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The Cambourne to Cambridge Order

Cambridgeshire County Council

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBOURNE TO CAMBRIDGE ORDER

Rebuttals

of

Jo Baker, BSc, MSc, FCIHT, FCILT, ACGI

of Greater Cambridgeshire Partnership

On behalf of Cambridgeshire County Council

27th August 2025

Planning Inspectorate Reference: DPI/E0535/25/1

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1. INTRODUCTION

1.1.1 This rebuttal proof of evidence has been prepared in response to the Proofs of Evidence submitted by Objectors to the Applicant's proposals for the Cambourne to Cambridge scheme.

1.1.2 My name is Jo Baker. I am the Project Manager for the Cambourne to Cambridge scheme for the Applicant. Details of my qualifications, professional career and key project experience are contained in my Proof of Evidence **[CD26-01-APP-W1-1]**.

1.1.3 This rebuttal has been prepared with the expectation that it will assist the Inspectors with consideration of the issues raised.

1.1.4 The fact that a point has not been responded to should not be taken as indicating that it is accepted.

2. SCOPE OF REBUTTAL

2.1.1 The scope of my rebuttal is specifically in response to matters raised in the Proof of Evidence of

- Ms Gazeley
- Mr Leigh
- Mr Johnstone
- Mayor Bristow
- CBAG
- Ms Postgate
- Professor Short
- Mr Blacklock
- Mr Haider

2.1.2 In my rebuttal proof, I will identify the point of fact or opinion to which I am responding and then set out my response. My rebuttal proof addresses the made and should also be read with the Rebuttals of other witnesses representing the Applicant.

3. REBUTTAL: ANNA GAZELEY: HOUSTON CREST PROPERTIES LTD/COTON ORCHARD

3.1 Introduction

3.2 Operator Support

3.2.1 On **[CD23-06 OBJ-52 SoC, Page 14]** Ms Gazeley assert that without the support of the Cambridgeshire and Peterborough Combined Authority (CPCA), in its capacity as Transport Authority, bus services will not use the CtoC scheme.

3.2.2 For the avoidance of doubt, the CPCA has not objected to the scheme which is aligned with its policies as outlined in **[CD1-21.01, Page 20].**

3.2.3 The Mayor of Cambridgeshire and Peterborough has objected to the scheme; his objection states **[CD26-11 OBJ-313, Page 2]:**

a. “I cannot guarantee the Applicant’s assumed bus service levels on C2C will be viable under future bus franchising arrangements operated by the Authority”;

b. “I can give no assurance that bus services will be permitted to operate on the C2C route under future bus franchising arrangements operated by the Authority”;

3.2.4 The points made by the Mayor are factually correct as, at this point in time the Authority has not committed to a timeframe and delivery plan for bus franchising and, as such, the services operated under franchising cannot be confirmed. As such, and as I have outlined in **[CD26-01-APP-W1-1, Page 47]** the Mayor does not have the power or authority to establish a bus franchise which excludes the CtoC corridor without the approval of the necessary expenditure by the Combined Authority, for which decision the Applicant’s agreement is mandatory. If a bus franchise is not established the County Council can agree to enable operators to utilise the new infrastructure albeit that it cannot avail itself of the options created by the Bus Services Act 2017 without CPCA support.

3.2.5 Moreover the Mayor is required under the terms of the Devolution Deal to work with the local authorities to deliver growth. Specifically **[CD7-03, Page 10]** the Combined Authority “will also work with Government and Greater Cambridge partners to support delivery of the existing Greater Cambridge City Deal which is ensuring the future success of the city and surrounding district of South Cambridgeshire by investing in housing, transport infrastructure, and skills needed to see future economic growth”. If the Mayor were to prevent buses operating on the Cambourne to Cambridge corridor for unspecified reasons, that would undermine compliance with the Devolution Deal.

3.3 Vehicle Guidance

3.3.1 **In [CD23-06 OBJ-52 SoC, Page 16**] Ms Gazeley states that the CavForth trial operated in a tightly controlled urban setting with short range vehicles and low operational complexity, and is not comparable to the proposed scheme.

3.3.2 The CavForth trials operated a route from Ferrytoll to Edinburgh Park, comparable in length to CtoC (14 miles approx) including sections of high-speed motorway running in mixed traffic on the M9 in fully autonomous mode – a challenge far more complex than the CtoC use case, not least as CavForth was fully autonomous whereas CtoC would simply use the guidance elements of the technology.

3.3.3 The CavForth trial, whilst not continued, informed technology development which is now, with UK Government funding, being demonstrated in Cambridge on routes in and around the CtoC corridor.

3.3.4 There is no formal report on the trial but Appendix 1 provides further details of both the CavForth trial and the new application in Cambridge.

3.3.5 These trials are funded through the Centre for Connected and Autonomous Vehicles which operates under the auspices of the DfT.

3.4 Safety and Crossing Points

3.4.1 At page 16 of her evidence, Ms Gazeley states that the current design of the proposed scheme includes no defined internal crossing provision with the orchard.

3.4.2 Details of crossing points within the Orchard have not been addressed because Houston Crest Properties has refused to engage in such discussions The applicant has made clear its willingness to engage in dialogue for example in a written offer of dialogues in the CBRE letter of 19 September 2024 **[CD26-01-APP-W1-2, Page 16].**

3.4.3 I have addressed safety matters in my proof. **[CD26-01-APP-W1-1, Page 44]**

3.5 Publicly Accessible

3.5.1 In **[CD23-06 OBJ-52 SoC, Page 19]** Ms Gazeley claims that the Applicant's statement that the Orchard is not publicly accessible is "demonstrably false" on the basis that the Orchard is both "physically accessible to the public" and "socially and educationally open".

3.5.2 There is no Public Right of Way into or across the Orchard or any permissive or other means of public access and the site is securely fenced and gated. As such it is not publicly accessible.

4. REBUTTAL: CPPF AND CPC

4.1 Edward Leigh

4.1.1 In **[CD26-10-W3-1, Para 3.11],** Mr Leigh notes that the GCP did not revisit any ideas for providing bus priority along Madingley Road as a result of the Independent Audit. As the Audit was an Independent process the Auditor was able to express any views he wished to and GCP did not seek to challenge those. In reality, GCP had already addressed the issue of on-line options through the OBC process and in **[CD13-07].** As a result of the work undertaken in **[CD13-07]** the Executive Board decided to proceed with work to improve Active Travel on Madingley Road and this work continues. Any interim bus priority work on Madingley Road would be potentially abortive, highly disruptive to traffic, and would reduce City Deal funding available for CtoC.

4.1.2 In **[CD26-10-W3-1, Para 4.1.4],** Mr Leigh states that "The GCP was sent the first version of my report in April 2021 as part of the Independent Audit **[CD8-27];** an updated version in July 2022 in response to the EIA consultation; and then in September 2024 an extract that included the journey time analysis. In its Statement of Case, the Applicant does not challenge the data or conclusions, I can only presume because it accepts the veracity of the data and the conclusions I have drawn from it".

4.1.3 The GCP has not responded to Mr Leigh's various evolving solutions for 3 reasons:

4.1.4 Firstly, the document was prepared for the Independent Audit of the CtoC scheme. That Audit is covered on **[CD23-01, Page 37]** and confirmed that "the Scheme should proceed to the next stage". As such whilst the audit did recommend, as has been the case, that GCP further consider interim measures, there was no requirement to revisit alternative schemes.

4.1.5 Secondly, despite frequent statements to the contrary from multiple objectors, GCP fully assessed the on-line alternative in **[CD1-20],** most notably **[CD1-20.07]** and the audit confirmed **[CD8-27, Page 5]** that the "the business case development followed the HMT Treasury Green Book and the Department for Transport's TAG methodology. The appraisal has been carried out in a robust manner and the economic analysis and financial case remain valid". As such there was and is no need to revisit earlier stages of option development.

4.1.6 Thirdly as Mr Leigh indicated in the 1st draft of his paper **[CD7-10, Page 2],** his proposals, only provided a "package of 'quick win' interventions to the Greater Cambridge Partnership and Combined Authority as an effective and low-cost interim solution while the details of longer-term infrastructure schemes, such as East West Rail, the CAM network and the Girton Interchange, are worked out". This matter is also addressed in **[CD23-01, Page 125].**

4.1.7 Overall, therefore, I do not accept the accuracy of the data or the conclusions drawn from it. In addition it would appear that the proposal put forward in Mr Leigh's April 2021 paper, has now been superseded by the option presented by Mr Johnstone in **[CD26-10-W2-1].**

4.1.8 That said, whilst it is not entirely clear which versions of his documentation Mr Leigh refers to in **[CD26-10-W3-1, Para 4.1.4]**, I note the following, as examples of my concerns regarding the reliability or value of such documents:

4.1.9 In **[CD26-10-W3-1, Page 32]** Mr Leigh states that bus tracking data "proves that there is negligible congestion outbound west of Grange Road (see Figure 6 on p36 to Figure 8 on p37), and therefore no need for bus priority, currently or in the foreseeable future". Bus tracking data is source of historic data which is useful for the analysis of past trends but one which is not capable of predicting future delays, especially when background traffic growth is likely to be compounded by the construction of a further 5,850 houses. Mr Leigh cannot make valid assertions about the "foreseeable future" on this basis of this historic data.

4.1.10 On **[CD26-10-W3-1, from Page 34 to 37**] Mr Leigh provides data analysing bus journey times in 2019 and 2024. The purpose of this is unclear and Mr Leigh doesn't appear to draw meaningful conclusions from the analysis. In any event the benefit of such analysis is uncertain. The A428 corridor from Black Cat to Caxton Gibbet has been under reconstruction, notably at the main roundabouts at either end since late 2023 which makes 2024 data of questionable value.

4.2 Steve Johnstone

4.2.1 Traffic modelling

4.2.2 Mr Whitehouse will deal with matters relating to the Outline Business Case and scheme benefits. **In [CD26-10-W2-1]** Mr Johnstone advances an argument that the scheme modelling is not fit for purpose and the scheme therefore not robust.

4.2.3 I will address two specific points raised in **[CD26-10-W2-1, Page 3]**.

4.2.4 Firstly Mr Johnstone queries the use of the CSRM model. The development of the business case has followed the process defined in the HM Treasury Green Book at DfT TAG. That process has been subject to Independent Audit. It is inevitable that any Business Case will reflect the available modelling tools which will themselves be based on historic data. The F series version of the CSRM was updated to reflect the best possible data. Further post Covid data has now been collected and used to create a new model for the region and that model will be used to inform the Full Business Case for the scheme.

4.2.5 Secondly: in the meantime, and with regards to Covid, further analysis has been undertaken in **[CD9-32]** which Mr Whitehouse discusses in **[CD26-01-APP-W6-1].**

4.2.6 This approach is considered to be proportionate in the context of the CtoC scheme which is, and always has been, intended to be a growth scheme to unlock economic development. Conventional modelling benefits such as Travel Time Savings have always been modest but the overall scheme benefits including factors such as Land Value Uplift remain strong and are not derived from the modelling work. As such, as is illustrated **[CD9-32]** debates over the details of the model have little or no impact on value for money.

4.2.7 The fact that Mr Johnstone refers to such benefits as "esoteric count-ups of things like Dependent Development are included" **[CD26-10-W2-1, Para 4.01]** suggests he may not be aware of or familiar with DfT's May 2025 framework **[CD8-32]** which Mr Whitehouse discusses further.

5. REBUTTAL: PAUL BRISTOW

5.1 Introduction

5.1.1 In **[CD26-11]** Mayor Bristow makes 5 summary points in response to which I would note the following matters:

5.1.2 Firstly, it remains uncertain as to whether a franchising system will be adopted as the Cambridgeshire and Peterborough Combined Authority has not committed to a timeframe and delivery plan for bus franchising and, as such, the scope of services operated under franchising cannot be confirmed.

5.1.3 As noted in **[CD9-57, Para 7.1.6.2]** any decision to make a transport plan or to spend money on transport related matters can only be made with the support of the Applicant.

5.1.4 It is not possible to form a view on whether or not franchising will be adopted, and if it is adopted whether or not buses will be franchised on the proposed route.

5.1.5 What is clear is that the route will serve a vital purpose in unlocking development. As I note in my response to Ms Gazeley, the Devolution Deal **[CD7-03, Page 10]** states the Combined Authority "will also work with Government and Greater Cambridge partners to support delivery of the existing Greater Cambridge City Deal which is ensuring the future success of the city and surrounding district of South Cambridgeshire by investing in housing, transport infrastructure, and skills needed to see future economic growth"

5.1.6 He states that "the scheme as currently proposed does not align with my mayoral priority to deliver a light rail network for Cambridge and the surrounding area". The scheme as currently proposed is aligned with CPCA Policy as noted in **[CD1-21.01, Page 20].** The issue of a future light rail network has been discussed previously. As Mr Freeman **[CD26-01-APP-W14-1, Page 6]** and Mr Kelly **[CD26-12 REP-09, Page 11]** suggest, the CtoC scheme is needed now to enable the growth envisaged in the Local Plan and Devolution Deal. In the future it could at some point be upgraded to Light Rail operation but as there are no current plans or commitments for Light Rail, such an upgrade cannot be foreseen.

6. REBUTTAL: CBAG

6.1 Introduction

6.1.1 The majority of points raised by CBAG, notably the points relating to the sequence of events outlined in **[CD26-06-1, Pages 4-12**] Coton Busway Action Group Proof of Evidence are addressed in my Proof of Evidence **[CD26-01-APP-W1-1, Pages 40-42].**

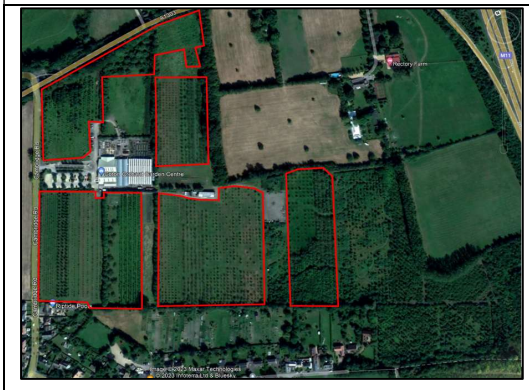
6.1.2 CBAG do raise a suggestion that "from the very beginning, the GCP and the Applicant have sought to downplay the "countywide and national significance of Coton Orchard" and "denigrate the status of the Orchard". **[CD26-06-1, Pages 4**].

6.1.3 The Orchard has never been and is not considered to be nationally significant. Moreover, until 2024 the Orchard was not classified as a County Wildlife site and the original trees were not protected by Tree Preservation Order until this year. Moreover, the trees now classified as Veteran trees would not necessarily have been considered as Veteran trees under prevailing guidance which informed the original Environmental Statement.

6.1.4 The profile of the Orchard has evolved significantly in the last few years. Prior to that the Orchard had a low profile. In reality at the 2017/8 consultation on Phase 1 which would have been the appropriate time to raise the issues, the Local Liaison Forum formal response (5/12/17) did not mention the Orchard at all. Neither does CPPF (29 January 2018). Nor Coton Parish Council (23/1/18). The suggestion that the credentials of the Orchard have been downplayed over a period of 10 years is meaningless. It is only since 2022 that the Orchard has become the focal point of the debate or indeed played any part in it.

6.1.5 The Orchard is not referenced in [**CD1-06.08]** Consultation Report Appendix G - Individual Consultation Report Phase One February 2018.

6.1.6 The suggestion that the Applicant's assessment of the Orchard is incorrect can be easily refuted by reference to aerial photography which demonstrates the loss of Orchard both since the second world war and over the period that Houston Crest Properties have managed the site. The figures below show the declining extent of Orchard outlined in red.

1945	2002
2012	2022
	

Map Data: Google

7. REBUTTAL: CAROLYN POSTGATE

7.1 Introduction

7.1.1 On **[CD26-04-1 OBJ-84, pages 1-3]** of her Proof of Evidence Ms Postgate covers points addressed in our Evidence.

7.1.2 On **[CD26-04-1 OBJ-84, page 3]** she asserts that "the planned expansion of the existing reservoir has been completely ignored by the Applicant in their plans for CtoC and, in my opinion, renders the off-road route for CtoC as outlined by the Applicant completely unworkable". That matter is addressed on **[CD23-01, Page 133]** and our position is corroborated on **[CD2-OBJ-271, Page 1]** where Anglian Water Services Limited & Cambridge Water explain that dialogue is ongoing to ensure the schemes can both proceed.

8. REBUTTAL: CLARE HALL

8.1 Introduction

8.1.1 I have addressed specific points raised by Professor Short, Mr Blacklock and Mr Haider with other issues addressed by members of the team.

8.2 Charles Alan Short

8.2.1 Professor Short suggests **[CD26-08-W1-1, from Page 50]** that as part of its "Attempts to Engage with the Applicant" Clare Hall sought meeting "over nearly 7 years" during a period commencing in late 2017.

8.2.2 As Professor Short then confirms, in addition to the standard invitations to consultations, meetings did take place with the then Project Managers on 18th April 2018 and 8th August 2019, as well as a meeting on 23rd January 2019 with GCP Transport Director Peter Blake. As such it would appear that the "Attempts" were successful.

8.2.3 Professor Short states **[CD26-08-W1-1, Para 9.4]** "during August of 2019 it appears that the position of GCP towards the routing via Rifle Range Road changed, with Adams Road now being the preferred option. This was confirmed by letter from Peter Blake of GCP at the start of September 2019". Mr Blake's letter is at Appendix 3 and it is clear from that letter that Rifle Range was the preferred route, but that GCP was further revisiting the two options, and that any decision remained with the Executive Board whose position remained consistent with Rifle Range as the preferred option.

8.2.4 Following the approval of a preferred route by the Executive Board and the Environmental Impact Assessment Consultation, further meetings took place but the description on **[CD26-08-W1-1, Pages 51 and 52]** is inaccurate.

8.2.5 GCP replied in writing to the Clare Hall Consultation response on 24th August 2022.(see Appendix 3) confirming on Page 2 that "we would be pleased to agree whatever access requirements may be needed to maintain College Operations" and offering a further meeting.

8.2.6 The meeting with Peter Blake referred to in **[CD26-08-W1-1, Point 9.9**] actually took place on 29/11/22 before the meeting with me. This was an in person meeting organised by the University's representative on the Executive Board.

8.2.7 The meeting of 16/12/22 was the agreed outcome of the meeting of 29/11/22 although Professor Short's account [CD26-08-W1-1, Pages 51-52] of the meeting is incorrect as it was primarily between myself and representatives of Pulsar and Gleeds along with Professor Short and Per Reiff-Musgrove of Clare Hall. WSP were represented at this meeting rather than the meeting with Peter Blake.

8.2.8 Following the meeting of 16/12/22 there was ongoing dialogue between Pulsar and GCP with GCP responding to requests where possible to do so. Requests for information on 3/1/23 and 6/2/23 both received timely responses (see Appendix 3 of this Rebuttal). Thereafter no further requests were received for some time. As Pulsar and Mr Baker were in touch with each other, there was an open line of communication, so the comment made in **[CD26-08-W1-1, 9.10]** with regards to costs is implausible.

8.2.9 Moreover, as Professor Short's evidence alludes to, he is involved in a number of University activities with ample access to the University's representatives on the GCP Executive Board (who arranged the meeting of 29/11/22 at the request of Prof Short) and Joint Assembly and the idea that the College was not able to engage with GCP is rejected. The two requests from Pulsar (12/1/23, 9/2/23) received prompt responses (Appendix 3) as did the EIA Consultation response and as would have any further queries had such queries been issued.

8.3 Jonathan Blacklock

8.3.1 The majority of issues raised by Mr Blacklock are addressed by Mr T Lewis.

8.3.2 In **[CD26-08-W4-1, Page 53]** Mr Blacklock questions the commitment to electric vehicle operations.

8.3.3 The Environmental Statement has been prepared on the basis of the operation of Euro VI buses for two reasons:

- Firstly it is appropriate to assess a worst case scenario
- Secondly because the Applicant is unable to guarantee that on the day the scheme opens, bus operations in Cambridge will be 100% electric. Even if the fleet allocated to the scheme were 100% electric any bus operator would want to right to replace a failed vehicle as a contingency measure in order to maintain service

8.3.4 As things stand, there is an ongoing programme of replacement of the bus fleet with electric buses. The U bus which serves the West Cambridge site is electric as are many buses operating Park and Ride services. I provide details of these in Appendix 2.

8.3.5 Therefore, as Mr T Lewis suggests **[CD26-01-APP-W11-1, Page 8]** the Applicant would be willing to accept conditions on the use of non-electric vehicles at times when noise impacts would be of greatest concern. Such conditions would be a stop-gap solution whilst conversion of the fleet to electric operation was completed.

8.4 Kamran Haider

8.5 Scheme and Transport Policy Overview

8.5.1 In **[CD26-08-W2-1, Para 2.35]** Mr Haider suggests that a segregated busway east of the M11 was not envisaged in the **TSCSC [CD7-07].** In fact, within **[CD7-07]** Figure 4.2 on Page 4-4 Figure 4.3 and Page 4-8, and Figure 5.3 on Page 5-7 all show High Quality Public Transport extending from the CtoC corridor into the city centre. Whilst a segregated busway was not identified at that location, the need for improvement was clearly identified. [**CD7-07, Table 5.14]** specifically refers to the need for "A1303 busway / HQPT infrastructure to serve Bourn Airfield / Cambourne".

8.5.2 In any event, the TSCSC was not an adopted policy document in its own right but was intended to inform the LTP3 and Local Plans as clarified on **[CD7-07, Page 1-1].** As Mr Haider subsequently identifies in **[CD26-08-W2-1, Para 2.42]** the SCDC Local Plan, which was informed by the TSCSC states "Provision of high-quality bus priority measures or busway on or parallel to the A1303 between its junction with the A428

and Queens Road, Cambridge;" The OBC has considered alternatives which address this requirement and concluded that the preferred option best meets it.

8.5.3 **In [CD26-08-W2-1, Paras 2.44-2.49, 2.133-2.139]** Mr Haider appears to argue that the scheme is deficient because buses do not go to Queens Road. This argument would appear to be based upon an interpretation of Part 8 (a) of policy SS/7 "New Village at Bourn Airfield" which Mr Haider correctly cites as stating “Provision of high-quality bus priority measures or busway on or parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge;" The preferred route indeed runs parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge. Whether the Applicants preferred option using the Rifle Range, or the alternative via Adams Road which Mr Haider promotes were to proceed, both would comply with the principal of providing a route parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge.

8.6 South Cambridgeshire Local Plan (2018)

8.7 Manual for Streets and Manual for Streets 2

8.7.1 In **[CD26-08-W2-1, Paras 2.92**] Mr Haider states that “Adams Road is a residential road and therefore, its design should follow the principles set out in MfS and MfS2. I would also expect RRR to follow these principles”.

8.7.2 In **[CD9-02, Page 5]** MfS states that it “focuses on lightly-trafficked residential streets, but many of its key principles may be applicable to other types of street, for example high streets and lightly-trafficked lanes in rural areas”. As Mr Haider accepts,MfS2 is primarily relevant to busier urban and rural streets.

8.7.3 Guidance contained within MfS/MfS2 is generally helpful but as Rifle Range is not a residential street MfS does not directly apply and MfS2 is largely inapplicable.

8.8 Consultation process

8.8.1 In **[CD26-08-W2-1, Paras 3.22**] Mr Haider suggests that the consultation process was flawed on the basis of his concerns with regards to journey time data presented in the consultation. He states that he “is not aware of any updated journey time or route design information following the Atkins 2015 report” which I take to refer to **[CD13-01].**

8.8.2 A subsequent paper **[CD9-53]** entitled “C2C Public Transport Journey Times 11.09.2015” provided the breakdown of the journey time data consistent with the leaflet. That document has been available on the GCP website since publication.

8.8.3 Irrespective of Mr Haider’s misplaced concern, the 2015 Consultation was used to support the SoCG which primarily makes the decision whether or not to proceed with the scheme. At that stage there was limited detail of the alternatives and data cited would be prepared accordingly.

8.8.4 The precise levels of response to each option were helpful to inform early decision making but the formal selection of options for this section of the scheme was based upon the OBC informed by the 2017/2018 consultation.

8.9 INSET Scoring

8.9.1 Future Proofing

8.9.2 In **[CD26-08-W2-1, Para 3.85]** Mr Haider argues that a future proofing argument was not relevant to the section of CtoC east of West Cambridge.

8.9.3 Mr Haider misunderstands the argument at the time. The position taken by the Mayor and others was that the section east of West Cambridge would become redundant and

that therefore the Adams Road option which is accepted to be lower cost, would be an acceptable interim solution. As such it was considered to offer greater future proofing in that it would reduce the risk of redundancy. With the cancellation of the CAM that argument no longer applies and the Rifle Range scheme offers a more flexible solution avoiding the constraints of Adams Road. Hence the scores should revert back to the scores set out in OAR1. As discussed in **[CD26-01-APP-W1-2, Appendix 2**] that alone would make the Rifle Range preferable but given the further points raised by Mr Haider I will revisit the scoring below.

8.9.4 The chronology with regards to cancellation of the CAM is also discussed further below.

8.9.5 CAM Sub-Strategy

8.9.6 In **[CD26-08-W2-1, Paras 3.90-3.95**] Mr Haider misinterprets the CAM Sub-Strategy. Whilst the then Mayor of Cambridgeshire and Peterborough discussed extensive tunnelling from the West Cambridge campus into the City Centre, and such alternatives were consulted on, tunnelling was only referred to in the CAM Sub-Strategy in the following context: "the City Tunnel Section, including underground tunnels and planned major interchange hubs at the city centre and at the mainline railway station, under the city of Cambridge". **[CD7-38, Page 12].** Tunnelling was not identified as a CAM Objective or Sub-Objective.

8.9.7 Segregation, however, was specified as a specific policy within the sub-strategy: CAM-E15: CAM is anticipated to be segregated as a default assumption; subject to full demand and transport planning analysis to justify the need for segregation**" [CD7-38, Page 7]**.

8.9.8 The requirement of the scheme is to be compliant with transport policy as adopted by the Cambridgeshire and Peterborough Combined Authority, namely the LTCP and its supporting documents which at that time included **[CD7-38**].

8.9.9 Change from Adams Road to RRR

8.9.10 In **[CD26-08-W2-1, Para 3.97]** Mr Haider suggests that the perceived change to RRR was based on a misapplication of policy

8.9.11 Mr Haider is incorrect. There never was a decision to select Adams Road as the preferred route and so there never was a decision to revert.

8.9.12 Work was undertaken as discussed in **[CD26-01-APP-W1-2, Appendix 2],** to revisit the alternatives in the light of the CAM and the issue of future-proofing, amongst other matters, as discussed above. Once the CAM sub-strategy was published, and the initial perception that Adams Road would enjoy greater support was clearly dispelled, that assessment was not taken further as noted in Mr Blake's letter of 26th May 2020 (see Appendix 3).

8.9.13 The decision taken by the Executive Board [**CD10-09, Page 7**], based on **[CD 10-19, Para 12.3]** followed the previous decision **[CD10-07, Page 6]** which had already noted the Rifle Range as a part of the preferred scheme based on **[CD10-20, Para 10.2]**. As such the Executive Board did not seek a further report because it had never recognised Adams Road as the preferred option.

8.9.14 I would agree with Mr Haider in **[CD26-08-W2-1, Para 3.98]** that with hindsight and for clarity we might have issued a new INSET reassessment. At the time, and from a procedural perspective, the view was that the original had never been superseded and so there was no requirement. Had such an assessment been undertaken then as indicated in **[CD26-01-APP-W1-2, Appendix 2]** it would not have changed the decisions made.

8.9.15 Mr Haider revisits the issue in **[CD26-08-W2-1, Para 3.102]** questioning the lack of reasoning and justification to change from Adams Road to RRR. Once again, there was no decision to adopt Adams Rd. As I discuss in **[CD26-01-APP-W1-2, Appendix 2]** and in my response to Professor Short's evidence.

8.9.16 In **[CD26-08-W2-1, Para 3.112**] Mr Haider makes a number of incorrect statements some of which I have already addressed but I would also note that he suggests that RRR is not segregated and that that fact is acknowledged by the Applicant. I am unclear why Mr Haider believes that that fact is accepted by the Applicant and I do not accept that analysis as the RRR will not be public highway and buses will therefore be segregated from all conventional traffic. Specific exemptions will be permitted to maintain existing access requirements but that is not comparable with a domestic street such as Adams Road where buses would mix with other traffic and cycles within an adopted highway.

8.9.17 In **[CD26-08-W2-1, Para 3.112**] he also states that "the CAM sub-strategy specifically relates to the CAM and not the CtoC scheme. Segregation for CAM was inherent from its conception. This was not the case for CtoC". The ARUP review **[CD9-01**] was commissioned jointly by CPCA and GCP and was prepared in order to address the CPCA aspiration that the CtoC scheme could form an eventual part of CAM. On that basis CtoC was intended to comply with the CAM sub-strategy. The CAM Sub-Strategy **[CD7-38, Page 12]** includes a plan which illustrates the way in which the GCP Corridors, including CtoC, were considered to be a part of the wider CAM network.

8.9.18 As stated in the Sub-Strategy on **[CD7-38, Page 1] "**Schemes which form part of the CAM will be expected to be compliant with the policies in this document". As such, the CAM sub-strategy does relate to CtoC as a part of the eventual CAM network.

8.9.19 **Cancellation of CAM**

8.9.20 That said, the scheme was discussed at the Joint Assembly in January and June 2020 but in both instances was not taken forward to the Executive Board. As noted in **[CD10-10, Pages 10-11**] Members on the Joint Assembly expressed their concerns about the suggestion that any decision to select Adams Road might in due course be made and in **[CD10-11, Page 15]** welcomed an indication that that position was not to be pursued. Moreover the opportunity for further technical work to be undertaken in advance of the 10th December 2020 meeting was limited as the initial intention had not been to present CtoC to this Board cycle. The reinstatement of the scheme was a direct request from Elected Members at the November 2020 Joint Assembly which in return reflected the failure of the Combined Authority to approve an alternative northern alignment for CtoC which was proposed by the Mayor but not seconded by any member of the Combined Authority.

8.9.21 Whilst the CAM was not formally cancelled at this point, the GCP Executive Board agreed to proceed as noted **[CD10-19, Para 1.9]** "the T&I Committee did not support the recommendations and the CPCA has no mandate to progress further with the proposals. The GCP's Cambourne to Cambridge proposals are therefore now being brought back to the Executive Board".

8.9.22 In **[CD26-08-W2-1, Paras 3.113 and 3.114]** Mr Haider suggests there is inconsistency in the Applicant's Statement of Case. As above, the situation is more complex. In **[CD26-08-W2-1, 3.115]** Mr Haider is correct that the CAM was formally cancelled in May 2021 but as per the **[CD9-55]** Agenda, and **[CD9-54, Page 7]** Minutes and **[CD9-56, Page 3**] Decisions of the CPCA Transport and Infrastructure Committee of 4th November 2020, in effect the CAM programme had already stalled because elected members would not support the Mayor's proposals which were not put to the vote as no seconder could be found.

8.9.23 Outline Business Case – Strategic Business Case Addendum (OBC Addendum) (November 2024)

8.9.24 In **[CD26-08-W2-1, Paras 3.130 and 3.131**] Mr Haider revisits the CAM chronology suggesting inconsistency in the OBC Addendum.

8.9.25 The decision to approve the preferred route including Rifle Range was taken by the Executive Board in July 2021 **[CD10-01]** after the CAM was cancelled. However as discussed already there was never a decision to adopt an option including Adams Road. As noted in the June 2020 Joint Assembly papers [**CD10-11]** and reiterated in December 2020 when that paper evolved into an Executive Board paper **[CD10-19],** the GCP had reviewed the choices and revisited them as is appropriate in the decision-making process. However by the time of the June 2020 paper the draft CAM sub-strategy had been published and that informed the decision to proceed with the scheme based on Rifle Range which the Executive Board had already reviewed and noted in December 2018 **[CD10-07].**

8.9.26 ES Addendum 2 (July 2025) – CD1-10.07

8.9.27 In **[CD26-08-W2-1, Paras 3.153**] Mr Haider offers criticism of ESA2.

8.9.28 ESA2 provided an explanation of the basis for the assessment summarised in the Environmental Statement by providing clear references back to the supporting documentation. It responded to the claim in **[CD9-52, Page 3]** that an "ES requires a description of the reasonable alternatives studied by the developer, which are relevant to the proposed works and their specific characteristics, and an indication of the main reasons for the option chosen, taking into account the significant effects of the proposed works on the environment. Whilst this work had already been undertaken, ESA2 clarifies the locations within the documentation supporting the Application that the justification for the scoring can be located.

8.9.29 In **[CD26-08-W2-1, Paras 3.149]** Mr Haider states that the revised scores in ESA2 are incorrect. He refers to a future proofing score of zero for Adams Road which I am unable to locate as no further reference is provided. **[CD1-10.07, Para 5.1.3]** provides details of where the justifications for the INSET scoring can be found.

8.9.30 In **[CD1-10.07, Para 5.1.13]** the future proofing issue is revisited. As noted in that document, simply by reversing the future proofing scores to their pre-CAM levels, as set out in OAR1, the Rifle Range returns to being the better performing option.

8.9.31 In **[CD26-08-W2-1, Paras 3.167] Mr** Haider suggests inconsistency in explanations for reverting to RRR. Whilst the issue is, as is outlined above, complex, it was not simply based on "discussions with cycle and residents groups" as Mr Haider suggests, but primarily driven by the draft CAM sub-strategy although the strong levels of local opposition were a concern of the Joint Assembly and scoring assumed in OAR3 did not reflect the balance of public acceptability which became clear once both options were being considered.

8.9.32 Throughout Mr Haider repeats points already addressed above and reiterates the misapprehension that Adams Road was ever approved as the preferred route which I address in my rebuttal of Professor Short's evidence at 8.2.3 of this document.

8.9.33 Applicants Proposed Route

8.9.34 In **[CD26-08-W2-1, Paras 4.29 onwards]** Mr Haider advances a complex argument which appears to use inappropriate assumptions to try to demonstrate that a greater proportion of hypothetical bus routes serving the scheme would be segregated with Adams Road whilst confirming that the Rifle Range option would offer more segregation.

8.9.35 However, the tables demonstrate that more of the scheme is segregated using Rifle Range. I have not checked the calculations because I am unclear as to any relevance but if I accept Mr Haider's calculations at face value I note that as well as increasing the percentage of the route which is shared, the use of his Adams Road option to the railway station also increases overall route length. Whilst this assessment was not part of our consideration of the merits of the two schemes Mr Haider inadvertently adds weight to the argument in favour of Rifle Range.

8.9.36 The conclusion at **[CD26-08-W2-1, Para 4.59]** seeks to compare the proportion of the route which is segregated. The comparison is of little or no value in evaluating the comparative merits of the Adams Road and RRR routes.

8.9.37 The Rifle Range option reduces the level of shared running both when the scheme is assessed in the conventional way and on the basis of Mr Haider's slightly unorthodox assessment. As the section of the scheme Clare Hall are contending it is inevitable that this will only form a small proportion of the entire scheme and, as such, the purpose of Mr Haider's comparison is opaque.

8.9.38 In reality Adams Road represents around 480m where buses would need to negotiate a residential street in a conservation area with inadequate space for pedestrians and heavy demand from cycles.

8.9.39 In **[CD26-08-W2-1, Para 6.9]** Mr Haider raises a valid point about the need for access to the area used for a skip. At present the skip lorry makes the same manoeuvre, albeit that the junction is not controlled. In the future the junction will benefit from signal control so will ensure that there is a reduced risk of conflict with through traffic on Grange Road. The details of the layout will need to be discussed with Clare Hall in advance of detailed design but access for very sporadic movements of a skip lorry are not considered to be a concern. By comparison a similar scenario arises on Adams Road where the service access to Robinson College is located and also requires vehicles to reverse in and out so whilst the point raised is valid, it does not represent a net argument in favour of Adams Road.

8.9.40 In [**CD26-08-W2-1, Para 6.12**] Mr Haider raises a query about access for maintenance from the Rifle Range Road. The Applicant has been clear that existing access rights will be maintained and is in discussion with Clare Hall's representatives with regards to a potential assurance in this regard. That process was delayed as Clare Hall's representative failed to confirm what existing rights the College would need to maintain but the Applicant remains open to discussion.

8.9.41 In **[CD26-08-W2-1, Para 6.18]** Mr Haider requests a legally enforceable agreement. As above, the Applicant is open to such discussion with regard to maintenance of rights currently enjoyed by the College. The Applicant would be willing to provide a legally enforceable agreement but only in the case of existing rights of commensurate status.

8.9.42 Many of the points Mr Haider raises in **[CD26-08-W2-1, Para 6.58 to 6.66]** refer to the speculative proposals for an amphitheatre. The Applicant is open to further discussion on this point with regards to maintaining any access rights currently enjoyed by the College but notes that jurisdiction will lie with the appropriate planning and highway authorities.

8.9.43 Adams Road

8.9.44 In **[CD26-08-W2-1, Para 7.44]** Mr Haider observes correctly that it is not unusual for buses and cyclists to share road space. The Applicant agrees but would refute that the Magdalene Street/Bridge Street example provides a precedent. This location is a part of the historic core which is severely sub-standard in nature. As a result the provision for cyclists and pedestrians in that location is poor but without any option for remediation. The similarity to the Adams Road option proposed by Mr Haider **in [CD26-08-W2-1, 4.5.2]** is that the proposals would force buses to negotiate a

residential street in a conservation area which at its western end is constrained and is used heavily by cyclists. Given that in the location in question there is an alternative which avoids such a scenario the Applicant would recommend the Rifle Range.

8.9.45 Increased Routing Flexibility

8.9.46 Mr Haider is correct in **[CD26-08-W2-1, 7.5.6]** that the Adams Road/Grange Road junction could be amended to enable buses from the busway to turn north onto Grange Road, but it is unclear as to the benefit of such a manoeuvre other than as a result of road closures. In the instance of road closures there are always options which can be considered. For example buses could turn from Charles Babbage Road onto J J Thompson Avenue to access Madingley Road, as one of many viable alternatives. Under normal circumstances a left turn forces traffic to head north and then turn south again via the constricted Magdalene Street/Bridge Street route.

8.9.47 Optioneering and Scheme Comparison

8.9.48 Mr Haider states in **[CD26-08-W2-1, 8.1.4]** that the failure to formally use INSET at the final decision making stage was a flaw in the decision making process. With the benefit of hindsight I would agree that it would have been beneficial to illustrate the final decision through the use of INSET but as I have mentioned 12.9.11 to 12.9.27 of this Rebuttal , from a formal perspective, the decisions made by the Executive Board maintained a constant position in favour of Rifle Range. The chronology is set out in **[CD26-01-APP-W1-2, Appendix 2].**

8.9.49 **[CD26-01-APP-W1-2, Appendix 2],** responded to the Clare Hall SoC on this matter and demonstrated that simply restoring the future-proofing scoring the OAR1 levels would place Rifle Range as the better scoring option.

8.9.50 Since the matter has been reopened by Clare Hall I have revisited the wider scoring which, for Adams Road I do not intend to amend further, but where for Rifle Range there are a number of matters such as land acquisition where I have further amended the score as noted. A revised INSET table is included as Table 1 below. This indicates scores from OAR1, OAR3, my score from [**CD26-01-APP-W1-2, Appendix 2],** Mr Haider's score, and a final suggested score.

8.9.51 For clarity I include a second table below explaining the final suggested scores. In most instances I would retain our original scoring from OAR1, or amendments made in OAR3. In 3 instances I believe amendments made in OAR3 can now be reversed back to OAR1 and based on justification made at that time.

8.9.52 For Public Acceptability I have further revised the scoring on the basis that Adams Road attracted far greater levels of opposition than the use of the Rifle Range whereas a number of the issues raised regarding the Rifle Range related to matters such as access to playing facilities which have largely been addressed now.

8.9.53 Overall I am clear that the Rifle Range remains the better performing option.

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Table 1: Updated INSET Scoring

	Adams Road					Rifle Range					
	OAR1	OAR3	Final	Clare Hall	GCP Final	OAR1	OAR3	Final	Clare Hall	GCP Final	
Reliability of journey	2	2	2	2	2	7	3	3	3	3	Agreed (OAR3)
Route flexibility	1	1	1	4	1	1	1	1	1	1	OAR1
Walking and cycle connectivity	3	3	3	3	3	7	7	7	3	7	OAR1
Impact on existing traffic	1	1	1	3	1	3	3	3	3	3	OAR1
Environmental impact – Visual Impact	4	4	4	4	4	2	2	2	1	2	OAR1
Environmental Impacts – Noise	3	3	3	3	3	3	3	3	1	3	OAR1
Environmental Impacts – Air quality	4	4	4	4	4	4	4	4	4	4	Agreed (OAR1)
Environmental Impacts – CO2 emissions	5	5	5	3	5	4	4	4	1	4	OAR1 KH confuses air quality and CO2
Environmental impacts – Biodiversity	2	2	2	2	2	1	1	1	1	1	Agreed (OAR1)
Environmental Impacts – Heritage	3	3	3	3	3	3	3	3	1	3	OAR1
Environmental Impacts – Green Belt	4	3	3	3	3	4	2	2	1	2	Both routes cross Green Belt (OAR3)
Safety	3	3	3	3	3	4	3	3	3	4	Restored to OAR1
Public acceptability	3	2	2	3	2	5	1	1	3	3	Very strong local objection to Adams Road not recognised by KH
Scheme Cost	3	3	3	3	3	3	**1**	1	1	1	Agreed (OAR3)
Land Acquisition Required	4	4	4	4	4	3	2	2	1	3	No landowners objections so score restored to OAR1
Impact on Local road network during construction	2	2	2	4	2	4	4	4	2	4	OAR1
Future proofing	3	6	3	2	3	6	**3**	6	2	6	Restored to OAR1 as risk of redundancy no longer applies
Average Score	2.94	3.00	2.82	3.12	2.82	3.76	2.76	2.94	1.88	3.18	

Table 2: Commentary on Scoring

Issue	Commentary
Reliability of journey	Agreed (as per OAR3)
Route flexibility	Not Agreed, as per OAR1.
Walking and cycle connectivity	Not Agreed, as per OAR1
Impact on existing traffic	Not Agreed, as per OAR1
Environmental impact – Visual Impact	Not Agreed, as per OAR1
Environmental Impacts – Noise	Not Agreed, as per OAR1
Environmental Impacts – Air quality	Agreed (as per OAR1)
Environmental Impacts – CO2 emissions	Not Agreed, as per OAR1. KH confuses air quality and CO2 and suggests that operational carbon savings should be ignored. Matter addressed by Mr Saunders
Environmental impacts – Biodiversity	Agreed (as per OAR1)
Environmental Impacts – Heritage	Not Agreed (as per OAR1).
Environmental Impacts – Green Belt	Not Agreed, as per OAR3. Both routes cross Green Belt hence both have negative impacts albeit the Applicant recognises that the impact of the RRR is more than for Adams Road. Impact for either scheme justifiable either under NPPF or VSC so a score of 1 would be excessive.
Safety	Not Agreed. Score restored to OAR1. Prelim design shows concerns raised with regards to proven rights of access can be managed by design of matters such as turning circle at Rugby Training Ground. The Adams Road option creates new conflicts on an existing residential road heavily used by cycles so some negative impact is inevitable.
Public acceptability	Very strong local objection to Adams Road, highlighted by Joint Assembly Members, not identified prior to OAR3 and not recognised by KH. Many issues raised with regards to Rifle Range now addressed. Therefore both options are negative but Adams Road was less acceptable.

Scheme Cost	Agreed (OAR3)
Land Acquisition Required	Score was amended in OAR3, but following negotiations with landowners restored to OAR1. This is perhaps generous to the Adams Road option as land would still need to be acquired from the University to enable widening of the existing route.
Impact on Local road network during construction	Not Agreed (as per OAR1). There would be an impact on Adams Road residents of that option whilst the Rifle Range option would not directly impact any Local Roads and would not impact Adams Road.
Future proofing	Restored to OAR1 as risk of redundancy no longer applies. Therefore Rifle Range would provide a facility with some flexibility for future improvement. Adams Road remains restricted given the constrained residential nature of the conservation area.

9. STATEMENT OF TRUTH

9.1.1 The rebuttal proof of evidence which I have prepared and provided is true and is given in accordance with the guidance of my professional institutions. I confirm that the opinions expressed are my true and professional opinions.