

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

1 August 2025

Sent by email only: [transportinfrastructure@dfat.gov.uk](mailto:transportinfrastructure@dfat.gov.uk)

Dear Sirs

**Transport and Works Act 1992: The proposed Cambridge County Council and Greater Cambridgeshire Partnership Cambridge South East Transport Order**

**Our Client: Cambridge University Hospitals NHS Foundation Trust ("Trust")**

We write on behalf of our client, Cambridge University Hospitals NHS Foundation Trust, in relation to the application for the above proposed order and further to your letter of 26 June advising of the extension of time for submission of Statement of Case.

We refer to the Trust's objection to the proposed order submitted on 7 March 2025 ("Objection"). Following submission of the Objection the Trust has been in discussion with Cambridgeshire County Council (as applicant) and the Greater Cambridgeshire Partnership (as promoter) with a view to securing binding assurances by way of a protective provisions agreement from CCC and GCP that the Trust's vital operations on the Cambridge Biomedical Campus will not be impeded as a result of exercise of the rights and powers sought in the proposed order.

At the date of this letter discussion and negotiation is ongoing, but an agreement has not been reached. Accordingly, we write to confirm that unless and until an agreement is reached the Trust would need to present oral evidence to the Inquiry being held into the application.

Mindful that the Trust, CCC and GCP are continuing discussions, and of the cost to the public purse of preparing a Statement of Case, our client requests that their objection letter (dated 7 March 2025, 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 requests that the Inspector exercise their discretion to allow the Trust to submit evidence to the Inquiry in the event that an agreement has not been reached at that stage.

Solicitors acting for CCC and GCP have previously confirmed they have no objection to the Trust's objection letter standing as its Statement of Case for the Inquiry.

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

Please direct all future correspondence in this matter to [hannah.edwards@mills-reeve.com](mailto:hannah.edwards@mills-reeve.com) and [peter.seaborn@mills-reeve.com](mailto:peter.seaborn@mills-reeve.com) .

Yours faithfully

A handwritten signature in blue ink that reads "Mills & Reeve LLP".

**Mills & Reeve LLP**

enc. Objection letter dated 7 March 2025

cc.

- (1) Richard Guyatt at: [richard.guyatt@wbd-uk.com](mailto:richard.guyatt@wbd-uk.com); [cset.order@atkinsrealis.com](mailto:cset.order@atkinsrealis.com); and in hard copy to Womble Bond Dickinson (UK) LLP, 3 Temple Quay, Temple Back East, Bristol, BS1 6DZ.
- (2) [Joanna.Vincent@gateleyhamer.com](mailto:Joanna.Vincent@gateleyhamer.com)
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**Together  
Safe  
Kind  
Excellent**

Date: 07 March 2025

Secretary of State c/o  
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Great Minster House  
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London  
SW1P 4DR  
[transportinfrastructure@dft.gov.uk](mailto:transportinfrastructure@dft.gov.uk)

By email only

**Dear Sir / Madam,**

**RE: The Cambridge South East Transport Order 202[x] and request for deemed planning permission**

I write on behalf of the Cambridge University Hospitals NHS Foundation Trust ("CUH") in respect of the application submitted by Cambridgeshire County Council ("CCC") on 9 January 2025 for a Transport and Works Act Order ("TWAO") for 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 express our firm support for the principle of the Scheme. However, as the plans currently stand, it gives rise to a number of concerns that CUH feels must be addressed to our satisfaction. This is to ensure that the vital operation of our estate and delivery of patient services can continue without unacceptable compromise, including to patient safety.

Until such time as the issues outlined within this letter can be addressed satisfactorily, CUH will unfortunately need 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.

**About the Cambridge Biomedical Campus and Cambridge University Hospitals**

Cambridge University Hospitals sits at the heart of the Cambridge Biomedical Campus ("CBC") which forms part of the UK's and Europe's leading life sciences cluster. The CBC is a vibrant, international

healthcare community and a global leader in medical science, research, education and patient care. CUH has the largest presence on campus in terms of estate, staff, patients and visitors. CUH has over 1,100 beds, 13,000 members of staff and is one of the largest acute hospital Trusts in the country. CUH is a family of hospitals comprising Addenbrooke's, and The Rosie maternity hospital. As well as providing emergency, surgical and medical care for local people, CUH is also a leading regional and national centre for specialist treatment. Work has just commenced to build a new Cambridge Cancer Research Hospital, and plans are moving forward for a new Children's Hospital. Sustainable access to the site is a key factor to ensure the campus can attract and retain staff. In addition, the promotion of active travel to CUH has the potential to contribute to a reduction in health inequalities through supporting accessibility to the hospitals. With the further predicted growth in and around Cambridge as well as the predicted growth on campus, increased transport links, such as the Scheme, will become ever more pressing.

### **Issues and concerns**

CUH 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 CSET scheme provides the final piece to the ambitious programme of work.

CUH has reviewed the information encompassing the application material and has identified the following issues and concerns. Notwithstanding this objection, CUH would welcome continued dialogue, and the opportunity to discuss the following observations further, with Cambridgeshire County Council and the GCP to clarify the position and appropriate next steps.

#### **1. Land acquisition**

1.1 CUH has rights of access over, and rights to connect into and use a number of essential infrastructure services within, Francis Crick Avenue, Addenbrooke's Road and Dame Mary Archer Way in respect of which CCC is seeking either:

- (i) permanent acquisition of land;
- (ii) permanent acquisition of rights;
- (iii) a power to alter the layout;
- (iv) a power to alter the layout of a street having a junction with such street;
- (v) a power to extinguish private rights.

1.2 In order to ensure that CUH's operations on the CBC are not impeded as a result of exercise by CCC of the rights sought in the TWAO, we request either that provisions are incorporated in the Order to ensure that exercise of CCC's proposed rights do not impinge CUH's access rights and

sub-surface services or that CCC enter into a separate agreement with CUH to provide such protections.

## 2. Protection of the Blue Light Route

- 2.1 Addenbrooke's Road, Francis Crick Avenue, and Dame Mary Archer Way form part of a wider network of key 'Blue Light Routes' ("BLR") which are used by ambulances to support access to emergency departments within both CUH and the Royal Papworth Hospital, delivery units within the Rosie Maternity Hospital, and support inter-hospital transfers for some of our sickest, often ventilated patients, who may need to travel to and from the facility via dedicated ambulance transfer. For this reason, it is critical that the BLR remain available and unobstructed during both the construction phase, and during operation to ensure patient safety. These routes are also used by the organ donation and blood transfusion services.
- 2.2 Whilst the Environmental Statement recognises the strategic importance of the BLR, protections appear to be limited to including monitoring proposals during the construction period only, via the CTMP. Whilst there is also reference to *'alternative access [being] fully coordinated and agreed with CBC and emergency services prior to any works being carried out'* no details are given as to how this will be secured, or what it would feasibly be.
- 2.3 In respect of the construction period, we would like a commitment from CCC to join the CBC Construction Group (a monthly forum at which the group discuss and coordinate activities and projects on the campus) to ensure proposals are discussed with CUH well in advance of the Code of Construction Practice (CoCP) and Construction Environment Management Plan (CEMP) being submitted, enabling a collaborative approach to managing the impacts of construction across the CBC and to avoid unforeseen impacts on the critical care operations of the hospital.
- 2.4 CUH operates a helipad in very close proximity to the CSET works areas on Francis Crick Avenue and Dame Mary Archer Way. CUH is the Regional Trauma Centre and it is used 24/7 by several different air ambulance services. There is a comprehensive operational manual and risk assessment which describes its' operation and links with local air traffic control. Potential for foreign object debris presents a serious risk to the operation of the facility and as part of the CEMP, it will be essential that consideration is documented, and management plans in place to support the mitigation during construction. We seek a commitment from the CCC to that effect, and that helipad operations will not be affected.
- 2.5 Given the highly sensitive and critical nature of these routes, additional reassurance is sought to ensure compliance with commitments made, and to ensure that adverse impacts on the BLR do not occur either during construction or operation.

## 3. Works to Francis Crick Avenue including the bridge to Hobson's Park

- 3.1 The Design and Access Statement and Environmental Statement both set out that the improvements to Francis Crick Avenue, 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:

- if the FCA Works are undertaken under permitted development rights, they will not be subject to the provisions of the Order (which relate to the carrying out of the works), or the conditions attached to the deemed planning permission; it is therefore unclear how measures to protect the BLR will be secured and how access to the CBC along this well utilised travel corridor will be protected and/or managed;
- notwithstanding that the FCA Works are said to be secured under permitted development rights, 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))

3.2 CUH requires clarity as to how the FCA Works are to be delivered, managed and overseen.

#### 4. Drainage

4.1 Hobson's Brook (also known as Hobson's Conduit) is within the Order Limits.

4.2 CUH benefits from a number of drainage rights in respect of the Hobson's Brook. The rights granted to CUH are also subject to obligations imposed on CUH 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.

4.3 In order to ensure that CUH's drainage rights are not impeded as a result of exercise by CCC of the rights sought in the TWA0, we request either that provisions are incorporated in the Order to ensure that:

- exercise of CCC's proposed rights do not impinge CUH's drainage rights; and
- in the event of any contamination incident, it is possible to readily ascertain whether it is attributable to the Scheme (or CUH); and
- should any contamination incident be found to be caused by the construction works, or ongoing operation of the CSET service, then the contamination will be mitigated, removed and cleansed by the CCC.

#### 5. Impact of construction workers using cycle and parking spaces

5.1 Car and cycle parking at the CBC operates close to capacity. Whilst staff car parking is managed through a permit system, visitor parking is not controlled but is an important asset to CUH and to the visitors who are often at the hospital for health-related reasons. We are concerned that the

construction phase of the Works, which is estimated to result in a daily construction workforce of up to 450 workers<sup>1</sup> during the busiest periods, may give rise to use of our car parks and cycle spaces by the construction workforce, taking valuable and scarce provision away from staff and visitors.

- 5.2 Paragraph 7.1 of the Transport Assessment provides that detailed arrangements for the transportation of the construction workforce will be developed prior to commencement of construction and specified in the pre-construction CoCP. There is no indication that stakeholders will be consulted as part of this process. In addition, whilst condition 4 of draft conditions appended to the request for deemed planning permission includes a requirement for a CEMP, engagement with stakeholders appears to be limited to communication of the plan, rather than development of it.
- 5.3 CUH therefore requires further reassurance that CCC will fully engage with CUH in preparation of the CoCP, CEMP and CTM. CUH would like to see a requirement for parking (car and cycle) monitoring to ensure that capacity is not impacted by construction workers along with a requirement for any impacts to be managed. We would welcome further discussion with CCC to explore whether temporary cycle parking (in the form of Sheffield Stands) could be provided either within the construction compounds, or nearby, for example at Babraham and Trumpington Park & Sites, or at the Southwest Travel Hub.

## 6. Impact on Francis Crick Avenue

- 6.1 Both the draft TWAO and the Environmental Statement make clear that permanent rights are sought to allow buses to run over Francis Crick Avenue which is a private road. Whilst CUH has neither a freehold nor leasehold interest in the road, 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. CUH requires assurance that agreements are in place to ensure that CUH is not detrimentally impacted by any increase in maintenance requirements.

## 7. Maintaining access to the Campus for pedestrians and cyclists

- 7.1 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 shows that this segment will predominantly comprise wildflower meadow.
- 7.2 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*

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<sup>1</sup> A set out at paragraph 7.37 of the Transport Assessment

*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."*

- 7.3 Noting that the emergency and maintenance access/service track will replace a dedicated active travel route with a route which will introduce vehicular traffic, CUH 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, CUH would like confirmation that the access track will be wide enough to accommodate not only existing use but projected future use.

## 8. Design Observations

- 8.1 CUH makes the following design observations and would welcome further dialogue with CCC to better understand the likely impacts of the Scheme on Francis Crick Avenue (which as above, is a BLR):

- (a) The southbound bus stop arrangement appears unclear and possibly compromised. There needs to be a suitably sized bus boarding infrastructure and arrangements which should, if necessary adapt the Green and Gardens to suit.
- (b) The bio-directional cycle track alongside Francis Crick Avenue 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 assurances that this has been considered and there is no further option.
- (c) The footway to the eastern side of Francis Crick Avenue 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 is likely to increase. It is not clear from the application material whether this has been considered;
- (d) The proposed junction of Francis Crick Avenue ("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). CUH would like to see these movements designed in.
- (e) CUH is currently progressing masterplanning in respect of the Acute Hospital (Addenbrookes 3). It is proposed that, subject to planning, a new junction to support the Acute Hospital is to be formed on the eastern side of FCA broadly in the location of the currently proposed controlled crossing on FCA. Subject to timing CUH would like to explore designing in allowance for this junction which based on early technical work undertaken by the Acute Hospital design team, appears feasible.

## Summary

Whilst CUH strongly supports the principle of the guided busway and associated development, 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 Cambridgeshire County Council to enable CUH to support the specifics of the scheme proposals in full.

CUH would very much welcome further dialogue with CCC and the Scheme's project team to resolve our concerns.

Any correspondence in respect of this matter should be sent to CUH as follows:

By e-mail to: [cuh.cefm.directoroffice@nhs.net](mailto:cuh.cefm.directoroffice@nhs.net)

By post to: Capital, Estates and Facilities Management

Box 102, Addenbrooke's Hospital

Cambridge Biomedical Campus

Hills Road, Cambridge, CB2 0QQ

marked to the attention of Carin Charlton, Director of Capital, Estates and Facilities Management.

Where possible, the preference is to receive correspondence via e-mail.

Yours faithfully

A handwritten signature in black ink, appearing to be 'CC', with a long horizontal stroke extending to the right.

Carin Charlton

**Director of Capital, Estates and Facilities Management – On Behalf of Cambridge University Hospitals NHS Foundation Trust**