initial long list of 34 options⁴⁹⁶. An early consultation stage in 2015 sought views on three high-level bus options to the west and a further three to the east of the Madingley Mulch roundabout. Options presented to both the west and east of the roundabout included lengths of segregated route and the use of existing roads. To the east of Madingley Mulch most support from respondents to the consultation exercise was received for the on-road option involving an in-bound bus lane, and to the west for a bus only route between Cambourne and Bourn Airfield combined with use of the existing roads⁴⁹⁷.

⁴⁹⁴ The Applicant's closing submissions (CD29-124), para 13.

⁴⁹⁵ Transport Strategy for Cambridge and South Cambridgeshire (CD7-07), pp 2-7 & 5-24.

⁴⁹⁶ Mr J Baker's PoE (CD26-01-APP-W1-3), para 4.4.3. Details of the consultation process are set out in The Cambourne to Cambridge Order – Consultation Report (CD1-06.01).

⁴⁹⁷ CD1-06.01, table 4-2.

- 20.16 Subsequently, separate consultation exercises took place for phase 1 (the route between Cambridge and the Madingley Mulch roundabout), and phase 2 (the route between the Madingley Mulch roundabout and Cambourne). The phase 1 exercise in 2017-18 presented three options: an on-road option with an in-bound bus lane, an on-road tidal bus lane, and a largely off-road alternative (with detailed variations) running to the south of Madingley Road. Although most respondents (40%) favoured a tidal bus lane, the off-road route was considered to offer greater overall benefits in line with the project's objectives, and was chosen for the next stage of development.
- 20.17 The phase 2 exercise took place in 2019 and presented the following options: a new route adjacent to the A428 and St Neots Road, on-road with junction improvements, and on-road with bus priority lanes. There was a clear preference for the off-road option, although concern was expressed about the loss of trees that this would cause at Hardwick.
- 20.18 More detailed proposals were drawn up for consultation during 2022 (referred to as the EIA consultation). The preferred route was for the most part a segregated busway consistent with the Scheme alignment. At Hardwick, options for both an on-road and off-road busway were put forward.
- 20.19 Two options were considered for the location of a P&R facility; at Scotland Farm and at the junction of St Neots Road and the A1303 (the Waterworks site). The Scotland Farm site was preferred by respondents to the consultation exercises, as it was considered to have a lesser visual and ecological impact and better accessibility to the west of Cambridge. It was subsequently included in the Order Scheme.
- 20.20 A series of option assessment reports were produced, which summarised the comparative performance of options, taking account of consultation feedback and value for money. On that basis, an off-road segregated route, with a P&R facility at Scotland Farm, was put forward as the preferred approach in option assessment report 3 (2019)⁴⁹⁸.
- 20.21 Further consideration was given to sections of the route arising from continuing dialogue with stakeholders⁴⁹⁹. At Hardwick, because of the effect of the loss of trees on the appearance of the area and the amenity of local residents, the on-road option was preferred. To the west of the Madingley Mulch roundabout, the route was realigned to avoid the Waterworks site as this offered some ecological merit. A more northerly alignment was suggested at Coton Orchard, which would have made use of a gap between the oldest trees, but which would have had a greater severance impact on the fields to the west of Cambridge Road, been more visible due to its more elevated location, and involved more earthworks. Consequently, that variation was not pursued.
- 20.22 At West Cambridge, taking account of concerns by the University about vibration and electro-magnetic interference, the route chosen was along

⁴⁹⁸ See Environmental Statement (CD1-10.01), para 4.5.4.

⁴⁹⁹ See Environmental Statement (CD1-10.01), paras 4.6.1-4.6.9.

Charles Babbage Road. At the eastern end of the route, consideration was given to the possibility of using Adams Road as an alternative to Rifle Range Road. The latter was considered to perform better, and at the inquiry we heard that Adams Road is one of the busiest cycle routes in Cambridge [17.42], providing links to University buildings, the Wilberforce Road Sports Ground, the City Centre, and westwards towards Coton, and is used by more than 3,000 cyclists daily⁵⁰⁰. Moreover, Adams Road would be re-configured as a quiet road as part of the Comberton Greenway Scheme, which is intended to make journeys on foot and by cycle between Cambridge and communities to the west more attractive and safer⁵⁰¹. Use of Adams Road as part of the busway would conflict with this aim, since it would be likely to pose a threat to the safe movement of cyclists and pedestrians. Rifle Range Road provides access to fewer premises, and there is no evidence of heavy cycle flows. We agree that it is more suitable for use as part of the busway than Adams Road.

- 20.23 The preferred option for the improvement of public transport is not only consistent with the spatial strategy of the Development Plan, but would also support the implementation of major development sites within the Cambourne to Cambridge corridor. It would, furthermore, have the potential to achieve objectives and aims of the Scheme to achieve improved accessibility to support the economic growth of Greater Cambridge, and to deliver a sustainable transport system connecting areas between Cambourne and Cambridge along the A428/A1303 corridor (above, paras 20.7 & 20.8).

Benefits of the Scheme

- 20.24 A range of benefits are propounded for the Scheme. Congestion is identified as a concern by the Applicant [10.4], and, although objectors, in particular CPPF & CPC, disagree about the extent of the problem [12.12], in supporting an alternative scheme with an in-bound bus lane [12.33, 12.35] they acknowledge a need to improve public transport between Cambourne and Cambridge. It is predicted by the Applicant that inbound journey times to the eastern end of the busway at Grange Road would be about 17 minutes, reduced from about 33 minutes in the morning peak period, about 27 minutes in the afternoon peak, and about 25 minutes during an inter-peak hour⁵⁰². The strategic case for the Scheme refers not only to delays in the morning peak with eastbound speeds to Cambridge up to and over 75% slower than average night-time speeds, but also 50-75% slower westbound speeds from Cambridge in the afternoon peak period⁵⁰³.
- 20.25 The journey time analysis undertaken by CPPF & CPC focusses on delays to bus journeys in 2019 and 2024 (pre and post COVID-19)⁵⁰⁴, and the information presented is not directly comparable with that submitted by the Applicant. Insofar as in-bound journeys are concerned, the data indicates a

⁵⁰⁰ Mr Strauss' PoE (CD26-13-1), and his appendix 4, Greenways Update April 2025 (CD26-13-5).

⁵⁰¹ Comberton Greenway leaflet (CD29-15).

⁵⁰² Cambourne to Cambridge Better Public Transport Project, Outline Business Case, Appendix B – Economic Case Addendum (CD1-21-02), table 4.4.

⁵⁰³ Cambourne to Cambridge Better Public Transport Project – Outline Business Case – Strategic Case (CD1-20.05), para 8.1.

⁵⁰⁴ Appendix A to Mr Leigh's PoE (CD26-10-W3-1), section 4.

reduction in delays over the five years period, other than on the section of route between Eddington Avenue and Grange Road where delays have increased. The worst performing section is that between Cambourne and Maddingley Mulch, where a median delay of 7.3 minutes has been calculated. Turning to out-bound journeys, despite reductions since 2019 there remain noticeable delays between the bus station and Grange Road. However, the Order Scheme would not provide for journeys before Grange Road, and delays here would apply irrespective of its implementation.

- 20.26 CPPF & CPC argue that congestion is not a significant problem in this direction, since traffic is dispersing as vehicles leave the City. In contrast there is agreement that delays which merit intervention occur on in-bound journeys along the A428/ A1303 corridor [10.21, 12.35]. It is also clear that delays to bus movement are frequently experienced within Cambridge, beyond the eastern end of the proposed busway at Grange Road [15.17, 17.10, 17.17]. The Order Scheme would do nothing to improve the reliability and journey time of services travelling into the City Centre.
- 20.27 The frequency of bus services in each direction between Cambourne and Cambridge is expected to increase from about 4 per hour⁵⁰⁵ to 8 per hour to and from Cambourne, with a further 2 peak period services from the P&R facility at Scotland Farm [5.2]. Moreover, the inclusion of more services to the Biomedical Campus would extend the opportunities for travel by public transport.
- 20.28 A principal benefit claimed by the Applicant for the busway is a significant increase in bus patronage. Over a 12 hours period the busway is predicted to carry 10,300 passengers⁵⁰⁶, increasing bus travel mode share and a shift away from private car use for journeys into and out of Cambridge. Notwithstanding our view that the Scheme is supported by an appropriate modelling exercise (below, para 20.55), a note of caution should be applied to the number of passengers expected. That is an average of 858 trips per hour, yet the economic case refers to hourly numbers of bus trips east of the P&R at Scotland Farm in 2036 for the morning peak, the inter-peak period and the afternoon peak of 881, 232, and 320 respectively by 2036⁵⁰⁷, indicating a lower number of passengers for much of the day.
- 20.29 The emergency and maintenance track which would run alongside the busway for much of its length would be available for use for active modes of travel. It was suggested, by CPPF & CPC amongst others, that the Comberton Greenway would offer a more attractive active travel route [12.31]. The greenway, which is being promoted by GCP, would provide an active travel route between West Cambridge, Coton and Hardwick, as would the Order Scheme, but at present it would not extend beyond Hardwick and Comberton. Consequently, although it may offer some advantages to the active travel route included in the Scheme in terms of gradient over some sections, it would be complementary, rather than an alternative, to that active travel route, which would provide an additional benefit in terms of

⁵⁰⁵ The Cambourne to Cambridge Order, Technical Report 12: Traffic and Transport (CD1-11.12), table TR12-4-1.

⁵⁰⁶ CD1-21.02, para 4.3.3.

⁵⁰⁷ Cambourne to Cambridge Better Public Transport Project – Outline Business Case – Economic Case (CD1-20.02), tables 8-10.

sustainable travel.

- 20.30 Benefits advanced in support of the Scheme in respect of air quality and biodiversity net gain are considered below (paras 20.322 20.79, 20.173).
- 20.31 We heard that economic outcomes in Cambridge derive in large part from person-to-person encounters [11.12]. Those would be facilitated by the busway, which would provide direct links to the West Cambridge site, where there are both academic and commercial/ research uses [3.9, 4.12]. The Scheme would also improve access to job opportunities throughout Cambridge⁵⁰⁸, including the Biomedical Campus and West Cambridge.
- 20.32 The initial BCR for the Order Scheme, taking account of journey time benefits, vehicle operating cost savings, active travel benefits and benefits in respect of marginal external costs was calculated by the Applicant as 0.5:1, a ratio which indicated poor value for money⁵⁰⁹. Taking account of wider economic benefits, such as agglomeration, labour supply impacts and output changes, in line with the DfT's VfM Framework⁵¹⁰, the adjusted BCR remains at 0.5:1⁵¹¹.
- 20.33 The third stage in the value for money assessment involves indicative impacts, a level which includes dependent development. The Applicant calculates a significant economic benefit from land value uplift, arising from the delivery of dependent housing sites. This uplift in respect of the Bourn Airfield and Cambourne West sites is stated as over £222 million (at 2010 prices)⁵¹², and it is key to the Applicant's calculation that, taking into account dependent development, the Order Scheme would produce an indicative BCR of 1.8, indicating medium value for money⁵¹³.

Challenges to the claimed benefits

- 20.34 Underpinning the claimed transport benefits, including shorter journey times and the likely number of passengers carried, are outputs from the E series and F series of the CSRM. Use of this transport modelling has been challenged by objectors [12.6, 14.21, 15.12, 18.127], notably CPPF & CPC who have expressed particular concern about the use of a pre-COVID 19 transport model and the treatment of the EWR project.
- 20.35 The E-series and F-series of the model both use data which does not account for the change in travel patterns which occurred due to the COVID-19 pandemic [12.6]. CPPF & CPC argue that the opportunity should have been taken to rebase the model to capture post-pandemic travel patterns, and that a sensitivity test which merely reduces the number of cars and LGVs on the highway network by 10% is an inadequate response [12.7]. We note that government advice, expressed in TAG Unit M4, is that trip matrices based prior to the pandemic should ideally be rebased, or, if this is not possible, an appropriate adjustment should be applied to model inputs

⁵⁰⁸ Mr Whitehouse's PoE for the Appellant (([CD26-01-APP-W6-1](#)), para 3.2.12 & 3.2.15.

⁵⁰⁹ CD1-21.02, para 4.4.8 & table 4-10.

⁵¹⁰ VfM Framework, 2025, Department for Transport (CD8-32), table 4.2.

⁵¹¹ CD1-21.02, para 4.4.1—4.4.14 & table 4-12.

⁵¹² CD1-21.02, table 4-17.

⁵¹³ Cambourne to Cambridge Busway – Technical Note on Scheme Value for Money, July 2025 (CD9-32), para 11-13, tables 3 & 4.

or outputs in a proportionate way.

- 20.36 It is not clear that a post-pandemic steady state has yet been reached, with the existing Cambridge guided busways showing a 31% increase in passenger numbers from 2024 to 2025 [10.37]. In that situation, we do not accept that there is a compelling case to rebase the model. There is merit in making an adjustment instead, and, although that applied was on an across-the-board basis, a global post-model adjustment is included in appendix B of TAG Unit M4 as one of the possible approaches to use. A sensitivity test was undertaken as recommended in the guidance. It is clear that the approach to use of the CSRM was within the range of options envisaged by government, and, as such, it was an appropriate way for the Applicant to proceed.
- 20.37 We have reached a different view on the Applicant's approach to treatment of the EWR scheme. It is true that a DCO application had not been made for this project at the date of the inquiry, and consequently it did not fall into the category of schemes set out in table A2 in TAG Unit M4 which should be included within the core scenario [10.43]. However, the government committed £2.5 billion to progressing EWR as part of the July 2025 spending review [12.14], work is progressing on the first connection stage further west [18.55], and EWR is proceeding with design work on the Cambourne to Cambridge section⁵¹⁴. On the information before us, EWR has a funding commitment, and we consider that it could appropriately have formed part of the core scenario.
- 20.38 Although, both the busway and EWR would provide for journeys between Cambourne and Cambridge they would provide access to different parts of the City, and the busway would allow journeys to be made from points along the route in addition to providing feeder access to a proposed rail station at Cambourne. We agree with the Applicant, the District Councils and EWR that the two schemes are complementary [10.45, 11.18, 18.54], and, as such, the latter project would not be expected to materially alter the effect of the Order Scheme in respect of land value uplift (above para 20.33).
- 20.39 Insofar as the BCR and value for money is concerned, CPPF & CPC query whether housing at Bourn Airfield and Cambourne West is properly considered as dependent development. They contend that there is nothing in the evidence to justify any assertion that the delivery of dwellings at Cambourne West or Bourn Airfield without the Scheme would breach a reasonable level of service on the transport network [12.19].
- 20.40 The position is clear in respect of Bourn Airfield. Condition No 13 of the planning permission prevents more than 500 of the 3,500 dwellings permitted from being occupied until the CtoC Scheme or an equivalent is operational between the development and Cambridge [4.6]. Provision of the Scheme will, therefore, enable this development to be fully implemented. Although there were suggestions (for example by the Mayor) that the terms of condition No 13 could be altered, we have no reason to doubt the clear view expressed on behalf of the District Councils that, given the reasoning

⁵¹⁴ You said, we did, Autumn update, EWR, November 2025 (CD29-109), sections 4.10.1-4.12.3.

behind the condition and the wording of Policy SS/7, it is unlikely that any application for a fresh permission without the condition attached would be considered favourably [11.10].

- 20.41 At Cambourne West, the position is different in that the relevant planning permission does not include an equivalent condition to that imposed on the Bourn Airfield scheme. However a planning obligation, related to the permission, requires the payment of contributions towards improved bus links between Cambourne and Cambridge, the final instalment to be paid prior to occupation of the 1,500th dwelling [4.10]. The obligation was necessary for planning permission to be granted, and consequently the occupation of 851 dwellings is linked to financial support for implementation of the Order Scheme.
- 20.42 Detailed criticisms have been made of the inputs concerning house prices and house price growth, used by the Applicant to calculate land value uplift and the indicative BCR [12.20-12.22]. In response the Applicant calculated a range of BCR metrics, taking account of scenarios advanced by CPPF & CPC [10.49]. These calculations were not disputed at the inquiry. In all but one of the sensitivity tests, the indicative BCR calculated by the Applicant is 1 or more, falling within the low value for money category, and, in the case of dependent development at Bourn Airfield only, the medium value for money category. It is only with a combination of dependent development restricted to Bourn Airfield, house prices adjusted downwards and no future house price growth, that the calculated BCR falls below 1, in which circumstance it would be viewed as indicating poor value for money. As noted above (para 20.33), however, the indicative impacts of the dependent development as calculated by the Applicant produce an indicative BCR of 1.8, indicating medium value for money.
- 20.43 There is no good reason to exclude Bourn Airfield and Cambourne West as dependent development. We note that the Applicant's calculation of house price growth is consistent with DfT guidance in TAG Unit A1-1, and we are satisfied that the approach to establishing house prices, derived from the average value of residential land drawing on published data for new properties is appropriate for use in establishing the economic case for the Scheme. In any event, even if the economic case is adjudged to produce poor value for money, it should be noted that the assessment does not take into account the prospect of further housing development to the west of Cambridge, such as the major site at Cambourne North identified in the emerging Local Plan [7.15] and enhanced employment opportunities.

Objectors' alternatives – CPPF & CPC

- 20.44 CPPF & CPC promote alterations to Madingley Road to provide an in-bound bus lane to Cambridge between the Madingley Mulch roundabout and the Madingley P&R facility. The outline of an alternative scheme has been prepared, and it is acknowledged that this option would need refining through more detailed design [12.32]. A feature of the CPPF & CPC alternative is the number of departures from highway standards [10.58, 10.59]. Whilst it is not unusual for some departures from standards to be accepted in development schemes, their extent on a road which is part of

the primary route network⁵¹⁵ is a cause for concern.

- 20.45 Of particular concern are lane widths as narrow as 3.25m [10.60]. CPPF & CPC suggest, based on research from France, that a 3m lane width with a 0.5m shoulder is an optimally safe arrangement for a 7m wide rural road, but highways literature from this country indicates that increased width is associated with lower accident rates⁵¹⁶. Reductions in lane width would make it more difficult to accommodate the swept paths of longer vehicles around the bends on this stretch of road, and narrow lanes would increase the likelihood of conflict and reduce highway safety on this important route to Cambridge from the west. Several of the departures are predicated on a reduction in the speed limit from 50mph to 40 mph⁵¹⁷, but there is no certainty that this change would be achieved. Indeed, the Applicant's highways witness pointed out that the existing speed limit is appropriate for the characteristics of the road and aligns with CCC's speed limit policy⁵¹⁸.
- 20.46 Of most significance is the situation at the M11 overbridge. CPPF & CPC's transport witness was clear that the arrangement proposed, involving the bus lane, eastbound running and right-turn lanes, and a west-bound running lane was not acceptable because the lanes were too narrow [10.64]. That view is consistent with the assessment of option 2 in the Rectory Farm Bridge Options Report which found that rearrangement of the carriageway to provide four narrow lanes, similar in width to those in the CPPF & CPC proposal, could lead to a higher risk of accidents and greater congestion [10.64, 10.65].
- 20.47 At the inquiry, CPPF & CPC made reference to the possible construction of a new bridge to overcome the problem of narrow lanes across the existing bridge. That is not part of their indicative alternative scheme. Moreover, the objectors' transport witness acknowledged that he had not considered arrangements for the approach to an additional bridge and whether compulsory purchase would be required [10.64]. Separately, CPPF & CPC's witness on transport economics suggested that adjustments to signals and the M11 off-slip could resolve the situation [10.65], but acknowledged that there was no evidence to support this claim.
- 20.48 The CPPF & CPC alternative has been prepared to fit within a corridor which would acknowledge the environmental sensitivities of the American Military Cemetery RPG and listed building and Madingley Wood SSSI. We agree with the objectors that there would be no adverse effect on the SSSI, but that some harm would be caused to the significance of the RPG and listed building (below, para 20.237). We have also taken into account that, due to its route along the existing road, the alternative would, not cause harm to the character and appearance of the landscape or to Coton Orchard CWS. Nor would it be likely to have anything more than a very limited effect on the openness of the Green Belt. Fundamentally, however, the CPPF & CPC alternative, as presented to the inquiry, is unsatisfactory due to the arrangements at the M11. Irrespective of any other considerations, it

⁵¹⁵ Mr Lonergan's rebuttal PoE for the Applicant (CD26-01-W8-4), para 3.1.2.

⁵¹⁶ CD26-01-W3-4, page 20.

⁵¹⁷ CD26-01-W3-4, para 3.3.2 (f).

⁵¹⁸ CD26-01-W3-4, page 27.

carries little weight for this reason alone.

Objectors' alternatives – the Mayor of the Combined Authority

- 20.49 The Mayor intends to introduce a franchising scheme for bus services by 2028 [15.3]. New services, such as those which are proposed for the busway, would require a service permit, and the Mayor anticipates that difficulties could arise with applications in demonstrating safety and competition with existing franchised routes. The form of the franchising model is not known at this stage, with an independent review underway at the time of the inquiry [15.3], and consequently there is no certainty about potential problems for establishing services on the guided busway.
- 20.50 Nevertheless, the Mayor also refers to two possible alternatives. He wishes to develop a light rail network for Cambridgeshire, and work has begun on a mass rapid transit study [15.9]. Although it is acknowledged that the Order Scheme is compatible with the existing LTCP [7.9], the local transport framework is set to change with the expected abolition of CCC, a new GCTS, and review of the LTCP. The Mayor argues that, should the new policy approach support light rail, it would not have been appropriate to build the busway, which would be difficult and expensive to convert, and would not necessarily be in the most suitable place [15.13]. Reference is also made to the CPPF & CPC alternative and other on-road schemes [15.6, 15.16]. We have already considered the CCF & CPC alternative (above, para 20.44-20.48), and the references to other on-road schemes are made in general terms only.
- 20.51 The Mayor explained at the inquiry that he supported growth as proposed in the Local Plans and that he acknowledged the need to improve transport links. Whilst critical of the Order Scheme, he has not presented any detailed alternatives. His references in this regard essentially amount to an argument of prematurity. The Order Scheme for a guided busway on one side of Cambridge is not so substantial that it would undermine other proposals which may come forward in the future, and there are no such proposals which have reached an advanced stage of preparation. In these circumstances, we do not consider that the Scheme would be premature with regard to possible alternative transport proposals which may come forward in Greater Cambridge.

Objectors' alternatives – other suggestions

- 20.52 In addition to its proposal for an in-bound bus lane along the A1303, CPPF & CPC also suggested a variation in the alignment of the route on either side of Cambridge Road at Coton [10.72], as a variant of the alternative alignment described above (para 20.21). It is claimed that the realignment of the route slightly to the north would lessen the impact on views since the introduction of a curve would restrict the extent of the busway which could be seen, would help maintain the viability of farming on the field it would cross, and would also enable the busway to utilise a gap in the orchard trees on the east side of the road⁵¹⁹. Insofar as the first point is concerned, we do not consider that the minor realignment proposed would materially

⁵¹⁹ See Mr Allder's PoE (CD26-01-APP-W4-1), images 4 & 6, and appendix 1 of his appendices (CD26-01-APP-W4-2).

alter the effect of the busway on the character and appearance of the area. Secondly, there would be a very limited difference in the extent of land retained north of the suggested route compared to that with the Scheme as proposed. As to the third point, although the suggested realignment route would still bisect the orchard the potential harm to veteran trees would be less.

- 20.53 Cambridge Connect has proposed a northern route to the east of Madingley Mulch via the A428 and Girton Interchange, which it suggests would have a less harmful environmental impact than the Order Scheme [18.93], although it would run across the open landscape to the north of the American Cemetery. A northern route (although not on the same alignment) was considered at an early stage by the Applicant. It was included in the 2015 consultation, but received majority opposition, and was screened out of further assessment. Residents of Madingley Road have requested that the route of the busway be moved to lessen the effect of dust and other emissions on health. The busway is proposed to be positioned approximately 50m to the south of the rear boundary of their property, whereas a separation distance of 100m is sought. With the safeguard of conditions controlling construction activities, we do not consider that, due to emissions, the proposed alignment of the busway would have a materially harmful effect on the living conditions, including health, of local residents (below, para 20.73, 20.77).

Conclusions on alternative options

- 20.54 There has been an extensive iterative process of considering options to improve public transport links between Cambourne and Cambridge. The option chosen, of a predominantly segregated guided busway, would respond to concerns about congestion and ensure improvements in timeliness and reliability. It would also improve accessibility to bus services through the provision of the P&R facility, and complement the proposal for EWR (below, para 20.66). We note that the Order Scheme would not do anything to relieve congestion and improve journey times to the east of Grange Road in the City Centre. Nevertheless, through the transport benefits, the Scheme should be capable of contributing to a shift in transport mode which is crucial to the Development Plan's spatial strategy. The emergency and maintenance access track would provide opportunities for active travel along most of the length of the busway: this is an important benefit which supports sustainable patterns of movement and it merits substantial weight.
- 20.55 CPPF & CPC made a series of detailed objections to the extent of benefits advanced by the Appellant. Those objections need to be put in the context that, in response to cross-examination on behalf of the Applicant, CPPF & CPC's witness on transport economics agreed that there was a need to meet the objectives set for the Scheme [12.2], and that the reliability of public transport was an important consideration. Detailed criticisms have been made of the Applicant's modelling, but we have found that the approach taken was appropriate.
- 20.56 CPPF & CPC argue that there is no need to provide an outbound bus lane from Cambridge [12.35], and suggest that delays in that direction are

within the normal variation of a bus service⁵²⁰. With major development proposed to the west of the City in both the existing and emerging Local Plans, we anticipate that it is likely that traffic conditions would worsen in both directions along the A428/A1303 corridor without intervention to secure a significant modal shift in transport. Moreover, the alternative of an in-bound bus lane to Cambridge, advocated by CPPF & CPC, raises questions of safety and deliverability, in particular in connection with the arrangement proposed at the M11.

- 20.57 A key benefit put forward for the guided busway is land value uplift at the major development sites of Bourn Airfield and Cambourne West. We are satisfied that the approach used in taking land value uplift into account is sound, but variables such as house prices and land value could be susceptible to change, and we are mindful that most of the sensitivity tests indicated that the Scheme would fall into the low value for money category. Overall, we consider that the benefit of land value uplift merits moderate weight. Having regard to the emphasis on growth in Greater Cambridge, improved access to job opportunities and facilitating person to person contact are benefits which carry substantial weight in support of the Scheme.
- 20.58 However, as acknowledged by CPPF & CPC, the economic case is but one element of the overall business case. Amongst other considerations, this also includes the financial case which demonstrates that there is sufficient funding available to meet the cost of the Scheme (above, para 20.269-20.273), and the strategic case which shows that the CtoC Scheme would align with and contribute to the delivery of policy priorities for Greater Cambridge [7.2-7.6, 7.9-7.13, 7.15-7.18].
- 20.59 The Order Scheme is fundamental to the infrastructure-led approach which underpins the spatial strategy of the Development Plan [11.5]. Specifically, in satisfying the requirements of a condition and planning obligation respectively [4.6, 4.10], provision of the busway would enable the major development sites at Bourn Airfield and West Cambourne to be fully implemented.
- 20.60 We conclude that proper consideration has been given to alternative options in developing the Order Scheme, and, without prejudging our consideration of other matters, that there is a clear rationale in support of the preferred option for a guided busway.

East West Rail (matter 4a)

- 20.61 The EWR project will provide a railway link to connect communities between Oxford and Cambridge. It has government support, with £2.5 billion committed in the July 2025 spending review to progressing the project [12.14]. Work is advancing from the western end of the route, with the third and final stage being the connection from Bedford to Cambridge.
- 20.62 The intended route of the new line passes to the north of Cambourne before heading to the south-east between Hardwick and Toft: land along this part

⁵²⁰ Mr Leigh's PoE for CPPF & CPC (CD26-10-W3-1), para 4.2.6.

of the route is covered by a safeguarding direction. The guided busway would cross the EWR route and the safeguarded land in the vicinity of the eastern side of Bourn Airfield [18.56]. At this point, it is proposed that the railway would run in a mined tunnel beneath the A428 and the airfield site.

- 20.63 Construction and operation of the busway would require the acquisition and use of some land which is safeguarded in respect of the EWR project. Should a DCO be made for that scheme, there is the possibility that construction work may proceed on both projects around the same time. In submitting its holding objection, EWR made it clear that the principle of the Order Scheme was strongly supported: its concern was to ensure that the interface between the two projects was managed effectively. That concern has now been addressed by an agreement between EWR and CCC [18.54], and the switch to a mined tunnel from the cut and cover method previously proposed [18.57]. Moreover, it is clear that the operational busway, which would run within Bourn Airfield and close to its northern boundary, would have no effect on the railway running below ground.
- 20.64 Insofar as the effect of construction of the railway is concerned, EWR has explained that the inclusion of a mined tunnel would avoid the need for local road disruption and diversions, including of the proposed busway⁵²¹.
- 20.65 Turning to consider the western part of the proposed EWR route, there would be no adverse effect on its delivery as a result of the Order Scheme. The link between Oxford and Bicester is in place, construction is underway to take the route on to Bletchley, and work is also ongoing to refurbish the line between Bletchley and Bedford [18.55]. At its nearest point (Bedford), this part of the route is well beyond the Order Limits. The provision of the busway would, though, facilitate access by public transport to places along the whole of the line via the opportunity to reach the railway at Cambourne. It would be complementary to the introduction of railway services between Oxford and Cambridge.
- 20.66 We conclude that the implementation, operation and maintenance of the Order Scheme would not prejudice the objective of safeguarding land to enable delivery of the EWR, nor that it would interfere with its operation. We further conclude that there the operation of the Order Scheme would be complementary to and support the upgrading of the railway between Oxford and Bedford.

Effect on local residents, pedestrians, cyclists, and motorists
(matter 4b)

Living conditions and health - air quality

Construction effects

- 20.67 The ES identified no significant adverse effects on receptors in respect of air quality during construction or operation, and assessed the overall risk to human health as low [10.127]. We note that at the limited number of receptor locations where there would be an increase in NO₂, PM₁₀ or PM_{2.5} concentrations, the increases would be limited in extent and would be at

⁵²¹ [CD29-109](#), section 4.10.2.

levels within the air quality objectives assessed, with no substantive evidence to the contrary. We agree with the Applicant's assessment that overall they would have a negligible impact [10.127]. Even where occupiers may experience the limited decline in air quality set out in the ES, given the overall predicted levels relative to those in the air quality objectives, there would be no discernible harm to health or living conditions of residents as a result of the proposal.

- 20.68 The ES predicts that there would be no change, or a negligible increase, in air quality as a result of the Scheme at the three modelled receptor locations nearest a vulnerable resident ([CD1-11.02](#)). The resident has particular concerns about construction and operational dust effects on a health condition, including how these may be influenced by the particular soil characteristics, topography and climatic conditions in the vicinity of their property [10.133, 17.46]. Having regard to the health effects of particulates reported, the concerns of that vulnerable resident are understandable.
- 20.69 The ES predictions are based on anticipated concentration levels of pollutants and the assessment is generic rather than evaluating the particular vulnerabilities of residents on an individual level. Nevertheless, the mitigation proposed by the applicant in the form of a CoCP, LEMPs and the potential flexibility in haul road situation [10.133] would provide a framework to ensure that detailed consideration of effects could be evaluated and mitigation appropriately designed and implemented to ensure that the potential for dust from the scheme to adversely affect health would be minimised.
- 20.70 The Applicant's proposed mitigation to a range of construction effects relies on measures in a CoCP that substantially accord with those in the draft CoCP and LEMPs, secured by the draft conditions (DCs) they have suggested. That requiring LEMPs to be prepared for each phase (DC9) is drafted to address specific issues and adhere to specified management plans to be approved. This includes a requirement for a *construction dust and air quality assessment, management and monitoring plan* and the draft CoCP includes a range of requirements and specifications for dust management and mitigation (DC8). As the Applicant points out, there is scope for the detailed situation of the construction haul road to be considered in discharging the details of construction access (DC20) [10.133].
- 20.71 However, it would be premature and inappropriate for a condition to specify the location of the haul road, to predetermine suitable landscaping or prescribe the siting and duration of any monitoring apparatus at this stage [19.6], without these being informed by the findings of a dust risk assessment and its recommendations. An explicit reference to the need for any dust assessment and management to accord with the IAQM guidance in conditions would provide clarity and certainty [17.46]. A suggestion that the route be repositioned is considered at para 20.53 above.
- 20.72 Bearing in mind that mitigation measures will need to be approved, there is no reason to suggest that mitigation would not be effective. Mitigation secured in this way would ensure that the health and living conditions of all human receptors living in the vicinity of the proposal would be safeguarded

during construction works [18.26,18.131].

- 20.73 Representations were made to the effect that the rights of the vulnerable resident referred to at paragraph 20.68 above, under Articles 2 and 8 as set out in the HRA1988 would be violated if the effects of the Scheme on their health condition exposing them to dust, debris and emissions were not effectively mitigated [17.46]. We have no reason to doubt the potential health implications to the individual as a result of exposure to dust and other particulate matter. Having had regard to their representation and those of the Applicant [10.135 - 10.138], we have found that, with appropriate mitigation secured by conditions, should the Order be made and a direction made that DPP be granted, that the proposed development would not result in the vulnerable resident suffering unacceptable harm to their living conditions nor adversely affect the equal right of a person with disabilities to live in the community. We are therefore satisfied that the making of the Order and the issuing of a direction to grant DPP would not unacceptably interfere with that resident's right to a private and family life and home nor their right to life. Provided appropriate mitigation would be provided, should the SoS decide to make the Order and direct that DPP be granted, that would be proportionate in the circumstances.
- 20.74 We have had due regard to the PSED set out under the EA2010. We have found that in this case [17.46, 10.135], with appropriate mitigation, the Scheme and its construction would not harm the interests of persons who share a protected characteristic including disability or impairment, nor would it have any adverse effect on the equality of opportunity, or the relationships, between such persons and persons who do not share a protected characteristic, such that there would be no breach of the PSED.

Operational effects

- 20.75 Effects of particulates during operation are predicted to be negligible in the ES [10.127] and the Applicant's suggested draft condition would require all buses to be Euro VI compliant as a minimum (DC32). Nevertheless, having regard to the PPG⁵²² the Scheme should be designed to incorporate landscaping that could assist in limiting any risk from dust and other particulate matter in operation, for example from windblown fine soils that may find their way onto the carriageway and subsequently be dispersed by vehicles [17.46]. Such mitigation would contribute to limiting adverse effects on health and living conditions of those living close to the busway and it is therefore necessary that any landscaping condition include that as a design objective, reflecting the Scheme Objectives [10.5]. As well as safety, the access approval draft condition (DC20) would also be necessary to ensure that the health and living conditions of human receptors are taken into account in the consideration of details.
- 20.76 Grange Road marks the western edge of the Cambridge City Centre Air Quality Management Area (AQMA). The Applicant's figures do not indicate that air quality would worsen within the AQMA as a result of the Scheme and that effects would be largely neutral and there is no detailed evidence

⁵²² How can an impact on air quality be mitigated? Reference ID: 32-008-20191101, Paragraph: 008, November 2019.

to the contrary. If the Scheme is successful in encouraging mode shift from those who may previously have driven polluting vehicles into the City Centre that has the potential to assist in meeting the AQMA objectives.

- 20.77 With mitigation, the air quality effects of the Scheme on human receptors would be acceptable.

Beneficial effects

- 20.78 Overall, the ES results show that at the majority of receptor locations the Scheme would lead to an improvement in air quality which it attributes to modal shift. This would be particularly with regard to predicted NO₂ concentrations. The figures show a far lower proportion of receptors seeing an improvement in PM₁₀ and PM_{2.5} concentrations as opposed to neutral effects. With some exceptions, where there are predicted to be reductions in pollutant concentrations these would largely be by a very limited amount [10.129].
- 20.79 The quantitative improvements would also be limited in extent compared to the predicted improvements in air quality expected to occur in any event without the scheme over the assessment period. Whilst it is important not to underestimate the harmful effects poor air quality has on human health and on other receptors, and consequently how important improvements to environmental conditions are, the benefit would be a limited one and carry limited weight in support of the proposal. As such, we cannot agree with the Applicant's suggestion that this should be afforded substantial weight in these circumstances [10.129, 10.185].

Living conditions and health – noise and vibration

Construction effects

- 20.80 The occupiers of six dwellings would experience significant adverse effects from noise during the construction phase [10.184], primarily as a result of the anticipated uninterrupted duration of noise generating works required in particular locations. A retaining wall for the busway would be located in very close proximity to Childerley Lodge and its garden. The Bin Brook bridge and its embankments would be situated immediately adjacent to the grounds of Gillian Beer House and 9/9A Hershel Road at Clare Hall and close to those properties. The proposed P&R facility would be situated nearby to the end pair of the row of semi-detached houses along the east side of Scotland Road and The Croft, a house on the other side of the road, is situated opposite part of the P&R site. Although temporary in duration, the disturbance from noise would be likely to harm occupiers' living conditions at Clare Hall.
- 20.81 Construction noise would also affect the living conditions of occupiers of a considerable number of other dwellings along the route. Whilst the anticipated duration of those works would avoid them being classified as significantly adverse effects in ES terms, occupiers would nevertheless experience harmful effects without appropriate mitigation. Vibration is not predicted to result in significant adverse effects on residential occupiers [10.126].

- 20.82 The Applicant's proposed mitigation relies on LEMPs including a *demolition and construction noise and vibration assessment, management and monitoring plan*, that accords with the appropriate British Standard, and *construction traffic management and workforce travel plans*. The approach put forward would include control of noise at source through equipment choice, positioning, operating hours and methods of work, along with acoustic screening, the avoidance of noise generating work during sensitive periods and effective communication with sensitive receptors [10.184]. These measures, which could be secured by conditions, have the potential to ensure that adverse effects would be minimised particularly at times when occupiers may reasonably expect a quieter environment. This would provide an appropriate framework within which noise from construction activities can be mitigated at all locations along the route, including on-road elements [18.132], not just where sensitive receptors would experience adverse effects.
- 20.83 Taking account of mitigation, the harm to occupiers' living conditions arising from construction noise carries moderate weight against the proposal, having regard to the scale of harm we have adopted above at 20.2, this is a conclusion similar to that which the Applicant reached [10.125]. Robust and effective mitigation would be necessary to ensure those effects are minimised as far as possible.

Operational effects – Cambourne and Cambridge

- 20.84 The proximity of the busway relative to some residential properties means that occupiers may be more likely to experience noise or disturbance from its use, effectively arising from regular bus movements. Effects are likely to be more pronounced at times of the day when other environmental noise would be less noticeable. The ES identified a number of locations where noise from bus movements could exceed internal or external noise criteria, particularly at night.
- 20.85 Although there is an aspiration to run electric powered buses which have the potential to be quieter than conventional engines, it is not suggested that the fleet using the busway would be composed only of such vehicles when it would first come into use, nor would it be reasonable to require that only electric vehicles could use the busway from the outset. [10.124] Electric buses will still generate some noise, for example from friction of tyres on the carriageway, other mechanical operations or potentially bodywork shaking under particular conditions.
- 20.86 The ES reports that significant adverse effects are possible for receptors close to the off-road busway sections both between Broadway and Stirling Way at Cambourne and in the vicinity of Rifle Range and Grange Roads at Cambridge. The Applicant's approach to address this is to prevent busses using the busway between 0000 and 0600, and limit the number of non-electric bus movements in the hours either side of that period on the eastern and westernmost off-road sections, secured by a suggested draft condition (DC34) [10.125, 18.38, 18.40, 19.5].
- 20.87 We agree that that such a limitation on use at particular times would be necessary to minimise effects to those sensitive receptors in Cambridge and Cambourne. This would not prevent electric buses operating on any part of

the busway, or bus services running on other parts of the busway, in the hours either side of the cessation. Nor would it prevent bus services running at any time on existing roads. This would mean that services could continue on existing roads at times where they would be unlikely to either encounter, or contribute to, congestion. The suggested restriction point at the eastern end of the busway would be south of Charles Babbage Road. This would also have the effect of providing similar protection to properties at West Cambridge, particularly those residential units at West Cambridge Residences which are immediately adjacent to the proposed route, avoiding unacceptable effects on occupiers' living conditions at that location.

Operational effects – Childerley Gate

- 20.88 The occupiers of properties at Childerley Gate, in particular Childerley Lodge, would benefit from the 0000 to 0600 restriction, but not the suggested limits in the hours either side and may experience some disturbance in those hours as a result. This could be particularly in warmer weather as the ES findings partly rely on an assumption that windows in the dwelling would be closed at night to achieve reasonable internal conditions [10.124]. Given its existing proximity to the A428 dual carriageway and existing noise environment this may not be as unreasonable an assumption it could be elsewhere.
- 20.89 Nevertheless, given the potential for harmful effects occurring late evening and early morning, it would be necessary to investigate whether any additional mitigation measures may be necessary, in order to ensure that occupiers' living conditions are not unacceptably impacted upon by noise. Whilst suggested draft conditions provide for the assessment and management of construction noise [20.82] and for the approval of any environmental noise barriers (DC19), as drafted they do not provide for any evaluation of operational noise and identification of where those barriers would be required. This should therefore be included as a requirement in any condition.

Operational effects - Scotland Road

- 20.90 The comings and goings of buses and other vehicles using the P&R facility, as well as potential disturbance from doors closing and users voices and activities, have the potential to cause disturbance to occupiers of the closest dwellings on Scotland Road [20.80], particularly early in the morning and later in the evening and at night [16.2, 18.131].
- 20.91 However, the proposed situation of the vehicular access would be in an offset situation relative to The Croft and some way from the nearest pair of houses on the east side of Scotland Road. The closest rows of parking spaces would be set back from the property boundary of the nearest of those houses by a generous landscaped area and the intervening retained field access. The end house is also set back from its nearest boundary within a garden, as is The Croft from Scotland Road. The linear layout of other houses in the row means that each would be progressively further from sources of noise and disturbance. These relative configurations would assist in limiting intrusive effects of any noise.
- 20.92 The ES Acoustics Technical Report [10.124] considered noise from vehicle

movements, as well as from engines revving and door slamming, and factored in the distance of the nearest sensitive receptor. It concluded that, experienced internally, noise such as door slams would be below the relevant British Standard's criteria, would not exceed either the DRMB's operational road traffic noise LOAEL or SOAEL thresholds, and operational noise at most would not exceed existing background levels. Objections are couched in generalised terms [16.2, 18.131] and these figures have not been challenged with no contrary quantitative evidence presented. We therefore have no reason to disagree with the Applicant's findings in this respect.

- 20.93 Whilst there would be the potential for vehicles approaching and leaving the P&R facility from and to the north to increase activity on the stretch of Scotland Road outside those dwellings [10.160], there is no evidence that increased activity would necessarily increase noise in dwellings alongside the road above levels already experienced [16.2, 20.139]. Whilst occupiers of the closest dwellings would be likely to be aware of activity within and leading to the P&R facility, its operation would not result in noise or disturbance that would be harmful to their living conditions.
- 20.94 The Applicant advises that there would be some noise benefits as a result of modal shift⁵²³ away from private car use, although this should be considered as a component of any overall transport and modal shift benefits [10.185].

Conclusions

- 20.95 Overall, with appropriate mitigation, harm to occupiers' living conditions from noise would largely be avoided or minimised, however even with mitigation the adverse construction noise effects that would be experienced at the locations set out above [20.80] carry moderate weight against the proposal.

Living Conditions –traffic disturbance

Construction effects

- 20.96 The TA does not anticipate construction traffic approaching from the north along Scotland Road, through villages such as Dry Drayton, but from the A428, accessed from the south via the M11 and the east via the A14. Moreover, the CTMP would not permit construction travel through local villages, including Dry Drayton [18.82, 18.131]. This would ensure that adverse effects on living conditions or the safety of other road users as a result of construction traffic moving through local villages would be avoided [18.127].

Operational effects

- 20.97 Bearing in mind the prominence of congestion featuring in the underlying drivers for change [10.4] and the relief of congestion featuring in the objectives and aims of the Scheme [10.5, 10.6], it is unsurprising that the proposal's effects on traffic conditions are a concern of some objectors. However, the TA predicts that there would be very little difference on the

⁵²³ Planning Statement para 3.3.10, 7.2.11, 7.2.19 ([CD1-15.01](#)).

number of existing road junctions already operating at or over capacity and that there would be minimal difference in traffic flows on the local highway network adjacent to the proposed route [10.131]. In bypassing some of these congested routes, the proposed busway would cross a number of existing roads where new signalised junctions would be introduced. Whilst these will mean traffic needing to wait at particular times in the vicinity of residential properties, there is no indication that this would lead to materially harmful effects on occupiers.

Living conditions – operational effects on privacy, outlook, lighting and visual impact

Childerley Gate

- 20.98 The elevated situation of the busway and its close proximity relative to Childerley Lodge and its garden would have an overbearing effect on occupiers [18.26]. The extent, proximity and appearance of the retaining wall necessary in this location would have an oppressive and intrusive effect on the outlook from the property. There is the potential that these effects could be more pronounced having regard to the extent of vertical and horizontal deviation from the plans that the draft Order would allow⁵²⁴. Existing vegetation alongside and on the existing embankment would in all likelihood have to be removed or extensively reduced to enable the construction of the retaining wall.
- 20.99 The active travel track route that would share the access and maintenance track would be the closest element of the Scheme to the property. It would pass at a height where users would be able to overlook the garden and some windows to habitable rooms in the property leading to a loss of privacy in some parts of the property and a perception of loss of privacy throughout. Even if the noise from bus movements would not be at harmful levels during the day [20.88], the frequency of buses at close proximity and in an elevated situation, particularly those travelling in a westwards direction, would have an intrusive effect which could be compounded by a feeling of being overlooked by passengers. Along with that of pedestrians and cyclists, the latter effect would be likely to be fleeting, but repeated regularly throughout the proposed operating hours, and throughout the day for the active travel route, would generate an perception of being overlooked. The intrusive effect would persist into hours of darkness with lighting on passing buses even if headlights may be unlikely to shine directly into the house or garden.
- 20.100 Therefore, without an appropriate range of mitigation to address these effects, the living conditions of occupiers of Childerley Lodge would be harmed. Any mitigation would need to be carefully considered to avoid a solution to one source of harm compounding another, for example an enclosure to ameliorate noise or prevent overlooking could worsen an oppressive or overbearing feeling if inconsiderately detailed and located. The two other nearby dwellings are situated further from the proposal so that the intrusive effects would be less marked, but nevertheless perceptible. This would lead to harmful effects which, although less severe

⁵²⁴ Part 2, article 6(1) & (2) ([CD1-02h](#)).

that those experienced at Childerley Lodge, would nevertheless require the mitigation to be designed with the living conditions of occupiers of those properties in mind.

Herschel Road, Cambridge

20.101 Similar perceptions of overlooking and intrusion from bus movements would also be experienced by occupiers of properties along Herschel Road. Existing vegetation in the gardens and grounds of properties adjacent to the site of the proposed embankments and bridge at Bin Brook would only partly diminish the visual intrusion caused by the scale, bulk and appearance of the structures and the intrusive effects of bus movements occurring at an elevated situation. Similarly, the potential, actual and perceived loss of privacy from users of the active travel route looking northwards as they pass over a raised vantage point would only be partly reduced by existing vegetation, particularly when trees are not in leaf. The extent of elevation would create a very different effect from that which current users of Rifle Range Road passing at ground level have on occupiers living conditions. Although the residential properties and windows to habitable rooms are set back, their intervening gardens and grounds extend up to the boundary beyond which the retaining structures would rise. The living conditions of occupiers would be harmed as a result.

20.102 Similarly to the situation at Childerley Gate, mitigation would be necessary to minimise that harm to occupiers living conditions through loss of privacy, an overbearing effect on part of the outlook from buildings and gardens and the general perception of intrusion. This too would need to be thoughtfully designed to avoid counterproductive effects, such as a measure aimed at minimising noise or avoiding overlooking compounding harm by way of visual intrusion. The effect on the significance of heritage assets would also need to be borne in mind in designing mitigation.

Scotland Road

20.103 Sufficient distance would exist between the proposed P&R facility and dwellings on Scotland Road to avoid harmful intrusion into their residential outlook [16.1]. Nevertheless, until the proposed landscaping matures, the facility would intervene noticeably in views of the landscape to the south, particularly when seen from first floor windows. Similarly, The Croft, being situated on the other side of Scotland Road, within its own garden, with intervening vegetation, and offset from the proposed vehicular access, would avoid visual effects so extreme as to cause harm to occupants' living conditions. Moreover, with appropriate landscape and other mitigation, residual effects would reduce over time.

20.104 There is the potential that the lighting necessary to ensure that all users of the P&R facility are safe could overspill, be intrusive or change the currently unlit field between houses and the A428 to such an extent that it could adversely affect the living conditions of residents. Although lighting may well remain perceptible, careful design would ensure that adverse effects on adjacent residential occupiers can be reduced and mitigated to an acceptable level through the approval of a lighting assessment and mitigation scheme secured through a draft condition (DC21).

Clare Hall

- 20.105 There would be considerably fewer options for mitigation where the Scheme would pass Brian Pippard House and the Erskine Building further along Rifle Range Road given the potential effects on the significance of designated heritage assets [18.11, 18.12]. However, whilst activity on the active travel route might increase considerably compared to current movements, it would remain at ground level and be similar in character to existing pedestrian and cycle movements, such that the effect of the change would not be particularly harmful. The introduction of bus movements would create a busier atmosphere perceptible from south facing windows and spaces opening onto Rifle Range Road. However, such activity in itself would not be likely to materially diminish the living conditions to a harmful degree.

West Cambridge

- 20.106 Given its current outlook onto an access road and car parking, the increased activity and movements at grade in front of the west elevation of the West Cambridge Residences would be noticeable but not so intrusive as to harm occupiers' living conditions.

Other locations

- 20.107 Elsewhere, whilst the busway and its associated paraphernalia would be perceptible from other residential properties along the route, separation distances would generally be greater, and changes in level less, than the locations mentioned above. Other occupiers would not be significantly affected by any visual or intrusive effects and with mitigation, particularly landscaping, their living conditions would not be harmed.

Accessibility for pedestrians, cyclists and horse riders

- 20.108 The use of the access and maintenance track as an active travel route would create a traffic free environment which would enhance accessibility for pedestrians, cyclists and horse riders along much of the route [10.185, 11.11 17.6, 18.60, 18.133]. It would provide opportunities for journeys between Cambourne and Cambridge, and places in between, by these active modes which is not currently available in its entirety. These would be complementary to other existing and proposed active travel initiatives in the area. The bus stops along the route and proposed P&R facility would also enhance opportunities for active travellers to change modes to public transport as part of their journeys.
- 20.109 A choice of routes, offering varying degrees of segregation from traffic, gradient, proximity to destinations and the environment through which they pass would contribute to the attractiveness of those routes to users. The presence of other routes and initiatives, including the Comberton Green Way, would not diminish the substantial benefit that the active travel route would provide to users [10.67, 10.185, 12.31, 18.60, 18.77, 18.138].
- 20.110 Where the busway would intersect with existing routes, crossings are proposed. This may mean that users would have to wait at traffic signals, or wait to check for oncoming buses and cyclists at unsignalised crossings, at a juncture on the route where this would previously not have been the case. However, their situation would be limited in number along the whole route

with eight signalised junctions (including one on Scotland Road), and four unsignalised junctions or crossing points, along with some points where the active travel route would cross existing private accesses.

- 20.111 The proposed at grade crossing of FP 55/2 between Madingley Road and Whitwell Way, Coton would ensure that access would be maintained along the route [10.130]. The diversion of a short stretch of the FP to provide a crossing that would meet the carriageways square on, would not affect the ability of users to reach existing destinations. Whilst users would have to check for buses before crossing, this is unlikely to cause anything other than a little inconvenience given the anticipated frequency of bus movements on this section of the route.
- 20.112 Bridleway 39/30 running alongside the M11 would have a slightly longer detour around the proposed east embankment of the M11 bridge. Although users may perceive that it adds a somewhat circuitous route where previously they could proceed in a straight line, the extent of the diversion would be limited and effectively remain at grade. The busway crossing would be signalised but would only introduce a minor inconvenience for those waiting to cross. Both this junction and the crossing of FP 55/2 would enable users to also join the active travel route at those points should they wish, a facility that would outweigh any little inconvenience of waiting to cross.
- 20.113 Other proposed junctions and crossings would pose very limited inconvenience to both users of existing routes and for future users of the active travel route. There is no substantive evidence to suggest that any such features would have a materially adverse effect on users' journey times, convenience or general experience.

Safety of motorists, pedestrians, cyclists and horse riders

- 20.114 The detailed design of junctions and crossings would be carried out at a later stage. However, there is little substantive evidence to suggest that the proposed locations or configurations of junctions and crossings would inherently make any users more vulnerable to harm than existing features in place. Signalised junctions would ensure that use by motorised vehicles and other modes is satisfactorily controlled. Other proposed crossings, including that across FP 55/2, should offer suitable visibility for both those crossing and buses using the busway [13.14, 18.133]. There is no indication that crossing on existing bridleways or on sections of the active travel route that would accommodate equestrian use would not be designed to appropriately and safely cater for horse riders [18.133].

West Cambridge

- 20.115 South of Charles Babbage Way the busway would cross FP 39/31. Interested parties indicated that this route is popular with cyclists travelling between academic facilities at West Cambridge and other University buildings, and the City Centre, aligning as it does with Adams Road, as well as those cycling between the City and Coton and beyond. The Scheme includes the diversion of FP 39/31 a short distance to the north to enable it to avoid crossing the busway where it makes a sharp bend. The selection of a route avoiding Adams Road [10.73, 20.22] means there would be less

likelihood for conflict with that busy cycle route [17.42, 18.69, 18.138].

- 20.116 As with all crossings where active travel interfaces with motorised vehicles, there is the potential for conflict between users. However, at this point the geometry of both the proposed busway and diverted FP would enable good visibility between footpath users and buses. Although buses would approach the crossing from the north down an incline, the carriage way is limited in length and the proposal is for the busway on both sides of the crossing to be restricted to a maximum speed of 20mph. The geometry of the bend to the south of FP 39/31 should also encourage buses to slow down as they approach and the details of any landscaping could ensure that it does not interfere with visibility from buses approaching from the south. Furthermore, for those cyclists whose journeys start elsewhere in the City centre this would be unlikely to be the only situation where they would have to cross other traffic, whether at a designated crossing point or elsewhere on the road network. Safety of all users would therefore be maintained.

Maintenance and access track

- 20.117 The use of the track as an active travel route would in itself assist in providing a safe route for those walking, wheeling, cycling or riding, segregating them from vehicles using the busway and more generally providing an extended vehicle free route. Were the access and maintenance track to be omitted [12.31], this amenity would be lost. A risk of conflict between buses with walkers and cyclists, even if such use were unauthorised, would result, harming pedestrian and cycle safety.

Unauthorised vehicles

- 20.118 Preventing unintentional or deliberate incursions onto the busway by motor vehicles has been taken into account in the TA, including traffic signal controlled bus gates at junctions with number plate recognition cameras to prevent, deter and record accidental unauthorised traffic straying onto the busway. Whilst illegal incursions elsewhere onto the existing busway have been reported leading to safety concerns [14.19], with the measures proposed there can be confidence that these should deter deliberate misuse as well. The absence of physical features on the drawings to prevent unauthorised access does not weigh against the proposal.

Crossings

- 20.119 The Scheme makes provision for a number of crossing places where the busway would traverse private land. Given that these have not been designed in detail at this stage, concerns about their practicality, utility and safety are understandable. Their introduction could cause an inconvenience and delay to those who can currently move about their private land for personal, commercial and agricultural purposes, particularly where movements are reported to be frequent and where the busway might interfere with current agricultural or horticultural practices on the land [13.9, 14.7].
- 20.120 Nevertheless, with the possible exception of some larger agricultural machinery [14.8], no convincing reasons have been presented to indicate that when detailed designs of the crossing are prepared, audited and

approved, that they could not provide adequate, safe and practical crossings for all users and accommodate the majority of users' anticipated needs [10.130]. This would include catering for those with particular mobility requirements which have been highlighted by interested parties [14.6, 14.7].

- 20.121 Many of those proposed crossings would be at stages where it is envisaged that the bus speed limit would be 50mph. However, noting the relatively straight horizontal alignment of the proposed busway either side of those crossings, there is no substantive evidence to suggest that the location of crossing points would be inherently unsafe, nor that their detailed design [10.130] could not ensure the adequate visibility of vehicles or persons crossing from approaching buses, and vice versa.
- 20.122 We have had due regard to the PSED set out under the EA2010. We have found that in the situation mentioned above where the busway would require a disabled person to cross it to move around their property [10.137, 10.138, 14.7], that with appropriate mitigation, the Scheme and its construction would not harm the interests of persons who share a protected characteristic. Nor would it have any adverse effect on the equality of opportunity, or the relationships, between such persons and persons who do not share a protected characteristic, such that there would be no breach of the PSED.

Grange Road, Cambridge

- 20.123 Grange Road is noted as a popular route for cyclists and pedestrians, including those going to and from schools and University facilities [17.39, 17.44, 18.89, 18.133, 18.134]. It is also reported as being congested with motor vehicles at some times of the day. Bearing in mind that buses already use Grange Road as part of their routes and as such all users will be familiar with interactions between bus traffic and other modes, the addition of further bus services would not introduce an additional risk to other road users in principle.
- 20.124 However, the intensification of the junction with Rifle Range Road would introduce additional bus movements at a location where space is constrained and visibility restricted [17.17, 17.39, 17.44, 18.81, 18.89, 18.133, 18.134], and the Applicant advises that more compact junction geometry is necessary⁵²⁵. The stage 1 Road Safety Audit identified a series of potential issues in the design of the junction⁵²⁶ including the implications of factors such as the existing width of Grange Road and that visibility of future users of the junction may affect its performance. Responses to the Audit's recommendations indicate that the implications of width constraints of Rifle Range and Grange Roads have been recognised, but that in some case further design work would be necessary [10.130]. This demonstrates that the safety of users of the busway, active travel route and Grange Road have been considered by the Applicant and that safety will remain an issue that will influence the detailed design of junctions. The requirement for

⁵²⁵ Road Safety Audit Response Sheet, WSP, 19 June 2023, para 1.20 to 1.22, 1.24, PDF 7-9([CD14-03](#)).

⁵²⁶ C2C Safety Audit Report, CCC Road Safety Engineering Team, 27 February 2023, para 1.20 to 1.24, pp12-14 ([CD14-01](#)).

detailed designs to be approved by way of conditions would ensure that the safety of all users of Grange and Rifle Range Roads can be safeguarded.

Strategic road network

20.125 In respect of effects on the strategic road network, we note that National Highways have raised no objections [18.14].

Implications of safety issues relating to the existing Cambridge Guided Busways

20.126 A number of parties referred to the tragic incidents and other safety issues that have occurred on existing guided busways in and around Cambridge, and the safety measures currently being implemented on parts of the network [13.14, 14.19, 18.133]. The envisaged option of road-based sensor guided buses would mean that they would operate along a conventional carriageway [5.3, 10.149], thereby avoiding potential issues with other users coming into contact with guidance kerbs or a track configuration.

20.127 We note that the Applicant has recognised that there were failings in the safety processes associated with the existing guided busway in Cambridge⁵²⁷. As mentioned at paragraph 20.119 above, the Applicant has carried out a road safety audit for locations where the busway would interface with highways and that the road safety audit process would continue through the detailed design stages⁵²⁸. The Applicant has also voluntarily adopted the principles of the Railways and Other Guided Transport Systems (Safety) Regulations 2006 [10.130]. It is clear from the Applicant's evidence that safety implications have not been ignored. Furthermore, conditions would mean that detailed designs would have to be approved. We therefore consider that the processes undertaken by the Applicant to date and the proposed mechanisms to review safety mean that sufficient measures would be in place to ensure that the safety of all users of the Scheme and existing networks would be fully considered.

20.128 Having regard to the present stage of design development, since detailed design will include further consideration of safety implications, we do not consider the Scheme as presented and illustrated would result in an unacceptable effect on the safety of users of the busway, users of the highway, or that of others crossing or otherwise interfacing with the busway.

Effects of congestion, movement, accessibility, parking and convenience on motorists, pedestrians, cyclists and horse riders

Construction effects

20.129 The construction of the Scheme will inevitably mean that there will be disruption to existing highways and those using them where the route would follow an on-road alignment and cross or interface with highways elsewhere. We have been presented with no convincing evidence that such works would not be capable of being controlled and managed, and affected

⁵²⁷ Mr Baker's PoE, para 5.3.2, p28 ([CD26-01-APP-W1-1](#)).

⁵²⁸ *ibid.*, section 5.3, pp28-29.

users informed about the implications, under the legislation, guidance and working practices that govern such works in the public highway. This includes ensuring that measures are put in place to ensure that vulnerable residents can continue to access the care and support they need during works that may affect access to their homes [18.132].

Congestion

20.130 Despite a variety of views being expressed about the timing, duration and severity of congestion on existing routes, there is little disagreement about where congestion already occurs and the delays and frustration this can lead to. This includes congestion on and beyond Grange Road into the City centre [17.10, 17.40, 18.89, 18.134] as well as issues reported on Cambridge Road in Coton, and its junction with Madingley Road [10.131, 17.24, 17.47]. Key drivers for the Scheme include the current congestion on the route and the prediction that this will increase, along with the harmful effect congestion has on the attractiveness of public transport as an alternative mode to private cars [10.4]. The Scheme's aims and objectives include relieving congestion [10.5, 10.6] and we note that this is an aspect of the scheme that has also generated support [17.7, 18.52, 18.58, 18.69] as well as the consequential effects on bus journey times.

Cambridge Road, Coton

20.131 The extent of the benefits that predicted reductions in bus journey times and impact on existing congestion would deliver may be disputed. However, the evidence indicates that the Scheme would enable buses to avoid congestion, particularly on Madingley Road, and at the same time have an effect by not contributing to congestion on that part of the route into Cambridge [10.18, 10.185]. The proposed signalised crossing on Cambridge Road at Coton may lead to some delay at times when traffic is heavy on the road. This may compound the frustration of motorists who are queueing and residents who experience traffic build ups in the village. However, there is no substantive evidence that the junction would have a materially harmful effect on the performance of the local road network.

Grange Road, Cambridge

20.132 The interventions proposed by the Scheme would end at Grange Road, but buses would continue their journeys into the City Centre. Other than the general anticipation that some who may currently drive into or through the City Centre may change modes as a result of the Scheme, the Scheme effectively leaves dealing with City Centre congestion and the effects this will have on services using the busway to be addressed through other measures or initiatives (see paragraph 20.25 above). Therefore any benefits in journey time and avoidance of congestion risk being reduced once services enter the City Centre traffic at certain times of the day. Nevertheless, having regard to existing traffic conditions, there is no convincing evidence that routing buses via Grange Road would have a materially harmful effect in terms of compounding that congestion.

St Neots Road, Hardwick

- 20.133 The plans show that at Hardwick, along St Neots Road where the busway would follow an on-road route, the proposed configuration would mean that all the existing laybys on the south side of the road would be removed to accommodate the footway and footway improvements. At this stage there is no detail of what, if any, parking and waiting restrictions may be introduced along the carriageway. The majority of these laybys currently have no parking or waiting restrictions, except where occupied by a bus stop.
- 20.134 Where those bus stops on the south side of the road are currently situated within laybys, they would re-provided within the carriageway. Although there is a footway along the south side of St Neots Road, cycleways are currently shared with the carriageway, delineated by road markings. The proposal would have the useability, convenience and safety advantages of providing an off-road, segregated cycle route which would link up with the active travel route on the access and maintenance track on the off-road sections of the busway. However, the removal of the laybys would mean that occupiers of, and visitors to, businesses and residential properties who currently make use of them would have to park on driveways. It is unclear whether any facility for parking or waiting on the carriageway would be provided at certain times but it is conceivable this might be resisted to enable the free flow of vehicular traffic, particularly buses [18.132].
- 20.135 We have not been made aware of any residential properties along St Neots Road that do not have a driveway, and rely solely on a layby for access, nor any other businesses solely dependent on a layby for parking and servicing. Therefore, there is no indication that any dwellings or other businesses would lose vehicular access or parking. The loss of laybys would nevertheless be inconvenient, particularly for households where they are used by delivery vehicles and accommodating visitors, or where properties have limited space in their curtilage.
- 20.136 The Applicant has proposed a solution to a business which relies on a small layby [10.132, 17.32], and we consider that this would be necessary to ensure that the business can continue to be adequately serviced and to enable customers to visit. However, no mechanism for securing this alteration has been advanced, and we consider it appropriate that a condition requiring details to be approved should explicitly secure any necessary layby features (see condition 23) in Annex 1 below).
- 20.137 Unlike that particular business, there is no substantive evidence that the inconvenience residential occupiers may experience by the loss of use of laybys would necessarily translate into a material harm to their accessibility or parking arrangements. Furthermore, although forming part of the Order works, there is no indication that the laybys do not form part of the adopted highway and consequently that their use and configuration could potentially be changed under separate highway legislation. This aspect of the Scheme does not weigh against the proposal.

Accessibility of P&R facility

20.138 The plans indicate that the P&R facility would be accessible from FP66/17⁵²⁹ which runs north to Dry Drayton [18.73, 18.82, 18.131]. Consequently, there would be some non-motorised access to the P&R from the village, albeit it may well not be suitable for regular commuters and would not serve cyclists. However, we note that the Applicant has advised that it has prepared proposals to improve non-motorised access between Dry Drayton and the P&R facility, but intends to pursue these separately to the Scheme proposal⁵³⁰.

20.139 Irrespective of any current requirements for traffic calming within or on the approaches to the village, the Applicant's traffic flow figures⁵³¹ predict that traffic on Scotland Road to the north of the P&R would be unchanged or reduced with the Scheme. Consequently, the absence of an active travel route alongside Scotland Road between the P&R and Dry Drayton or other villages to the north of the proposal, and any proposals for traffic calming in Dry Drayton, do not weigh against the proposal.

Parking in Coton

20.140 Given the proposed location of bus stops throughout the Scheme in relation to the existing road network and proposed and existing P&R facilities, it is questionable as to whether future commuter parking associated with the potential bus stop near Coton would be as inevitable as some parties have suggested [17.24, 17.47]. In any event, we have been presented with no reason that, should any unlawful or inconsiderate parking take place by users of bus stops along the route, including in Coton, that this could not be managed in the usual manner by the appropriate authorities, as with any existing issues.

Conclusions on effect on local residents, pedestrians, cyclists, and motorists

20.141 The proposal would result in both beneficial and harmful effects on the interests of local residents, pedestrians, cyclists, and motorists. Where it would arise, the harm to occupiers' living conditions arising from noise and effects carries moderate weight against the proposal.

20.142 Otherwise, with appropriate mitigation secured by conditions, the effects of the Scheme on the health and living conditions of residents, and on the safety and convenience of all roads users and others who may interface with the busway, would not be materially harmed. Some effects of the scheme would be beneficial to pedestrians, cyclists, horse riders and motorists, and by extension to any local residents using those modes of transport.

20.143 With mitigation the scheme would accord with CLP Policies 34, 36 and 80, and SCLP Policies SC/9 and SC/12 in respect of lighting, air quality and dust

⁵²⁹ Proposed Site Plans, and Rights of Way, Traffic Regulation, and Highway Plans, sheets 6 & 7 in both ([CD1-12.05a](#) & [CD1-16.04a](#)).

⁵³⁰ Mr Baker's PoE, para 4.7.13 and 11.6.1, pp22 & 44 ([CD26-01-APP-W1-1](#)).

⁵³¹ TA Appendix D – Traffic Flows ([CD1-25.05](#)), illustrating traffic flows the AM and AM peaks, for the 2041 Do Minimum and 2041 Do Something scenarios.

effects, and accessibility. With regard to the protection of human health and quality of life from noise, the significant adverse effects on some receptors means that overall the proposal would conflict with CLP Policy 35 and SCLP Policy SC/10. The proposal would accord with the approach in NPPF paragraphs 115, 116, 187, 198 and 199.

Effect on the Environment – Flood Risk (matter 4c)

- 20.144 The Environment Agency initially objected to the Scheme in respect of the modelling concerning flood risk, as did several other parties [18.45, 18.103, 18.127]. Following some revisions, which informed preparation of the flood risk assessment (FRA), and clarifications, the Environment Agency withdrew its objection, stating that the modelling work is sufficiently robust [18.4]. There is no detailed evidence to the contrary, and we have no reason to doubt the reliability of the modelling exercise which underpins the FRA.
- 20.145 The busway would cross Bin Brook, where the existing bridge would be replaced by a more substantial structure [5.4]. Local residents have expressed concern about flooding on the Gough Way estate and to properties on Barton Road which are located a short distance to the south and upstream of the crossing point [17.38, 17.43, 18.110, 18.128], and the occurrence of historical flooding in this area is acknowledged in the FRA. A strip of land alongside Bin Brook has been identified as falling within flood zone 3 [10.119]: flood zone 3 is identified in the NPPF as an area where there is a high probability of flood events occurring.
- 20.146 The NPPF refers to the sequential test in connection with flood risk: at paragraph 174 it explains that the aim of the test is to steer new development to areas with the lowest risk of flooding from any source, and paragraph 175 seeks use of the sequential test in areas at risk of flooding, except where a site-specific FRA demonstrates that no built development would be located on area at risk of flooding from any source. The policy must be read with the guidance in PPG – Flood Risk and Coastal Change. Paragraph 7-027 advocates a proportionate approach to the application of paragraph 175 of the NPPF. Where a site-specific FRA demonstrates clearly that the proposed layout, design and mitigation measures would ensure that occupiers and users would remain safe from surface water flood risk for the lifetime of the development, without increasing flood risk elsewhere, the sequential test need not be applied. In this case, the FRA refers to a high risk of, not only surface water flooding, but also fluvial flooding in the vicinity of Bin Brook, and, contrary to the Applicant's position [10.121], the sequential test is, therefore, appropriate.
- 20.147 Given that an objective for the Order Scheme is to deliver a sustainable transport system connecting areas between Cambourne and Cambridge along the A428/A1303 corridor (above, para 20.7), and the extent of the area at high risk of flooding along Bin Brook, the scope for a sequentially preferable alternative route is inevitably limited. In this case, we consider that there is no reasonably available alternative to the route along Rifle Range Road and over Bin Brook, which would be appropriate for the Scheme. The CPPF & CPC proposal fails to provide a satisfactory arrangement to cross the M11 (above, para 20.48), and the use of Adams Road as part of a link from West Cambridge to Grange Road has been

discounted due to its heavy cycle flows (above, para 20.22). There is no suggestion of other possible alternative routes in the vicinity [10.122, 10.123]. Accordingly we find that the sequential test is passed.

20.148 That leads to the application of the exception test, required for essential infrastructure in flood zone 3 in accordance with paragraph 7-032 and table 2 of PPG. The exception test is set out in paragraph 178 of the NPPF, and requires that the development would provide wider sustainability benefits which outweigh the flood risk, and be safe for its lifetime without increasing flood risk elsewhere.

20.149 The Applicant's modelling predicts that the change in the magnitude of fluvial flood events with the Bin Brook bridge in place would be minimal, both in terms of depth and extent of floodwater [10.121], and it is not expected to worsen the situation for nearby properties. There would be an increase in surface water due to the impermeable construction of the busway. This is intended to be addressed by a surface water strategy which would include the formation of swales and filter strips discharging into detention basins [5.4]: a basin is proposed to the west of the Bin Brook bridge and a drainage attenuation tank to the east. A condition to secure the surface water strategy, which would be capable of avoiding any increase in risk from surface water flooding, is suggested by the Applicant and the District Councils. The balance with wider sustainability benefits is addressed in our overall conclusions.

20.150 The FRA pointed to potential impacts in respect of surface water run-off generally and the crossing of ordinary watercourses. Concerns in these regards would be addressed by the surface water strategy [10.119, 18.105, 18.129]. Flows from the watercourses would be piped below the busway, using pipes of sufficient size to accommodate the 0.1% annual exceedance probability peak flows⁵³², and details of the piped sections of ordinary watercourses could be included in the strategy.

20.151 We conclude that the Order Scheme would not materially increase flood risk, and that it would be safe for its lifetime and would not increase flood risk elsewhere in accordance with paragraph 178(b) of the NPPF.

Effect on the environment – nature conservation (matter 4c)

International sites

20.152 The ES has identified several international sites in the vicinity of the route of the proposed busway. In the light of the evidence submitted to the inquiry, it is the potential effect of the proposal on the Eversden and Wimpole SAC which is relevant to consideration of the application [10.77], and a Habitat Regulations Assessment is required to consider whether the Order Scheme would be likely to have a significant effect on that site. The Conservation of Habitats and Species Regulations 2017 (as amended) requires that where a plan or project is likely to have a significant effect on an international site, and where the plan or project is not directly connected with or necessary to the management of the international site, a competent authority (the SoST

⁵³² Environmental Statement appendix TR13.1 – Flood Risk Assessment (CD1-11.13.02), para 5.3.1.

in this instance) is required to make an appropriate assessment of the implications of that plan or project on the integrity of the international site in view of the site's conservation objectives.

- 20.153 The Eversden and Wimpole SAC is situated about 6km to the south of the busway route, beyond Toft and Comberton. A qualifying feature of the SAC is that it hosts the species barbastelle bat, and its conservation objectives include to ensure that the site contributes to achieving the favourable conservation status of barbastelle bat by, amongst other means, maintaining or restoring the supporting processes on which the habitats of qualifying species rely.
- 20.154 Natural England considers that the population of barbastelle bats in the SAC is almost definitely functionally linked to that in Madingley Wood SSSI, which is located on the north side of the A1303 and about 400m from the route of the busway [18.17]. Because of the proximity of the populations and the likelihood of their use of shared autumn swarming sites, Natural England advises that the health and survival of the Madingley Wood population is important for maintaining genetic diversity to support the population in the SAC.
- 20.155 The busway would be interposed between the SAC and Madingley Wood, and it has the potential to fragment flight paths and to present a collision risk for bats crossing the busway. We agree with the view expressed in the Applicant's Statement to inform Habitats Regulations Assessment that an impact pathway between the SAC and the busway route would exist, and that a likely significant effect on the SAC cannot be ruled out⁵³³.
- 20.156 Mitigation measures to address the potential adverse effects of the busway on the SAC would involve replacement of foraging habitat and the planting of trees and hedgerows to minimise the disruption to flight paths⁵³⁴. At a number of points along the route of the busway, more mature trees would be planted, some of which may be on bunds, to encourage the flight height of bats to be maintained above 4m and leaving a narrow gap above the busway. There is a suggestion in a report of a recent research study (the O'Malley study) that such bat hop-overs may increase the risk of collision with vehicles, encouraging barbastelle bats to cross roads at unsafe heights⁵³⁵. For its part the Applicant points to the average flight height of bats in the study recorded as 4.75m, with single deck buses of 3m in height intended for use on the busway⁵³⁶.
- 20.157 We note that double deck buses are currently in use on routes between Cambourne and Cambridge, and we cannot be certain that services using the busway would be operated exclusively by lower single-deck vehicles. However, the frequency of vehicle movement is likely to be less on the busway (20 vehicles per hour [5.2]) than on roads used by all types of vehicles, as in the O'Malley study. Moreover, services on the busway are planned to operate between 0600 and 2400, with the absence of services

⁵³³ ES Appendix TR5.11: Statement to inform Habitats Regulations Assessment (CD1-11.05 TR5.11) Table TR5 5-1.

⁵³⁴ Mitigation measures are set out in section 7 of Ms Reason's PoE (CD26-01-APP-W12-3).

⁵³⁵ Increasing canopy cover elevates vehicle collision risk for barbastelle bats at roads, in www.nature.com/scientificreports, 2025 (CD29-102).

⁵³⁶ Technical Note 5, CtoC Response to O'Malley barbastelle behaviour paper (CD29-103).

overnight reducing the potential for collisions to occur. Lighting for the operational Scheme would be restricted to areas where safety issues have been identified, leaving large unlit stretches. Conditions are suggested to control landscape details, hours of operation and lighting. Construction activities are intended to be the subject of a CoCP and LEMP, which would require measures to maintain bat flightlines during construction and management plans for protected species, and would have the ability to control the extent of lighting and working hours.

- 20.158 Following engagement with the Applicant, Natural England has reached the view that, with the securing of appropriate mitigation, the collision risk to bats is acceptable, and that the mitigation proposed is also acceptable [18.21]. With the safeguard of conditions to secure mitigation, we conclude that the Order Scheme would not harm the favourable conservation status of barbastelle bat in the SAC, and that it would not pose a threat to the integrity of the Eversden and Wimpole SAC.

Madingley Wood SSSI

- 20.159 The SSSI is an example of the ash-maple woodland type characteristic of the chalky boulder clay of Eastern England. Its importance as woodland would be unaffected by the operation of the busway. It is likely that the A1303, which runs immediately to the south of the wood, would be used by construction traffic. This is a well-used main road, and the addition of additional vehicles over a temporary period should not have any effect on the adjacent SSSI. As mentioned above (para 20.154), the wood hosts a population of barbastelle bats which is understood to be functionally linked to the population in the Eversden and Wimpole SAC to the south of the busway route [18.17]. We have reached the view that, whilst the busway, would have the potential to disrupt the flight paths of bats, which would include movement to and from shared swarming sites, the Order Scheme would not harm the favourable conservation status of barbastelle bat in the SAC (above, para 20.158). Similarly, we find that the proposal would not be materially harmful to the continued presence of barbastelle bats in the SSSI.

Coton Orchard CWS

- 20.160 The busway would run across this CWS. At the inquiry there was debate about the extent of traditional orchard, a priority habitat. The eastern part of the CWS is dominated by an area of scrub, with fruit trees present between the scrub and Cambridge Road. Of the area within the Order limits, 0.42ha is considered by the Applicant to be traditional orchard, and 1.33ha to comprise other orchard habitat⁵³⁷. For his part, the ecology witness for CPPF & CPC considered this to be an under-estimate⁵³⁸. A defining characteristic of traditional orchards is that they are managed in a low intensity way. There is broad agreement between the Applicant and objectors that Coton Orchard is managed in that way, and the citation for the CWS specifies the current qualifying criteria as *traditional orchard*. That interpretation is principally of relevance to the consideration of biodiversity

⁵³⁷ Mr Whitby's supplemental PoE (CD29-85), para 11.

⁵³⁸ Mr Woodfield's PoE (CD26-10-W4-1), para 5.2.4-5.2.6.

net gain (BNG). Insofar as the direct impact of the busway is concerned, the Applicant and CPPF & CPC agree that the loss of habitat due to its construction through Coton Orchard would have a significant adverse effect at a county level. We agree that the busway would have a permanent harmful effect, a consideration to which we give substantial weight.

- 20.161 Of particular importance within Coton Orchard is a row of 12 veteran Bramley apple trees, which are covered by a TPO. Three trees are on the edge of the Order limits: it is intended that they would be retained, with ground protection and fencing in place, measures which could be secured by a condition.
- 20.162 Another three veteran trees are positioned centrally to the busway route. Translocation to elsewhere within the Coton Orchard or to a location within the Order limits at Rectory Farm is proposed. An outline methodology has been prepared by a specialist contractor, involving ground investigation, root pruning and wrapping, and a 10 years programme of aftercare at the new site⁵³⁹. Reference was also made by the Applicant to the translocation of a 100 years old mulberry tree [10.83].
- 20.163 Features of the trees proposed for translocation include hollow stems, a longitudinal crack, and branch hollowing from old wounds⁵⁴⁰. In response to questions, the Applicant's arboricultural witness acknowledged that there would be a greater likelihood of success with younger, and more vigorous, trees, and he had no direct experience of translocating veteran apple trees, referring to advice from a specialist contractor who had not visited the orchard. The example of a successful translocation was of a different type of tree to those at Coton Orchard, a type which was acknowledged to be longer-lived, and it was not known whether the tree concerned could be considered as a veteran specimen.
- 20.164 Taking the above considerations together, we do not share the confidence of the Applicant that translocation could be undertaken without loss or deterioration to the three veteran Bramley trees concerned. Paragraph 193(c) of the NPPF stipulates that development resulting in the loss or deterioration of veteran trees should be refused unless there are wholly exceptional reasons, which could include the public benefit from infrastructure projects, and that a suitable compensation strategy exists.
- 20.165 In the event of loss or deterioration of the veteran trees, the Applicant has prepared a draft compensation strategy [10.80], which would provide for orchard restoration or management to produce veteran-like habitat, and new planting. If the loss or deterioration of the translocated trees were to occur, it would not be possible to provide other veteran trees through replacement planting: that would come about over time, encouraged by orchard pruning. The draft strategy has the potential to provide compensation for the loss or deterioration of veteran trees, and the measures anticipated could be secured by a condition. However, as a draft document, with further detail of compensation expected, it cannot be regarded as a suitable compensation strategy, as sought by paragraph

⁵³⁹ Appendices to Mr Allder's PoE (CD26-01-APP-W4-2), para 1 of appendix 6.

⁵⁴⁰ Mr Allder's PoE (CD26-01-APP-W4-1), image 2 – tree survey schedule.

193(c) of the NPPF. In any event, harm would have occurred to the veteran trees.

20.166 In addition to the harmful effect on the CWS as a whole, we give substantial weight to the potential for harm to the veteran trees proposed for translocation. We consider whether there are wholly exceptional reasons to set against this harm in our overall conclusions.

Other wildlife sites and habitats

20.167 Parts of three other non-statutory sites (Coton Path Hedgerow CWS, Scrubland east of the M11 CiWS, and Bin Brook CiWS) fall within the Order limits [10.79]. As with Coton Orchard, construction of the busway would inevitably result in an element of habitat loss, a consequence acknowledged by the Applicant⁵⁴¹. However, with the implementation of habitat mitigation and compensation measures, the Applicant argues that adverse effects would not be significant. The only contrary professional evidence was provided on behalf of CPPF & CPC. Its witness expressed concern about the extent of habitat loss at Coton Path Hedgerow CWS and scrubland east of the M11 CiWS, but he had not visited or surveyed any of the other three non-statutory sites, and at the inquiry he accepted that he was not in a position to agree or disagree about any residual effects.

20.168 Construction work would cause the loss of habitats at various places along the route. The ES explains that the Scheme has been refined to minimise the loss of important habitats; for example construction compounds are proposed to be located within lower value habitats, and several attenuation ponds have been designed to maintain aquatic habitats⁵⁴². Landscaping proposals would provide for compensation. These measures could be secured by means of conditions, although the Applicant acknowledges that habitat creation would take time to reach maturity. Bearing in mind the time required for mitigation to become effective, we attribute moderate weight to the harm which the Scheme would cause to other wildlife sites and habitats.

Fauna

20.169 CPPF & CPC make a generalised criticism that the construction of a new linear corridor across the landscape would sever existing boundaries, introduce new risks of collision, noise, lighting and air pollution, and also cause adverse effects on fauna through losses to wildlife sites⁵⁴³.

20.170 We have already referred to the potential effect of the Scheme on barbastelle bat (above, para 20.154-20.158). Construction of the busway would cause disturbance to other fauna and has the potential to have an adverse effect. Badgers are known to be present within the Order limits. Whilst it is considered that impacts in setts may be avoided through detailed design work, a Natural England badger mitigation licence to exclude badgers may be required as an alternative⁵⁴⁴. A similar approach

⁵⁴¹ Mr Ellis's PoE (CD26-01-APP-W13-1), para 1.1.85.

⁵⁴² CD26-01-APP-W13-1, para 1.1.90 & 1.1.91.

⁵⁴³ Mr Woodfield's PoE (CD26-10-W4-1), para 6.2.3.

⁵⁴⁴ CD26-01-APP-W13-1, para 1.1.99-1.1.126.

may be required in respect of water vole. Great crested newts have been recorded at two ponds in the vicinity, and may use habitat on the route. Vegetation clearance, which could adversely affect this species and reptiles could be subject to control through a licence and ecological method statement respectively.

- 20.171 Insofar as birds are concerned, which would also be disturbed by construction activities, a restriction on the clearance of vegetation is proposed between March and August. Vegetation clearance would be restricted to reduce the risk to aquatic life. Mitigation for terrestrial invertebrates is expected to include habitat creation and the creation of dead wood features. Mitigation measures involving the exclusion or displacement of species from certain areas during the construction period would involve disturbance, and habitat creation would take time to become effective. These are temporary harms which merit moderate weight.
- 20.172 It is the Applicant's evidence, drawing on the ES, that there would be no significant effects on most species through operation of the busway⁵⁴⁵. To reduce the risk of collisions to badgers, fencing and underpasses are proposed. Certain aquatic fauna would be at risk from increased levels of suspended sediment and pollutants in surface water run-off. It is intended that run-off would be managed to ensure that water quality treatment and pollution control requirements would be met. There is no detailed evidence before us to suggest that the mitigation measures proposed by the Applicant, which could be delivered by condition, would not be effective.

Biodiversity net gain

- 20.173 There is a dispute between the Applicant and CPPF & CPC about the delivery of BNG, which centres on two matters: inclusion of individual trees and the acquisition of off-site units [10.87, 10.88, 12.37]. We note that the metric used by the Applicant is provisional, and that there would be the opportunity in revisiting BNG in line with a suggested condition to ensure that any omissions in the initial calculation were addressed. A consequence of that may be a need to acquire off-site units. The parties disagreed about the extent to which off-site units may be required to achieve at least 10% BNG, with CPPF & CPC suggesting that this could give rise to a significant additional cost. There is, however, the opportunity to provide a substantial number of off-site units at Lower Valley Farm, with additional funding available from the GCP programme budget if needed⁵⁴⁶, and to provide watercourse units at Sheep's Green. The evidence before us indicates that the Order Scheme would provide an uplift in biodiversity. In view of the need for the position to be reassessed using a revised metric, this is a consideration which merits no more than moderate weight in support of the Scheme.

Effect on the Environment – Character and Appearance of the Area (matter 4c)

- 20.174 Nine broad landscape character areas (LCAs) have been identified for

⁵⁴⁵ CD26-01-APP-W13-1, para 1.1.129-1.1.141.

⁵⁴⁶ See CD29-93-1 & CD29-93-2.

Cambridgeshire. The proposed busway would be contained within Greater Cambridge, and it is the more localised LCAs identified in more recent studies which provide the appropriate context for assessing the effect of the proposal on landscape character⁵⁴⁷. The greater part of the Order lands would extend across landscape character area LCA4B – the Lolworth to Longstowe Wooded Claylands. This LCA is described as a settled rural landscape with a wooded parkland character⁵⁴⁸. It includes small blocks of woodland, and has an irregular and generally rectilinear field pattern.

- 20.175 That part of the route of the busway between Hardwick and Cambridge Road, Coton is generally consistent with the character of the wider LCA. Further to the west, however, the route passes through the previously developed land at Bourn Airfield and close to the built-up area of Hardwick. The linear form of the busway would cut across the irregular field pattern east of Hardwick. However, as a relatively narrow feature, it would not significantly disrupt the countryside through which it would pass, and planting and earthworks would help to integrate the busway into the surrounding landscape. To the north of the A428, construction of the P&R facility would encroach onto the settled rural landscape: this would be a substantial built feature, although the impact would be lessened by planting within this site. Lighting would be introduced at the P&R facility, which would indicate the extent of the encroachment during the hours of darkness when the busway would be operational. This is not, though, an undisturbed part of LCA4B: there is lighting nearby at the junction of Scotland Road with the A428, and traffic on that road and properties in Hardwick also contribute to light impact. With planting established, we consider that the Order Scheme would have a limited adverse effect on the landscape of LCA4B as a whole.
- 20.176 Relatively short sections of the busway would run through LCA4A – Croxton to Conington Wooded Claylands at Cambourne, and at the eastern end of the route through LCA 3B – The Bourn Tributaries Lowland Farmlands and Townscape Character Area (TCA) 2 – West Cambridge. At Cambourne, the busway would for the most part pass through the existing built-up area, and no adverse effect is expected. TCA2 is of greater sensitivity given the presence of heritage assets including West Cambridge Conservation Area. We have found that the Scheme would cause limited harm to the character and appearance of the Conservation Area (below, para 20.226), which would become moderately more urbanised. Considering the wider TCA, however, the effect of the Scheme would be negligible. We have reached a similar view in respect of LCA3B where the short sections of the Order lands would be close to West Cambridge and the M11.
- 20.177 Insofar as the Order lands and their immediate surroundings are concerned, there would inevitably be a major change arising from the construction of the busway, its accompanying access and maintenance track, the P&R facility, and the new bridges. The landscaping and earthworks proposed, together with the strengthening of field boundaries crossed by the busway, would lessen its impact, which we consider would give rise to a moderate

⁵⁴⁷ The Greater Cambridge Landscape Character Assessment (CD18-02) and the Cambridge Inner Green Belt Study (CD18-01).

⁵⁴⁸ CD18-02, pg 97.

level of harm.

- 20.178 During the construction period of up to two years⁵⁴⁹, the formation of construction compounds, the presence of plant and equipment, and the work activities themselves would disrupt and detract from the landscape. Given the temporary nature of these activities, we consider the harm to be limited.
- 20.179 We do not share the view expressed by the CPPF & CPC⁵⁵⁰ and some other parties that, from certain places, the busway would be a discordant element in the landscape. The busway would introduce a hard-surfaced roadway to the area, but for the most part this would be at or close to ground level. The planting and earthworks proposed would provide screening which itself would blend into its surroundings. In consequence from vantage points such as Red Meadow Hill to the south of Coton, the busway would not be discernible. Buses moving along the route would be visible, but the presence of 20 vehicles per hour moving through the landscape would not have a significantly harmful effect in views over the countryside.
- 20.180 In closer views, such as from the footpath between Coton and Madingley Road, near the crossing point on Cambridge Road, and on FP 66/17 which crosses the A428 by a bridge near the P&R facility, elements of the Scheme would be clearly seen, but with the exception of the P&R facility they would not represent a major component of views over the wider countryside. By year 15, with landscaping established, the localised harm to visual amenity from the Order Scheme would not merit more than limited weight. As with the effect on landscape, construction activities would be more prominent and would detract from visual amenity. However, over the temporary period of construction that harm would be limited.

Effect on the Environment – Carbon Emissions (matter 4c)

- 20.181 There is a dispute between the Applicant and CPPF & CPC about the implications of the Order Scheme for carbon emissions. In revising the original estimate in the ES, the Applicant had calculated that there would be a net reduction of 7,055 tCO₂e of carbon over the 60 years assessment period, taking account not only of modal shift to bus travel, walking and cycling, but also changes in vegetation and the impact of embedded carbon in construction materials [10.92].
- 20.182 That figure is an update from that in the ES, and used data from the latest available version (May 2025) of the DfT's TAG data book, together with the F series of the CSRM. CPPF & CPC are critical of the latter change in traffic model, referring to a substantial increase in the reduction of carbon due to changes in general traffic from 30,960 tCO₂e to 56,915 tCO₂e as highlighting the unreliability of the approach used. However, that figure relates to a calculation based on the May 2022 TAG data book, and the change from general traffic calculated using the May 2025 TAG data book, which underpins the net figure for carbon reduction, is much more modest, at less than 4,000 tCO₂e⁵⁵¹. The Applicant has also explained that the

⁵⁴⁹ Environmental Statement - Technical Report 8: Landscape (CD1-11.08.1), para 5.1.1.

⁵⁵⁰ Mr Littlewood's PoE (CD26-10-W1-1), para 7.22.

⁵⁵¹ Table 1 in CD26-01-APP-W3-2.

updated calculations take into account a reduced proportion of petrol and diesel cars⁵⁵².

20.183 CPPF & CPC argue that the trend in electric vehicle take-up between the final two modelled years should be extrapolated until it reaches about 100%. Alternatively, use should be made of data from the CAS data book, which indicates electric vehicle take-up of 99% by 2050 [12.28]. We note that guidance on carbon impacts is contained in the DfT's recent Local Transport QCG (CD8-41). That indicates that where the last modelled year is a long time (for example more than 5 years) from 2050, data for appraisal years beyond that date can be held constant up to the end of the assessment period. An alternative approach extrapolating the trend between 2041 and 2050 to the end of the assessment period would not be appropriate as it would imply that the take-up of electric vehicles would exceed 100% [10.94].

20.184 A further assessment of carbon impact by the Applicant, taking account of the recent guidance from the DfT, indicates a reduction of 1,446 tCO₂e⁵⁵³, whereas CPPF & CPC suggest that their approach would result in an increase due to the presence of infrastructure carbon. Even if that approach is accepted, with a lower proportion of petrol and diesel vehicles in the fleet from which a reduction in carbon would accrue, CCF & CPC's carbon witness acknowledged that a benefit from an earlier take-up of electric vehicles would have occurred, albeit one that was not attributable to the Order Scheme.

20.185 It is clear from the evidence that the position concerning carbon emissions is subject to change, particularly concerning the vehicle fleet mix, and the extent to which this may or may not be attributable to the Scheme. We consider that the approach to assessing carbon emissions used by the Applicant more closely follows government guidance. However, given the low level of predicted carbon reduction, this carries at most little weight in support of the Scheme. Even if the view were to be taken that the guided busway would be a net emitter of carbon, in providing a sustainable travel choice it would be a strategic fit with outcomes necessary to decarbonise local transport, as mentioned in the Local Transport QCG.

Effect on the Green Belt (matter 4d)

20.186 Much of the central and eastern sections of the Scheme for which DPP is sought, including the P&R facility would be within the Green Belt⁵⁵⁴. The Scheme for a guided busway to meet transport needs in Greater Cambridge is local transport infrastructure. In accordance with paragraph 154(h)(iii) of the NPPF, such development is not inappropriate in the Green Belt provided that a requirement for the location can be demonstrated, openness is preserved, and there is no conflict with the purpose of including land within the Green Belt.

20.187 Between Hardwick and Cambridge the Green Belt extends across the A428/A1303 corridor, which connects Cambourne to Cambridge. Any

⁵⁵² Mr Saunders' rebuttal (CD26-01-W3-4), para 3.3.4.

⁵⁵³ The Applicant's carbon assessment responses, 14 October 2025 (CD29-63), table 3.

⁵⁵⁴ See the plan in appendix A of the Cambourne to Cambridge Order – Green Belt Assessment (CD1-18).

scheme to provide a new or upgraded public transport scheme along this part of the corridor would need to cross the Green Belt. That applies to both the Order Scheme and to the CPPF & CPC alternative. The alternative location considered for a P&R facility, at the junction of St Neots Road and the A1303, is also within the Green Belt. Construction compounds would be required along the route and at the P&R facility, and consequently a number of these would need to be located within the Green Belt. We are satisfied that the Order Scheme demonstrates a requirement for a Green Belt location.

- 20.188 The P&R facility would include limited built development in the form of a facilities building and several bus shelters. More significantly, it would provide parking space for up to 2,000 cars, and would extend considerably further from Scotland Road than adjacent frontage development. This element of the Scheme would not preserve openness and would clearly encroach into the countryside, contrary to one of the purposes for including land in the Green Belt.
- 20.189 Although on its route through the Green Belt, much of the busway would be at or close to the existing ground level, there are sections where the ground level would be raised with the formation of embankments, particularly on the slope across Madingley Hill and on the approaches to the bridges over the M11 and Bin Brook. The bridges themselves would impinge on openness, and there would also be an impact from associated features, including traffic signs and signals, and fencing. Taking account of excavation for cuttings and drainage basins, there would overall be an adverse impact on openness from construction of the busway. Bearing in mind the proximity of Bin Brook to West Cambridge, the presence of the new bridge and the introduction of the engineered feature of the roadway would, in a limited way, detract from the role of the Green Belt in preserving the setting and special character of the historic City of Cambridge.
- 20.190 We have found that the movement of buses along the roadway would not have a significantly harmful effect in views over the countryside (above, para 20.179), but their presence, away from the existing roads, would erode openness to a limited degree. There would also be harm to openness and encroachment into the countryside from the establishment of construction compounds, albeit for a temporary period.
- 20.191 We conclude that the development involved in the Order Scheme would not preserve the openness of the Green Belt, and that certain elements would conflict with purposes of including land within it. Consequently, although the Scheme involves the provision of local transport infrastructure, it would be inappropriate development in the Green Belt. We consider in our overall conclusions whether other considerations clearly outweigh the Green Belt harm, and any other harm, and give rise to very special circumstances to justify inappropriate development.

Effect on Heritage Assets (matter 4e)

- 20.192 The ES identified a number of heritage assets whose significance would be harmed by the scheme and Mr Wilson's evidence identified additional ones, with effects being limited to their settings in all but one case and the Applicant finding that any harm to significance would be less than

substantial [10.106, 10.109]. Objectors have contended that the extent of harm would affect more assets and in some cases be more extensive than the Applicant's assessments [17.11, 17.12].

Adequacy of methodology and assessment

- 20.193 Historic England agreed with the scope and methodology of the Applicant's heritage assessment [18.6]. Although consideration of relevant heritage assets and the effects on them is set out across a number of documents, with later ones dealing with earlier omissions [10.106], the overall assessment is comprehensive and there is no evidence that any assets material to the consideration of the Scheme have been excluded.
- 20.194 The more detailed design drawings of the Scheme in the vicinity of the Erskine Building that Historic England considered necessary to fully assess harm to its significance were not provided [18.12, 18.13]. Nevertheless, the Applicant's witnesses were questioned on the matter and we inspected the location. On this basis, and bearing in mind that the Scheme has not been developed to detailed design stage, we consider that there is sufficient information before us to enable an adequate assessment of the extent of any harm to the listed building's significance. In doing so we have also had regard to the potential for different carriageway specifications [5.3], and any consequent variance in the extent of harmful effects. Further, should the SoST be minded to direct that DPP be granted, conditions would be necessary to avoid, minimise and/or mitigate any harmful effects on significance.
- 20.195 The Applicant's LVIA [10.112] relies in part on the Greater Cambridge Landscape Character Assessment. The scope of that Greater Cambridge Assessment is geographically wide and thematically includes consideration of the historic context and landscape character in respect of the setting of Cambridge as a distinctive and historic university city. Consideration of the significance of the West Cambridge Conservation Area in the Applicant's Heritage Statement [10.106] recognises its location between the historic core of the City and the open clay lands to the west, amongst other factors (see 20.222 below). Criterion 2e of SCLP Policy NH/14 includes the wider historic landscape and settlement patterns of South Cambridgeshire as a particular focus.
- 20.196 Whilst the Heritage Statement is focused on individual heritage assets [18.127], we do not consider the ES overall to be flawed or inadequate in respect of consideration of the wider historic setting of Cambridge, particularly with regard to its western edge. Our findings on this matter informed our conclusion on the ES at paragraph 6.8 above.

Designated Heritage Assets

American Military Cemetery

- 20.197 The grade I American Military Cemetery RPG is a unique example of a post-war military cemetery [3.7, 17.26]. Its significance is derived in a large part from its historic and social importance. Also, from its formally laid out commemorative landscape of the highest quality designed by an internationally renown practice, along with a monumental Memorial Chapel

and Wall of the Missing, together creating a landscape of exceptional character whose design acknowledges its rural situation.

- 20.198 The grade II* listed building known as Memorial and Attached Walls Steps and Pool Surround at American Military Cemetery relies on its situation within, and as part of, this landscape for some of its significance, as well as its architecture, decoration, materials, and historic and social importance. The inscriptions and statues on the Wall of the Missing face northwards and, on this side, it partly encloses the adjacent pools and steps. Nevertheless, although somewhat austere, the contrasting brick reverse of the wall is finely finished and presents more than simply a utilitarian back to the south. It also performs as an enclosure of architectural quality, consciously designed with openings which make the composition permeable to the south and allow glimpses of the cemetery in the other direction. Furthermore, the south exterior wall of the Memorial Chapel includes a large carved relief map and other motifs, visible through the trees from Madingley Road. These aspects confirm that the setting within which the listed building's significance can be understood and experienced extends to the south well beyond the immediate vicinity of the wall.
- 20.199 The RPG also derives significance from its setting within the Cambridgeshire countryside which it is designed to overlook to the north [17.15, 17.26], and also from the rural character of the tree and hedge lined Madingley Road and countryside sloping down to the south beyond. The mature trees, soft landscaping including neat formal hedges within the RPG adjacent to Madingley Road, in turn provide a verdant setting to the south of the listed Memorial as an important component of the RPG
- 20.200 The busway and maintenance track would follow a straight alignment in a cutting or on a shallow embankment in the location where it would traverse an area some distance down the slope of Madingley Hill to the south of the Cemetery. As a result of this topography, the intervening trees and vegetation and the considerable separation distance from the designated heritage assets, there would be no intervisibility between the busway and the Cemetery. The insertion of a linear route through the landscape would not materially alter the countryside character of the area in a way which would erode the setting of the Cemetery assets or adversely affect how they would be experienced or enjoyed from within that landscape [10.107, 17.20, 18.130].
- 20.201 Its location relative to the Cemetery would also ensure that any activity associated with the operation of the busway including the movement and noise from buses, would not materially affect the tranquillity experienced within the RPG and around the listed building. Consequently, neither the proposed busway infrastructure nor its operational use would have a harmful effect on the significance that the RPG and the listed building derive from their settings [10.107, 17.26, 18.59, 18.75, 18.94, 18.130].

Erskine Building, Clare Hall

- 20.202 The Erskine Building's national significance as a grade II* listed building includes architectural and historic interest in the form of: its distinctive and pleasing building form, layout, scale and massing; its architectural details; its design by an internationally renowned architect and as a unique example

of a University building of its era. Distinctive features such as the oversized rainwater goods including those which discharge into the concrete drainage channel, referred to in the list entry as a canal, which runs alongside its Rifle Range Road elevation, and its permeable composition to the south where internal routes and courtyards are linked to walkways providing open, uncontrolled and unencumbered access make important contributions to this significance. [6.3, 10.108, 18.10]

- 20.203 The informal configuration of the existing track, extensive grass verges, line of trees and absence of enclosure between the south elevation and the fence to the sports ground opposite, contribute to the significance that the building gains from its setting to the south. The continuation of the canal trench with its termination in a semicircular feature alongside the adjacent and sympathetically designed Brian Pippard Building also contributes to this significance. The permeability of the southern elevation in contrast with the more formal arrangements to the north along Herschel Road is an important aspect of the building's composition. These aspects create a particularly sensitive environment whereby even relatively minor changes in its setting could have a marked effect on the Erskine Building's significance.
- 20.204 The Order Limits include that part of the canal running alongside the gable of No 5 Family Walk, and immediately abut, but do not contain, the canal feature adjacent to the remainder of the south elevation ([CD1-12.01a](#), sheet 17) [10.108]. The proposed site plans ([CD1-16.04a](#), sheet 17) illustrate that the proposed carriageway would occupy much of the space currently taken up with both the track and its grass verge to the south, albeit a proposed section immediately to the east of the Erskine Building ([CD1-16.05](#), section 17) illustrates a modest soft verge on the sports ground side and a wider one adjacent to the boundary with Clare Hall. The plans ([CD1-12.05a](#), sheet 17) show changes in levels within the existing grass verge alongside the Erskine Building which would steepen its gradient. The drawings indicate the carriageway would be flanked by a drainage and kerb system, with a retaining feature and indicative hedge planting beyond, along the extent of the Erskine Building boundary.
- 20.205 Some of the ambiguity arising from the limited detail provided about the design of the Scheme in this location was addressed in Mr Wilson's oral evidence, including that it was not the intention for any works to physically touch the canals or rainwater goods along the south elevation [10.108]. Nevertheless, given the stage of design being considered and level of detail presented there remains the potential for certain detailed design solutions to be more harmful to this significance than others [20.194].
- 20.206 The busway would introduce a considerably more engineered appearance than at present with kerbs and drainage features. Together with the access track alongside it would reduce the amount of soft verge on either side compared to the existing arrangement. At present short paths in complementary brick and concrete materials to the listed building's hard landscaping palette link the modest concrete bridges over the canal towards the current track [18.9]. The proposed design would truncate their southern extent. Even relatively limited increases in levels in the remaining verge would alter this relationship and would at least necessitate the removal and relaying of the paths [10.108, 18.9].

- 20.207 The Proposed Site Plans ([CD1-16.04a](#), sheet 17) show the emergency and maintenance track occupying the location of all but one of the trunks of the row of lime trees alongside the Erskine Building such that their removal would be highly likely [18.12]. If they were removed, whilst it would render the south side of the building more visible, particularly compared to when the trees were in leaf, it would erode the current subtle relationship of filtered views of the architecture and, in the other direction, expose the buildings and spaces to activity and movements along the proposed busway. The more solidly linear and lower characteristics of a hedge would not replicate these effects.
- 20.208 Even with the anticipated twelve buses an hour on this part of the route [5.2], the increase in vehicle movements and associated noise would alter the quiet and informal character of the track to one more akin to that of a suburban street. This effect would also be perceptible within the courtyards and walkways of the listed building, more so if the row of limes were be removed, although that effect would still be relatively limited.
- 20.209 Together, these effects would noticeably and harmfully change the way in which the listed building is experienced from both the external and internal spaces within the building complex which look out over Rifle Range Road and beyond to the south. Consequently its significance derived from this aspect of its setting would be harmed to a moderate extent [10.108, 18.11].
- 20.210 However, were a direction for DPP to be granted, appropriate planning conditions could ensure that the detailed design of all aspects of the busway and its landscaping in this location were designed to minimise and mitigate adverse effects in this sensitive location [10.106, 18.13]. Such measures would not avoid the harm nor be likely to entirely mitigate it. Given the high significance of the asset, its sensitivity to changes within this aspect of its setting and the potential extent of harm, it would be necessary and reasonable to require such details to be separately approved in the particular context of the Erskine Building and nearby assets, and to be explicit about some of the interventions that would be unacceptable such as barriers or enclosures. Exceptionally given the high level of significance of the asset, it would be necessary for Historic England to have the opportunity for input before any details were approved (see 20.317 below).

Elmside and 48 Grange Road, Cambridge

- 20.211 Elmside Including Boundary Wall and Gate is a grade II listed former house, now part of Clare Hall, designed by a leading Arts and Crafts movement architect. As well as its noted designer, its significance includes its impressive architectural composition, traditional materials, finely crafted detailing, historic associations as well as interior features. The list entry identifies its group value with numerous listed houses and college buildings on Grange Road, including No 48. It derives significance from this wider setting within the architectural and historically interesting buildings and verdant streetscape of which it is a part and, at closer quarters, from the informal character of Rifle Range Road mentioned at paragraph 20.203 above and its similarly informal and low key junction with Grange Road.
- 20.212 To the east of the Erskine Building the busway corridor would narrow

slightly before terminating at a widened junction with Grange Road with associated traffic signals and with the likely loss of a mature tree of considerable stature on the corner. The Scheme would result in the southern aspect of the setting within which Elmside is experienced from Rifle Range and Grange Roads becoming moderately more urbanised.

- 20.213 The signage, signals and other paraphernalia associated with a busway junction with the road would be likely to be intrusive in the street scene and the listed building's setting, becoming more harmful should the proposed configuration include guidance kerbs [5.3] and necessitate features such as a car trap near the junction (see 20.209 above). These effects, along with the increased vehicle movements and noise that would be perceptible both inside and outside the grounds to the rear of Elmside, would result in a limited erosion of the listed building's significance derived from its setting.
- 20.214 48 Grange Road is a former house whose national significance as a grade II listed building includes its architecture, detailing, materials, configuration relative to Grange Road and likely associations with a notable C19 architect. Some of its significance relies on its setting including the tree and historic building lined Grange Road. Whilst the urbanising and intrusive paraphernalia effects described above would detract from this significance, given the building's off-set situation on the opposite side of Grange Road to the proposed busway junction, the degree of harm would be very limited.
- 20.215 Were a direction for DPP to be made, the harmful effects to Elmside and No 48 have the potential to be mitigated to a degree, particularly in terms of visual effects and character. This would be through the considerate detailed design and specification of the configuration, materials and landscaping of the busway in the vicinity of the listed buildings, which could be controlled by way of conditions. Suggested restrictions on times of vehicle movements, however, would be likely to have a negligible effect on mitigating any harm as they would only be in effect for a limited time during the day [10.106].

Schlumberger Gould Research Centre

- 20.216 The distinctive Schlumberger Gould Research Centre and Attached Perimeter Wall to the North is a particularly important 1980's building by a foremost contemporary architect displaying a highly innovative use of technology, materials and design [10.106]. These attributes, along with historic associations and the high degree of survival it displays contribute to its significance as a grade II* listed building.
- 20.217 The Applicant identifies its setting as making a high contribution to its significance. The level, relatively undeveloped nature of its immediate surroundings and level topography beyond allows its striking architectural forms, including its exoskeleton of cables and tubular masts supporting its distinctively shaped polygonal membrane roof-covering, to be experienced and appreciated. Busses would use the existing Charles Babbage Road at this location in the Scheme. Whilst vehicular traffic effects are already present in its setting to the north, the visual effects of additional activity to the south would slightly change how it would be experienced and have a harmful, but very limited effect on, its significance. The elevated approach to the bridge over the M11 would stand out within the flat surroundings and

be visible in views out from the asset. However, the effect on that part of the building's significance derived from the surrounding mix of industrial and undeveloped plots towards the site, would be adverse but very limited in its extent.

Other Listed buildings

- 20.218 Harm to the settings of listed buildings in Coton was largely expressed in vague or general terms by interested parties [18.130]. As well as the architectural and historic interest they possess, the grade II listed buildings [10.106] ([CD1-11.07.02](#), paras 6.3.21 to 6.3.63) obtain varying degrees of significance from their settings within the village, their relationship to one another and their situation within the streetscape. With the exception of the listed Water Pump, the wider agricultural hinterland around Coton would have provided the economic and social context and purpose for the listed residential, ecclesiastical, agricultural and monumental buildings and structures in the settlement. Consequently, their significance relies to a degree on the surrounding countryside including that through which the Scheme would pass to the north of the village, albeit in all cases to at most only a limited or very limited extent.
- 20.219 The spire and tower of the grade I listed Church of St Peter is a prominent landmark within the village and from some vantage points in the surrounding countryside. However, in the latter it features more as an incidental element within the landscape. The Church derives much of its significance from its architecture and history, along with its picturesque and historic situation within the village. It also benefits from the limited contribution of its rural situation including the surrounding fields that would have historically helped to sustain the church and congregation and where some of its features can be visually experienced at a distance.
- 20.220 Intervening trees and buildings mean that there would be minimal intervisibility between those grade II listed buildings which are located in Coton and the busway. Whilst there would be co-visibility in some wider views across the countryside in which the spire and tower of the Church of St Peter appear, the busway's linear, low lying characteristics would not compete or interfere with the vertical feature of the tower and spire some distance way.
- 20.221 The addition of a new communications route in the form of the busway would bypass the village where more historic road and lanes meet, changing the distribution and pattern of routes and intervening in the agricultural landscape which forms part of the listed buildings' settings. However, given the limited or very limited extent to which their significance relies on this attribute, and the extent and manner in which the intervention would manifest itself, the Scheme would not diminish what significance all the listed buildings derive from their wider landscape setting. Consequently, there would be no harm to the significance of any of the listed buildings in Coton.

Coton Conservation Area

- 20.222 Coton Conservation Area [3.7] encapsulates the historic core of the village where most of the aforementioned listed buildings are located. Those and

many of their neighbouring buildings contribute to the attractive, historic streetscape where the buildings, streets, spaces and trees combine to give it its special architectural and historic character, and hence significance. Similarly to the listed buildings within, it also derives some significance from the countryside in which it is set and with which it has historic economic, functional and social associations. The predominantly agricultural landscape provides a setting in which the Conservation Area is experienced, and which helps to preserve its tranquil character. [10.106]

20.223 The characteristics and effects of the busway mentioned at paragraphs 20.220 and 20.221 above, would also have a similar effect on the Conservation Area by way of the limited incursion into its setting. This would be most apparent in longer distance views of the Conservation Area from the north and in views out of the Conservation Area along Cambridge Road where the works would be closest and most perceptible at the location of the proposed signalised junction. The infrastructure itself, and the movements of vehicles using it, would cause some limited harm to the significance that the Conservation Area derives from its setting. [10.109, 12.3, 17.11, 18.130]

20.224 The landscape treatment of the busway corridor and the detailed treatment of the infrastructure in the vicinity of Cambridge Road has the potential to reduce these harmful effects and could be controlled by way of a condition should a direction to grant DPP be made.

West Cambridge Conservation Area

20.225 West Cambridge Conservation Area [3.8] covers an extensive area to the west of the City Centre characterised by a cohesive townscape of houses, colleges and University buildings with associated open spaces, many set within attractive and mature tree lined streets. As well as other parts of the City characterised by colleges and their grounds which adjoin it, important aspects of the Conservation Area's setting which contribute to its special character include the green open spaces of playing fields and undeveloped land to the west which provide for views into and out of the City Centre and form part of the transition from country to City and vice versa. The West Cambridge Conservation Area Appraisal ([CD18.03](#), pp 18, 29, 32 & 57) identifies notable and important views including from Rifle Range Road to the south west across open green spaces outside the Conservation Area and those from Cranmer Road over sports grounds in the other direction. [10.106, 18.6, 18.130]

20.226 Within the Conservation Area itself similar effects to those which would affect the Eskine Building, Elmside and 48 Grange Road [20.209, 20.212, 20.214], would also harm the character and appearance, and hence significance, of the Conservation Area as a whole. This too would be limited in extent considered in the context of the whole area, but with the potential for harm to be greater depending on the detailed design and configuration of the Scheme.

20.227 The proposed bridge over the Bin Brook and the embankments on either side [5.4] would be located immediately outside the Conservation Area boundary. The height, mass and extent of this structure would be a prominent feature in the otherwise flat topography of the open areas either

side of Bin Brook to the south. This would harmfully interrupt some of the views from within the Conservation Area both towards the south from properties along Herschel Road and would be an intrusive change in views from the vicinity of Cranmer Road.

- 20.228 The potential exists for the detailed design of the bridge, the treatment of the embankments' retaining structures and soft landscape proposals to be developed so as to go some way in mitigating these adverse effects. Nevertheless, the overall height and mass of the structure, along with vehicle movements occurring at an elevated height being perceptible from within and outside the Conservation Area, would have a moderately harmful effect on the significance that the Conservation Area as a whole derives from its setting. [10.109, 18.6, 18.130]

Conduit Head Conservation Area

- 20.229 Taking account of the contribution its setting makes to its significance and the configuration and effects of the of the proposal in the vicinity, we concur with the Applicant's assessment that there would be no harm to the significance of the Conduit Head Conservation Area [10.106].

Non-designated heritage assets

- 20.230 Although originally described as former lodges to Childerley Hall, only one of the buildings would appear to have that origin, the other being a former chapel [10.109] (appropriately known as Gate House and Chapelgate respectively). Although Gate House at least would appear to have been associated with Childerley Hall whose southern approach it sat next to, the Hall lies almost 2km to the north of the buildings, and its former southern approach drive has been severed physically and visually by the A428 and its flanking embankments and vegetation. The remaining short stub of road between the two buildings has an enclosed character as a result.
- 20.231 As well as historic interest in their own right and associations with the Hall and local community, the buildings' significance includes their architecture as a purpose designed element of a high-status landscape and a revivalist ecclesiastical building respectively. What significance they derive from their setting of the remains of the Hall approach and the trees and vegetation in their environs would be eroded slightly by the visual effects of the busway structure and the vehicles that would use it in an elevated position on the existing embankment to the north. The harm to significance to both buildings would be very limited. There is no suggestion that the proposal would have an effect on the significance of the listed Hall.
- 20.232 Leslie Barnet House, recognised as a Building of Local Interest, is an attractive property within Clare Hall whose significance largely results from its attractive late C19 Kentish vernacular architecture, history and materials [10.106]. It also derives some significance from its situation on Herschel Road where it both contributes to, and benefits from, the street scene and also from the relatively spacious grounds of the house and its neighbours to the rear giving a partly secluded and quiet setting. The minor noise impacts identified in the ES, along with some very limited visual intrusion through

increased vehicle movements would result in a minor diminution of its significance [20.209, 20.212, 20.214, 20.226]. However, its set-back situation relative to the proposed busway along with the largely intervening Brian Pippard Building which lies between it and Rifle Range Road, would mean that effects on its significance by way of changes in its setting would be very limited, as would the extent of any harm [10.109].

- 20.233 Although the Applicant's heritage witness ascribed less than substantial harm in these cases, that category of harm does not feature in the NPPF's policy relating to non-designated heritage assets. However, that does not alter our findings above which we note are similar to the extent of harm the Applicant has identified.

Heritage effects of CPPF & CPC alternative scheme

- 20.234 CPPF & CPC maintain that their scheme would not extend beyond the highway land along the boundary of the American Military Cemetery nor harm the Memorial listed building [12.38].
- 20.235 The RPG includes not only the cemetery itself but also the land to the south which includes the driveways to the south entrance and the verdant mature woodland character of the adjacent area embracing the car park. Paragraph 20.198 above explains that the listed Memorial's significance partly relies on its setting to the south. The stretch of Madingley Road which runs alongside the south of the Cemetery and its environs are consequently in a particularly sensitive location in terms of designated heritage assets, a context such that any alterations to the road's configuration in this location would need careful consideration.
- 20.236 Any incursion into the RPG itself which lies immediately to the north of Madingley Road would be regrettable and harmful in its own right. That harm to the RPG would increase, and extend to harming the significance of the listed Memorial, should it require the removal of the neat hedges alongside Madingley Road, have an adverse effect on the root protection areas of the mature trees, or require retaining structures or similar which the Applicant maintains would result from necessary changes in the road level [10.58, 10.66].
- 20.237 It appears very unlikely that an alternative scheme following the configuration advanced by CPPF & CPC would not impinge to some degree on the RPG or the setting of the Memorial [12.38, 17.15, 18.70], and harm those assets. However, it has been demonstrated that the alternative scheme would necessitate more extensive works to the north of the existing carriageway, and if they were to be of the nature suggested by the Applicant, they would result in limited to moderate harm to the significance of both the RPG and listed building.
- 20.238 Given the uncertainty of the exact details or the likely extent of any consequential implications such as level changes, it is not possible to conclusively assess whether any such effects would be insurmountable, incapable of effective mitigation, or whether there would be benefits to the Cemetery [14.13], nor the outcome of a balancing exercise of any harmful effects and any benefits of the alternative scheme. However, as an on-road scheme, some of the types of mitigation the Applicant proposes to mitigate

harm to different heritage assets elsewhere may not be possible or appropriate in this situation; for example restrictions on frequency, times or speed of buses, planting to filter or screen views, or a restricted palette for road markings.

- 20.239 In any event, the Applicant and CPPF & CPC do not disagree that the alternative scheme would cause less than substantial harm to the significance of the RPG [10.61, 12.38], a view that we share. Our assessment is that there would also be some harmful effects on the listed building, but that they would be less than substantial as well. These are factors that need to be considered in evaluating its implications as an alternative with regards to the acceptability of the Scheme.
- 20.240 What significance the grade II* listed Madingley Mill derives from its setting is largely in the form of its countryside and farmyard location, and its relatively conspicuous situation. Despite the Applicant's position [10.62] and its relative proximity to the highway, given the presence and current levels of use of Madingley Road to the south, any increase in the extent or width of carriageways and paths, associated level alterations or increase in vehicular use would be unlikely to materially harm its significance.
- 20.241 Given the potential international or diplomatic consequences that would go beyond the planning considerations in this case, it is not possible to form a view on whether the treaty implications identified by the Applicant could be overcome were there a proposed alternative that was otherwise acceptable. Nevertheless, the issue adds an additional level of complexity and the potential for delay to an alternative scheme in this location [10.62, 12.39].

Buried heritage assets

- 20.242 The effect on the significance of buried assets identified by the Applicant and the mitigation proposed are not matters in dispute [10.110]. With the proposed mitigation in the form of investigation and recording, no reason has been presented to consider that the effects would be unacceptable, and it is not a consideration that weighs against the proposal. It would, however, be necessary to attach a condition should a direction to grant DPP be made to ensure that an appropriate and timely programme of mitigation would be implemented.

Findings

- 20.243 The harm to significance that would be caused by the Scheme and is identified above would be less than substantial in the terms of the NPPF in the case of each designated heritage asset. The implications of this are considered in the balance below.
- 20.244 Considered overall, the Scheme would not sustain or enhance the special character and distinctiveness of the historic environment, nor the significance of heritage assets even allowing for proposed mitigation. Therefore, the Scheme would not receive the support that SCLP Policy NH/14 gives to development that would achieve those aims. Similarly, as the Scheme would not preserve or enhance the significance of the heritage assets, their setting and the wider townscape, including views into, within and out of a conservation area, the Scheme would not accord with criterion

a of CLP Policy 61.

20.245 Although SCLP Policy NH/14 makes reference to accordance with the NPPF, and criterion e of CLP Policy 61 introduces a consideration of public benefit where there would be harm, neither of these policies explicitly reflect the NPPF's approach of balancing harm to heritage assets with benefits. This reduces the weight that conflict with these policies carries.

Effect on statutory undertakers, statutory utilities and other utility providers (matter 5)

20.246 The Scheme would require a number of existing services, largely within the existing highway, to be diverted, including overhead and underground electricity cables, water and drainage pipes, gas mains and communications apparatus. The maintenance and access track would provide a utility corridor for both services required for the Scheme and for affected utilities, which would enable safe inspection and maintenance access without disrupting buses on the busway carriageway [10.144]

20.247 Schedule 11 of the draft Order makes provisions for dealing with the apparatus of statutory undertakers on land that would be acquired and streets stopped up as a result of the Order. Schedule 12 contains protective provisions in respect of statutory undertakers whose assets may be affected, Parts 1 and 2 of which deal with general provisions with parts 3 to 9 providing for named undertakers [1.12].

20.248 By the close of the inquiry the only outstanding objection in this regard was from AW&CW [18.23-18.25]. Other affected undertakers and utilities, including National Highways and Cadent Gas Ltd, resolved issues with the Applicant, including through protective provisions being amended in the draft Order and subsequently withdrawing their objections [1.12, 8.1, 8.7, 10.3, 10.144, 10.166, 18.14, 18.35].

20.249 The Order Lands overlap with areas identified for works associated with the Grafham to Cambridge pipeline and Fens Reservoir schemes, the latter including a new service reservoir at Madingley, with indicative pipelines crossing the route to the west of the existing reservoir [18.25]. Whilst some parties raised concerns about the potential for conflict between the various proposed infrastructure [13.12, 17.29, 17.47], these generalised concerns appear unfounded given that both AW&CW and the Applicant have indicated that they are confident that agreement would be reached on outstanding matters [10.166, 18.25] and that amendments to the draft Order were not anticipated to be necessary. The protective provisions in Parts 5 and 6 [10.166] of Schedule 12 of the draft Order would ensure that the scheme would not adversely impact on AW&CW's ability to carry out their undertakings.

20.250 Consequently, with the protective provisions set out in Schedules 11 and 12 of the draft Order, we do not consider that making the Order would have any unacceptable effects upon any statutory undertakers, statutory utilities or other utility providers, nor their ability to carry out their undertakings effectively, safely and in compliance with any statutory or contractual obligations.

Consistency with compulsory purchase guidance (matter 6).

Whether there is a compelling case in the public interest to exercise compulsory acquisition and use powers (matter 6a)

- 20.251 It is clear from the evidence before us (paragraphs 20.3 to 20.9 above) that the Order Scheme is intrinsically linked to national and local policy for development in Greater Cambridge which supports economic and housing growth [7.2 to 7.12]. Major development is focused within a necklace of settlements beyond the Green Belt, and strategic sustainable travel between the City and those locations is required to provide access to affordable housing and to support the economy of Cambridge, particularly given the importance of face to face meetings to drive innovation in the sectors in which it excels [11.12].
- 20.252 It is widely recognised that improvement of public transport on the A428/A1303 corridor is already needed, and provision of public transport links are required to enable strategic housing development sites at Cambourne West and Bourn Airfield to be fully implemented [7.5, 7.6, 11.9]. The Scheme would fulfil this need and in doing so would provide benefits in accessibility to jobs, housing and education and play a fundamental role in supporting social inclusion and reducing inequalities [11.14], delivering the existing spatial strategy for Greater Cambridge [11.9] and supporting that in the emerging Development Plan [7.17, 11.18]. It would complement EWR with potential for future connections with an envisaged North Cambourne railway station [7.17, 10.15, 10.45]. The improved accessibility to public transport would be enhanced by the P&R facility which would also assist in mode shift away from private cars underlying existing and emerging policy and allocations. The benefits that the Scheme would deliver are squarely in the public interest.

Remaining objections

- 20.253 Ms Gazeley, Coton Orchard Ltd and Houston Crest Properties Ltd contend that as the guidance mode has not been finalised, there is insufficient detail and certainty that the acquisition of land would be necessary and proportionate to the public benefit identified [13.6]. However, for the reasons set out at paragraphs 10 and 1.11 above we have considered the Scheme on the basis of the mode where the evidence has been sufficient to evaluate the effects of the Scheme. The evidence has also been adequate to enable a clear understanding of how the land would be used.
- 20.254 Having regard to the Mayor's position on future bus services [10.188, 10.189], notwithstanding his opposition to the Scheme, it is likely that a pragmatic approach to bus services and routes that may use the busway would be taken in light of the circumstances at the time. It is far from conclusive that services using the busway would be restricted to an extent that would prevent the Scheme from fulfilling its purpose. By the same token, it does not indicate that the bus routes and services actually using the busway would be likely to be so limited as to fail to deliver the public benefits that support the compelling case to acquire land [13.6].
- 20.255 As we have found, that there is no satisfactory alternative to the Scheme deliverable in a timely manner [20.56]. It has not been demonstrated that

there would be an alternative means of achieving the Scheme objectives, nor meeting the need for the transport solution that the Scheme would provide. Therefore, on the evidence available there is no alternative to the acquisition and uses of land necessary to deliver the Scheme.

20.256 Part of the objection from Ms Gazeley, Coton Orchard Ltd and Houston Crest Properties Ltd is that the contentious off-road section of the busway between Long Road and the M11 would not meet the threshold of regional or national benefit to demonstrate a public interest case. However, although that section is the focus of much of the opposition to the Scheme, whether there is a compelling case in the public interest to acquire individual parcels of land or rights, including those at Coton Orchard, is a matter that needs to be considered in the context of the whole Scheme and its overall need and any advantages or disadvantages.

20.257 Although maintaining a holding objection in relation to land, rights and interests owned by South Staffordshire Water and Cambridge Water, AW&CW have not indicated that there is any outstanding objection to the acquisition or use of land or rights that they own or occupy [10.165, 10.166, 18.23, 18.24, 18.25]

20.258 Consequently, these remaining objections do not dilute the need case for acquisition.

Whether reasonable efforts have been made by the acquiring authority to negotiate the purchase by agreement (matter 6a)

20.259 The CPP Guidance is clear that an Order should only be made where reasonable efforts have been made to negotiate the purchase of land by agreement⁵⁵⁵. The Applicant as the acquiring authority has provided details of the progress of negotiations with affected landowners and others with an interest in land, including where agreements had been completed, and those at other stages such as where terms had been agreed and negotiation was continuing. We note that agreement has been reached with a number of parties with land interests, including those with regulatory functions [10.3]. By the close of the inquiry six statutory objections had been withdrawn, with another indicating that they had no outstanding objections.

20.260 This demonstrates that in these cases, reasonable efforts have been made to negotiate purchase by agreement. Even with those parties who did not wish to engage, the Applicant had made some attempt to negotiate or make an offer.

20.261 Some parties have been particularly critical about the manner in which negotiations have been carried out [14.5 to 14.8, 14.23 to 14.33, 16.2, 16.5, 18.34]. The Applicant has accepted that there were shortcomings in the accuracy of records detailing engagement with the Sadlers [10.156]. However, even allowing for these, the Applicant 's records show that there have been some attempts to negotiate with the Sadlers, PX Farms Ltd and PX Land Ltd, and the Spearing family. Despite reaching an impasse with some owners, the Applicant has confirmed that an invitation to negotiate

⁵⁵⁵ Para 12.3.

remains open [10.155].

20.262 We agree with the Applicant that matters raised by PX Farms Ltd and PX Land Ltd about expenditure incurred, damage caused to land during surveys or the value of the land [16.3, 16.4], are appropriately matters for any compensation should the land be acquired, or through dispute resolution clauses in any access agreements between the parties [10.161]. Similarly, any adverse impact on farming or horticultural practices as a result of the acquisition of land or rights [13.4, 14.8, 18.31, 18.32] would be a matter to be appropriately addressed and dealt with if and when any compensation is assessed should the land be acquired [10.158, 10.160, 10.161]. These matters do not therefore have a material bearing on the case for compulsory acquisition.

20.263 Even if the Applicant has not conducted some negotiations with the sensitivity, courtesy or proficiency that parties may have expected, the evidence indicates that they have nevertheless adhered to the approach advocated in the DPP Guidance overall.

Whether there is sufficient justification for interfering with the human rights of affected parties (matter 6b)

20.264 The making of the Order would authorise the compulsory acquisition of land and rights over land, and would provide powers to use land temporarily for construction compounds and access to enable construction to take place. Where agreement with landowner and rights holders has not been achieved, the exercise of the powers in the Order would represent interference with the rights of natural and legal persons to the peaceful enjoyment of their possessions, under article 1 of the First Protocol to the European Convention on Human Rights, as incorporated into UK law by the HRA1998.

20.265 In light of our findings at paragraphs 20.279 to 20.289 below, all of the land included in the Order which would be subject to powers of acquisition or use is necessary to enable the Scheme to proceed.

20.266 Article 1 of the First Protocol is a qualified right where interference may be permissible in the public interest. The Scheme would contribute to a significant improvement in connectivity in the region, and an associated uplift in economic and social conditions. Those benefits could only be achieved if the land required for the development and its construction were available. Taking into account all material considerations, we conclude that interference with the rights of those persons whose property would be acquired is necessary and proportionate, and that the purposes for which compulsory acquisition powers are sought would justify that interference.

20.267 The acquisition of land at the Sadlers' farm would include a route regularly used by family members of different generations [4.1]. However, the proposals indicate that a means of access would be maintained by way of a crossing over the busway. Through conditions requiring approval of details, adequate measures would be in place to ensure that all crossings would be appropriately designed to ensure that they would be accessible for those with a disability, impairment and of different ages (condition 21), Annex 1).

20.268 We have had regard to our duties under the PSED and paid due regard to the need to advance the equality of opportunity and foster good relationships, between persons who share a protected characteristic and those who do not, as well as to eliminate discrimination and other conduct prohibited by the EA2010. The arrangements that would be in place should DPP be granted would provide for a means to ensure that users of different ages and abilities would be able to use the same crossing through inclusive design such that equality and good relationships between those who share protected characteristics and who do not would be maintained, and discrimination avoided.

Whether there would be any impediments to exercising the powers in the Order (matter 6c)

Funding

20.269 The capital cost of the Scheme was estimated at £192,284,900 in November 2024, which is the most up to date figure provided by the Applicant. £7,471,000 of this would be allocated for land and rights acquisition⁵⁵⁶. The core funding of the Scheme would be financed from the City Deal funds, of which £500 million has been confirmed by government. Financial contributions of at least £37 million would also be secured through planning obligations attached to major developments along the route which require the busway infrastructure to be delivered, including Cambourne West, Bourn Airfield, and West Cambridge [10.33].

20.270 The legal framework governing monies from those planning obligations should ensure that such funding is available for the projects identified or intended, which includes the Scheme [4.8, 4.10, 4.13, 10.48, 17.1]. The Applicant's Funding Statement ([CD1-07](#)) confirms that the CGP Executive Board have already approved a budget of £181 million in March 2024 for the Scheme, noting that Scheme costs would be monitored, revisited and further approval provided where necessary in light of cost revisions and current market uncertainty⁵⁵⁷. The Funding Statement concludes that the funds will meet the capital costs of implementing the Scheme, including compensation and acquisition costs in the event of a blight notice⁵⁵⁸. The approved budget confirms that a significant proportion of the funding should be available now or early in the process, with no indication that funding would not be available in a timely manner to ensure that the compulsory acquisition would be complete within the statutory timescales.

20.271 An objector has suggested that CCC and GCP may face budget or cashflow deficits, and that funding might be affected by local government reorganisation [13.11]. However, there is no substantive evidence to suggest that capital funding that has been budgeted for the Scheme would be adversely affected by any organisational revenue issues, nor that, given the anticipated timescales of the projects, that funding would be at risk with any changes in governance [10.33].

20.272 The Funding Statement anticipates further funding to be forthcoming from a

⁵⁵⁶ Estimate of Costs, WSP, November 2024 ([CD1-08](#)).

⁵⁵⁷ Funding Statement (Required by Rule 10(3)(a)), GCP, November 2024, para 3 to 6.3 ([CD1-07](#)).

⁵⁵⁸ *ibid.*, para 8.

major residential allocation proposed in the emerging GCLP for Cambourne West⁵⁵⁹. Whilst that contribution is not a commitment at the present time, it is clear that there is, in any event, sufficient funding available from City Deal and other monies, to meet the cost of the Scheme and that measures are in place to keep costs and budgets under review with a commitment to allocate further funds as necessary [10.35, 10.170].

20.273 Consequently, funding would not be an impediment to the Scheme going ahead.

Other potential impediments

20.274 In light of our conclusion on the acquisition and replacement of two plots of open space land provided for in the Order at paragraph 20.307 below, the inclusion of these areas of open space in the BoR would not be an impediment to the powers which would be contained within the Order.

20.275 The implementation of EWR, particularly as it would pass under the busway in a mined tunnel where the two would cross, would mean that it would be unlikely that a physical, timing or phasing impediment to implementing the Scheme would occur [10.140, 18.57]. Similarly, although the Order Limits overlap with the planned routes of water supply improvement infrastructure in the vicinity of Madingley Service Reservoir, AW&CW's submission confirms that their proposals would not delay or impede delivery of the Scheme [18.25]. Neither body has an objection to the principle of the scheme [18.23, 18.54]. Although reference has been made to restrictive covenants on land formerly owned by the National Trust [14.2], as the Trust have confirmed that they have agreed to disapply these, this would not be an impediment to the Scheme.

20.276 Objectors [13.10, 15.10] have pointed to the prospect of increased powers and functions for combined authorities, the anticipated lifetime of the GCP and future local government reorganisation which may replace CCC, albeit that should the latter occur, no inherent barriers to delivery by a successor organisation have been identified. In any event, article 48 of the draft Order provides for CCC as the undertaker of the works to transfer interests with the SoS's consent.

20.277 Whilst the potential exists for the priorities of authorities to change and for bodies taking on new or enhanced roles to also take different approaches, the commitments from government including the extent of City Deal funding pledged mean that any impact of such changes on the implementation of the Scheme can be little more than speculation at this time in the context of national and regional priorities. We note that, although opposing the scheme, the Mayor recognised [10.22] the need for a transport scheme such as the Scheme or an equivalent to facilitate growth at Bourne Airfield and Cambourne. Changes in governance in themselves would be unlikely to be a realistic impediment to the Applicant, or any successor, in implementing the Scheme.

20.278 From the evidence presented, there is no indication that the requirement to

⁵⁵⁹ *ibid.*, para 7.

obtain any other consents or licences would lead to any legal impediments to implementation.

Whether all the land and rights to be acquired are necessary to implement the Scheme (matter 6d)

20.279 Article 23 of the draft Order ([CD1-02h](#)) would provide the powers for compulsory acquisition, with articles 28, 29 and 30 providing powers for the temporary use of land [5.5]. Article 26 provides powers for the acquisition of rights over land, with the plots detailed in Schedule 7. Amongst other provisions, article 23 provides for rights to be acquired by agreement on plots which are not to be compulsorily acquired between Stirling Way and Broadway at Cambourne and between the M11 and Ada Lovelace Road in Cambridge, set out in Schedule 6. This approach in the draft Order means that in those circumstances land would not be acquired unnecessarily, illustrating that a proportionate approach has been adopted in identifying the extent and duration of acquisition and use of land or rights.

Land at Bin Brook

20.280 The Applicant has provided sufficient justification [10.146] to demonstrate that the extent of land they seek to include alongside Bin Brook between the Gough Way housing estate and Rifle Range Road (plot 16-179) is necessary as an integral element of the flood mitigation measures required as a result of the proposed bridge construction.

Access and maintenance track

20.281 In the road-based configuration proposed, the carriageway itself should present no particular physical impediment to other vehicles using it. Given the anticipated frequency of buses using it, there would also appear to be few situations where the closure of part of one lane, for example to recover a broken down bus or carry out works within the carriageway, would have a material effect on the free flow of buses even if they had to manoeuvre around such obstacles. The circumstances where a bus or buses would effectively block the carriageway such that other buses or emergency vehicles could not pass would appear to be very limited. In the case of emergency access, it would appear likely that access could be gained from one of the points along the route where it intersects with the road network such that they could reach an incident from both directions [12.30].

20.282 However, given the aims of the project, it would be appropriate and necessary to design the scheme to minimise the opportunities for any delay or interruption in services along the busway. Even though the likelihood of circumstances where the busway would be impassable would be low, if it did occur the potential effect on the health and safety of all users could be severe, thereby making it a higher risk. Providing a service corridor under the track would ensure that any access required for inspection, maintenance or repair which could otherwise see part of a carriage way lane closed for some time, would avoid any interruptions [10.151]. Even though emergency access could be achieved along the carriageway, were a serious incident to occur, having a separate track would make providing a safe route for evacuation considerably easier to provide in an emergency situation, particularly if a number of different emergency vehicles were on

the scene.

20.283 At some locations, parts of the track would provide the safe route necessary to enable users to walk to and from bus stops. Furthermore, we have found the day-to-day use of the track as an active travel route would be a benefit of the Scheme, further encouraging mode shift, supporting combined active travel and bus trips and providing a complementary addition to a choice of routes for journeys between Cambourne and Cambridge, and destinations in between. There would also be a safety function by providing a segregated route for pedestrians and cyclists to use. Despite any signage or prohibition to do so, the two lane road configuration and conventional appearance of the busway may make it more likely to be used by pedestrians and cyclists, putting them in conflict with buses, without a track to provide a segregated and safe route. Considering the Scheme as a whole, the inclusion of the access and maintenance track would be necessary for a road-based sensor guidance busway mode, and it follows that the inclusion of sufficient land to provide it would be necessary too.

20.284 Therefore, the access and maintenance track forms an integral part of the Scheme. Although not the principal piece of infrastructure on which the guided transport system would run, it would be necessary for its operation and can reasonably be considered as ancillary to it. The evidence does not point to the access and maintenance track falling outside of the scope of a TWA1992 Order [10.147, 10.148, 12.31].

Land at Scotland Farm

20.285 One of the aims of the Scheme includes the delivery of a P&R facility at Scotland Farm [10.6]. It would be reasonable for the facility to cater for charging for plug-in vehicles in light of national and local policy aimed at providing infrastructure to encourage and promote low emission vehicles⁵⁶⁰ and it is typical that charges are made for the use of such facilities. There is no convincing evidence to support PX Farms Ltd and PX Land Ltd's assertion that the inclusion of such a revenue generating element would be outside the scope or aims of the Scheme [16.1].

20.286 Although PX Farms Ltd and PX Land Ltd contend that more land than is reasonably required for the P&R facility is sought [16.1], this is unsubstantiated. The drawings show that the Order Limits in and around Scotland Road are relatively tightly drawn around the existing carriageway, the proposed car parking area with its landscape buffer that we have found to be necessary as part of the mitigation of its effects at 20.103 above and an attenuation pond, with no obvious areas of superfluous land. In the absence of convincing evidence to the contrary the extent of land to provide the facility along with access, landscaping and drainage works, would be necessary to implement the Scheme.

Land at Childerley Gate

20.287 There has been no elaboration upon why landowners consider that insufficient justification has been given for the acquisition of land adjacent

⁵⁶⁰ NPPF paragraph 112 e) and SCLP Policy SC/12-6i.

to Childerley Lodge and Chapelgate, nor what their suggestion is as to how elements of the Scheme might be implemented with less permanently acquired land [10.164, 18.26]. Given the anticipated extent of works in the vicinity of the properties, including the construction of a retaining structure and enhanced planting which would be necessary for mitigation (see paragraph 20.100 above) as illustrated on the proposed drawings and sections⁵⁶¹, the extent of land to be included between the A428 and Childerley Lodge does not appear to be excessive. Indeed, the Order Limits in this location are tightly drawn relative to the works immediately north of that property. The area to the west of Chapelgate (plot 4-050) is identified for temporary use for a construction compound⁵⁶², with no substantive evidence that its extent would be too great given its intended purpose.

Land east of Hardwick

20.288 The Spearing family's concerns about access to their land should intervening plots be acquired and developed would appear to be addressed by the proposed drawings which show a crossing of plot 11-120 to the south of Madingley Road [18.32]. The drawings also indicate new private means of access being created to fields in the vicinity of Long and St Neots Roads which would provide access to fields that would become separated as a result of the Scheme [10.163, 18.31].

20.289 Concerns about the effects of severance or fragmentation of land on its utility [10.163, 14.17, 14.18, 18.31] would be matters to be addressed in deciding appropriate compensation should the land be acquired, and not a matter that would materially influence the acceptability of the acquisition of land and rights. The legislation provides an approach for situations where an owner objects to the division of their land where they consider that it would cause material detriment to their retained land. However, should they wish to do so, this is a discrete process to be pursued separately to that of considering whether land or rights should be acquired.

Conclusions on compulsory purchase

20.290 It is important for the future economic and social wellbeing and success of Greater Cambridge that the Scheme proceeds, and there is a compelling case in the public interest to acquire and use land for the purposes of the Order Scheme. The land and rights over land included in the draft Order are necessary to implement the scheme, and reasonable efforts have been made to negotiate the purchase of land by agreement. It is noteworthy that those parties which have raised objections do not oppose the principle of improving public transport between Cambourne and Cambridge. Taking into account all material considerations, we conclude that interference with the rights of those persons whose property would be acquired is necessary and proportionate. There are not likely to be any impediments to implementing the Scheme.

⁵⁶¹ Deemed Planning Drawings: Proposed Site Plans, Sheet 4 ([CD16.04a](#)) and Proposed Site Sections, Sheet 2, Section 08 ([CD1-16.05](#)), and ([CD1-12.01a](#)).

⁵⁶² Deemed Planning Drawings: Construction Compounds & Site Access, Sheet 4 ([CD1-16.07a](#)).

Acquisition of Open Space Land (matters 8, 9, 10 and 11)

- 20.291 The two plots of open space that would be acquired [5.5] are a pair of linear strips situated along the east side of the M11 where the motorway is set down in a cutting. One of the plots includes a section of bridleway 39/30 running from Madingley Road down to the existing footbridge over the M11 (see Figure 3). They are part of a much larger area of designated open space that was classified in 2011 as *natural and semi-natural green space* and identified as being of environmental rather than recreational importance⁵⁶³. Using the same criteria, the Applicant assessed [10.171] the quality of the open space land as being lower than the 2011 assessment, noting its lack of maintenance, low levels of natural surveillance, absence of lighting and no signs of being used by visitors beyond the bridleway, amongst other considerations [10.174].
- 20.292 Other than the route of the bridleway, the verges are overgrown and the other land is dominated by dense scrub and small trees rendering it difficult to access and unsuitable for most recreational activities. Although the vegetation and its relative inaccessibility contribute to its value as a habitat, it limits visibility such that the land has an uncomfortably isolated atmosphere even with the bridleway passing through, albeit affording bridleway users a natural setting through which to pass.
- 20.293 The proposed exchange land would consist of a strip made up of two plots at the edge of an open grass meadow bounded by trees. The proposals illustrate the exchange land forming part of a larger area of open space partly encircling a retention basin [5.5] (see Figure 4). It would be on the opposite side of the M11, close to the western abutment for the proposed bridge and would be accessed via the active travel route running on the emergency and maintenance access track. The Applicant proposes that the area would be planted with trees and species rich grassland along with informal seating and wayfinding features. The plans illustrate the provision of a private access to private land to the south through which existing informal routes connect Rectory Farm with the existing bridleway which runs between Coton and the existing M11 footbridge.
- 20.294 The criteria by which the SoSHCLG would need to be satisfied to issue a certificate for the replacement open space are set out at paragraph 2.4 above, reflecting section 19(1)(a) of the ALA1981 that the exchange land should be no less in area and equally advantageous as the land to be taken.

Area of land

- 20.295 At 1,006m² the proposed replacement open space would be 2m² larger than the open space plots to be acquired. Consequently, the exchange land would be not less in area than the open space to be acquired [10.173]. That the size of land would meet the area criteria was not a matter of dispute from those objecting to the issuing of a s19 certificate [9.4, 12.44, 17.49].

Equality of advantage

⁵⁶³ The Cambridge Open Space and Recreation Strategy 2011, cited in the Application for certificate regarding open space, Appendix 10: Open Space Assessment, para 5.4.1 and 5.4.5, p28 (PDF 212) ([CD1-22](#)).

- 20.296 The exchange land is not currently used by the public for recreational purposes and would therefore avoid being considered as disadvantageous in that regard. The CPP guidance confirms that replacement land does not need to have the same character and features as the order land and that the advantages it offers may not be the same either. However, the guidance points out that the advantages offered by the replacement land may be *sufficient to provide an overall equality of advantage* with those provided by the existing open space [10.172].
- 20.297 The Applicant focuses on the replacement land's accessibility as a result of the Scheme as to why it was selected from potential options. They consider it would provide an equality of advantage, including having regard to its location and access proposals, the degree of natural surveillance that would be achieved, its landscaping being better for recreation than the scrub on the open space and its greater separation from the M11 making it a quieter place [10.174, 10.175]. It is reasonable to take into account the exchange land and its context as part of the Scheme in considering its advantages and disadvantages compared to the existing open space. Consequently, its current inaccessibility and seclusion, and comparatively limited habitat provision, do not necessarily count against any equality of advantage it may have [9.4, 17.49].
- 20.298 The replacement open space would rely on links to the active travel track for its public access, which bearing in mind our findings at 20.54 above would be an integral part of the Scheme [12.44]. There is no indication that any users of the proposed public open space would have access to informal routes across private land to south. However, this is more of a missed opportunity rather than an inherent disadvantage. The exchange land's immediate adjacency, and proposed short link, to the active travel route alongside the busway would ensure that it would be accessible by a range of active travel modes. The route would enable linkages to a wider network of PROW and other routes. This would include connections to bridleway 39/30 alongside the east side of the M11 and the road and footway network at West Cambridge nearby, and to the west, the footway alongside Cambridge Road linking Coton and Madingley Road, as well as the entire length of the active travel route beyond in both directions.
- 20.299 The exchange land would, therefore, be at least as accessible to get to by walkers and cyclists as the current open space, if not more so. As the proposed treatment would avoid dense scrub or similar planting on the land itself, it would also be more accessible for use by the public.
- 20.300 Whilst the habitat value of the current open space would not be reproduced in the same form on the exchange land, the proposed location would be close to areas of woodland and be set within a larger area where habitat and biodiversity enhancement can take place [17.49].
- 20.301 CPPF & CPC contend that the access and maintenance track is not required, and as such the open space would not benefit from any accessibility or surveillance it would offer [12.44]. However, given our findings at 20.54 above in relation to the track, this is not an argument that can be supported. The presence of a pond close by on the eastern side would not necessarily pose a risk to safety if well designed and managed, and this

feature has the potential to contribute to a setting to the replacement land that could be both visually attractive and provide interest through attracting wildlife.

- 20.302 CPPF & CPC's argument that land owned by CPPF to the south of the open space on the same side of the M11 would be preferable [12.44] is not well founded. Even if an alternative site were considered better in several respects than the proposed exchange land, that would not mean that it should necessarily be chosen in preference. This is because the test is that replacement land should be equally advantageous to that to be lost in a manner outlined in the government guidance, and not that it has to be more advantageous in some respects.
- 20.303 In any event, CLP policy requirements for the loss of open space (see paragraph 20.306 below), which include potential betterment and proximity as criteria, are a separate consideration to that governing consideration of a s19 certificate [2.4, 10.179], such that the locational and proximity arguments put forward by objectors are less pertinent in this respect [9.4, 12.44, 17.49]. The indicative configuration of the replacement open space, its wider open space context and its arrangement relative to the busway and active travel route would provide the basis for good levels of natural surveillance and the deterrence of anti-social behaviour, something the current open space does not achieve [12.44].
- 20.304 The provisions of article 36 of the draft Order ([CD1-02h](#)) would require that the exchange land must be acquired before the open space, that it is laid out as open space within a year of the Scheme coming into use and that the LPA have certified its satisfaction with the provision and lay out of the replacement open space. It would also require the exchange land to be vested, or offered for vesting, in the open space landowner and subject to the same rights, trusts and incidents that are attached to the current open space land.
- 20.305 All this leads us to consider that the proposed exchange land would be equally advantageous as an area of open space as the land to be acquired.

Planning policy

- 20.306 The above findings confirm that the lost open space would be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard and the location would be within a short walk over the proposed M11 bridge of from the original site. Consequently, the loss of this area of open space would accord with the exception criteria in CLP Policy 67 [10.179]. These replacement and reprovision circumstances would also accord with NPPF paragraph 104(b).
- 20.304 In addition to the public open space classified as special category land, the Scheme would also result in the loss of two areas of land which are designated as open space within the CLP, one the area of woodland immediately to the east of the Open Space Land and the other part of land to the west of the University Rugby Club practice pitch, together amounting to an area of around 4,300m². Replacement space is proposed adjacent to the exchange land referred to above (para 20.293). Taking into account the current limited extent of accessibility to both existing areas, the proposed

area would be more accessible and would comply with CLP Policy 67. We agree with the Applicant's Open Space Assessment [10.171] that the effect on the sports facilities at the practice pitch would not lead to a conflict with CLP Policy 73 or NPPF paragraph 104(b).

Conclusion

- 20.307 For the above reasons the tests of s19(1)(a) and schedule 3, paragraph 6(1)(a) of the ALA1981 are satisfied and it would be appropriate for a certificate to be granted to this effect

Other Matters

- 20.308 The construction of the busway would result in the permanent loss of about 39ha of the BMV agricultural land [10.183]. However, the ES indicates that this higher quality land extends beyond the route of the busway, and the Scheme has been designed with crossing points and access arrangements to facilitate continued agricultural use of land affected by the proposal. Consequently, although the loss of BMV land would be an adverse effect of the Order Scheme, it is one which only carries limited weight.
- 20.309 Parts of the route lie within MSAs [7.8]. Policy 5 of the MWLP does not preclude development in such locations, but where it does not fall within certain specified categories (as is the case here), an overriding need for the development should be demonstrated. That is a matter we consider in our overall conclusions.
- 20.310 The inquiry heard that the ashes of deceased members of the Sadler family are buried in one of the fields through which the route of the busway would pass [14.4, 14.5]. The presence of deceased family members' ashes buried on land that would be acquired is a very sensitive matter. However, despite the communication issues reported by Mr Sadler, the Applicant is aware of the sensitivity, their location has been established, and the carriageway would not appear to directly interfere with the site, although it would be within the Order Limits. If the ashes are to remain in their burial place, careful consideration will be required as to how the landscaping to the north of the carriageway would be designed and treated so as to respect the sensitive location and achieve appropriate mitigation. However, there is no convincing reason why this could not be achieved in preparing the detailed design.
- 20.311 An objector raised extensive concerns about the governance of the project [17.51]. The submissions to the inquiry are extremely critical of the way in which the project has been promoted by CCC and the GCP, and of the involvement of the University of Cambridge. These matters fall outside the scope of our consideration of the Order Scheme, and such concerns should be pursued separately from the inquiry process.

Conditions

- 20.312 We have had regard to the Applicant's suggested conditions and those suggested by other parties [10.87 19.3 to 19.6], as well as the discussion about conditions at the inquiry which included the potential for alternative wording and additional conditions. As appropriate, the wording of suggested conditions has been amended to satisfy the NPPF tests and guidance in the

PPG, including combining requirements in a single condition where this would provide clarity or avoid duplication. Those conditions we consider would be necessary are set out in Annex 1 to this report. For ease of reference the reasons why they are considered necessary are provided after each condition.

- 20.313 It would be necessary to include specific provisions for the preservation of the significance of the grade II* Erskine Building during construction and in the detailed design of infrastructure and landscaping and this requirement would be appropriately incorporated in the relevant conditions. As a condition would require approval of a CoCP and LEMPs, it would not be necessary to impose a separate condition (DC13) requiring a plan for the demolition of the Atlas Building. It is not necessary to include any caveats to enable the LPA to agree an alternative to details, and therefore it is not necessary to include a condition setting out the circumstances of such agreements (DC35).
- 20.314 In the particular circumstances of the likely construction effects of the proposal and the need for the development to accord with mitigation that supported the ES's conclusions, it is necessary in the interests of clarity and certainty for a number of conditions to be explicit in specifying the essential constituent plans and measures, including the condition requiring LEMPs [10.134]. However, it has not been demonstrated that some other conditions require to be prescriptive when the submission and approval of a suitable scheme would ensure that details necessary to be approved can be provided.
- 20.315 A condition securing a LEMP would include a requirement for a CTMP. Whilst it would be overly prescriptive to specify particular businesses as consultees, the condition will enable the CTMP to ensure appropriate liaison and publicity in respect of construction traffic effects on the existing road network [18.78, 18.79]. The LEMP condition's dust and air quality management requirements would put in place a requirement to implement and monitor measures [17.46, 19.6]. The position of temporary construction haul roads would be capable of being controlled by a condition requiring access details to be approved [17.46, 19.6].
- 20.316 We have not included the suggested allowance for start-up and close-down activities outside of permitted construction hours (DC33) as this would be imprecise, difficult to enforce and lack certainty for contractors and residents.
- 20.317 Exceptionally, in light of potential effects on protected species and a SAC, flooding and a grade II* listed building, it is necessary that Natural England [18.21, 19.3], Historic England and the Environment Agency [19.3] are consulted on details submitted to discharge conditions dealing with mitigation of effects on those species, the asset and on ground water. In other circumstances it would be proportionate and sufficient for information submitted to discharge condition to evidence engagement with other bodies.
- 20.318 As well as ensuring bus operations on the busway avoid disturbance to residential occupiers, a condition limiting and restrict use at particular times during the night would include mitigation of such effects on Clare Hall

[18.39, 18.40]

- 20.319 It is necessary that conditions requiring investigation of any contamination and archaeological remains within the site are pre-commencement conditions, and it is also necessary that particular details are required to be approved before work on a particular phase can commence in order that the effect of the conditions are not negated by work commencing before details are approved. We have been presented with no reason to disagree with the Applicant's view that the requirement to obtain approval of wording on pre-commencement conditions is not engaged in this case [19.2].

Overall Conclusions

- 20.320 The Order Scheme for a guided busway between Cambourne and Cambridge is intrinsically linked to national and local policy for development in Greater Cambridge which supports continued growth. To safeguard the character of the City and its setting, the spatial strategy which underlies Development Plan policy promotes major development at locations beyond the Green Belt, linked to the City by sustainable travel options.
- 20.321 Several major development sites are situated between Cambourne and Cambridge, and there is widespread recognition, including by objectors to the Order, of the need to improve public transport on this corridor. In addressing this need, the Scheme would play a fundamental role in supporting the spatial strategy for Greater Cambridge. It would reduce journey times and the reliability (to the eastern end of the busway) and frequency of services would be improved. Accessibility to bus services would be enhanced by provision of the P&R facility, and the busway would complement the EWR with expected links to a new rail station at Cambourne. That is an important package of benefits which carry substantial weight, notwithstanding that the Scheme would not address congestion in Cambridge beyond the end of the busway.
- 20.322 The provision of improved public transport links between Cambourne and Cambridge would bring benefits in accessibility to jobs, housing and education, and would also support person to person contact, a key consideration in the local innovation ecosystem. We expect that the transport benefits would facilitate a significant shift in mode away from use of the private car for journeys to and from Cambridge, consistent with policy intentions for sustainable travel. Improved public transport links are linked by condition and planning obligation respectively to the major residential sites at Bourn Airfield and Cambourne West. The Scheme would enable these developments to be fully implemented: these benefits accord with the spatial strategy and the promotion of growth in Greater Cambridge and merit substantial weight.
- 20.323 Whilst we recognise that there would be an associated uplift in land value from implementation of major development, that is a factor which is susceptible to change and the economic benefit merits moderate weight. The opportunity for active travel to take place along the emergency and maintenance track, enhancing sustainable travel options, carries substantial weight. Other benefits which would arise from the Scheme are an improvement in air quality and noise due to modal shift, and BNG. The improvement in air quality would be limited and merits limited weight. As

for BNG, whilst the intention is to secure at least 10%, further assessment is required, and this benefit carries moderate weight.

20.324 We have had special regard to the desirability of preserving the settings of the listed buildings considered, and, where appropriate, any features of special architectural or historic interest which they possess. Construction of the proposed busway would cause harm to the significance of the following listed buildings: the Erskine Building at Clare Hall, Elmside and 48 Grange Road in Cambridge, and the Schlumberger Gould Research Centre in West Cambridge. The significance of Coton and West Cambridge Conservation Areas would also be harmed. We have paid special attention to the desirability of preserving or enhancing the character or appearance of these conservation areas.

20.325 In no case would more than moderate harm be caused to the significance of any of these assets, and in each case the harm would be less than substantial: nevertheless the assets' conservation, and therefore the harm that would be caused, carries great weight. Paragraph 215 of the NPPF requires that harm to the significance of designated heritage assets be weighed against the public benefits of the proposal. Construction of the guided busway is a key infrastructure project in Greater Cambridge which aligns with national and local imperatives for growth. It would lead to a series of public benefits identified above (para 20.321-20.323), which for the most part carry substantial weight, and clearly outweigh the at most moderate extent of harm to the significance of the designated heritage assets, even giving considerable importance and weight to that harm. The proposal would also cause some limited harm to the significance of the non-designated heritage assets of Gate House and Chapelgate at Childerley Gate and to Leslie Barnet House at Clare Hall: that too would be clearly outweighed by the benefits of the Scheme, having regard to paragraph 216 of the NPPF.

20.326 Because of flood risk in the vicinity of Bin Brook, this is a case where application of the exception test in paragraph 178 of the NPPF is required. We have found that that the Order Scheme would not materially increase flood risk, and that it would be safe for its lifetime and would not increase flood risk elsewhere in accordance with paragraph 178(b) (above, para 20.151). Paragraph 178(b) requires that the development would provide wider sustainability benefits to the community that outweigh the flood risk. The magnitude of fluvial flood events with the Bin Brook bridge in place would be minimal, both in terms of depth and extent of floodwater and a surface water strategy would avoid any increase in risk from surface water flooding (above, para 20.149 & 20.150). The Order Scheme would improve accessibility for communities in the Cambourne to Cambridge corridor, and would provide significant sustainable travel infrastructure in support of the spatial strategy. These wider sustainability benefits clearly outweigh the limited flood risk associated with the project.

20.327 Paragraph 193(c) of the NPPF explains that development which would result in the loss or deterioration of veteran trees should be refused unless there are wholly exceptional circumstances and a suitable compensation strategy exists. We note that footnote 70 of the NPPF specifies infrastructure projects where the public benefit would clearly outweigh the loss or

deterioration of habitat as an example of wholly exceptional reasons: the public benefits associated with the infrastructure project of the guided busway and identified above (para 20.321-20.323) amount to such wholly exceptional reasons. However, a suitable compensation strategy is not in place, and the proposal would conflict with the second limb in paragraph 193(c). Bearing in mind the potential for a suitable strategy to be prepared and secured by condition, we consider that this conflict carries little weight.

20.328 Sections of the guided busway would be in the Green Belt, and would amount to inappropriate development. In accordance with paragraph 153 of the NPPF, that Green Belt harm carries substantial weight. To that Green Belt harm must be added the harm to designated and non-designated heritage assets, the limited flood risk, noise during the construction period which carries moderate weight, the adverse effect on the living conditions of residents of Childerley Gate and Herschel Road, which with mitigation merits limited weight, the minor inconvenience of diversions to FP 55/2 and bridleway 39/30, permanent harm to Coton Orchard CWS and the potential for harm to the veteran trees there, both considerations which carry substantial weight, little weight to the conflict with paragraph 193(c) of the NPPF, harm to other wildlife sites and habitats which has moderate weight, at most moderate harm to aspects of the character and appearance of the area, and limited weight attributable to the loss of BMV agricultural land. As mentioned above (para 20.321 & 20.322), the Order Scheme would produce an important package of transport benefits, and would be fundamental to implementation of the spatial strategy for Greater Cambridge. These benefits carry substantial weight and the harm to the Green Belt and the other harms resulting from the proposal would be clearly outweighed by other considerations. Consequently, we conclude that very special circumstances exist to justify inappropriate development in the Green Belt.

20.329 Two areas of open space would be affected by the provisions of section 91(1) of the ALA1981. Exchange land of slightly greater size and of equal advantage would be provided, and the loss of the existing open space does not represent an impediment to the Scheme.

20.330 We have already referred to the alignment of the Order Scheme with the spatial strategy for Greater Cambridge (above, para 20.320). Policy 5 of the CLP and Policy T1/2 of the SCLP refer to the greater use of more sustainable forms of transport. Specifically, the proposal would comply with Policy 14 of the CLP which requires the provision of necessary infrastructure to support major development, and Policies SS/7 and SS/8 of the SCLP, which seek good quality bus links in connection with the development of the sites at Bourn Airfield and Cambourne West respectively.

20.331 Policies 4 of the CLP and S/4 of the SCLP refer to the NPPF in respect of development in the Green Belt. Given our conclusion that very special circumstances exist to justify inappropriate development in the Green Belt, the proposal would be consistent with these policies. It would also comply with Policy NH/3 of the SCLP, since sustainability considerations and the need for the development (to support growth and the Development Plan spatial strategy) would outweigh the irreversible loss of BMV agricultural land. As there would be some adverse effect on the character and

appearance of the area, the proposal would not comply with Policy NH/2: similarly it would not be consistent with Policies NH/5 and NH/7 concerning sites of biodiversity importance and veteran trees. Because of the effect on heritage assets there would also be non-compliance with Policy 61 of the CLP. The proposed busway would, though, be consistent with the provisions of Policy 35 of the CLP which seeks to avoid significant adverse effects to health and quality of life, and with Policies 36 of the CLP and SC/12 of the SCLP concerning air quality. There is an overriding need for the development, which is important to the continued growth of the Greater Cambridge economy: it would, therefore, comply with Policy 5 of the MWLP concerning MSAs.

- 20.332 The most important policies in this case are those concerning sustainable transport and major development sites, with which the Order Scheme would be aligned. We find that the proposal would be consistent with the Development Plan considered as a whole.
- 20.333 The PSED set out in section 149 of the EA2010 requires, amongst other matters, that a public authority must have due regard to the need to eliminate discrimination, and to advance equality of opportunity between persons who share a protected characteristic and those who do not share it. Concern has been expressed about the effect on air quality and its implications for a person with a disability. We have found that in this case, with appropriate mitigation, the Scheme and its construction would not harm the interests of persons who share a protected characteristic including disability or impairment, nor would it have any adverse effect on the equality of opportunity, or the relationships, between such persons and persons who do not share a protected characteristic, such that there would be no breach of the PSED.
- 20.334 The Order Scheme is crucial to securing sustainable development on the west side of Cambridge. There are no practical alternatives to the proposals before us. Accordingly, we have found that the purposes for which land and rights would be acquired and the benefits of the Scheme justify interfering with the human rights of those with an interest in the land affected, under the provisions of the European Convention on Human Rights as incorporated into UK law by the HRA1998. We have considered the proposal on the basis on which it has been presented, that is for a guided busway employing sensor guidance, and not including other forms of guidance. The definition of guided busway in the draft Order should reflect that situation.
- 20.335 For the reasons given above, and having regard to all matters raised, we conclude that the benefits which would flow from the proposal clearly outweigh the harms which we have identified. There is a compelling case in the public interest to acquire and use land for the purposes of the Order Scheme.

21. RECOMMENDATIONS

To the Secretary of State for Transport

21.1 We recommend that:

- i) The Cambourne to Cambridge Order 202() be made in the form

shown in Core Document 1-02h subject to:

the replacement of the definition of guided busway in article 2(1) with:

"guided busway" means a way provided for the use of vehicles which are constructed or adapted to carry more than 8 passengers for hire or reward and use the mode prescribed in article 2(g) of the Transport and Works (Guided Transport Modes) Order 1992(b);

and the insertion of *guided* before *busway* in line 1 of the text relating to Work No 1 in Schedule 1.

- ii) An amended Book of Reference for the Cambourne to Cambridge Order 202() be required from the Applicant, in the form shown in Core Document 1-13.03, and reflecting any change in the interests in land at Bourn Airfield of Anthony Simon Taylor, Leonard Dovell Taylor and Thomas William Taylor, and of Juniper Propco (Bourn) Ltd.
- iii) A direction be made under section 90(2A) of the Town and Country Planning Act 1990 to the effect that planning permission be deemed to be granted for the works authorised by the Order, subject to the conditions set out in Annex 1 to this report.

To the Secretary of State for Ministry Housing, Communities and Local Government

21.2 We recommend that:

- i) A certificate be issued under section 19(1)(a) of the Acquisition of Land Act 1981 in respect of plots 14-153 and 14-154 to the east of the M11 motorway, Cambridge.

Richard Clegg and Geoff Underwood

INSPECTORS

ANNEX 1 – SCHEDULE OF RECOMMENDED CONDITIONS RELATING TO THE REQUEST FOR A DIRECTION FOR DEEMED PLANNING PERMISSION

INTERPRETATION

In the following conditions:

The development: means the works specified in paragraph 3 of The Cambourne to Cambridge Order - Request for Deemed Planning Permission, November 2024 (CD1-14.01).

The environmental statement: means the environmental statement comprising the Environmental Statement, Appendices and Technical Reports and their Appendices and Reports and Environmental Statement (Addendum) (June 2025), Environmental Statement (Addendum 2 and Clarifications) (July 2025) and Environmental Statement (Addendum 3 and Clarifications) (November 2025).

The Order: means The Cambourne to Cambridge Order 202[X].

The Order Limits: means the limits of deviation and the limits of land to be acquired or used and shown on the Works and Land Plans.

The approved planning direction drawings: means the drawings, plans and details referred to in condition No 2 and set out in Annex 2 of this report.

CONDITIONS

Commencement of development

- 1) The development hereby permitted shall be commenced not later than 3 years from the date on which the Order comes into force.

Reason: To ensure that the works are commenced within a reasonable period of time.

Approved plans

- 2) The development hereby permitted shall be carried out in accordance with the approved planning direction drawings.

Reason: To provide certainty.

Development Phasing Plan

- 3) No development shall commence (including any intrusive site investigations and demolition) until a Development Phasing Plan setting out the sequence of delivery of the development has been submitted to and approved in writing by the relevant local planning authority. The Development Phasing Plan shall include a proposed sequence for providing detailed design of the following elements and areas including, where appropriate, the securing of any necessary consents, licences or permissions:
 - i) areas marked on the approved planning direction drawings "Area of Design to be Executed by Developer";

- ii) enabling works including tree and hedge protection, haul roads, site compounds and accesses, archaeology and site investigations;
- iii) proposed site compounds;
- iv) landscaping; and
- v) any other building or structure, or alteration to an existing building or structure, for which details of scale and external appearance were not provided as part of the request for the planning direction.

The Development Phasing Plan shall identify:

- a) each phase of development, including its geographic location;
- b) the indicative duration of works for each site compound, construction access and haul road. This should include where and when areas of existing or replacement open space land are proposed to be used temporarily for construction works and for other associated purposes for the delivery of the development, will be closed to and unavailable for public use and subsequently re-opened;
- c) a construction programme providing the sequence and timing of the proposed development; and,
- d) for those areas marked on the approved planning direction drawings "Area of Design to be Executed by Developer", where appropriate, the date and planning reference number of the detailed planning permission.

The development shall be carried out in accordance with the approved Development Phasing Plan.

Reason: to ensure that the impacts of the proposed works are mitigated in a timely manner, to provide a clear framework for the determination of discharge and monitoring of conditions, to ensure co-ordination with those elements of the development to be delivered by parties other than the Applicant, and to identify when access to existing or replacement public open space land will be interrupted.

Contamination: risk assessment

- 4) No development shall commence until a Contamination Risk Assessment, including intrusive site investigation, of the risks posed by any contamination on the site, whether or not it originates on the site, and including gases and water quality, has been submitted to and approved in writing by the local planning authority. The Contamination Risk Assessment shall:
 - i) be based on information identified in the Desk Top Study undertaken to support Technical Report 11 Soil, Geology and Land Contamination (Document ref: CtoC-11-TR11-00) of the Environmental Statement and the Mott MacDonald Geotechnical and Geo-environmental Preliminary Risk Assessment, May 2020 appended to it; and
 - ii) be undertaken by a suitably qualified contaminated land practitioner, in accordance with British Standard BS 10175: Investigation of potentially contaminated sites - Code of Practice and the Environment Agency - Land Contamination Risk Management (LCRM) (or equivalent British Standard and Model Procedures if replaced).

and include:

- iii) an Intrusive Site Investigation Report providing a survey of the extent, scale and nature of contamination; and
- iv) an assessment of the potential risks to: human health; property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes; adjoining land; ground waters and surface waters; ecological systems; and archaeological sites and ancient monuments.

Reason: To ensure that the development can be carried out safely without unacceptable risks to human health, property, adjoining land, ground and surface waters, ecological systems, and archaeological sites and ancient monuments.

Contamination: remediation scheme

- 5) No phase of the development (as identified in the approved Development Phasing Plan) shall take place where land affected by contamination is found in land to be developed in that phase, as identified in the Contamination Risk Assessment required by condition No 4 which poses risks identified as unacceptable, until a detailed Remediation Scheme for that phase has been submitted to and approved in writing by the relevant local planning authority. The Remediation Scheme shall:
 - i) include an appraisal of remediation options, identification of the preferred option(s), the proposed remediation objectives and remediation criteria, and a description and programme of the works to be undertaken including a verification plan setting out the timescales for the submission of Verification Reports; and
 - ii) be sufficiently detailed and thorough to ensure that upon completion the site will not qualify as contaminated land under Part IIA of the Environmental Protection Act 1990 in relation to its intended use.

The approved Remediation Scheme for each phase shall be carried out in accordance with the approved programme of works within it. Upon completion of the approved programme of works a Verification Report by a suitably qualified contaminated land practitioner shall be submitted to and approved in writing by the local planning authority before the relevant phase of development is first brought into use.

Reason: To ensure that the development is carried out safely and is safe to use without unacceptable risks to human health, property, adjoining land, ground and surface waters, ecological systems, and archaeological sites and ancient monuments.

Reporting unexpected contamination

- 6) Any contamination that is found during the course of construction of the development hereby permitted that was not previously identified shall be reported immediately to the relevant local planning authority. Development on the part of the site or phase of development affected shall be suspended until a Supplementary Contamination Risk Assessment has been carried out

and submitted to and approved in writing by the local planning authority. Where unacceptable risks are identified or found, development on that part of the site or phase of development shall not resume until a Supplementary Remediation and Verification Scheme or Schemes have been carried out in accordance with details that shall first have been submitted to and approved in writing by the local planning authority.

Reason: To ensure that the development is carried out safely and is safe to use without unacceptable risks to human health, property, adjoining land, ground and surface waters, ecological systems, and archaeological sites and ancient monuments.

Post remediation long term monitoring and maintenance

- 7) No phase of development (as identified in the approved Development Phasing Plan) where contamination has been identified and remediated shall take place until a Monitoring and Maintenance Scheme (the Scheme) to demonstrate the effectiveness of the proposed remediation for that phase has been submitted to and approved in writing by the local planning authority. The Scheme shall include timescales for the reports and any necessary Remediation Protocols to be completed and submitted. The Scheme shall make provisions to include results of any analysis of samples undertaken as part of the Materials Management Plan required by clause xii) of condition No 10.

The approved Scheme shall be implemented in accordance with the timescales set out in the approved Scheme.

The reports produced must be submitted to and approved in writing by the local planning authority in accordance with the timescales set out in the approved Scheme.

If any of these reports identifies any discrepancy with the Verification Report then a Remediation Protocol for the necessary remediation shall be submitted to and approved in writing by the local planning authority in accordance with the timescales set out in the approved Scheme.

Thereafter, any necessary remediation and verification shall be carried out in accordance with the approved Remediation Protocol before the relevant phase of development is first brought into use.

Reason: To ensure that the development has been carried out safely and is safe to use without unacceptable risks to human health, property, adjoining land, ground and surface waters, ecological systems, and archaeological sites and ancient monuments and remains so.

Archaeology

- 8) With the exception of the site investigation works approved under condition No 4, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until a programme of archaeological mitigation work has been carried out in accordance with a Written Scheme of Investigation (WSI) for that phase, which has first been

submitted to and approved in writing by the relevant local planning authority. The WSI shall include:

- i) details of proposed mitigation works including those identified as being required in relation to areas of archaeological significance by the preceding archaeological evaluation works undertaken and completed in line with the 'Written Scheme of Investigation for an archaeological trial trench evaluation' – WSP (Sept 2022) and set out in the Environmental Statement Technical Report 7 Heritage Impact Assessment (Document ref: CtoC-11-TR07-00) and its relevant supporting appendices (TR7.2 and TR7.3); and
- ii) a programme for assessment and subsequent analysis, publication and dissemination, and deposition of resulting material at the Cambridgeshire Archive facility, or another appropriate store approved by the relevant local planning authority, including timescales for any publication, dissemination and deposition and the notification thereof to the relevant local planning authority.

The mitigation works for each phase, and subsequent analysis, publication and dissemination, and deposition of resulting material, are to be carried out in accordance with the specifications and timescales in the approved WSI.

Reason: To ensure that the significance of any archaeology and buried heritage assets is investigated, evaluated, recorded, protected and/or preserved as appropriate.

Code of Construction Practice

- 9) No development shall commence until a Code of Construction Practice (CoCP) has been submitted to and approved in writing by the relevant local planning authority. The CoCP must accord substantially with the draft Code of Construction Practice (Document ref: CtoC-26-00). Amongst other provisions, the CoCP must include measures for temporary hedges, screens or other features to ensure that bat flightlines are maintained during construction, that the performance and effectiveness of the measures are monitored, and that there are mechanisms to alter or amend the measures if the monitoring identifies that this is necessary.

The relevant local planning authority shall not approve the CoCP until it has:

- i) sought the views of Natural England on all aspects of the CoCP which relate to the provision of the bat flightline maintenance measures; and,
- ii) taken any views and recommendations made by Natural England in this respect into account.

The development and construction works are to be carried out in accordance with the approved CoCP.

Reason: To ensure that the avoidance, minimisation and mitigation measures upon which the development relies to make it acceptable during the construction phase are appropriately designed, implemented and monitored in order to avoid unacceptable effects on the health and living conditions of

human receptors, habitats, species and ecological systems, ground and surface waters, heritage assets, and travel and transport.

Local Environmental Management Plan(s)

- 10) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until a Local Environmental Management Plan (LEMP) in relation to that phase has been submitted to and approved in writing by the relevant local planning authority.

A LEMP shall include all the measures necessary for effectively managing the environmental effects of construction for each phase. A LEMP shall accord with the Code of Construction Practice approved under condition No 9. Unless confirmed in writing beforehand by the relevant local planning authority that elements set out in the following clauses for a particular phase are not necessary, a LEMP shall include:

- i) a Construction Traffic Management Plan, which shall include:
 - a. details of the permitted access routes and accesses for construction traffic;
 - b. details of the access and egress points for worksites and compounds.
 - c. temporary and permanent closures and diversions of highways and other public rights of way;
 - d. a list of roads which may be used by construction traffic in the vicinity of the site, including any restrictions to construction traffic on these routes, measures for the avoidance of large goods vehicles operating adjacent to schools during drop-off and pick-up periods, and the management and signage necessary to implement, monitor and enforce any restrictions;
 - e. the proposed traffic management strategy;
 - f. other measures which will affect the highway, including lorry holding areas;
 - g. measures for the establishment and operation of traffic liaison groups with key stakeholders to ensure programmes of works are shared and understood, including appropriate arrangements for engagement with local communities directly affected by site specific traffic management plans and the frequency of such arrangements; and
 - h. a register of applications for consents associated with temporary traffic management measures;
- ii) construction workforce travel plans setting out proposals for site access for all workers and site staff, including a demonstration of how public transport routes and facilities for cycling and walking according to anticipated demands have been taken into account;
- iii) a Construction Dust and Air Quality Assessment, Management and Monitoring Plan, which shall:
 - a. be carried out in accordance with the appropriate Institute of Air Quality Management guidance;

- b. provide an assessment of dust and air quality impacts associated with the construction process, including where these may have more pronounced effects on vulnerable individuals;
 - c. specify the measures to be put in place to avoid, minimise or mitigate potential harm to human health and residents' living conditions;
 - d. specify the dust and air quality inspection and monitoring procedures to assess the effectiveness of measures to prevent dust and pollutant emissions during construction; and,
 - e. specify the measures and procedures required to be implemented should inspection and monitoring indicate that measures are not effective or performing as intended;
- iv) details for implementation of appropriate handling, treatment and disposal procedures during construction for the control of invasive and non-native species and any other species listed in Schedule 9, Part I or Part II of the Wildlife and Countryside Act 1981, as amended, or the Weeds Act 1959;
- v) surface water and groundwater control measures to include a description of the measures to be used to protect surface water and groundwater from pollution. The measures shall demonstrate how they follow the environmental good practice guidance set out within:
 - a. The latest Groundwater Protection Guides and Pollution Prevention for Businesses guidance from the Environment Agency and the Department for Environment, Food and Rural Affairs,
 - b. The Guidance for Pollution Prevention series of documents, including:
 - i. GPP1: A General Guide to Preventing Pollution, and
 - ii. GPP5: Works and maintenance in or near water.
 - c. Relevant CIRIA guidance, including:
 - i. C532: Control of water pollution from construction sites;
 - ii. C648: Control of water pollution from linear construction projects: technical guidance; and
 - iii. C649: Control of water pollution from linear construction projects: site guide,(or any equivalent guidance if replaced) and explain any circumstances where it is not reasonably practicable to do so;
- vi) details of the construction compounds, access and temporary haul roads;
- vii) measures to avoid the pollution of surface and ground water, and remediate and contamination that may occur;
- viii) details of temporary fencing and means of enclosure associated with the construction phase;
- ix) a Construction Lighting Management Plan, including where applicable, construction lighting shall comply with the Institute of Lighting Professionals Guidance notes for the reduction of obtrusive light – GN01 (2011) and the provisions of BS EN 12464-2-2014 (Outdoor Workplaces) (or any equivalent guidance and British Standard if replaced);
- x) a Demolition and Construction Noise and Vibration Assessment, Management and Monitoring Plan - in accordance with the provisions of

- BS 5228:2009 +A1:2014 Code of Practice for noise and vibration on construction and open sites (part 1- noise & 2-vibration) (or any equivalent guidance and British Standard if replaced) which includes details of any piling and mitigation/monitoring measures to be taken to protect local residents from noise or vibration;
- xi) a Site Waste Management Plan demonstrating how waste arising from the development is to be minimised and that which is produced is to be handled in such a way that maximises opportunities for re-use or recycling;
 - xii) a Materials Management Plan covering materials brought onto, used in and removed from the development which shall include:
 - a. details of the volumes and types of material proposed to be imported or reused on site;
 - b. details of the proposed sources of the imported or reused material;
 - c. details of the chemical testing for all material to be undertaken before placement onto the site;
 - d. results of the chemical testing which shall show the material is suitable for use on the development; and
 - e. confirmation of the chain of evidence to be kept during the materials movement, including material importation, reuse placement and removal from and to the development;
 - xiii) details of non-road mobile machinery confirming that they meet a requirement to operate to the highest relevant Euro non-road emissions standards at the time of use;
 - xiv) an Ecology Site Management Plan, including provisions for protected species;
 - xv) details of any embankments and planted hedges to be created to encourage elevated bat crossing of the busway and any other bat mitigation measures;
 - xvi) details of a construction phase complaints procedure and protocol for members of the public and businesses which includes provisions for making the procedure and protocol widely available to the public and for the display and publication of contact details of named individuals from contractors empowered to constructively respond to, manage and resolve complaints and details of proactive community liaison and engagement to be undertaken before, during and after construction works; and
 - xvii) for the relevant LEMP(s) relating to works on and in the vicinity of Rifle Range and Grange Roads, a groundworks and construction methodology, including details of the physical and management measures to ensure the preservation and protection of Clare Hall grade II* listed building and any features of special architectural or historic interest which it possesses, in particular, but not limited to, rainwater goods and the drainage canal, and those features of the adjoining Brian Pippard Building which contribute to the significance Clare Hall grade II* listed building derives from its setting, through all phases of the development. The methodology shall include details of the durations protection features should remain and by which stage they must be removed.

Any LEMP produced shall be made available in forms suitable for inspection by members of the public, including electronic methods.

The relevant local planning authority shall not approve any LEMP that incorporates measures to avoid, minimise or mitigate construction effects on bats, including the CoCP's requirement for bat flightline maintenance measures to be implemented, until it has:

- a) sought the views of Natural England on all aspects of the LEMP which relate to the provision measures to avoid, minimise or mitigate construction effects on bats; and,
- b) taken any views and recommendations made by Natural England in this respect into account.

The relevant local planning authority shall not approve any LEMP that includes methodology and details of measures to ensure the preservation and protection of Clare Hall grade II* listed building, until it has:

- c) sought the views of Historic England on all details submitted to discharge this condition which relate to the grade II* listed Clare Hall and its setting; and,
- d) taken any views and recommendations made by Historic England in this respect into account.

The development and construction works are to be carried out in accordance with the approved LEMP and the requirements of its component plans, methodologies, measures, details, surveys and procedures, including the retention of protection features for the durations specified.

Reason: To ensure that the avoidance, minimisation and mitigation measures upon which the development relies to make it acceptable during the construction phase are appropriately designed, implemented and monitored in order to avoid unacceptable effects on the health and living conditions of human receptors, habitats, species and ecological systems, ground and surface waters, heritage assets, and travel and transport.

Piling and boreholes

- 11) No investigation boreholes, or structures or buildings requiring the use of penetrative methods for investigation or foundations shall commence until the details of the methodology for investigation or the design details of the foundations as appropriate, have been submitted to and approved in writing by the relevant local planning authority. The methodology shall be prepared having regard to the relevant Environment Agency Groundwater Protection Position Statements. The methodology shall include a demonstration that the work will not lead to any unacceptable risk to groundwater and include details of any mitigation that is necessary.

The relevant local planning authority shall not approve any such details, until it has:

- i) sought the views of the Environment Agency on all details submitted to discharge this condition; and,
- ii) taken any views and recommendations made by the Environment Agency in this respect into account.

The development shall be carried out in accordance with the approved methodology including any necessary mitigation.

Reason: To prevent the pollution of controlled waters in order to avoid any unacceptable effects on human health, river systems and the natural environment.

Tree and hedge protection

- 12) With the exception of the site investigation and mitigation works approved under conditions Nos 4 and 8, no phase of site clearance, enabling or preparatory work, development or any work to trees or hedges, (as identified in the approved Development Phasing Plan) shall take place on that phase until a scheme for the protection of retained trees and hedges (the Tree and Hedge Protection Plan) and as appropriate an Arboricultural Method Statement) in accordance with paragraphs 5.5 and 6.1 of British Standard BS 5837: Trees in relation to design, demolition and construction - Recommendations (or in an equivalent British Standard if replaced) or a Hedgerow Method Statement, has been submitted to and approved in writing by the relevant local planning authority. The Arboricultural and Hedgerow Method Statements shall:
- i) consider all construction and associated activities in a logical sequence in relation to the potential impact on trees and hedges and provide details of proposed tree and hedge works, the specification and position of protection barriers and ground protection and all measures to be taken for the protection of any trees and hedges from damage during the course of any activity related to the development; and
 - ii) be informed by an assessment of the detailed design of the development on existing trees within Coton Orchard, retained veteran trees within Coton Orchard and existing trees within the West Cambridge Conservation Area, which has been submitted to and approved in writing by the relevant local planning authority beforehand.

The necessary measures identified must be implemented in accordance with the approved Tree and Hedge Protection Plan, Arboricultural Method Statement and Hedgerow Method Statement before any site clearance, enabling or preparatory work, development or any work to trees or hedges take place, and the approved measures shall be retained and maintained until construction work is complete and all construction machinery, equipment and materials have been removed from that phase or part of the site.

Reason: to ensure that trees and hedges are protected during the construction phase to preserve the character and appearance of the area, including the significance of the West Cambridge Conservation Area, and to preserve habitats to maintain biodiversity.

Veteran trees at Coton Orchard

- 13) No site clearance, enabling or preparatory work or development shall commence and no veteran tree shall be cut down, uprooted, destroyed,

pruned, cut or damaged in any manner until a revised Veteran Tree Mitigation Strategy, a detailed Veteran Tree Translocation Method Statement and a revised Veteran Tree Compensation Strategy have been submitted to and approved in writing by the relevant local planning authority. The Veteran Tree Mitigation Strategy shall identify locations to translocate the three veteran trees that would be relocated, in as close a proximity to the current locations as would be reasonably feasible having regard to providing the most appropriate conditions to best ensure their survival.

The work shall be carried out in accordance with the revised Veteran Tree Mitigation Strategy and the Veteran Tree Translocation Method Statement. Should any of the translocated trees be removed, uprooted, destroyed or die within ten years from the date of the last veteran tree to be translocated, or any of the three retained veteran trees closest to the busway be removed, uprooted, destroyed or die within five years of the date of the completion of the busway, the measures in the revised Veteran Tree Compensation Strategy shall be implemented within the timescales it sets out.

Reason: to avoid the loss or deterioration of veteran trees, or if loss or deterioration occurs, to ensure that a suitable compensation strategy exists.

Removal of Trees or Hedgerows

- 14) No trees, hedges or any part of a hedge shall be removed at any time between 1 March and 31 August of any one year unless a competent ecologist has:
- i) first undertaken a detailed survey of the trees or hedges for active birds' nests immediately before those trees, hedges or parts of hedges are due to be removed; and
 - ii) provided written confirmation to the relevant local planning authority prior to the removal of the surveyed trees, hedges or parts of hedges that no birds will be harmed and, where necessary, that appropriate measures have been put in place prior to any tree or hedge removal to protect nesting birds.

Reason: To protect nesting birds and maintain biodiversity.

Soil handling

- 15) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until a Soil Handling Management Plan (the Plan) for that phase has been submitted to and approved in writing by the relevant local planning authority. The Plan shall:
- i) be based on available Agricultural Land Classification data and supplemented, as necessary, with the findings of a detailed soil resource and agricultural land classification survey to be undertaken in relation to any agricultural soils that would be disturbed by the development, including volumes of available soil resources; and,

- ii) include proposed mitigation measures to manage soils from within the Order Limits from agricultural land in a sustainable way during construction, including measures for stripping, storing and re-use of topsoil where appropriate and protection of soils from contamination.

Site preparation, enabling, construction and development shall be carried out in accordance with the approved Plan and the measures it contains shall be completed prior to that phase of the development first being brought into use.

Reason: To ensure the sustainable use of soils, agricultural land and the safeguarding of natural resources.

Surface Water Drainage

- 16) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until a Surface Water Drainage Scheme (the Scheme) for that phase, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, on the principles within the Surface Water Drainage Strategy (Annex TR13.1.4 of the Appendix TR13.1: Flood Risk Assessment, Document ref: CtoC-TR13-00) and the Water Framework Directive Screening and Scoping Assessment (Technical Report 13, Appendix TR13.2, Document ref: CtoC-11-TR13-00), has been submitted to and approved in writing by the local planning authority. The Scheme shall:
- i) provide information about the design storm period and intensity, the method employed to delay and control the surface water discharged from the site and the measures taken to prevent pollution of the receiving groundwater and/or surface waters;
 - ii) include a timetable for its implementation;
 - iii) provide, a management and maintenance plan for the lifetime of the development which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime;
 - iv) demonstrate that it has been prepared in coordination with the design of hard and soft landscaping required under condition No 18;
 - v) demonstrate that it has taken account of the views, comments and recommendations of the Environment Agency, the Lead Local Flood Authority and, in respect of interfaces with the Strategic Road Network National Highways, sought in connection with the Scheme; and,
 - vi) demonstrate that the detailed design provides compliance with the provisions of the Water Framework Directive.

The development shall be carried out in accordance with the approved Scheme and all measures in an operational condition prior that phase of the development is first brought into use. The sustainable drainage system shall be managed and maintained thereafter in accordance with the management and maintenance plan approved as part of the Scheme.

Reason: To ensure that there is no increased risk of flooding within or beyond the Order Limits as a result of the Scheme.

Biodiversity Net Gain

- 17) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no development shall commence until a Site Wide Biodiversity Net Gain (BNG) Plan has been submitted to and approved in writing by the relevant local planning authority. The Site Wide BNG Plan shall:
- i) demonstrate that no less than 10% BNG will be achieved;
 - ii) be developed in line with a biodiversity net gain assessment, based on the Statutory Biodiversity Metric (February 2024), and demonstrating a minimum positive biodiversity net gain unit score in line with the net gain target of 10% above the pre-development baseline and how this will be achieved through a combination of on-site and/or off-site works.
 - iii) where appropriate, provide measures required in accordance with the Department for Environment, Food and Rural Affairs guidance on Irreplaceable Habitats, February 2024, except as provided for under the requirements of condition 13: and,
 - iv) include details of the management and monitoring of BNG, including reporting intervals and the mechanism for any necessary remedial work where the monitoring concludes that the target 10% BNG is not being achieved.

With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until an updated Phase Specific BNG Plan has been submitted to and approved in writing by the relevant local planning authority. The updated Phase Specific BNG Plan shall demonstrate compliance with the Site Wide BNG Plan

The BNG measures shall be implemented and monitored in accordance with the approved Site Wide and relevant Phase Specific BNG Plans. A monitoring report shall be submitted to the local planning authority in accordance with the approved Site Wide BNG Plan.

Reason: To provide ecological enhancements that the development relies on to be acceptable planning terms.

Sustainability and Carbon Management

- 18) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until a Sustainability and Carbon Management Plan (the Plan) for that phase has been submitted to and approved in writing by the relevant local planning authority. The Plan shall include:
- i) details of how the detailed design will incorporate measures for climate change adaptation including aspects described in Table TR3-4 1 - Potential impacts and embedded mitigation of the ES Technical Report 3: Climate Resilience (Document ref: CtoC-11-TR03-00);

- ii) measures for energy and carbon reduction, including equipment and lighting energy efficiency;
- iii) measures for water efficiency and recycling throughout the development's lifecycle; and,
- iv) details of materials specification and sourcing, including considerations of embodied carbon and emissions, carbon performance, longevity and measures for prioritising locally sourced materials and local waste management facilities.

All site clearance, enabling or preparatory work, construction and the development shall be implemented in accordance with the approved Plan.

Reason: To ensure that the development contributes to the reduction of greenhouse gas emissions, encourages the re-use of existing resources and takes account of, and is resilient to, the effects of climate change.

Landscaping

- 19) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until a detailed soft and hard Landscaping Scheme (the Scheme) for that phase has been submitted to and approved in writing by the relevant local planning authority. The Scheme shall:
- i) demonstrate how it accords with the landscape mitigation as shown on the Planning Direction Drawings listed in Annex 2;
 - ii) include a landscape management plan, including long term design objectives, management responsibilities and maintenance regimes for all landscape areas;
 - iii) include as part of the Scheme a demonstration that no barriers, fences, enclosures or similar features are to be permanently erected anywhere within the Order Limits between a position level with the west elevation of the Brian Pippard Building at Clare Hall in the University of Cambridge and a position level with the east elevation of Elmside at Clare Hall in the University of Cambridge; and,
 - iv) demonstrate that it has been prepared in coordination with the design and preparation of:
 - a. the Veteran Tree Mitigation Strategy, Veteran Tree Translocation Method Statement and Veteran Tree Compensation Strategy required by condition No 12;
 - b. sustainable water drainage measures required by condition No 16; and,
 - c. The BNG Plan required by condition No 16.

All planting, seeding or turfing comprised in the approved Scheme shall be carried out in the first planting and seeding seasons following the first use of that phase of the development or the completion of that phase of the development, whichever is the sooner; and any trees or plants which within a period of 10 years from the completion of the phase of development in which they are planted die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species. All landscaping shall be managed and maintained in accordance with the approved Scheme. No barriers, fences, enclosures or

similar features are to be permanently erected in the area set out in clause iii) above.

Reason: To assist in the assimilation of the development into its natural and built surroundings and to provide the mitigation the development relies on to avoid, minimise and mitigate adverse effects on landscape character, biodiversity, the living conditions of residents and the grade II* listed Clare Hall.

Bat Monitoring

- 20) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until a detailed Bat Monitoring Strategy (the Strategy) according with Reason, P.F. and Wray, S. (2025) UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats - version 1.2, Chartered Institute of Ecology and Environmental Management, for that phase has been submitted to and approved in writing by the relevant local planning authority. The Strategy shall identify:

- i) who is responsible for monitoring;
- ii) how it will be funded;
- iii) how the monitoring will be carried out including details of methods, equipment, survey effort and licensing;
- iv) how access for monitoring will be ensured, including in the event of assets having changed hands;
- v) how, when and to whom the results are to be reported;
- vi) the party or parties responsible for implementing any remedial measures that are required;
- vii) how and by whom any remedial measures are to be approved and reviewed.

The Strategy shall:

- viii) define the elements that are to be monitored, when and how often;
- ix) have clearly defined and measurable objectives;
- x) include a clear definition of success for each mitigation and compensation feature;
- xi) include proportionate and appropriate methods for data collection and analysis;
- xii) stipulate the triggers or thresholds for remedial action, and identify what the remedial action and measures should be; and
- xiii) provide a framework to enable a contribution to a wider understanding of the measures applied and their success.

The monitoring, reporting, dissemination and, as necessary, the implementation of remedial measures, shall be carried out in accordance with the approved Strategy.

Reason: To ensure that the effectiveness of mitigation upon which the development relies to make it acceptable is appropriately monitored, and that the results of the monitoring can be accepted upon, in order to protect

bats and their supporting ecological systems from any harmful effects of the development.

Detailed design

- 21) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no phase of the development (as identified in the approved Development Phasing Plan) shall commence until details of the design, scale, layout and external appearance of the development in that phase have been submitted to and approved in writing by the relevant local planning authority. As necessary for each phase, these details shall include those for:
- i) any building, including utility enclosures and substations;
 - ii) any busway stop, including any shelters, platforms and access;
 - iii) the M11 overbridge, Bin Brook crossing or any other bridge and their associated structures including embankments, abutments and parapets;
 - iv) environmental noise barriers (whether comprised of earth mounds, landscaping or physical acoustic fence / barriers structures or a combination thereof if required);
 - v) retaining structures;
 - vi) the formation, laying out or alteration of any means of access to any highway used by the busway or vehicular traffic;
 - vii) the formation, laying out or alteration of any pedestrian, cycle or equestrian route;
 - viii) the internal roads, footpath and cycle ways, and busway crossings;
 - ix) any gates, fences, barriers and means of enclosure, having regard to the provisions of clause iii) of condition 18);
 - x) a Busway Traffic Signage and Road Marking Scheme;
 - xi) vehicle parking arrangements at Scotland Farm Travel Hub, including the number of spaces;
 - xii) cycle parking facilities at Scotland Farm Travel Hub, including the number of spaces;
 - xiii) all structures including bus stops and shelters at Scotland Farm Travel Hub;
 - xiv) street furniture including bins and benches at Scotland Farm Travel Hub;
 - xv) a scheme for any CCTV at the Scotland Farm Travel Hub, including details of the appearance of the height, type, and position of CCTV and supporting apparatus within the Travel Hub site;
 - xvi) a Travel Hub Traffic Signage and Internal Wayfinding Scheme; and,
 - xvii) those works between Grange Road and the westernmost extent of the proposed location Basin 07 as shown on the approved planning direction drawings, the detailed design of all aspects of the works including the engineering details of the busway and maintenance and access track, any retaining structures, changes in level, replacement footpath links to Clare Hall, any enclosures, signage structures and other street furniture.

These details shall include:

- xviii) clear benchmarks for design quality along the route;
- xix) section details of the busway proposed on Rifle Range Road;

- xx) a 3D model render of a bus stop illustrating that there is coordination with the details of materials in the soft and hard Landscaping Scheme required by condition No 18; and
- xxi) sample panels of finishes and materials in situ concrete finishes; and weathering steel samples.

The relevant local planning authority shall not approve any details submitted to discharge this condition relating to clauses iii) and iv) above, until it has:

- a) sought the views of Natural England on those details and,
- b) taken any views and recommendations made by Natural England in this respect into account.

The relevant local planning authority shall not approve any details submitted to discharge this condition relating to clause xvii) above, until it has:

- c) sought the views of Historic England on all those details; and,
- d) taken any views and recommendations made by Historic England in this respect into account.

The development of each phase must be carried out in accordance with the approved details. The CCTV scheme required by clause xv) must maintained thereafter in accordance with the approved details for the lifetime of the development.

Reason: To provide the mitigation the development relies on to avoid, minimise and mitigate adverse effects on the character and appearance of the area, the significance of heritage assets, protected species, the living conditions of residents and to ensure that the scheme is designed to provide accessibility for those with a disability, impairment and of different ages.

Lighting

- 22) No external lighting shall be provided or installed until an Artificial Lighting Impact Assessment and Mitigation Scheme (the Scheme) has been submitted to and approved in writing by the relevant local planning authority. The Scheme shall include:
 - i) details of the method of lighting and predicted effects of lighting, including luminaire type and profiles, mounting location and height, aiming angles and orientation, angle of glare, operational controls, horizontal and vertical isolux contour light levels and calculated glare levels to receptors;
 - ii) the extent and levels of illumination over the Order Limits and on adjacent land, and predicted lighting levels at the nearest light sensitive receptors;
 - iii) specifications that all artificial lighting will meet the Obtrusive Light Limitations for Exterior Lighting Installations contained within the Institute of Lighting Professionals Guidance Note for the Reduction of Obtrusive Light - GN01/20 (or equivalent guidance if it is replaced).
 - iv) confirmation that, where necessary, lighting and mitigation is designed to accord with the Bat Conservation Trust and Institute of Lighting Professionals Guidance Note 08/18 (or equivalent guidance if replaced) and that it explicitly addresses sensitive areas for barbastelle bats likely to be affected by the development.

The relevant local planning authority shall not approve any details submitted to discharge this condition, until it has:

- a) sought the views of Natural England on those details and,
- b) taken any views and recommendations made by Natural England in this respect into account.

The lighting and mitigation shall be implemented in accordance with the approved Scheme, retained as such and no external lighting shall subsequently be installed, altered, repositioned or replaced anywhere within the Order Limits unless it accords with the Scheme.

Reason: To ensure that the mitigation upon which the development relies to make it acceptable is implemented in order to avoid unacceptable effects on the health and living conditions of human receptors, and on habitats, species and ecological systems.

St Neots Road, Hardwick

- 23) With the exception of the site investigation, mitigation and tree protection works approved under conditions Nos 4, 8 and 12, no development shall commence on that part of St Neots Road situated between the junction of St Neots Road and Cambridge Road to the east, and No 325 (Old) St Neots Road to the west, until a Layby, On-street Parking and Waiting Scheme (the Scheme) has been submitted to and approved in writing by the relevant local planning authority. The Scheme shall include details of the layout of the proposed footway and cycleway, landscaping, any laybys to be retained, reconfigured or re-provided, details of any parking and waiting restrictions proposed and details of in and off carriageway bus stops. The development shall be carried out in accordance with the approved Scheme.

Reason: In the interest of the safety of all users of the highway and to ensure that suitable provision is retained for businesses or other properties that can demonstrate a genuine reliance on laybys or other parking and waiting arrangements.

Electric vehicle charging

- 24) The Scotland Farm Travel Hub shall not be first brought into public use until a scheme providing for electric vehicle charge points (the Scheme) detailing the number and specification of charge points and the management and maintenance arrangements to ensure they remain in good condition, available and modified or replaced as necessary, has been implemented and made available for use, having first been submitted to and approved in writing by the relevant local planning authority. The electric vehicle charge points shall be implemented in accordance with the Scheme and thereafter remain available for use, and managed and maintained in accordance with the approved Scheme.

Reason: To ensure that the facility is designed to enable charging of plug-in vehicles in a safe, accessible and convenient location, to assist in supporting more sustainable means of travel and contribute to the improvement of air quality for all receptors.

Replacement Open Space

- 25) Prior to any part of the busway first being brought into public use for buses or active travel the replacement open space shall be provided, landscaped in accordance with details approved under condition No 18 and made available for use by the public as public open space in the location shown on the Special Category Land Plans (CtoC-12-D03). The open space shall remain available to the public as public open space thereafter.

Reason: To ensure that there is no net loss in public open space and that the space remains appropriate and available for public use.

Monitoring cycle parking provision within the Scotland Farm Travel Hub

- 26) Prior to the Scotland Farm Travel Hub first being brought into public use, a scheme for the monitoring of cycle parking provision within the Travel Hub (the Monitoring Scheme) including the specifications for Cycle Parking Occupancy Surveys and the timeframes within which they must be carried out in a survey year, shall be submitted to, and approved in writing by, the relevant local planning authority. Thereafter, the Monitoring Scheme shall be implemented as approved.

The Cycle Parking Occupancy Survey required by the approved Monitoring Scheme shall be carried out within the timeframe specified within the approved Monitoring Scheme within one year of the date of the Scotland Farm Travel Hub first being brought into public use, and thereafter within 5, 10 and 15 years of the date of the Scotland Farm Travel Hub first being brought into public use.

If at any time, the cycle parking occupancy survey reports that cycle parking occupancy levels within the Travel Hub are above 90% of the total number of existing cycle parking spaces for a defined period set out in the approved Monitoring Scheme, a programme for implementation of additional cycle parking provision at the Travel Hub (the Implementation Programme) shall be submitted to the relevant local planning authority within three months of the date of the completion of the relevant Cycle Parking Occupancy Survey. The additional cycle parking spaces shall be implemented in accordance with the Implementation Programme within three months of the date the Implementation Programme has been approved in writing by the relevant local planning authority, or within nine months of the date of the completion of the relevant Cycle Parking Occupancy Survey, whichever is the sooner.

Reason: To ensure that appropriate cycling infrastructure is provided and that it responds to the any demand for increased provision to assist facilitating active travel and mode shift to sustainable transport modes.

- 27) Within 14 days of the Scotland Farm Travel Hub first being brought into use the developer must confirm in writing to the relevant local planning authority the date on which the travel hub was first opened for public use.

Reason: In order to be able to establish the timescales by which compliance with condition No 26 requiring the Cycle Parking and Monitoring Scheme can be monitored and enforced.

Bus emission standards

- 28) No bus shall use any part of the off-road busway unless the bus is compliant with the Euro VI emission standard as a minimum.

Reason: To limit carbon and other emissions to provide the mitigation upon which the development relies to be acceptable and to avoid harmful effects on human health, residents' living conditions and quality of life, habitats and species arising from poor air quality.

Permitted Construction Hours

- 29) With the exception of specified works relating to construction of the M11 overbridge which have been submitted to and approved in writing by the relevant local planning authority prior to any such specified works taking place, all investigation, clearance, preparation, enabling, demolition and construction works shall take place only between 0800 hours to 1800 hours Monday to Friday, and 0800 hours to 1300 hours on Saturday and shall not take place at any time on Sundays or on Bank or Public Holidays.

Reason: To provide the mitigation upon which the development relies to be acceptable and to avoid harmful effects on human health and residents' living conditions.

Restriction on bus movements

- 30) i) No buses of any means of propulsion shall operate on the off-road busway between 0000 hours and 0600 hours on any day.
ii) No more than 9 bus movements in total shall occur between 0600 hours and 0700 hours on any day, and no more than 9 bus movements in total shall occur between 2300 hours and 2359 hours on any day on that part of the busway running between the south of Charles Babbage Road and Grange Road unless the operating buses are propelled solely by electric motors.
iii) No more than 6 bus movements shall occur between 0600 hours and 0700 hours on any day, and no more than 6 bus movements shall occur between 2300 hours and 2359 hours on any day on that part of the busway to the west of Broadway unless the operating buses are propelled solely by electric motors.

Reason: To provide the mitigation upon which the development relies to be acceptable, and to avoid harmful effects on human health and living conditions of occupiers of residential properties and Clare Hall.

*** END OF SCHEDULE OF CONDITIONS ***

ANNEX 2 – SCHEDULE OF PLANS

PLANNING DIRECTION DRAWINGS

Location Plan

Drawing No: 70086660-WSP-GEN-XX-DR-HW-000001 Rev P06

Proposed Site Plans

Drawing Nos: 70086660-WSP-HGN-XX-DR-HW-002000 Rev P10; 002001 Rev P10; 002002 Rev P10; 002003 Rev P10; 002004 Rev P10; 002005 Rev P10; 002006 Rev P10; 002007 Rev P10; 002008 Rev P10; 002009 Rev P10; 002010 Rev P10; 002011 Rev P10; 002012 Rev P10; 002013 Rev P10; 002014 Rev P10; 002015 Rev P10; 002016 Rev P10; and 002017 Rev P10

Proposed Site Sections

Drawing Nos: 70086660-WSP-HGN-XX-DR-HW-002018 Rev P06; 002019 Rev P06; 002020 Rev P06; 002021 Rev P06; 002022 Rev P06; and 002023 Rev P06

M11 Overbridge General Arrangement

Drawing No: 70086660-WSP-SBR-XX-DR-BR-0003 Rev P04

Bin Brook Bridge General Arrangement

Drawing No: 70086660-WSP-SBR-XX-DR-BR-0004 Rev P04

Construction Compounds

Drawing Nos: 70086660-WSP-TTM-XX-DR-CP-009000 Rev P07; 009001 Rev P07; 009002 Rev P07; 009003 Rev P07; 009004 Rev P07; 009005 Rev P07; 009006 Rev P07; 009007 Rev P07; 009008 Rev P07; 009009 Rev P07; 009010 Rev P07; 009011 Rev P07; 009012 Rev P07; 009013 Rev P07; 009014 Rev P07; 009015 Rev P07; 009016 Rev P07; and 009017 Rev P07

OTHER DRAWINGS

Special Category Land Plan

Drawing No: 70086660-OD03-00 Rev P03

Longitudinal Sections

Drawing Nos: 70086660-OD03-0018 Rev P03; 0019 Rev P03; 0020 Rev P03; 0021 Rev P03; 0022 Rev P03; 0026 Rev P03; 0027 Rev P03; 0028 Rev P03; 0029 Rev P03; 0030 Rev P03; 0031 Rev P03; 0032 Rev P03; 0033 Rev P03; and 0034 Rev P03

ANNEX 3 – GLOSSARY OF ABBREVIATIONS AND TERMS USED IN THE REPORT

active travel	Journeys made by modes of transport that are fully or partially people-powered: walking, wheeling and cycling
ALA1981	Acquisition of Land Act 1981
American Cemetery, the	The Cambridge American Cemetery and Memorial at Madingley, also known as the American Military Cemetery
AOP Rules, the	The Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006
Applicant, the	Cambridgeshire County Council in its role as the applicant for the Order, Deemed Planning Permission and open space certificate
AQMA	(Cambridge City Centre) Air Quality Management Area
AWSL	Anglian Water Services Limited (Anglian Water)
AW&CW	Anglian Water and Cambridge Water
BCR	Benefit Cost Ratio
Biomedical Campus	The Cambridge Biomedical Campus
BMV agricultural land	Best and most versatile agricultural land: that in grades 1, 2 & 3a of the Agricultural Land Classification
BNG	Biodiversity Net Gain
BoR	Book of Reference
Bourn Airfield	Bourn Airfield New Village development site - including outline planning permission S/3440/18/OL, and allocation in SCLP Policy SS/7
C19	Nineteenth century
C2C	Cambourne to Cambridge (Better Public Transport Project or mass transit scheme) (also CtoC)
CAS	DfT's common analytical scenarios
CAM	Cambridge Autonomous Metro
Cambourne West	Development site - including outline planning permission S/2903/14/OL and allocation in SCLP Policy SS/8 (also known as West Cambourne)
CaPCAM	Cambridge and Peterborough Combined Authority [transport] Model.
CBAG	Coton Busway Action Group
CCC	Cambridgeshire County Council

CCiC	Cambridge City Council
CGC	Cambridge Growth Company
City Deal, the	Greater Cambridge City Deal
CiWS	City Wildlife Site
CLP	Cambridge Local Plan 2018
CO ₂	Carbon Dioxide
CO ₂ e	Carbon Dioxide equivalent
CoCP	Code of Construction Practice
CPC	Coton Parish Council
CPCA	Cambridgeshire and Peterborough Combined Authority
CPP Guidance	Guidance on the Compulsory Purchase Process, MHCLG, 2025
CPPF	Cambridge Past, Present & Future
CPPF & CPC	Cambridge Past, Present & Future and Coton Parish Council acting jointly (e.g. in making a joint case at the inquiry)
CPRE-C&P	The Countryside Charity Cambridge and Peterborough (the Cambridgeshire and Peterborough branch of the Campaign to Protect Rural England)
CSRM	Cambridge Sub-regional Model
CTMP	Construction Traffic Management Plan
CtoC	Cambourne to Cambridge (Guided Busway) (also C2C)
CWS	County Wildlife Site
DC	Draft condition(s) suggested by the Applicant, followed by number in Draft Conditions Schedule [CD29-96]
DCO	Development Consent Order
DfT	Department for Transport
District Councils	Cambridge City and south Cambridgeshire District Councils
DMRB	Design Manual for Roads and Bridges
DPP	Deemed Planning Permission
draft condition(s)	Draft condition(s) suggested by the Applicant as set out in revised schedule of possible planning conditions of 13 November 2025 [CD29-96] and with proposed revisions note of 20 November 2025 [CD29-115].
EA2010	Equality Act 2010
EIA	Environmental Impact Assessment

Erskine Building, the	Grade II* listed building recorded as "Clare Hall, University of Cambridge" on the National Heritage List
ES	Environmental Statement
ES-A	Environmental Statement (Addendum), June 2025
ES-A2	Environmental Statement (Addendum 2 and Clarifications), July 2025
ES-A3	Environmental Statement (Addendum 3 and Clarifications), November 2025
EWR	East West Rail
exchange land, the	Other land proposed to be given in exchange for the Open Space Land
FotC	Friends of the (River) Cam
FP	footpath
FRA	Flood Risk Assessment
GCN	Great Crested Newt(s)
GCP	Greater Cambridge Partnership
GCLP	(Draft) Greater Cambridge Local Plan 2024 – 2045
GCTS	Greater Cambridge Transport Strategy
GLVIA	Guidelines for Landscape and Visual Impact Assessment
ha	hectare
HRA1998	Human Rights Act 1998
IAQM	The Institute of Air Quality Management
IP Rules, the	The Transport and Works (Inquiries Procedure) Rules 2004
km	kilometre
LEMP	Local Environmental Management Plan
LGV(s)	Light Goods Vehicle(s)
LOAEL	Lowest Observed Adverse Effect Level
LTCP	Cambridgeshire & Peterborough Combined Authority Local Transport and Connectivity Plan, 2023
LTMP	Local Traffic Management Plan
LVIA	landscape and visual impact assessment
m	metre(s)
Mayor, the	the Mayor of Cambridgeshire and Peterborough, Mr P Bristow
MHCLG	Ministry of Housing, Communities and Local Government

MSA	Mineral Safeguarding Area(s)
MWLP	Cambridgeshire and Peterborough Minerals and Waste Local Plan 2036, 2012
NNNPS	National Networks National Policy Statement
NPPF	National Planning Policy Framework
open space certificate	The certificate applied for under section 19 (1)(a) of the Acquisition of Land Act 1981 in relation to the acquisition of open space land situated to the east of the M11
Open Space Land, the	Existing open space land within the Order Limits proposed to be acquired at plots 14-153 and 14-154 (as shown on the Works Plans and Land Plans [CD1-12.01a])
Order, the	The Order applied for under the Transport and Works Act 1992
Order Limits	The extent of the land which would be covered by the Order (as shown on the Works Plans and Land Plans [CD1-12.01a])
p, pp	page, pages
P&R	Park and Ride
para	paragraph
PIM	Pre-inquiry meeting
PoE	Proof of Evidence
PP	planning permission
PPG	Planning Practice Guidance
PRoW	Public Right(s) of Way
PSED	Public Sector Equality Duty (under the EA2010)
QGD	Local Transport Quantifiable Carbon Guidance, DfT
remaining objection	a relevant objection (i.e. one from someone who has an interest in land to be acquired) that has not been withdrawn or disregarded
RPG	registered park and garden
S, s	Section (of an Act)
s19 application	The application under section 19 (1)(a) of the Acquisition of Land Act 1981 for an open space certificate
SAC	Special Area of Conservation
SCDC	South Cambridgeshire District Council

Scheme, the	the proposed Cambourne to Cambridge guided busway
SCLP	South Cambridgeshire Local Plan 2018
SOAEL	Significant Observed Adverse Effect Level
SoC	Statement(s) of Case
SoM	The Statement of Matters issued by the Secretaries of State on 11 August 2025
SoS	Secretary(ies) of State
SoST	Secretary of State for Transport
SoSHCLG	Secretary of State for Housing, Communities and Local Government
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
statutory objector(s)	a person(s) or local authorities specified in s.11(4) of the TWA1992, including any person(s) whose land interests would be compulsorily purchased under a Transport and Works Order.
TA	Transport Assessment
TAG	Transport Analysis Guidance
tCO ₂ e	Tonnes of Carbon Dioxide Equivalent
TCPA1990	Town and Country Planning Act 1990
TPO	Tree Preservation Order(s)
TR	Technical Report supporting the Environmental Statement
travel hub	The proposed Scotland Road park and ride facility and travel hub, incorporating car parking, interchange and facilities and waiting building.
treaty land	Land at the American Military Cemetery subject to a treaty between the British and US governments in 1954
TSCSC	Transport Strategy for Cambridge and South Cambridgeshire
TWA1992	Transport and Works Act 1992
University, the	University of Cambridge
VfM Framework	Value for Money Framework, DfT, May 2025
West Cambourne	Development site - including outline planning permission S/2903/14/OL and allocation in SCLP Policy SS/8 (also known as Cambourne West)
West Cambridge (Site/Campus)	University of Cambridge West Cambridge Site, including outline planning permission 16/1134/OUT and allocation in CLP Policy 19

XiC	Examination in chief
XX	Cross examination

ANNEX 4 – APPEARANCES

FOR THE APPLICANT:

Mr N Cameron KC & Mr M Henderson

Counsel for Cambridgeshire County Council, instructed by Womble Bond Dickinson (UK) LLP

They called:

Mr C Whitehouse MA(Cantab)
MSc(Eng) MBA CILT CMgr MCMi

Technical Director, Business Case Advisory Team, WSP

Mr P Freeman

Chair, Cambridge Growth Company

Mr J Lonergan MSc
BEng(Hons) BSc(Hons) CEng
FICE FGS MCIHT MPWI, MAPM

Technical Director, Construction and Logistics Team, WSP

Mr J Baker BSc MSc FCIHT
FCILT ACGI

Senior Project Manager, Greater Cambridge Partnership

Mr A Saunders BA(Hons)
MCIEEM MCIWEM CEnv CWEM

Technical Director, Environment Team, WSP

Ms P Reason BSc MSc FCIEEM
CEcol CEnv MIEMA

Director, RSK Biocensus

Mr C Carolan BSc(Hons)
MArchSc(Hons)

Associate Landscape Architect, WSP

Mr C Alder MSc HNDarb
FArborA MICFor RCarborA

Associate Director and Consultant, Barrell Tree Consultancy

Mr T Wilson BSc(Hons) MA
MSc MCifA FSA

Associate Director, Cultural Heritage and Archaeology Team, WSP

Mr J Southon BSc(Hons) MSc
FRGS MCIWEM CEnv CWEM CSci
CGeog

Technical Director, Sustainable Water Management Team, WSP

Mr T Lewis MSc LLM CEnvH
CSci FIOA FCIEH MIEEnvSci
MIAQM

Technical Director, Acoustics Team, WSP

Mr P Whitby BSc(Hons)
MCIEEM, CEcol

Managing Director, The Ecology Co-Op

Mr J Franklin BSc(Hons)
MRICS

Senior Director, Compulsory Purchase Team, CBRE Ltd

Mr S Sensecall MRTPI

Consultant, Carter Jonas LLP

Ms V Redman

Partner, Womble Bond Dickinson (UK) LLP

Mr S Roberts MRTPI

Partner, Carter Jonas LLP

FOR SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL (SCDC) AND CAMBRIDGE CITY COUNCIL (CCiC) (REP-09):

Ms E Drabkin-Reiter

Counsel SCDC and CCiC, instructed by
Mr R Pitt, Principal Lawyer, 3C Shared
Services - Legal Practice ⁵⁶⁴

She called:

Mr S Kelly BSc (Hons) MBA
MRTPI

Joint Head of Planning, Greater Cambridge
Shared Planning (GCSP)

Ms C Taruvinga BA MA MRTPI

Strategic Sites Team Leader (NSIP/Major
Infrastructure Delivery), GCSP

FOR CAMBRIDGE PAST, PRESENT & FUTURE (CPPF) AND COTON PARISH COUNCIL (CPC) (OBJ-251)

Mr J Parker

Counsel for CPPF and CPC, instructed by
Ms L Foster of Richard Buxton Solicitors

He called:

Mr S Johnstone BSc CEng
MICE MCIHT

Engineering Director, Lawrence Walker Ltd

Mr E Leigh MA MSc MTPS

Transport Professional

Prof L Hirst

Professor of Materials Physics, University
of Cambridge

Mr D Woodfield BSc CEcol
CEnv MCIEEM

Professional Ecologist & Managing
Director, Bioscan (UK) Ltd

Mr J Littlewood BSc MSc

Chief Executive, CPPF

FOR CLARE HALL IN THE UNIVERSITY OF CAMBRIDGE (OBJ-213):

Mr H Phillpot KC

Counsel for Clare Hall, instructed by
Dentons UK and Middle East LLP

FOR THE MAYOR OF CAMBRIDGESHIRE AND PETERBOROUGH (OBJ-314):

Mr P Graham

Chief of Staff to the Mayor

He called:

Mr P Bristow

Mayor of Cambridgeshire and
Peterborough

FOR PX FARMS Ltd AND PX LAND Ltd (OBJ-252)

Mr J Peck

PX Farms Ltd

⁵⁶⁴ on behalf of Cambridge City Council and South Cambridgeshire District Council.

FOR MS GAZELEY, COTON ORCHARD LTD AND HOUSTON CREST PROPERTIES LTD (OBJ-52)

Ms A Gazeley

Director, Coton Orchard Ltd, Company Secretary, Houston Crest Properties Ltd, and resident of Coton

FOR J & W R SADLER, CROME LEA FARM, MADINGLEY HILL (OBJ-102)

Mr R Sadler BSc MRICS

Chartered Surveyor and son of J & WR Sadler

OTHER INTERESTED PARTIES:

Mr N Baker BSc (Hons) DipTP MRTPI

Planning Director, Lichfields, for Juniper Propco (Bourn) Ltd (SUP-14)

Mr D Davies

For North Newnham Residents' Association (REP-03)

Mr D Strauss (SUP-10)

Resident of Adams Road, Cambridge

Mr A Davidson (OBJ-142)

Resident of Gough Way estate, Cambridge

Ms W Blythe

Chair, The Federation of Cambridge Residents' Associations (OBJ-309)

Mr A Burford

Resident of Madingley Road, Coton for Mr A & Mrs S Burford (OBJ-211)

Dr J Green (OBJ-53)

Interested person

Dr M Treacy

For Coton Busway Action Group (OBJ-143)

Ms C Postgate (OBJ-84)

Resident of Coton

Ms M Fyfe (OBJ-297)

Resident of South Cambridgeshire

Ms S Buckingham

For Friends of the Cam (OBJ-203)

Ms L Wood

Senior Partner, Ashcroft Veterinary Practice, Hardwicke (OBJ-01)

Prof T Booth

For CPRE Cambridge & Peterborough (OBJ-308)

Mr P Singleton (OBJ-123)

Resident of Cambridge

Dr B Sutton (OBJ-94)

Resident of Coton

Ms K Fry

Chair, Gough Way Residents' Association (OBJ-175)

Mr M Baker

Resident of Gough Way estate, Cambridge, for Mr M & Mrs R Baker (OBJ-132)

Mr M Sullivan MRTPI (OBJ-226)

Interested person

ANNEX 5 - DOCUMENTS SUBMITTED AFTER THE INQUIRY OPENED

Superseded, duplicate and withdrawn documents are not listed

Application documents

CD1-02h	Revised draft Order, 19 November 2025.
CD1-02i	Comparison version of draft Order between CD1-02d (revised draft Order, 12 September 2025) and CD1-02h.
CD1-02j	Schedule of changes to the draft Order, 19 November 2025.
CD1-03a	Revised explanatory memorandum to the draft Order, November 2025.
CD1-12.01a	Revised works and land plans, November 2025.
CD1-12.05a	Revised rights of way, traffic regulation and highway plans, November 2025.
CD1-12.07	Revised longitudinal sections for proposed works, October 2025.
CD1-13.03	Revised book of reference, November 2025.
CD1-13.04	Schedule of changes to the book of reference, November 2025.
CD1-16-04a	Revised proposed site plans, November 2025.
CD1-16-07a	Revised construction compound plans, November 2025.

Additional documents

CD25-25	Schedule of statutory objectors, 19 November 2025. Submitted by the Applicant.
CD25-26	Written question from the Inspectors concerning the Water Framework Directive assessment, 12 November 2025.
CD25-27	Inspectors' site visits schedule, dated 31 October 2025.

Withdrawn objections

CD28-03	Letter dated 29 October 2025 from Dentons UKMEA LLP withdrawing the objection to the draft Order and application for costs by Clare Hall in the University of Cambridge (OBJ-213).
CD28-04	Email dated 10 November 2025 from Cambridge University Rugby Union & Associations of Football Trust Ltd withdrawing its objection to the draft Order (OBJ-238).
CD28-05	Emails dated 10 & 11 November 2025 from Bidwells withdrawing the objection to the draft Order by Bedlam Farming Company Ltd (OBJ-212).

CD28-06	Letter dated 12 November 2025 from Gowling WLG (UK) LLP withdrawing the objection to the draft Order by Cadent Gas Ltd (OBJ-148).
CD28-07	Letter dated 14 November 2025 from TLT LLP withdrawing the objection by the EWR Company to the draft Order (OBJ-247).
CD29-05	Letter dated 16 September 2025 from National Highways withdrawing its objection to the draft Order (CD2 REP-10.1).

Inquiry documents

CD29-01	List of appearances for CCiC and SCDC (REP-09).
CD29-02	Mr Cameron's and Mr Henderson's opening statement on behalf of the Applicant.
CD29-03	Ms Drabkin-Reiter's opening statement on behalf of Cambridge CiC and South Cambridgeshire DC.
CD29-04	Mr Parker's opening statement on behalf of CPPF & CPC (OBJ-251).
CD29-06	Judgement in A1 Properties (Sunderland) Ltd v Tudor Studios RTM Co Ltd: [2024] 3 WLR. Submitted by the Applicant.
CD29-07-0	Natural England (REP-11) position statement dated 16 September 2025.
CD29-07-1	Record of engagement between the Applicant and Natural England. Submitted by the Applicant.
CD29-07-2	Possible planning conditions agreed by the Applicant and Natural England.
CD29-08	Extract from Cambridgeshire and Peterborough Combined Authority Transport Model – Model Specification Report, WSP and Atkins Ltd, October 2022.
CD29-09	Extracts from Transport update: Cambridge and South Cambridgeshire, CCC, June 2025.
CD29-10	Mr Cameron's and Mr Henderson's submissions on advertisement of the inquiry on behalf of the Applicant.
CD29-11	Map and programme for accompanied site visits, 17 September 2025.
CD29-12	Statement of common ground between CCiC and CCC.
CD29-13	Statement of common ground between SCDC and CCC.
CD29-15	Comberton Greenway consultation leaflet, Greater Cambridge Partnership. Submitted by CPPF & CPC.
CD29-16	Web page of Transport Analysis Guidance historical and reference information, October 2022, DfT.
CD29-17	Summary description of development. Submitted by the Applicant.

CD29-18	Technical Note 3 – Thermal Imaging Report on barbastelle bats crossing the A1303 & A428.
CD29-19	Erratum to Mr Bristow’s proof of evidence (CD26-11) (OBJ-314).
CD29-20	Statement of common ground between CPPF & CPC and CCC.
CD29-21	Lichfields’ update to statement on behalf of Juniper Propco (Bourn) Ltd (SUP-14).
CD29-22	Errata to Coton Busway Action Group’s (OBJ-143) proof of evidence and summary proof (CD26-06-1 & CD26-06-7).
CD29-23	Errata to appendix 3 to Mr J Baker’s proof of evidence (CD26-01-APP-W1-2).
CD29-24	Email dated 24 September 2025 from Mr N Baker (SUP-14) enclosing CDs 29-24-1 to 29-24-7.
CD29-24-1	Illustrative masterplan, Bourn airfield.
CDs 29-24-2 & 3	Plans of western and eastern accesses, Bourn airfield.
CDs 29-24-4 & 5	Plans of footway and cycleway improvements and connections, Bourn airfield.
CDs 29-24-6 & 7	Approved non-material amendment for western access, Bourn airfield, and decision notice.
CD29-25-0	Mr Burford’s speaking notes (OBJ-211).
CD29-25-1	Guidance on the assessment of dust from demolition and construction, The Institute of Air Quality Management, 2024. Submitted by Mr Burford.
CD29-26-0	Ms Blythe’s statement (OBJ-309).
CD29-26-1	Judgement in Ashwell Property Group plc and Ashwell (Barton Road) Ltd v Cambridge City Council: [2008] EWCA Civ 1151. Submitted by Ms Blythe.
CD29-26-2	Heritage Ecosystem Impact Assessment: A pilot study of East West Rail’s preferred Route E (Cambourne to Cambridge), South Cambridgeshire; Universities of York and Cambridge. Submitted by Ms Blythe.
CD29-26-3	Screenshot from Thames Landscape strategy, Rewilding Arcadia webpage. Submitted by Ms Blythe.
CD29-27	Mrs Postgate’s speaking notes (OBJ-84).
CD29-28	Ms Fyfe’s statement (OBJ-297).
CD29-29-0	Extract from minutes of the Greater Cambridge Partnership Executive Board, 1 July 2021. Submitted by Dr Treacy.
CD29-29-1	Dr Treacy’s speaking notes (OBJ-143).
CD29-30	Transport Act 2000. Submitted by the Mayor of Cambridgeshire and Peterborough.

CD29-31-0	Mayoral decision notice concerning a bus franchising scheme, 7 February 2025. Submitted by the Mayor of Cambridgeshire and Peterborough.
CD29-31-1	The Cambridgeshire and Peterborough Combined Authority Area Franchising Scheme for Buses 2025. Submitted by the Mayor of Cambridgeshire and Peterborough.
CD29-31-2	Minutes of the Cambridgeshire and Peterborough Combined Authority Board, 6 February 2025. Submitted by the Mayor of Cambridgeshire and Peterborough.
CD29-31-3	Agenda and papers for meeting of the Cambridgeshire and Peterborough Combined Authority Transport Committee, 15 September 2025. Submitted by the Mayor of Cambridgeshire and Peterborough.
CD29-31-4	English Devolution and Community Empowerment Bill. Submitted by the Mayor of Cambridgeshire and Peterborough.
CD29-33	Bat mitigation measures on roads – a guideline, Conference of European Directors of Roads, 2013. Submitted by the Applicant.
CD29-34	Technical memo – solar studs and bat hats, WSP, September 2025. Submitted by the Applicant.
CD29-35	Note on Cambourne to Cambridge bus services, WSP, September 2025. Submitted by the Applicant.
CD29-36	Ms Wood’s speaking notes (OBJ-01).
CD29-37	Tree preservation order TPO/01/2025 – Coton Orchard, Cambridge Road, Coton.
CD29-38	Ms Buckingham’s speaking notes (OBJ-203).
CD29-39	Mr Davidson’s speaking notes (OBJ-142).
CD29-40	Plan showing extent of Coton Orchard.
CD29-41	Venn diagram of local government in Cambridgeshire and Peterborough.
CD29-42	Plan showing overlap of Order lands with Anglian Water projects.
CD29-43	Location plan for planning permission ref S/2903/14/OL – West Cambourne.
CD29-44	Location plan for planning permission ref 16/1134/OUT – West Cambridge.
CD29-46	Plan showing Madingley Wood SSSI.
CD29-47	National Character Area profile – 88 Bedfordshire and Cambridgeshire Claylands, Natural England.
CD29-48	Cambridge Inner Green Belt Study Supplement, LDA Design, 2016.

CD29-49	Cambridge Landscape Character Assessment, Cambridge City Council, 2003.
CD29-50	Extracts from Cambridgeshire Landscape Guidelines.
CD29-51	Schedule of busway crossing points. Submitted by the Applicant.
CD29-52	Technical memo – Bin Brook retaining solutions, WSP, October 2025. Submitted by the Applicant.
CD29-53	Memo – nitrogen dioxide receptors-0, WSP, October 2025. Submitted by the Applicant.
CD29-54-0	Email dated 11 October 2025 from Richard Buxton Solicitors (OBJ-251) concerning the CPPF landholding and Coton Countryside Reserve.
CD29-54-1	Coton Countryside Reserve leaflet, CPPF. Submitted by CPPF & CPC.
CD29-54-2	Plan of CPPF landholding at Coton.
CD29-55	Letter dated 9 October 2025 from Womble Bond Dickinson concerning a change of the Applicant's planning witness.
CD29-56	List of acronyms. Submitted by the Applicant.
CD29-57	Plans of the extent of the highway along the A1303 at Madingley.
CD29-58	Cross-sections and highway information on the A1303 at Madingley.
CD29-59	Spreadsheet of land value uplift calculations.
CD29-60	Response to CPPF & CPC alternative scenarios for land value uplift assessment. Submitted by the Applicant.
CD29-61	Errata and addendum to environmental statement technical report 8 (CD1-11.08.2).
CD29-62	Mr Sensecall's supplementary note on planning evidence for the Applicant.
CD29-63	Note on carbon assessment responses, WSP, October 2025. Submitted by the Applicant.
CD29-64	Supplementary note concerning translocation of fruit trees. Submitted by Ms Gazeley (OBJ-52).
CD29-65	Mrs Postgate's note concerning footpath No 2 (OBJ-84).
CD29-66	Professor Hirst's (OBJj-251) response to CD29-63.
CD29-67	Joint note on behalf of the Applicant and Clare Hall (OBJ-213) concerning negotiations between the parties and the inquiry programme.
CD29-68	Mr Littlewood's note (OBJ-251) in response to CD29-62.

CD29-69	Letter dated 20 October 2025 from the GCP to Ashcroft Veterinary Practice in response to the Practice's objection.
CD29-70	Mr Singleton's speaking notes (OBJ-123).
CD29-71-1	Cambourne to Cambridge Busway Integration Report, 2025. Submitted by CCiC and SCDC.
CDs 29-71-2 to 29-71-7	Extracts from the Draft Greater Cambridge Local Plan, Regulation 18 consultation, 2025. Submitted by CCiC and SCDC.
CD29-72	Letter dated 31 October 2025 from Womble Bond Dickinson concerning a change of the Applicant's ecology witness.
CD29-73	Transport Strategy for Cambridge and South Cambridgeshire, Cambridgeshire County Council, 2014.
CD29-74	Mr Kelly's supplementary proof of evidence (REP-09).
CD29-75	Errata to appendix A to Mr Leigh's proof of evidence (CD26-10-W3-1).
CD29-76	Coton Orchard County Wildlife Site citation.
CD29-77	Statement of common ground between the Environment Agency (OBJ-301) and CCC.
CD29-78	Mr R Sadler's speaking notes (OBJ-102).
CD29-79	Professor Booth's speaking notes (OBJ-308).
CD29-80	Ms Fry's speaking notes (OBJ-175).
CD29-81	Mr M Baker's speaking notes (OBJ-132).
CD29-82	Judgement in Save Stonehenge World Heritage Site Ltd v the Secretary of State for Transport, [2021] EWHC 2161 (Admin).
CD29-83	Dr Sutton's speaking notes (OBJ-94).
CD29-84	Letter dated 16 October 2025 from National Highways (OBJ-313) concerning an agreement for the M11 overbridge.
CD29-85	Mr Whitby's supplementary proof of evidence on ecological matters for the Applicant.
CD29-86	Environmental Statement Addendum 3 and clarifications. Submitted by the Applicant.
CD29-87	Judgement in Mordue v the Secretary of State for Communities & Local Government and Others, [2016] 1 WLR.
CD29-88-1	Email trail between Mr Sullivan (OBJ-226) and the Greater Cambridge Partnership concerning services on the proposed busway. Submitted by Mr Sullivan.
CD29-88-2	Plan showing possible extension of busway along the A1198. Submitted by Mr Sullivan.
CD29-89	Highway boundary overlays on A1303 topographical survey.
CD29-90	Addendum to Mr Franklin's proof of evidence for the Applicant.

CD29-91	Statement of common ground between Cadent Gas Ltd (OBJ-148) and Cambridgeshire County Council.
CD29-92	Technical statement by Civilstix on the depiction of the highway boundary of the A1303 at Madingley. Submitted by CPPF & CPC (OBJ-251).
CD29-93-1	GCP Infrastructure Programme Biodiversity Net Gain Approach, Report to the Greater Cambridge Partnership Executive Board, 6 November 2025.
CD29-93-2	Decision Summary of the GCP Executive Board, 6 November 2025.
CD29-94	Note concerning analysis of land value uplift sensitivity tests and real house price growth, WSP, November 2025. Submitted by the Applicant.
CD29-95	Email dated 12 November 2025 from National Highways concerning its position in respect of the Order scheme.
CD29-96	Revised schedule of possible planning conditions, 13 November 2025. Submitted by the Applicant.
CD29-97	Email dated 12 November 2025 from Ms Marchant including an objection to the Order scheme.
CD29-98	Judgement in Gateshead MBC v the Secretary of State for the Environment.
CD29-99	Judgement in Associated Petroleum Terminals (Immingham) Ltd and Humber Oil Terminals Trustee Ltd v the Secretary of State for Transport, [2025] EWHC 1992 (Admin).
CD29-100	Citations for ecological sites.
CD29-101	Cambridgeshire County Council's response dated 14 November 2025 to Ms Marchant's request for information.
CD29-102	Increasing canopy cover elevates vehicle collision risk for barbastelle bats at roads, report by KD O'Malley & Others in www.nature.com/scientificreports , 2025. Submitted by Mr Parker (OBJ-251).
CD29-103	Technical Note 5, Response to CD29-102, November 2025. Submitted by the Applicant.
CD29-104	Cambridgeshire & Peterborough Minerals and Waste Local Plan – Adopted Amendments to the Policies Map, 2021.
CD29-105	Note on Madingley Slip Road County Wildlife Site, WSP, November 2025. Submitted by the Applicant.
CD29-106	Judgement in Euro Garages Ltd v the Secretary of State for Housing, Communities & Local Government and Another, [2018] EWHC 1753 (Admin). Submitted by the Applicant.
CD29-107	Judgement in Wyatt v Fareham BC, [2022] EWCA Civ 983. Submitted by the Applicant.

CD29-108	2024 Consultation Feedback Summary Report, East West Railway Company, November 2025. Submitted by the Applicant.
CD29-109	You Said, We Did – Autumn Update, East West Railway Company, November 2025. Submitted by the Applicant.
CD29-110	Email dated 20 November 2025 from Anglian Water Services Ltd providing an update to the holding objection from Anglian Water and Cambridge Water (OBJ-271).
CD29-111	Information on existing bus services and photographs of access to St Neots train station. Submitted by Mr Sullivan (OBJ-226).
CD29-112	Written closing submissions of Roythornes LLP on behalf of PX Farms Ltd (OBJ-252).
CD29-113	Letter dated 21 November 2025 from Womble Bond Dickinson on behalf of the Applicant concerning pre-commencement conditions.
CD29-114	Note on certification of deposited plans. Submitted by the Applicant.
CD29-115	The Applicant's note on draft planning conditions, dated 20 November 2025.
CD29-116	Note on agreement between the Applicant and Ashcroft Veterinary Practice (OBJ-01). Submitted by the Applicant.
CD29-118	Note on Ashcroft Veterinary Practice, removal of National Highways plots, work No 1, and implications for the Order and application documents. Submitted by the Applicant.
CD29-119	Mr Graham's closing submissions on behalf of the Mayor of Cambridgeshire & Peterborough.
CD29-120	Ms Gazeley's closing submissions on behalf of Houston Crest Properties Ltd, Coton Orchard Ltd, and herself.
CD29-121	Mr R Sadler's closing submissions on behalf of J & W R Sadler.
CD29-122	Mr Parker's closing submissions on behalf of CPPF & CPC.
CD29-123	Ms Drabkin-Reiter's closing submissions on behalf of CCiC and SCDC.
CD29-124	Mr Cameron's and Mr Henderson's closing submissions on behalf of the Applicant.
CD29-125	Addendum to CD29-124.
CD29-126-1	Record of decisions of CCiC and SCDC dated 25 November 2025 to approve the Regulation 18 version of the GCLP for consultation.
CD29-126-2	Schedule of amendments to the Regulation 18 version of the GCLP.