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Secretary of State for Transport
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Our ref: COT1/1 (LPF)

8 January 2025

Attn: Transport Infrastructure Planning Unit

BY EMAIL ONLY: transportinfrastructure@dft.gov.uk

Dear Sirs

RE: Cambourne to Cambridge (“CtoC”) TWAO (“the CtoC busway”)

1. We are instructed by Cambridge Past Present and Future (“**CPPF**”). CPPF is a statutory consultee. Our client is a charity that purchased the land that is subject to a CPO¹ in the early 1930s to protect the setting of the historic village of Coton and the countryside setting of the historic city of Cambridge. The intention was to prevent future development and to this end a number of restricted covenants were also put on the land, including those held by The National Trust.
2. We are also instructed by Coton Parish Council (“**CPC**”).
3. It is worth mentioning at the outset that the route of the CtoC busway does not have public support. It was rejected at several stages of consultation. A petition with over 20,000 signatures was presented to GCP asking them to consider the CPPF alternative instead (see below 43-49). In addition, the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire has objected, along with the Woodland Trust and the National Trust.
4. CPPF and CPC oppose the making of the TWAO for the deemed grant of planning permission for the CtoC busway and the compulsory purchase of CPPF land for the off-road segment of the busway.
5. In summary, CPPF and CPC acknowledge the need, in principle, to improve accessibility in the Greater Cambridge region to deliver a reliable public transport service between Cambourne and Cambridge. However, CPPF and CPC object to the CtoC busway on the basis that:
 - a. The transport modelling undertaken to justify the CtoC busway is materially flawed as it is based on outdated pre-Covid data and assumptions about commuting and car journeys which do not reflect sufficiently accurately the baseline conditions for modelling future scenarios;

¹ CPPF is the freehold owner of 8 land areas subject to CPOs with the following plan number references: 10-109, 10-114, 12-126, 12-127, 13-128, 13-129, 13-137 & 13-141.

- b. The benefits of the CtoC busway can be delivered by way of a less costly and less environmentally harmful in-highway bus priority scheme (“**the CPPF alternative**”) (see Figure 1 below which shows the alignment of the CtoC busway, the CPPF alternative bus lane and the alignment of East West Rail into Cambridge).

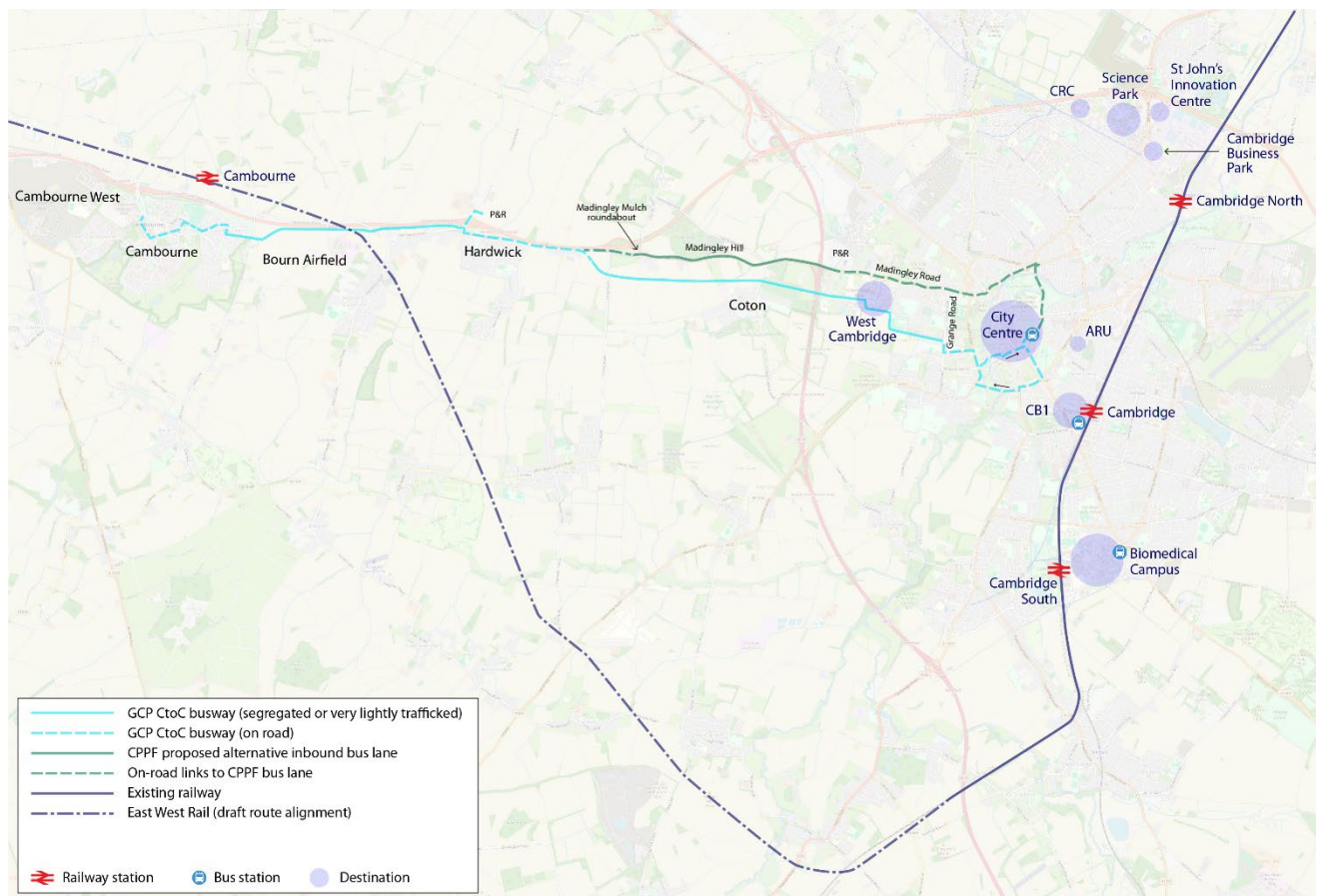


Figure 1: Proposed routes of GCP CtoC busway and CPPF alternative on road scheme

6. CPPF contends that Greater Cambridge Partnership (“**GCP**”) has not demonstrated that there is a compelling case in the public interest to justify the compulsory acquisition of its land and that planning permission for the CtoC busway should not be granted.

Planning Justification

7. The planning justification for the CtoC busway derives from planned housing growth in the South Cambridgeshire area in the South Cambridge Local Plan 2018 (“**the Local Plan**”). It derives from the 2014 Transport Strategy for Cambridge and South Cambridgeshire (“**TSC&SC**”) and led to the adoption of Local Plan Policy SS/7: New Village at Bourn Airfield. This sets out a requirement for:

8 (a) *Significant Improvements in Public Transport, including:*

- i. *Provision of a segregated bus link from Cambourne to Bourn Airfield new village across the Broadway, and on through the development to the junction of the St Neots Road with Highfields Road;*
 - ii. *Any measures necessary to ensure that a bus journey between Caldecote / Highfields and the junction of the A428 and the A1303 is direct and unaffected by any congestion suffered by general traffic;*
 - iii. *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;*
8. The need for Policy SS/7 arose because at the time of its adoption it was deemed that employees and other commuters from Cambourne and the new housing at Bourn Airfield travelling into the central Cambridge business district along Station Road (“**CB1**”) and the Biomedical Campus attached to Addenbrookes Hospital in Trumpington would unacceptably exacerbate congestion on Madingley Hill and Madingley Road.
9. However, since the adoption of SS/7 there have been significant material changes in circumstance:
 - (i) The A14 has been upgraded to provide three lanes between the Girton (M11) and Milton interchanges, with two-lane eastbound exit ramps at the Histon and Milton interchanges with the consequence that journey times from Cambourne to the Histon, Milton and Horningsea interchanges is more reliable for private and public transport accessing north and east Cambridge.
 - (ii) Cambridge North station has opened giving Cambourne and future Bourn Airfield residents faster and more convenient access via the A428 and A14 to rail services than travelling to Cambridge Central station.
 - (iii) From 2027, the A428 will be dualled all the way west to the A1, creating a fast route from Cambourne and Bourn Airfield to employment sites in St Neots, Bedford and beyond.
 - (iv) Travel patterns have changed post-COVID, leading to much reduced congestion on Madingley Hill.
 - (v) The government reconfirmed in the Autumn Budget 2024 its support for East West Rail (“**EW**R”) to run to Cambridge. The current preferred alignment between Bedford and Cambridge includes a station at Cambourne, which will link the expanding settlement directly to major employment sites at the Biomedical Campus (via the new Cambridge South station, which is due to open in 2025), CB1 (via Cambridge Central station), Bedford and Bletchley (for Milton Keynes). The delivery of EWR will significantly curtail the need for, and benefits of the CtoC busway because many of its intended passengers are likely to use the rail services between Cambourne and the stations in Cambridge, rather than the CtoC busway (albeit that no modelling has been carried out by the GCP to understand the likely modal split of trips between EWR and CtoC).
10. GCP has failed to re-evaluate key transport modelling and delivery aspects of the CtoC busway in light of these material changes in circumstance. Instead it has used an interim update to the CSRM strategic model, which is described in the Validation Report as follows: “The F-series ... added a 2019 Present Year Validation (PYV) to extend the life of the model until such time as a whole new base year can be created (once the disruption to travel behaviour and patterns caused by the COVID-19 pandemic has settled to a “new normal” state).” The changed circumstances have created significant uncertainties in

traffic volumes, travel times and bus patronage on the CtoC busway. CPPF say these are fatal uncertainties that potentially undermine the justification for the TWAO.

11. While the CPPF alternative is addressed further below, it should be noted that it is entirely consistent with policy SS/7, offering “*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.*”
12. Finally, the CtoC busway application fails to serve Cambridge North a key employment/education destination from Cambourne. Cambridge North is home to the internationally renowned Cambridge Science Park and various other business parks including the St John’s Innovation Centre and Cambridge Regional College.

East West Rail

13. The proposed extension of EWR into Cambridge South and Cambridge Central rail stations will abstract a large proportion of travellers from Cambourne commuting to south and central Cambridge, including the Biomedical Campus and the CB1 business district because rail will offer faster and more reliable journey times than CtoC bus services that will still encounter congestion after they leave the busway west of the city centre.
14. The EWR delivery company commenced a non-statutory consultation in November 2024 on the rail route between Bedford and Cambridge via Cambourne in advance of submitting an application for a Development Consent Order.
15. The government’s reconfirmed commitment in the Autumn 2024 budget to building EWR to Cambridge makes it a significant material consideration.
16. Although the OBC Addendum acknowledges that “EWR will have an impact on travel in the CtoC corridor”, it goes on to claim without basis that “the impact on CtoC is not likely to be significant”. It has therefore not incorporated EWR into any of its modelling. In other words, it has attributed no trips between Cambourne and Cambridge to EWR services.
17. Our clients contend that the impact of EWR on CtoC will be very significant, and that GCP is wrong not to have modelled a scenario that includes EWR, in accordance with TAG Unit M4 Forecasting and Uncertainty.

Flawed traffic modelling of the CtoC busway

18. According to the GCP’s supporting transport information, the principal objective of its transport modelling of the CtoC busway is to appropriately represent travel conditions on the highway network to judge the journey time savings derived from the CtoC busway scheme.
19. CPPF considers that the traffic modelling used to justify the CtoC busway is materially flawed, in particular because the F-Series CSRM used is calibrated to pre-Covid data for traffic volumes and bus patronage, which differ significantly from current conditions, in terms of quantities and temporal distributions of trips.
20. The CtoC busway relies to a large degree on attracting car drivers switching to travelling by bus. The circumstances that will lead people to switch are sensitive to relative costs

and journey times and reliability/variability. Modelling the effects of altering those parameters for bus services, as the CtoC scheme aims to do, requires (necessarily though not sufficiently) an accurate baseline. Without that, modelling becomes a paradigm of garbage in, garbage out.

21. Instead, the CtoC busway submission is based on the 2015 CSRM2 model, which was only last updated to any degree in 2019 through the creation of the “F-Series” version. The model series used for the Outline Business Case and the Transport Assessment both pre-date the Covid pandemic. This approach is not acceptable, as evidence from similar situations elsewhere in the UK suggest that bus patronage continues to lag well behind pre-Covid levels and may in fact never fully recover.
22. It is important to note that the ‘F-Series’ of the CSRM Strategic Model, used in the Transport Assessment, comes with a caveat: “*[this version] added a 2019 Present Year Validation (PYV) to extend the life of the model until such time as a whole new base year can be created (once the disruption to travel behaviour and patterns caused by the COVID-19 pandemic has settled to a “new normal” state).*”
23. It is clear that GCP’s own consultant identifies the 2019 situation as being one that is outside of the “new normal”. Moreover, the F-Series model was only intended to be an interim solution to extend the model until such time as a new base year could be created, once the disruption caused by Covid-19 had settled.
24. The F-Series is not fit-for-purpose today; some four years after the event and at least two years beyond the new “normal state” having settled.
25. Moreover, commuting and Park & Ride usage into and out of major cities has reduced even further, as employees have in general embraced homeworking as an alternative to travel. Evidence shows that homeworking remains much higher than in 2019. It is therefore essential that post-covid data is used for transport modelling.
26. The current estimated initial BCR of 0.5 already means that for every £2 of investment, only £1 is recovered in social benefits, which represents Poor (second lowest) value for money category in the DfT Value for Money Framework. The monetised benefits, in particular journey time savings, are derived from the modelling. Without an accurate baseline, forecast journey times and journey time savings are unreliable, and hence the monetised benefits and the BCR too are unreliable.
27. If the BCR is relied upon notwithstanding these issues, it must be noted that the BCR has been calculated to include the social benefit of an active travel route set upon the maintenance track for the CtoC busway. However, this could be surplus to requirement given existing and planned active travel routes in this area. As such, if the benefit of the CtoC active travel route were materially reduced, the BCR would be reduced further.

Problems with the CtoC scheme

Serious irreparable adverse biodiversity impacts

28. The off-road segment of the CtoC busway, adjacent to the Parish of Coton, is aligned to go through numerous locally designated wildlife sites and 28 valuable hedgerows. These include:

- (i) Coton Orchard County Wildlife Site which is within the footprint of the CtoC scheme.
 - (ii) Scrubland east of the M11 City Wildlife Site (CiWS) which is within the footprint of the CtoC Scheme;
 - (iii) Coton Path Hedgerow Country Wildlife Site which is within the footprint of the CtoC Scheme;
 - (iv) Bin Brook CiWS which is within the CtoC Scheme boundary and joins Grange Road;
29. The largest and most sensitive site affected is Coton Orchard County Wildlife Site which is also a site for breeding birds. Six veteran trees are within the scheme boundary and overall Coton Orchard contains 14 veteran trees², a mix of hedgerows, scrub traditional orchard and a large expanse of formerly intensive orchard – referred to in the Ecological Impact Assessment chapter of the Environmental Statement (“**the EclA**”) as “other orchard”.
30. The construction of the CtoC busway in this location would bisect the Orchard, destroying 2.2ha of wildlife habitat including Traditional Orchard and Veteran Trees, which are both classed as Habitat of Principle Importance under section 41 of the Natural Environment and Rural Communities (“**NERC**”) Act 2006. The latter is impossible to mitigate, and it could be argued that is also the case for the former, given that recreating the habitat would take over 60 years because of the requirement for standing deadwood.
31. The applicant’s Ecological Impact Assessment dated October 2024 (“**EclA**”) has identified that the CtoC busway would cause significant harm to ecological receptors of county importance. The applicant also confirms that some of this harm cannot be mitigated. The applicant also proposes a significant package of mitigation to offset the significant ecological harm to all of the locally designated wildlife sites.
32. Additionally, the Environmental Statement has not considered the *indirect ecological impacts* of the proposed scheme, namely those caused by severance, human disturbance, and the potential demise of the orchard as a viable land-use. As a consequence, the ecological harm that would be caused by this scheme has been underestimated and the mitigation proposed is inadequate, and therefore it does not meet the requirements of planning policy. The mitigation hierarchy is a widely used good practice framework that guides users towards limiting as far as possible the negative impacts on biodiversity from development projects. It can be applied to projects in any sector and is based on a sequence of four iterative actions: avoiding and minimising any negative impacts (prevention), before restoring and finally offsetting residual impacts (remediation). It is a linear process; a sequential set of steps from best scenario to worst scenario, namely (1) Avoid, (2) Minimise/mitigate, (3) Compensate, (4) Offset.
33. The applicant has failed to follow this guidance given that there are other transport options available that would also meet the scheme objectives but would avoid this harm. This includes the CPPF alternative which they first submitted to the applicant in 2021 and followed with an updated version in September 2024.
34. The Wildlife Trust for Bedfordshire Cambridgeshire and Northamptonshire notes this fundamental flaw and Martin Barker, Conservation Manager for the Trust, has stated in

² EclA, 5.3.26.

its objection lodged 19 December 2024 that the scheme proponents have failed to select the option that avoids significant adverse impacts on the natural environment.

35. Further, the CtoC busway includes provision for a surfaced 3.5m wide maintenance track along most of its length, which significantly increases the land take and habitat loss. Maintenance tracks are required next to rail and kerb-guided roads because regular motor vehicles cannot travel on them. However, the CtoC busway is designed for optical guidance along a standard-width road, which **can** be used by emergency and maintenance vehicles without any physical adaptation or driver training. Therefore, there is no need for a maintenance track to run along its entire length.
36. The CtoC busway claims that the use of the maintenance track as an active travel route, to be used by cyclists, walkers, horse-riders as a benefit. However, there is no need for an additional active travel route on this section because one already exists between Cambridge and Coton, which the GCP is extending west to Hardwick. The existing active travel route runs parallel to the proposed maintenance track through Coton orchard only around 250 metres to the south. GCP has not demonstrated need or benefit in having a second active travel route so close to the existing one sufficient to overcome the ecological harm the CtoC busway maintenance track will cause.
37. Additionally, the introduction of an active travel route into the County Wildlife Site (which currently has restricted public access) will result in a significant increase in human disturbance to wildlife in the orchard. This disturbance (harm) could be avoided by not having the active travel route – which is not needed in this location as there is already one.
38. In summary the maintenance track/active travel route is unnecessary and would result in ecological harm. This harm could be avoided by removing it from the scheme.

Landscape harm

39. The Landscape and Visual Impact Assessment (LVIA) is on the whole competent and thorough but is unconvincing in its appreciation of the sensitivities of the landscape's character and visual amenity of the area to the west of Cambridge as well as the value that area has to the city. For instance, it is felt that the assessment has underestimated the sensitivity of two local landscape areas in particular: 1) to the north and east of Coton and, 2) the narrow farm access off Grange Road (Rifle Range Lane) and its adjoining landscape immediately to the west of Bin Brook (West Fields). In relation to the latter, the effect on the visual amenity of the area is the same at year 1 and year 15 and therefore we can assume that the scheme cannot be visually mitigated. Likewise, it might be reasonable to assume that the effect on the landscape character cannot be mitigated either.
40. The Open Space Assessment has identified potential site C as a suitable replacement area for the loss of two areas of existing open space both as identified in the Cambridge Local Plan 2018. The area of the replacement site might be deliverable, but we do not believe this is an appropriate location to encourage public access and dwell time because it is an isolated and unsurveilled area that includes a balancing pond and is adjacent to a motorway and a steep embankment.

Serving Cambridge North

41. Bus services to key service destinations in north Cambridge, such as the Regional College, Science Park and Cambridge North station, can use the A428/A14, which, following a major upgrade completed in 2020, will be significantly faster than either the CtoC busway or any route via Madingley Road. This can be seen in Figure 2 below which demonstrates the current bus routes in central Cambridge alongside the two proposed busways.

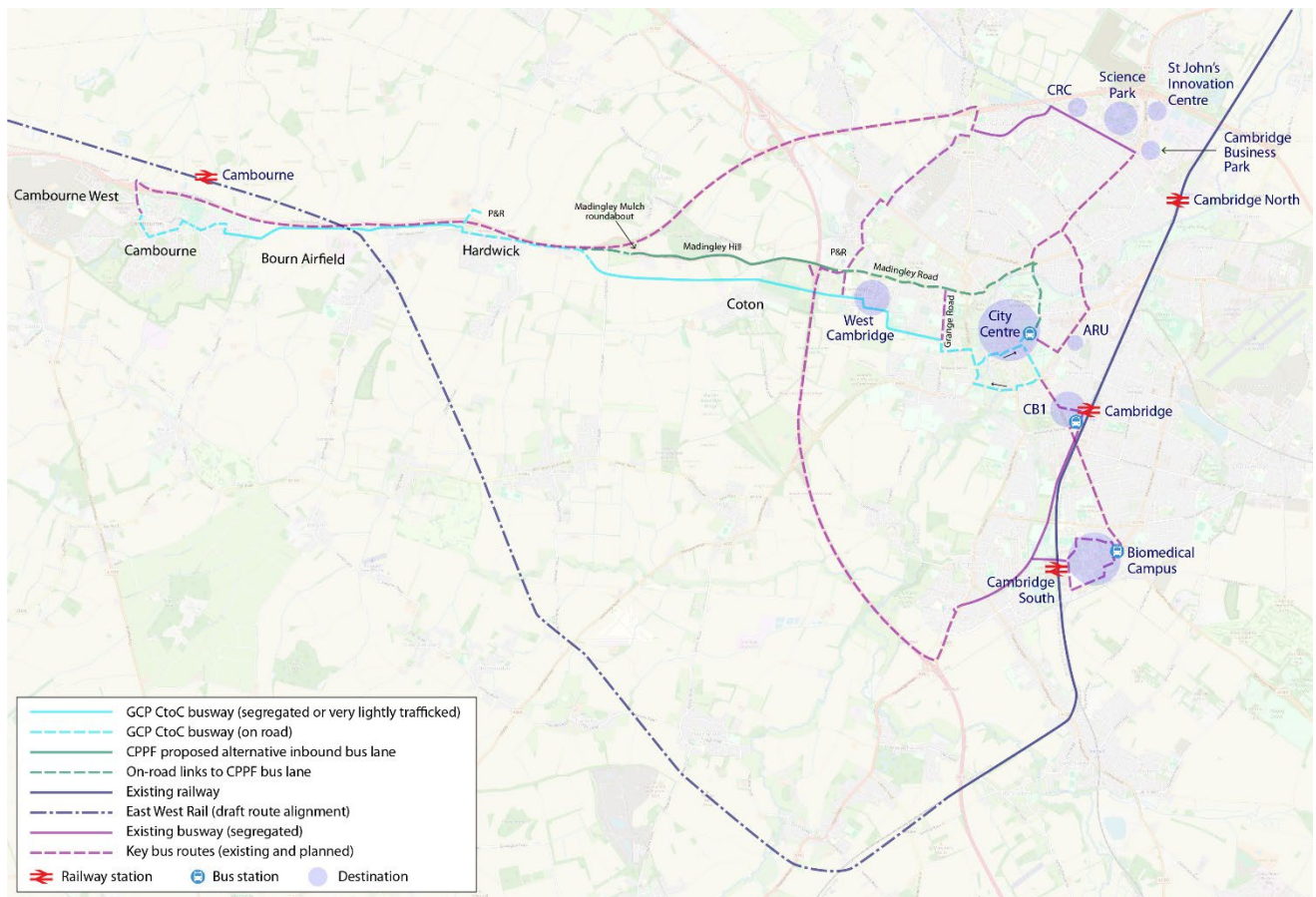


Figure 2: Key bus routes in central Cambridge with the proposed busways overlaid.

Untested technology for bus guidance

42. The GCP has indicated its intention to deliver the busway with optical guidance (which could entail having painted markings on the carriageway) to enable buses to run without active steering. This differs from the existing Cambridgeshire Guided Busway, which has precisely aligned concrete kerbs that enable guidewheels attached the front axle to steer the bus.
43. Although the GCP has expressed confidence that an optical guidance technology will be available when the busway opens, it has not identified a working example of buses using optical guidance at the desired running speed (approximately 90kph), yet alone in a comparably rural environment through all seasons of the year. Although trials of driverless buses are being conducted in the UK, it is not yet assured that such technology will be licensed for use at the desired running speed of the CtoC busway, or that the technology would qualify as “guided” within the meaning of the TWAO.

Summary of CPPF alternative

44. Instead of building the new CtoC busway between St Neots Road and West Cambridge, CPPF proposes building an inbound bus lane down Madingley Hill (**“the CPPF bus lane”**). This would achieve almost identical benefits as the equivalent section of the CtoC busway in terms of journey time savings for buses. In addition, the CPPF bus lane could provide journey time savings to all bus, coach, emergency and public service vehicles using Madingley Road to enter Cambridge or join the M11. By comparison, the GCP’s proposed busway would provide journey time savings only to vehicles permitted to use the busway, fitted with the appropriate guidance technology and driven by a driver trained in its use.³
45. The CPPF bus lane would be entirely consistent with the Local Plan requirement for *“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.”*
46. The CPPF bus lane more cost-effectively meets the CtoC busway objectives by solving the actual problems encountered by buses. The lack of congestion outbound beyond the M11 junction obviates the need to build segregated infrastructure for buses travelling out of Cambridge. The only scenario in which the busway would provide time savings over an inbound bus lane is if inbound traffic were queued all the way back to Madingley Mulch roundabout. If this were to happen, there would be safety implications for the operation of the A428, and National Highways would be seeking mitigatory measures to reduce queuing at the A428 exit.
47. The CPPF alternative is better suited to meeting the changed circumstances since 2014: GCP’s budgetary constraints, owing in part to high inflation of construction costs; the likelihood of East West Rail being built, which would provide faster transport connections between Cambourne and Cambridge, including the Biomedical Campus and CB1 (which together draw a quarter of all commuters from Cambourne); and significantly altered travel patterns post-COVID.
48. The CPPF bus lane also fits better with the local authorities’ and national strategic objectives on decarbonisation of transport, traffic reduction and modal shift, including a target that is central to the City Deal (for which the GCP is the delivery body) of reducing peak-time traffic in Cambridge by 10–15% on 2011 levels; whereas the CtoC busway makes sense only if traffic levels follow a business-as-usual growth trajectory over the long term.
49. Finally, the CPPF bus lane scheme provides significantly better value for public money, as it provides most of the same benefits as the busway between Hardwick and West

³ Since the GCP is applying to build the busway under the Transport and Works Act, it must use guidance technology, whether or not it provides a significant benefit. This leads to a considerable disadvantage in that buses and coaches will not be permitted to use the busway if the operator is not party to an access agreement, the bus is not fitted with the required guidance technology or is not driven by someone trained in its use. This will include long-distance and chartered services, emergency service and public service vehicles, all of which could use an in-highway bus lane (with appropriate drafting of the associated Traffic Regulation Order).

Cambridge with minimal, if any, land purchase costs and no need for an expensive new bridge over the M11.

50. Finally, the CPPF scheme also includes provision for an active travel route, part of which already exists, part of which is in-development to be delivered in 2025 and the final part of which has been proposed by the County Council. This active travel scheme would make use of the existing bridleway as far as Highfields Caldecote and would require a short section of new right of way to connect to the planned Bourn Airfield development. This active travel route also has the advantage of being more direct, it runs in the valley thus avoiding the biggest hill in the area, and it is away from traffic and therefore it is more attractive to users.

Conclusion

51. CPPF and CPC acknowledge the in principle need to improve accessibility in the Greater Cambridge region to deliver a reliable public transport service to serve housing growth in Cambourne. However, they object to the CtoC busway and the Compulsory Purchase of CPPF land on the basis that the GCP transport modelling is materially flawed and the benefits of the CtoC busway can be delivered by way of a less costly and less environmentally harmful in-highway bus priority scheme as proposed by CPPF. The GCP has failed to demonstrate that there is a compelling case in the public interest to justify the compulsory acquisition of its land and that planning permission for the CtoC busway should not be granted.

Yours faithfully,



RICHARD BUXTON SOLICITORS