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Statement of Case

Objection to the Cambourne to Cambridge Transport and Works Act Order

This Statement of Case is submitted on behalf of **Coton Orchard Limited** (affected tenant), **Houston Crest Properties Ltd** (landowner), and **Anna Gazeley** (long-time resident of Coton) in objection to the Cambourne to Cambridge (CtoC) Transport and Works Act Order (TWAO). The proposed scheme, submitted by Cambridgeshire County Council (CCC) on behalf of the Greater Cambridge Partnership (GCP), seeks the compulsory acquisition of land at Coton Orchard and the deemed grant of planning permission for the off-road segment of the CtoC busway.



We fully support improvements to public transport and active travel connectivity between Cambourne and Cambridge. However, the GCP's preferred route (shown above) is fundamentally flawed. We specifically object to the off-road segment (referred to in the Deemed Planning Drawings¹ as Sections 6 to 11, highlighted above, spanning approximately 1.6 miles), which would cut through Madingley Hill, best and most versatile (BMV) farmland, and Coton Orchard—a Priority Habitat and County Wildlife Site—inflicting irreversible harm on an irreplaceable landscape.

¹ [CambourneToCambridgeTWAO-CCC - CtoC-16-DP4-00.pdf p2](#)

Rather than supporting central government's growth objectives, the GCP's preferred route is likely to conflict with the planned reservoir expansion and East West Rail (EWR) projects, critical to addressing water scarcity and improving connectivity. Additionally, this route would consume a disproportionate share of the City Deal grant, diverting funds from infrastructure projects that better align with the government's goals while complementing its broader vision for sustainable growth.

Better alternatives exist, such as the on-road proposal by Cambridge Past, Present & Future (CPPF). This would deliver the necessary transport improvements, align with government priorities, and achieve these aims at a lower financial and environmental cost—all without the lasting damage of the current proposal.

This Statement of Case sets out the grounds for our objection to the TWAO, largely as first submitted in our formal objection. We understand that experts in carbon calculations, veteran trees, biodiversity, economics, and transport policy have raised independent objections. Therefore, while we have retained our original points to ensure the wider framework of our objection remains clear, we have not expanded our analysis, instead offering the perspective of someone directly affected—a ground-level view of what this scheme means for the landscape, community, and future of the area.

This document continues with a personal statement followed by a structured list of objection points.

A Personal Perspective

My father, Albert Gazeley, was born in London's East End, the youngest of six children. As part of Operation Pied Piper, he and his siblings were evacuated to Cambridge during the Blitz, where they made their home. A third-generation clockmaker, he had no ties to farming, yet he grew up in an era when orchards shaped the landscape – the air alive with birdsong and the hum of insects.

After serving in the RAF, he built a career in the Far East with Seiko watches, always longing to return. When he did in 1996, much of what he cherished had vanished – orchards grubbed up, nightingales silenced. Then, an advert in the Cambridge Evening News caught his eye: Coton Orchard for sale – a development opportunity. Others saw profit; he saw a chance to preserve history.

He converted the cold stores, replacing the asbestos roof, and leased them to a garden centre, allowing the rest of the orchard to transition from commercial to conservation. Pesticides were abandoned. The soil – undisturbed – teemed with life. New trees were planted – heritage varieties on vigorous rootstock, not for yield, but for resilience. Fallen trees became rich deadwood habitats, vital for biodiversity.

Some say personal history has no place in a public inquiry, but it matters. The applicant reduces the orchard to numbers on a spreadsheet – a place where a subtraction can be mitigated by a sapling planted elsewhere. But an orchard is not just a collection of trees. As Peter Rayner², who was born there, put it: “To see the orchard as a collection of trees is itself a flawed approach. It is, and always has been, part of the heritage of Cambridge and its surrounding villages.”

Even the applicant's own Environmental Impact Assessment admits this land is a lifeline for red-listed birds, bats, invertebrates, fungi and mosses – species declining everywhere, yet thriving here. Fracture the orchard, and the ecosystem collapses.

At a time when our council has declared a climate emergency, what sense is there in destroying Cambridgeshire's largest remaining traditional orchard? To reach net zero? Healthy soil is a carbon sink. To clean the air? Trees store carbon and produce oxygen. For economic growth? A reservoir is planned for Madingley Hill, yet the GCP route would run straight through it. To improve transport? The busway would terminate at Grange Road – already gridlocked, with no clear onward connections. Is it cost-effective? The Benefit-Cost Ratio (BCR) is below 0.5 – a failure by any reasonable standard.

I will leave the technical arguments to those with PhDs and Nobel Prizes – many of whom oppose this scheme. But as someone who has watched and listened for over a decade, I ask: what sense is there in this?

I know what the cost will be – to our county's finances, its environment, and its heritage.

² [YouTube](#) Peter Rayner reading his letter to the Cambridge Independent

Grounds for Objection

1. Significant Adverse Environmental Impact:

Coton Orchard, Cambridgeshire's largest traditional orchard³, is designated a Priority Habitat under the UK Biodiversity Action Plan⁴, recognised as a “hotspot for biodiversity.” This unique mosaic habitat supports veteran trees, hedgerows, and orchard floor habitats, offering irreplaceable ecosystems for a wide range of wildlife. It is on Best and Most Versatile (BMV) farmland and within the Cambridgeshire greenbelt. It is an irreplaceable haven for biodiversity on the margin of a large, urbanised, city. Cambridgeshire is already the most nature depleted county in the country⁵, has among the poorest canopy cover⁶ and worst water quality, with 89%⁷ of its rivers showing unacceptable levels of nutrient pollution.

The TWAO Environmental Statement⁸ acknowledges that “the orchard supports a notable range of insects, including some nationally rare species” and that its loss will have a “significant effect.” However, the report understates the site’s biodiversity, simplifies the mitigation of its destruction, and contains misleading statements. For example, the claim that the orchard “was managed intensively in the past through the use of pesticides and herbicides⁹” fails to reflect that over the subsequent three decades such practices ceased, the orchard has flourished, now supporting over 100 botanical species in its understory, as documented by Jonathan Shanklin¹⁰, in July 2024 and has the support of Pesticide Action Network UK¹¹

In October 2023, Coton Orchard was designated a County Wildlife Site due to its exceptional ecological value, including its veteran trees. As part of the selection process, Wildlife Trust Officer Lucy Wilson confirmed that most trees exceed 40 years of age, with some dating back to the original 1922 plantings. Twelve of these trees are listed in the Woodland Trust Ancient Tree Inventory¹², including a Bramley apple tree with a 2.44-metre circumference – one of the largest of its kind recorded in Britain¹³.

Apple trees are particularly valuable wildlife habitats as they age quickly, developing veteran features such as hollow trunks, rot holes, dead wood, and sap runs much sooner than slower-growing species like oaks. These features provide essential nesting sites and food sources for a wide range of invertebrates, birds, bats, and fungi. The presence of

³ PTES Traditional Orchard [inventory](#)

⁴ Natural England Technical Information Note TIN020

⁵ The Cambridge Nature Network – [Report](#) prepared by The Wildlife Trust BCN

⁶ FOE Tree Cover Mapping [Report](#)

⁷ [Citizen testing finds 75% of rivers in Britain in poor ecological health | Rivers | The Guardian](#)

⁸ GCP Environmental Statement NTS Document Ref: CtoC-9-00 p21

⁹ GCP Environmental Statement Ref: CtoC-10-ESO-00 p103

¹⁰ British Antarctic Survey Emeritus Fellow, Botanical Society of Britain & Ireland Recorder for Cambridgeshire

¹¹ <http://cotonorchard.com/letters/PANUK.pdf>

¹² Ancient Tree Inventory [Map](#)

¹³ Recorded by David Alderman of <https://treeregister.org/> Aug 2023

these veteran apple trees directly contradicts the applicant's assertion that the orchard is "dominated by high-density younger trees."¹⁴

On 15 January 2025, by a vote of seven to one, the South Cambridgeshire District Council (SCDC) Planning Committee approved the making of a Provisional Tree Protection Order (TPO) PZZHXBPN¹⁵, recognising the significant conservation value of these trees. The Tree Evaluation Method for Preservation Orders (TEMPO) score of 16 confirms their high importance, as this assessment considers factors such as amenity value, condition and longevity. A score of 16 falls within the "definitely merits a TPO" category, highlighting the trees' exceptional ecological and landscape significance and reinforcing the need for their protection.

Coton Orchard's rich biodiversity is further evidenced by its role as a critical habitat for numerous protected and rare species:

- **Bats:** "A total of eleven bat species were recorded during the survey period. These comprised *Nathusius*, *Common* and *Soprano Pipistrelle* bats, *Noctule*, *Serotine*, *Leisler's*, *Barbastelle*, *Brown Long-eared*, *Whiskered/Brandt's*, *Natterer's* and *Daubenton's*." "The hedgerow with the most activity was hedgerow 10, along the eastern boundary of Coton Orchard"¹⁶ emphasising its importance as a habitat corridor and feeding ground.
- **Invertebrates**¹⁷: A "sizeable area of habitat mosaic in Coton Orchard (2.2ha) will be lost to the Scheme, which contain a notable diversity of invertebrate species. Surveys identified 239 species, 14 Nationally Scarce species, including eight beetles, two bees and four moths. ... given the range and number of species, and rarity of some, the impact will result locally in a significant adverse effect." Additionally, Red Data Book species were recorded in 2024 by the Cambridgeshire Moth Group¹⁸ not reflected in the EIA.
- **Birds:** Forty-two breeding species were observed in Coton Orchard 2024 (Sixty-seven within survey area¹⁹) by applicant surveyors WSP²⁰, including "Five Species Listed on Section 41 (Priority Species) of the Natural Environment and Rural Communities (NERC) Act, 2006". Additionally, sixty-one²¹ species was noted by RSPB and other Cambridgeshire recorders, twenty-nine BoCC Red/Amber-listed and/or NERC Priority Species.
- **Soil Biodiversity:** Including fungi, mosses, and lichens, are critical to ecosystem health and resilience. Dr Merlin Sheldrake²², a leading expert and author of

¹⁴ CtoC-10-ES0 p103

¹⁵ [Agenda for Planning Committee on Wednesday, 15 January 2025, 10.00 a.m.](#)

¹⁶ Cambridge Ecology 02/04/2020 P0608-R-019b Ref. 3.10, p20-21

¹⁷ GCP Environmental Statement Ref: CtoC-10-ESO-00 p69, p106

¹⁸ Reported in [Guardian](#)

¹⁹ CtoC-10-ES0-00 p69

²⁰ TR5.18 Breeding Bird Survey Report: Coton Orchard 2024 p8

²¹ Coton Orchard Species Record: [Birds](#)

²² https://en.wikipedia.org/wiki/Merlin_Sheldrake

Entangled Life, describes Coton Orchard as “a national treasure... a century-old island of undisturbed biodiversity in a highly developed landscape: its communities of plants, animals, and fungi cannot be replaced.” Dr Chris Preston recorded 45²³ species of mosses and liverworts at Coton Orchard, including *Thuidium tamariscinum*, typically found only in ancient woodlands. These findings underscore the orchard’s uniqueness and its essential role in biodiversity conservation.

The TWAO application fails to fully account for the ecological significance, rich biodiversity, and irreplaceable habitat that Coton Orchard provides. Steve Oram, Orchard Biodiversity Officer at the People’s Trust for Endangered Species, summarises²⁴: “This utterly destructive proposal can never achieve biodiversity net gain due to the vast amounts of damage that it will do to an ancient orchard full of veteran trees, and the enormous impact of a road going through so much previously undamaged and unfragmented countryside.”

2. **Adverse Commercial Impact:**

The fragmentation of Coton Orchard by the proposed busway has implications that extend beyond ecological damage, threatening its economic viability as well. Over the past 30 years, the orchard has transitioned from intensive fruit & juice production to a conservation-focused, pesticide-free approach, prioritising quality over quantity, seeking premium pricing to meet production costs. This shift includes the cultivation of heritage varieties of apples, cider apples, pears, and perry pears.

In collaboration with local enterprise Blue Barrel Cider²⁵, the orchard planted 30 new cider apple trees last season, with plans to add 50 more this season, alongside establishing a heritage perry orchard. Apples from the veteran Bramley trees were used to create a limited-edition *Cuckoo’s Return*TM cider, as well as blended with Arcadia Orchard’s Black Dabinett apples to produce a premium sparkling cider, *East to Eden, Origins*TM. By expanding Coton’s stock of heritage trees, the orchard aims to achieve greater self-sufficiency and, in turn, supply other cider & perry makers. Additionally, trees from the Tian Shan Mountains (*Malus sieversii*)—the wild ancestor of all domestic apple varieties—have been introduced. These trees bring genetic diversity, enhancing natural resilience to climate change and pests, while offering unique flavour profiles that add a compelling selling point to the orchard’s products.

Traditional orchards are defined by trees grafted onto vigorous rootstocks²⁶, requiring wider spacing and substantial acreage to sustain operations, particularly at lower production intensity. At Coton Orchard, the rows of apple trees have been planted in a carefully established north-to-south orientation, with avenues maintained between them to facilitate uninterrupted access for tractors and other essential machinery. Over

²³ Coton Orchard Species Record [Moses](#) and liverworts

²⁴ [ptes_letter.pdf](#)

²⁵ [Our Story - Blue Barrel Cider](#)

²⁶ UK Biodiversity Action Plan; Priority Habitat Descriptions. BRIG (ed. Ant Maddock) 2008.

decades, these rows—together with the adjoining hedgerows—have become deeply rooted and integral to the orchard's operational and ecological structure. Unlike ploughed fields, this orientation cannot be arbitrarily altered without fundamentally impairing the orchard's functionality. The proposed busway and its associated infrastructure would sever these critical access routes, making operations impractical and rendering the orchard commercially unsustainable.

Without economic viability, the orchard cannot be managed effectively for conservation. Habitat loss would extend far beyond the immediate busway footprint, as traditional orchard management practices—critical to maintaining biodiversity—would become unfeasible. This fragmentation would jeopardise the orchard's future, undermining its cultural heritage and its role as a reservoir of biodiversity. The cascading effects of this scheme would leave an irreplaceable environmental and economic void in the local landscape. None of the above has been adequately considered or reflected in the TWAO application.

3. **Poor Value for Money (VfM):**

The Department for Transport's Value for Money framework classifies a Benefit-Cost Ratio (BCR) below 1 as “poor.” The initial BCR for the Cambourne to Cambridge (CtoC) project stands at 0.43²⁷ based on 2010 prices. Adjusting for inflation to 2025 would further diminish this ratio.

In the Autumn Budget 2024²⁸, Chancellor Rachel Reeves reaffirmed the government's commitment to East West Rail (EWR), with initial services between Oxford, Bletchley, and Milton Keynes set to begin in 2025, and extensions to Bedford by 2030. While the specific route to Cambridge is under consultation, both proposed alignments include stations at Cambourne, offering a more efficient solution for long-term growth and potentially duplicating infrastructure and expenditure, thereby further reducing the VfM of the CtoC busway as currently proposed. A less costly on-road alternative, referenced overleaf, could help achieve comparable growth objectives more swiftly and at a fraction of the cost, delivering significantly better VfM.

4. **Insufficient Public Benefit:**

At the CCC meeting on 21st March 2023²⁹, Council Leader Lucy Nethsingha outlined two key objectives for the CtoC busway: “decarbonisation ... moving to a net zero economy” and enhancing public transport links between Cambourne and Cambridge, particularly to destinations like post-16-year-old education colleges, employment centres, Addenbrooke's Hospital, and the Biomedical Campus. The CtoC project as outlined, however, falls short of evidence to demonstrate that these objectives will be met.

²⁷ Mott MacDonald Outline Economic Case 17th January 2020 [link](#)

²⁸ [Autumn Budget 2024 \(HTML\) - GOV.UK](#)

²⁹ YouTube recording [Full Council - 21 March 2023](#)

- Carbon Emissions:** The EIA estimates a net saving of approximately 5,000 tonnes of CO₂ equivalent (tCO₂e) over a 60-year period³⁰. The report itself concedes that this is “a minor benefit given the time taken to reach net zero and the relatively small overall carbon reduction.” This equates to an annual reduction of less than 100 tCO₂e—a negligible contribution in the context of UK transport emissions, which were 406 million tCO₂e in 2022³¹. To provide further context, this reduction represents approximately 0.0016% of the 4th UK Carbon Budget, with projected contributions of 0.0003% to the 5th and 0.0004% to the 6th Carbon Budgets. Such fractional impacts render the scheme's claimed carbon benefits statistically insignificant. Carbon savings these minimal raises serious questions about the project's justification from a carbon reduction perspective. In light of the urgent need for impactful climate action, the scheme's carbon performance fails to meet the threshold for meaningful contribution to the County³² or UK's net-zero targets.
- Travel options:** The CtoC route fails to address practical travel needs and lacks integration with existing transport services. Bus franchising in Cambridgeshire is still in its early stages, making it likely that any new services will depend on commercial operators, such as Stagecoach, which already runs Cambourne–Cambridge services (e.g., Bus Route 4³³, changing at Drummer Street Bus Station). Andy Campbell, former Managing Director of Stagecoach East for 14 years and a respected authority on local transport, has publicly criticised the CtoC route as “fundamentally flawed.” Speaking on BBC Radio³⁴, he highlighted that terminating the route at Grange Road fails to provide direct access to Addenbrooke's Hospital, post-16 education in Cambridge, and other key destinations. Bypassing major transport corridors, such as the M11 and A14, the proposed busway restricts connectivity and limits integration with the wider transport network. These fundamental shortcomings severely undermine the scheme's ability to deliver meaningful improvements to regional travel infrastructure.

5. Alternative Options:

A viable in-highway alternative has been proposed by the local conservation charity Cambridge Past, Present and Future (CPPF). This option, when considered alongside the future East West Rail (EWR) connection linking Cambourne and Cambridge while serving additional destinations, provides a practical and sustainable solution.

The CPPF will supply the technical details of their proposed route. However, several key objections raised by the GCP and CCC Councillors during consultations and meetings to which I was privy warrant closer scrutiny to ensure a thorough and fair assessment of the CPPF in-highway alternative.

³⁰ CtoC-10-ESO-00 p23

³¹ Transport and environment statistics 2022 Gov.uk [link](#)

³² Approx 0.0057% source [CCC](#)

³³ Stagecoach journey planner

- **American Military Cemetery (AMC):** Cllr Elisa Meschini, Chair of the GCP, has claimed that the CPPF's proposed on-road alternative is unviable due to an objection from the AMC³⁵ citing terms of their covenant. However, this assertion is contradicted by AMC Superintendent Matthew Browne³⁶, who addressed the GCP Executive Board³⁷ to express specific support for the CPPF's proposed on-road route.
- **Madingley Wood SSSI:** The protection of Madingley Wood, a Site of Special Scientific Interest (SSSI), is frequently cited by GCP officers (and in turn Councillors) as a reason for rejecting the CPPF's proposed on-road routing. Jo Baker, GCP Project Manager, claimed that "the strip of land between the fence line and the highways contains mature native trees that are more valuable than the trees to be lost at Coton Orchard." However, in a letter dated 25 September 2024, Baker acknowledged that the GCP "have not undertaken a tree survey for Madingley Wood SSSI". Unlike the applicant's proposal, which involves constructing a new infrastructure bisecting Coton Orchard, the CPPF on-road alternative utilises the existing road infrastructure, avoiding harm to both Coton Orchard *and* the SSSI. The existing road will remain in use regardless of the busway's construction, meaning the applicant's alignment would unnecessarily add to environmental disruption in this sensitive area. In contrast, the CPPF route minimises additional impact, preserving the integrity of the SSSI while saving Coton Orchard and avoiding the ecological harm caused by severing its habitat.
- **Independent Audit:** Officers and Councillors reference an independent audit to support the off-road option presented by the applicant, implying validation of the proposed route and discrediting the CPPF on-road alternative. However, the audit explicitly states, "It is not the role of this audit to adjudicate between conflicting options,"³⁸ highlighting its limited scope.

The audit further emphasises the need to consider "significant changes in the wider context, including the impact of Covid-19, the increasing importance of climate change, the government's new bus policy, (and) East-West Rail" stressing that these factors must be addressed in the next stages of developing the CtoC scheme. The audit also critiques the scheme's reliance on the City Access program, which proposes soft measures such as reducing on-street parking and reallocating road space to active travel, without offering alternative solutions to improve city-wide bus accessibility. Crucially, it notes that "no detailed modelling of the likely impact has been conducted, so it remains uncertain whether bus accessibility will improve."

³⁵ Full Cambs County Council Meeting 21 Mar 2023

³⁶ American Magazine [Report](#)

³⁷ GCP Exec Board meeting 01.07.21. [YouTube](#)

³⁸ GCP CtoC Audit 2021 [Final Report](#) p.6 & p69

This lack of conclusive analysis undermines the credibility of claims that the proposed route has been validated and raises significant questions about the robustness of the applicant's approach.

6. **Significant Opposition:**

The GCP off-road routing for the CtoC busway has faced significant cross-party and expert opposition, both locally and nationally. As of 9th March 2025, the CPPF petition³⁹ has gathered **23,685** signatures which also reflects public opinion demonstrated in each and every consultation over the past years. Prominent opponents include Baroness Jenny Jones, Green Party peer and environmental advocate, and Lord Whitty, Labour peer and former Parliamentary Under-Secretary of State for Food, Farming and Sustainable Energy. Sir Partha Dasgupta, economist and author of the Dasgupta Review on biodiversity, and Sir David King, former Chief Scientific Adviser and climate change expert, have also raised objections. Conservation organisations opposing the route include the People's Trust for Endangered Species (PTES), The Wildlife Trusts, and The Woodland Trust. High-profile environmental advocates such as Dr Merlin Sheldrake, biologist and author, and Chris Packham, naturalist and broadcaster, have joined the call for the proposal to be reconsidered. This extensive opposition reflects a broad and credible coalition against the proposed off-road routing of the CtoC busway⁴⁰.

7. **Planning Policy Conflicts:**

National Planning Policy Framework (NPPF) "Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons". Jack Taylor⁴¹, lead campaigner at the Woodland Trust, emphasised that "these veteran trees are protected through the NPPF" and are a "vital and treasured part of the UK's natural and cultural landscape."

8. **Technical and Financial Issues:**

The unresolved technical challenges, funding uncertainties, and lack of evidence supporting the feasibility of the CtoC project raise serious concerns about its viability as outlined in the application.

- **Guidance System:** The application cites a "market sounding exercise" of 6 options, conducted in October 2018, which concluded that both kerb-guided and optical guidance systems could meet the scheme's requirements but does not make a definitive selection. The applicant acknowledges that "the physical infrastructure required for each system would differ." ⁴² The failure to select a

³⁹ Petition link <https://www.change.org/p/save-the-green-corridor-cambourne-to-cambridge-bus-lane-not-busway>

⁴⁰ We can provide evidence, if required.

⁴¹ Article <https://www.woodlandtrust.org.uk/press-centre/2023/05/veteran-trees-bus-route-rethink/>

⁴² CtoC-10-ES4-00 ES Scoping Report 2.4.3 & 2.4.5 p12

single system at this stage potentially undermines the robustness of the project's technical foundation.

- **Safety and Financial Concerns:** Throughout consultations, the public has been led to believe that the proposed CtoC busway will mirror the existing Cambridgeshire Guided Busway, which operates between Cambridge, Huntingdon, and St Ives. This system uses a kerb-guided mechanism, one of the two guidance systems under consideration for the CtoC project as mentioned above. However, the existing busway has faced significant safety issues.

Between 2015 and 2021, three fatalities occurred on the Cambridgeshire Guided Busway. In May 2023, the Health and Safety Executive (HSE) initiated legal proceedings against CCC for historic health and safety failings related to these incidents. By September 2024, the council admitted liability, pleading guilty to two charges under the Health and Safety at Work Act.

The financial repercussions of these safety failures are considerable. The council faces significant legal and compensation costs, with potential fines estimated to reach eight figures⁴³. Additional safety measures, such as installing new fencing along the busway, have further strained resources. These expenses compound CCC's existing budget deficit, currently standing at £28 million.

As the accountable body for overspending by the GCP, CCC assumes further financial risk from unresolved safety and operational concerns surrounding the proposed CtoC busway. These issues, if not adequately addressed, could lead to substantial budgetary overruns, placing further strain on already limited public funds.

The proposed route would not only transect valuable habitats but also sever well-used paths connecting residents to the school south of the alignment and homes to the north. Additionally, it would disrupt farm and orchard routes, necessitating crossings that have yet to be adequately addressed. Given the serious incidents associated with the original guided busway, such oversight appears negligent. These concerns would not arise if the CPPF on-road alternative were adopted, offering a safer, more cost-effective, and less disruptive solution.

- **New Service Reservoir at Madingley:** The applicant's alignment of the CtoC busway appears to conflict with Anglian Water's (AW) preferred pipeline corridor and associated infrastructure for the proposed Fens Reservoir⁴⁴, a critical project to address Cambridgeshire's severe water scarcity. Addressing this scarcity is a key factor underpinning the approval of 3,500 homes at Bourn Airfield⁴⁵—a

⁴³ [Judge due to sentence Cambridgeshire council after busway deaths - BBC News](#)

⁴⁴ Phase two consultation – p35 <https://fensreservoir.co.uk/assets/images/downloads/Associated-Infrastructure-brochure-2024-FINAL-WEB-SPREADS.pdf>

⁴⁵ SCDC notice of approval <https://www.scambs.gov.uk/news/formal-planning-permission-issued-for-new-village-at-bourn-airfield-after-similar-decision-for-west-cambridge-site>

decision that overrode Environment Agency objections. This approval is subject to Section 106 funding, which includes contributions for transport infrastructure potentially linked to the CtoC scheme. The proposed alignment therefore raises serious technical and funding concerns that the applicant has only superficially addressed.

While the Fens Reservoir is still in the consultation phase, the proposed location for the new service reservoir near the existing facility at Madingley is a logical choice for AW, enabling efficient integration with Cambridge Water’s network by co-locating new infrastructure alongside existing facilities. This strategic approach minimises disruption and reflects sound engineering principles.

The new Madingley Hill reservoir is estimated to be approximately 200m by 200m⁴⁶—around eight times the width of the motorway (24–28m). If the busway were required to span the reservoir, as it does the M11, it would necessitate substantial additional infrastructure, significantly increasing both the carbon footprint and financial cost of the project. Avoiding the reservoir entirely would also pose considerable challenges due to the surrounding terrain and the need for integration with other infrastructure, further complicating and escalating costs. Moreover, rerouting the busway to bypass the reservoir expansion would likely take it beyond the boundaries of the current TWAO application, potentially nullifying the scheme by rendering it incompatible with the submitted plans.

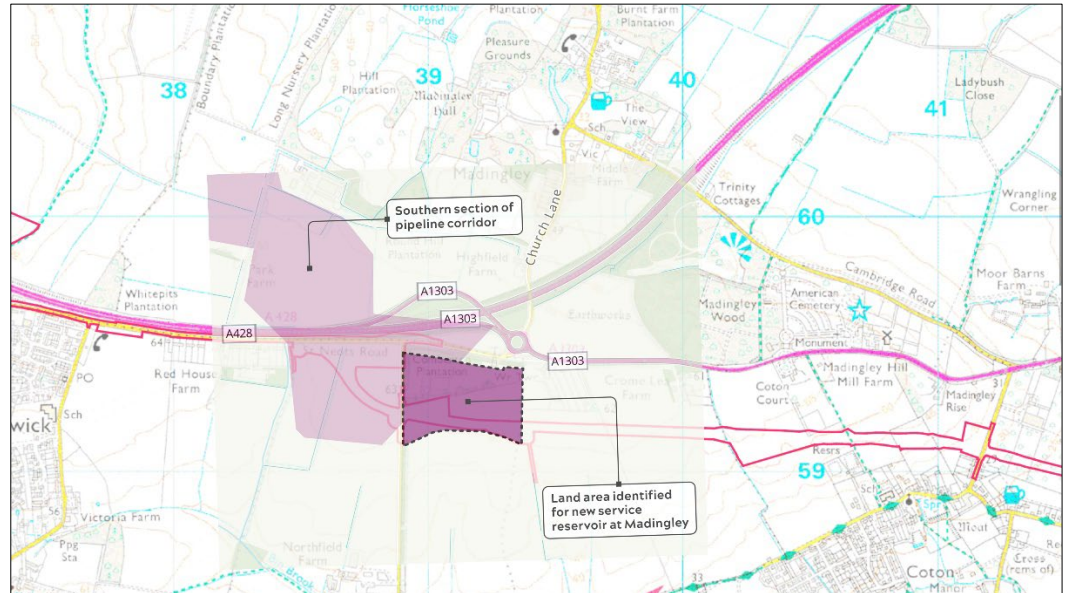


Illustration above created by overlaying maps from AW and CTOC consultation brochures.

The applicant’s off-road route risks creating unnecessary conflicts between the busway and this essential water infrastructure. Construction activities for the proposed route could delay or disrupt the reservoir project, which is vital for regional growth and sustainability. Moreover, the additional infrastructure costs

⁴⁶ CtoC-10-ESO-00 11.3.6. p128

required to mitigate these conflicts would further inflate the CtoC scheme's already significant budget.

These issues could be entirely avoided by adopting an on-road bus lane along Madingley Road, as proposed by CPPF. This alternative achieves the project's objectives while avoiding interdependencies that risk undermining both schemes.

9. **Heritage and Cultural Impacts:**

Cambridgeshire's fruit-growing heritage is a vital part of its cultural identity, with over 20 apple varieties originating in the county. Traditional orchards like Coton Orchard are rare survivors of this legacy, as England and Wales have experienced an 81%⁴⁷ decline in such sites. Coton Orchard holds significant historical value, not only as part of Cambridgeshire's rich fruit-growing heritage but also as a site of cultural and historical importance. During World War II, it served as a refuge for Austrian Jews, embedding it deeply in the local community's memory. In recognition of this heritage, an Anne Frank Horse Chestnut sapling has been planted within the orchard, symbolising resilience and hope. This is now noted on the UK Holocaust Map⁴⁸, further underscoring the site's significance in Holocaust remembrance. The destruction of this orchard for the proposed busway would result in the irreparable loss of a key cultural and historical landmark, undermining efforts to preserve the region's heritage for future generations.

10. **Insufficient Mitigation Measures:**

In the context of Biodiversity Net Gain (BNG) Regulations⁴⁹, the loss of any Irreplaceable Habitat precludes achievement of BNG for that habitat. Veteran trees are deemed Irreplaceable Habitat and so removal would mean that it is technically not possible to achieve net gain in biodiversity of veteran trees.

11. **Insufficient Funding and Financial Viability Concerns:**

The applicant's Estimate of Costs for the CtoC project is £192.3 million⁵⁰, excluding £15.3 million already spent, bringing the total to £207.6 million⁵¹—a 14.5% increase. This figure is significantly underestimated. Adjusted for risk (£165.2 million base cost in 2020, Tender Price Index (TPI): 192⁵²), and projected inflation to 2026 (TPI: 228), along with reasonable contingency and factors such as increased employer National Insurance contributions announced in the Autumn Budget of 2024 (8.7%)⁵³, the estimated cost rises to between £226.1 million and £307.9 million.

⁴⁷ [Orchards vanishing from the landscape, says National Trust - BBC News](#)

⁴⁸ <https://www.ukholocaustmap.org.uk/map/records/coton-orchard>

⁴⁹ DEFRA (2024a) Guidance Irreplaceable habitats <https://www.gov.uk/guidance/irreplaceable-habitats>

⁵⁰ Estimate of Costs TWAO ref CtoC-8-00

⁵¹ GCP Exec Board Agenda 02/10/24 p99 [Document.ashx](#)

⁵² Tender Price and Building Cost Indices <https://costmodelling.com/>

⁵³ [December 2024 issue of the Employer Bulletin - GOV.UK](#)

Under Rule 10(2)(c) of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006, a Funding Statement must demonstrate sufficient and reliable funding for the proposed works.

The applicant's statement relies on:

- **City Deal Grant**⁵⁴ (£500 million), with £200 million subject to review in 2025 and not guaranteed for CtoC alone.
- **Section 106 Contributions** (£37.9 million⁵⁵), which are only partially allocated to the CtoC scheme, alongside other projects.

The inclusion of the full Section 106 contribution figure for CtoC is misleading, as it is not exclusively allocated to this project. City Deal funding, already over-programmed with a published deficit of £73 million⁵⁶, further complicates funding reliability. CCC, designated as the accountable body for shortfalls, faces a projected budget gap of £34.2 million in 2025-26. Moreover, in March 2024, the Government allocated £7.2 million to progress the Cambridge South East Transport (CSET) scheme to TWAO submission due to escalating costs, highlighting that similar GCP projects are underfunded.

In contrast, the CPPF on-road scheme, which avoids the need for a costly motorway bridge, is estimated to cost just 10% of the current proposal. This alternative delivers comparable transport benefits at vastly reduced cost within a much shorter construction delivery time.

Conclusion

The proposed CtoC busway, specifically the off-road segment and additional motorway bridge, is a deeply flawed scheme that fails to justify its environmental destruction, excessive cost, and weak public benefits. Despite promises of enhanced connectivity and sustainability, the project achieves neither. Its Benefit-Cost Ratio remains below the Department for Transport's acceptable threshold, and the claimed carbon savings are statistically insignificant, offering no meaningful contribution to net-zero goals. The lack of a viable funding plan and over-reliance on overstretched public resources further undermines its feasibility. By contrast, the on-road alternative proposed by CPPF offers a practical, sustainable solution that can be delivered more quickly and at just 10% of the cost. Combined with the forthcoming EWR link, these alternative addresses connectivity and economic growth goals while preserving the invaluable heritage and biodiversity of Coton Orchard and Madingley Hill. As the landowner, HCP strongly objects to the compulsory purchase of its land for a scheme that is neither justified in the public interest nor compliant with planning and environmental standards. Such acquisition would irreparably harm the orchard's unique ecological and cultural value while failing to deliver proportional public benefits.

⁵⁴ <https://www.gov.uk/government/news/greater-cambridge-city-deal-signed>

⁵⁵ CtoC-7-00 6.1 Cambourne West £8.7 + 6.2 Bourn Airfield £20.0 + 6.3 West Cambridge £9.2 = £37.9

⁵⁶ GCP Exec Board Agenda 02/10/24 p99 [Document.ashx](#)

Request for Site Visit

The full extent of the environmental damage and the viability of an alternative route cannot be fully appreciated without first-hand observation. I respectfully request a site visit as part of the public inquiry, specifically to assess Madingley Road, the SSSI boundary, and Coton Orchard—crucial context no written submission can fully convey.

For any queries regarding this statement or regards the next steps in the TWAO process, please contact me at the registered business address:: Coton Orchard Limited c/o Landbeach Lakes, Ely Road, Waterbeach, Cambridge CB25 9PG. Email: anna@cotonorchard.com

Yours sincerely,

Anna Gazeley

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Company Secretary Houston Crest Properties Ltd

☎ 07874 138 391



Figure 1 Above orchard looking up Madingley Hill



Figure 2 Above orchard looking across woodland scrub towards Cambridge