

Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

7 August 2025

Sent by email only: transportinfrastructure@dft.gov.uk
and Joanna.Vincent@gateleyhamer.com

Dear Sirs

The proposed Cambridge South East Busway Transport and Works Act Order (“the Scheme” and “the TWAO”)

Our Client: The University of Cambridge (“the University”)

We act on behalf of the University in relation to the above proposed TWAO, and refer to the University’s letter of objection to the proposed TWAO dated 7 March 2025 (“Objection”), and your letters of 26 June and 6 August 2025, advising of extensions of time for submission of Statements of Case by objectors, to 19 September 2025.

As explained in the Objection, the University is fully supportive of the Scheme in principle. However, it does give rise to a number of concerns that the University feels must be addressed to its satisfaction, to ensure that the vital operation of its estate and its delivery of services can continue without unacceptable compromise.

Since submission of the Objection, the University has been in discussion with Cambridgeshire County Council (“CCC”) (as applicant) and the Greater Cambridgeshire Partnership (“GCP”) (as promoter) with a view to securing protective provisions in an agreement from CCC and GCP to ensure that the operation of the University’s estate, and its delivery of services, will not be impeded as a result of exercise of the rights and powers sought in the proposed TWAO.

As at the date of this letter, negotiations between the University, CCC and GCP are ongoing, but an agreement has not yet been reached. As such, we write to confirm that, unless or until agreement is reached, the University intends to present oral evidence to the Inquiry being held into the TWAO application.

Given that negotiations are ongoing, the University kindly requests that its Objection (a copy of which is enclosed for ease of reference), is treated as its Statement of Case pursuant to rule 7(3) of the Transport and Works (Inquiries Procedure) Rules 2004, and that the Inspector

exercises their discretion to allow the University to submit evidence to the Inquiry in the event that an agreement has not been reached by that stage.

Please note that GCP have confirmed they have no objection to the University's Objection being treated as its Statement of Case for the purposes of the Inquiry.

This letter has been copied to the solicitors acting for CCC and GCP in accordance with the above quoted rules.

Yours faithfully

Mills & Reeve LLP

cc Adam.Richards@wbd-uk.com
Enc



Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Sent via email to
transportinfrastructure@dft.gov.uk

7 March 2025

Dear Secretary of State

**The Cambridge South East Transport Busway, Transport and Works Act Order ("TWAO"):
Representation from the University of Cambridge**

I am writing on behalf of the University of Cambridge (the University) in respect of the application submitted by Cambridgeshire County Council ("CCC") on 9 January 2025 for the TWAO to enable the construction of a two-way guided busway between Cambridge Biomedical Campus at the southern end of Francis Crick Avenue, Cambridge, and a new travel hub facility at the A1307/A11/A505 road junction southeast of the village of Babraham ("Scheme").

I write first and foremost to express our firm support for the principle of the Scheme. However, as the proposals currently stand, they give rise to a number of concerns that the University feels must be addressed to our satisfaction, thus ensuring the vital operation of our estate and delivery of services can continue without unacceptable compromise.

Until such time as the issues outlined within this letter can be addressed satisfactorily, the University unfortunately needs to **register its objection to the proposals**. It is hoped that with further engagement, and the provision of additional information and assurances, our concerns can be resolved.

Issues and concerns

The University has been pleased to have engaged with the Greater Cambridge Partnership (GCP) for over a decade in relation to improvements for access to the Cambridge Biomedical Campus (CBC) from the south/east. The work has been divided into several phases, with earlier phases having been delivered. The Scheme comprises the final element of the ambitious programme of works.

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The University has reviewed the information encompassing the TWAO application material, and has identified four key areas of concern. – In summary, the University is concerned to ensure that during both the construction and operational phases of the Scheme:

- (i) Access to research buildings/land/facilities for staff, students and visitors is maintained at all times;
- (ii) Drainage of land and buildings is not compromised;
- (iii) The Granta Backbone Network is not harmed/impacted; and
- (iv) Vibration and electromagnetic sensitive research is not harmed.

Further detail is provided in sections 1 – 6 below.

Notwithstanding this objection, the University would welcome continued dialogue, and the opportunity to discuss its particular concerns with CCC and the GCP further, to clarify the position and agree appropriate next steps.

1 Land acquisition

- 1.1 The University has rights of access over, and rights to connect into and use a number of essential infrastructure services within, Francis Crick Avenue (FCA), Addenbrooke's Road and Dame Mary Archer Way, in respect of which CCC is seeking either:
- (i) power to compulsorily acquire land;
 - (ii) power to compulsorily acquire rights;
 - (iii) power to alter the existing layout;
 - (iv) power to alter the layout of a street having a junction with such street;
 - (v) power to extinguish private rights.
- 1.2 In order to ensure that the University's operations on the CBC are not impeded as a result of exercise by CCC of the powers sought in the TWAO, we request that protective provisions are incorporated in the TWAO to ensure that the exercise of CCC's proposed powers does not impinge the University's access rights and sub-surface services (including the Granta Backbone Network), or that CCC enter into a separate agreement with the University to provide such protections.

2 Works to Francis Crick Avenue, including the bridge to Hobson's Park and the roundabout at Addenbrooke's Road/Dame Mary Archer Way

- 2.1 The Design and Access Statement and Environmental Statement both state that the improvements to Francis Crick Avenue, including the roundabout at the southern end and associate works, which also include works to Hobson's Bridge (being the existing guided bus bridge) ("FCA Works") *"can be secured under permitted development rules under the Town and Country Planning (General Permitted Development) Order 2015"* and that the works *"will be effected by agreement and relying on permitted development rights"*. On reviewing the application material there is a lack of cognisance as to how the FCA Works will in fact be delivered, managed and overseen. We make the following observations in that regard:
- 2.2 if the FCA Works are undertaken under permitted development rights, they will not be subject to the provisions of the TWAO (which relate to the carrying out of the works), or the conditions attached to the deemed planning permission; it is therefore unclear how:

- 2.2.1 access to the CBC along this well utilised travel corridor will be protected and/or managed,
 - 2.2.2 to vibration and electromagnetic impacts on surrounding buildings (including research buildings) will be mitigated and/or managed;
 - 2.2.3 the physical protection and continuous operation of, and access to, the Granta Backbone Network will be secured.
- 2.3 notwithstanding that the FCA Works are said to constitute permitted development, they appear to be included in the application for deemed planning permission (see for example Condition 2 and drawing number 5212868-ATK-GEN-WHL_AL-DR-ZL-000001 (Sheet 1 of 16)).
- 2.4 The University has various land interests at the CBC, as shown on Figure 1 below:

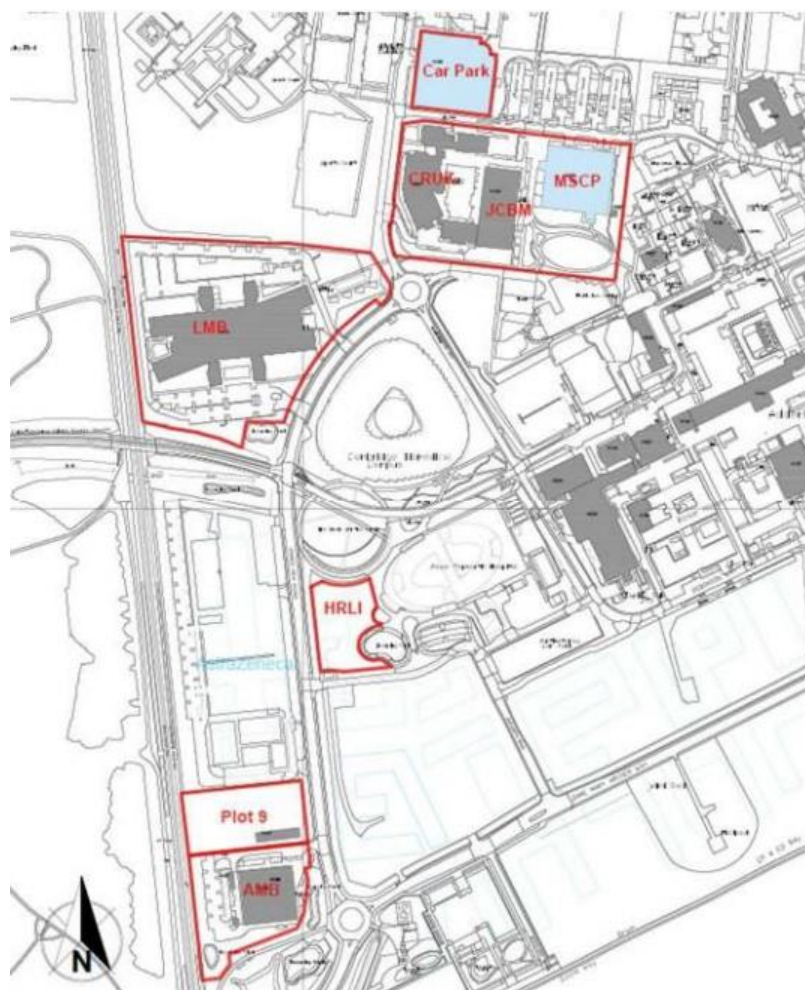


Figure 1. University land interests at CBC

- 2.5 The University has a long leasehold interest in the Anne McLaren Building (AMB) and Plot 9. The AMB and Plot 9 are the closest of the University's affected land interests to the Scheme, alongside tenanted space within the Laboratory of Molecular Biology (marked as "LMB" in Figure 1 above). Part of the AMB is subject to a lease to AstraZeneca UK Limited dated 24 October 2019 for a term expiring on 23 October 2029.

- 2.6 In addition to these interests, the University is also the principal leaseholder of the Heart and Lung Research Institute Building (marked “HLRI” on Figure 1 above), which sits between the Royal Papworth Hospital building and FCA, under which it has access and servicing rights along Francis Crick Avenue and Robinson Way. The University also has freehold and leasehold interests in other property to the north of the CBC, which are accessed from Robinson Way. These are known as “CRUK”, “JCBM” (and are shown marked as such of Figure 1 above) and two car parks.
- 2.7 Each of the interests noted above comprise the University’s estate (Estate). The University considers that the properties on the Estate which will be most significantly impacted by the Scheme are the AMB and Plot 9. However, the University’s use and enjoyment of the other properties will be detrimentally affected if the Scheme impinges on its rights to use FCA for access and servicing and to use the Hobson’s Conduit for drainage, as well as its right to use external areas at the LMB.
- 2.8 The University requires clarity as to how the FCA Works are to be delivered, managed and overseen and reassurance that CCC will fully engage with the University in preparation of the CoCP, CEMP and CTMP to ensure that impacts are mitigated and minimised insofar as possible.

3 Drainage

- 3.1 Hobson’s Brook (also known as Hobson’s Conduit) is within the TWAO ‘Order Limits’.
- 3.2 The University benefits from a number of drainage rights in respect of the Conduit. The rights granted to the University are also subject to obligations imposed on the University to take steps to prevent discharge into the Conduit which contaminates or threatens to contaminate it (including compensation provisions) and, specifically, not to allow any soil or “other substance” to be discharged into, or cause any obstruction to the free flow of, the Conduit, or to cause it to overflow onto the adjoining freehold land.
- 3.2.1 In order to ensure that the University’s drainage rights are not impeded as a result of exercise by CCC of the powers and rights sought in the TWAO, we request that provisions are incorporated in the TWAO to ensure that:
- (i) exercise of CCC’s proposed rights do not impinge the University’s drainage rights; and
 - (ii) (ii) in the event of any contamination incident, it is possible to readily ascertain whether it is attributable to the Scheme (or the University) and if it is so attributable, steps will be taken by CCC to remedy the contamination/decontaminate.

4 Impact on Francis Crick Avenue

- 4.1 Both the draft TWAO and the Environmental Statement make clear that permanent rights are sought to allow buses to run over FCA which is a private road. Whilst the University has neither a freehold nor leasehold interest in the road, it is a member in the Management Company that maintains FCA, and it has certain rights over it (including but not limited to rights of way, servicing and drainage) and is required (via separate agreements concerning use of infrastructure across the CBC) to contribute to the cost of maintenance of the road.

It is not clear from the application material as to whether additional bus journeys will have a detrimental impact on the level of wear and tear on the route, but it would seem logical that it would. The University requires either reassurance that there will be no significant increase in wear and tear, or to ensure that agreements are in place to ensure that the University is not detrimentally impacted by any increase in maintenance requirements/costs.

5 Maintaining access to the Campus for pedestrians and cyclists

- 5.1 The DNA path is an important active travel (walking, cycling and wheeling) corridor access to the CBC for a range of settlements in South Cambridgeshire. The current application documents include the northern segment of the DNA path as an area subject to *“unrestricted powers to acquire land”* and the plans show that this segment will predominantly comprise wildflower meadow.
- 5.2 Further, the CSET Consultation Report (January 2025) provides that *“For the majority of the route, the service track will be a new facility. It will replace part of the existing DNA cycle path (a permissive cycle track) where it joins the new busway route from just south of Nine Wells Local Nature Reserve (LNR) and the end of Addenbrooke’s Road overbridge.”*
- 5.3 Noting that the emergency and maintenance access/service track will replace a dedicated active travel route with a route which will introduce vehicular traffic, the University requires further clarity on the proposals for the track and what measures will be put in place to ensure that users of the path are unaffected by the Scheme, both during construction and operation. In particular, the University would like confirmation that the access track will be wide enough to accommodate not only existing use but projected future use.

6 Design Observations

- 6.1 The University makes the following design observations and would welcome further dialogue with CCC to better understand the likely impacts of the Scheme on FCA:
 - 6.1.1 The southbound bus stop arrangement appears unclear and possibly compromised. There needs to be suitably sized bus boarding infrastructure and arrangements, which should, if necessary, adapt the Green and Gardens to suit.
 - 6.1.2 The bio-directional cycle track alongside FCA is proposed without a buffer; the effect of this is that the 3 metre width set out in the drawings may not be achieved in practice, and vehicle/cyclist conflict may arise. We seek reassurances that this has been considered and options to provide further protection do not exist.
 - 6.1.3 The footway to the eastern side of FCA is not shown to be increased in width. This footway is narrow and if pedestrian demand increases as a result of the Scheme, pressure on the footway capacity is likely to increase. It is not clear from the application material whether this has been considered.
 - 6.1.4 The proposed junction of FCA and the busway does not allow buses to turn left from the Green and Gardens into FCA and right from FCA into the Green and Gardens. These movements will become critical once the Scheme and the

East-West Link is enabled through the heart of the campus (which is consistent with a number of CBC masterplans). The University would like to see these movements designed in.

In Summary

Whilst the University strongly supports the principle of the Scheme, along with the contribution that its development would make to sustainable travel options and public transport provision, there are aspects of the submitted documentation and proposals, as set out above, that require further investigation and clarification by CCC to enable the University to support the specifics of the Scheme proposals in full. The University would very much welcome further dialogue with CCC and the Scheme's project team to resolve our concerns. Unless and until our concerns are satisfactorily resolved we will have no choice but to maintain our objection, and reserve our position to submit further information in due course should that be necessary.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graham Matthews', is positioned above the printed name. The signature is stylized with large, overlapping loops and a long horizontal stroke extending to the right.

Graham Matthews