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The Cambourne to Cambridge Order

Cambridgeshire County Council

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBOURNE TO CAMBRIDGE ORDER

PROOF OF EVIDENCE

of

Ralph Lewis

of WSP

On behalf of Cambridgeshire County Council

18/08/2025

Planning Inspectorate Reference: **DPI/E0535/25/1**

CONTENTS

Clause	Page
1. INTRODUCTION	1
1.1 Qualifications and Experience	1
1.2 Key Project Experience	1
1.3 Scope of Evidence	3
2. SCHEME DEVELOPMENT	5
2.1 The Proposed Development	5
2.2 Consultation	6
3. THE APPLICATION SITE	7
3.1 Application Site and Surroundings	7
3.2 Relevant Planning History	7
3.3 Development Plan Allocations	7
4. PLANNING POLICY FRAMEWORK	10
4.1 Introduction	10
4.2 National Planning Policy and Guidance	10
4.3 Adopted local planning policy	11
4.4 Relevant Planning Policies	11
4.5 Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) [CD6-03]	13
4.6 Other Relevant Strategies and Reports	14
4.7 The Emerging Local Plan	14
5. ASSESSMENT OF COMPLIANCE WITH PLANNING POLICY	16
5.2 Emerging Policies	16
5.3 Principle of Development	18
5.4 Transport and Connectivity	25
5.5 Green Belt	35
5.6 Open Space	40
5.7 Landscape, Design Quality and Public Realm	42
5.8 Natural Environment and Biodiversity	45
5.9 Air Quality	53
5.10 Noise and Vibration	55
5.11 Heritage	58
5.12 Climate and Green House Gases	64
5.13 Water and Flood Risk	68
5.14 Soils, Materials and BMVL Loss	73
5.15 Overall Balancing and Conclusion	75
OVERALL BALANCE	80
6. PLANNING CONDITIONS	81
7. ANALYSIS OF THE MAIN ISSUES	82
7.1 Main issue (1)	82
7.2 Main issue (2)	85
7.3 Main issue (3)	85
7.4 Main issue (4D)	86
7.5 Main issue (7)	88
7.6 Main issue (8/9)	92
7.7 Main issue (10/11)	93
8. SUMMARY OF EVIDENCE FROM OBJECTORS	95
9. RESPONSES TO GROUNDS OF OBJECTIONS (OUTSIDE OF MAIN ISSUES)	97
9.2 Environmental and Ecological Impacts	97
9.3 Green Belt, Landscape Character and Heritage	98
9.4 Route Selection and Assessment of Alternatives	98
9.5 Economic and Strategic Viability	99
9.6 Public Interest and Transport Functionality	99
9.7 Consultation and Governance	99
9.8 Land Acquisition and Private Rights	100
9.9 Technical, Design and Construction Concerns	100
10. RESPONSES TO INDIVIDUAL OBJECTORS	100
11. CONCLUSIONS	103

12.	STATEMENT OF TRUTH	105
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1. INTRODUCTION

1.1 Qualifications and Experience

- 1.1.1 My name is Ralph Lewis. I am an associate director and team lead for WSP's Infrastructure Planning team (South + London office).
- 1.1.2 I have been a Chartered member of the Royal Town Planning Institute (MRTPI) since 2011 and have experience in leading a wide range of large-scale infrastructure projects and residential + commercial developments. I have lead consents and planning delivery on a number of major infrastructure instructions, including acting as Thames Water's planning lead for its Eight20 initiative; working to deliver the Thames Tideway Tunnel Development Consent Order; acting as planning lead for HS2 Euston and Brent Cross West Rail Stations; and working as planning lead and EIA coordinator for the Ely Southern Bypass.
- 1.1.3 During my career I have been seconded into various organisations including: Network Rail, Cross Rail, Thames Water, and have a total of 17+ years of experience at delivering planning and consents services to a range of local authorities and professional organisations.
- 1.1.4 I hold the following qualifications:
- (a) MSc Spatial Planning, University College London (2008);
 - (b) BA Geography, King's College London (2005)
 - (c) Professional Memberships: Chartered Member of the Royal Town Planning Institute (MRTPI) (2011)

Employment history (Chronological)

1.1.5	WSP	2021 – Current	(Associate Director / IP Team Leader)
1.1.6	GL Hearn	2018 – 2021	(Associate Director)
1.1.7	Atkins	2012 – 2018	(Senior Planner)
1.1.8	DP9	2008 – 2012	(Planning Consultant)

1.2 Key Project Experience

- 1.2.1 The following is a brief summary of key experience on projects which I consider to be relevant to the Cambridge to Cambourne TWAO.

West Anglia Mainline, Network Rail TWAO Planning Lead

- 1.2.2 I was seconded to Network Rail to lead planning and coordination services for the preparation and submission of a Transport and Works Act Order (TWAO) application to enable capacity enhancement on the West Anglia Mainline. I was requested to work closely with Winckworth Sherwood to prepare the TWAO application which was approved by the Department for Transport in 2017. TWAO secured for the development of Northumberland Park Station to allow additional track and overhaul of the station; in addition to coordinating the associated EIA.

Midland Main Line Electrification (Route Sections 2+23), Network Rail TWAO Planning Lead

- 1.2.3 I am currently working on the Midland Mainline (MML) electrification Scheme acting as lead planning consultant. The Midland Main Line railway line is part of the strategic rail network and plays a key role in enabling economic, environmental and community benefits at national, regional and local level. The UK has committed to an ambitious target to reduce emissions by at least 68% by 2030 through the COP27 Summit, held in November 2022. Electrification of the railways will form part of this strategy, with the Government's Net Zero Strategy committing to a rail network of net zero emissions by 2050. The Midland Main Line Programme is planned as a major complex multi-disciplinary programme of work as a key stage in the journey towards the decarbonisation of the route. My roles on this project include acting as planning consultant, coordinating land referencing activities and consultation engagement.

RE / London Borough of Barnet, Brent Cross Thameslink Planning Lead

- 1.2.4 I worked on behalf the London Borough of Barnet to coordinate the various planning activities arising from the Brent Cross Thameslink redevelopment. Overseeing submission of the new Thameslink Station planning application under reserved matters, new Waste Transfer Station, new Compound + Sidings, condition discharges, EIA screening, and consequential amendments. Consent for the new station was granted in April 2020.

Euston Station, HS2 Planning Manager

- 1.2.5 I worked on behalf the HS2 to coordinate and prepare the Euston Station Sch.17 planning submission. Tasks included working with the local planning authority to coordinate multiple rounds of pre-application engagement, public engagement and consultation, stakeholder negotiation, application preparation, cost profiling. Project paused/cancelled by UK Government in March 2023 owing to budgetary concerns.

Ely Southern Bypass, Cambridgeshire County Council Planning Lead and EIA Coordinator

- 1.2.6 I acted as lead planning consultant and EIA coordinator, working on behalf of Cambridgeshire County Council and Cambridge Highways to deliver the Ely Southern bypass scheme, south of Ely. I was required to coordinate the EIA, planning application submission, draft a number of supporting statements and assist with community engagement.

Caerphilly Solar Farm – Development of National Significance (DNS), Caerphilly County Borough Council Planning Lead

- 1.2.7 I worked on behalf of Caerphilly County Borough Council to prepare a DNS application (Development of National Significance) for a new solar farm in Caerphilly, Wales. When approved this will be the largest publicly owned solar farm in Wales, offering a 20 megawatt capacity to provide for over 6000 homes across a 35-year lifespan. Work included site appraisals, establishing appropriate consenting mechanisms along with EIA screening / scoping, project planning, and technical coordination to deliver the necessary application materials. I was required to work closely with Planning and Environment Decisions Wales (PEDW), to ensure the timely submission and validation of the DNS application, and project programming to ensure all key project milestones were achieved.

Grand Union Canal – Strategic Resource Options Consents Strategy, Affinity Water Planning Adviser

- 1.2.8 I worked on behalf of Affinity Water to prepare a planning policy appraisal and consents strategy looking to assess the most appropriate consenting routes for their intended work, including outlining the planning context for the potential developments required to

utilise the Grand Union Canal as a Strategic Resource Option (SRO). The purpose of the planning appraisal and consenting strategy was to highlight the key issues and planning policies relevant to the proposed development, seeking to outline the risks and key project timelines for each option. The report sought to consider the possible consenting routes that Affinity Water Limited could follow to secure the necessary permissions for the construction and operation of the proposed development, with additional advice provided on the advantages and disadvantages of each option provided.

1.3 Scope of Evidence

1.3.1 This Proof of Evidence relates to the public Inquiry to be held into the applications by Cambridge County Council (“CCC”) for:

- (i) the proposed Order (“the Order”) under the Transport and Works Act 1992 (“TWA”);
- (ii) the direction as to deemed planning permission for the development for which provision is included in the Order;
- (iii) the certificate under section 19 (1)(a) of the Acquisition of Land Act 1981 in relation to the acquisition of open space land.

1.3.2 My scope of evidence presented within this proof addresses the following main matters as raised by the Secretary of State (“SoS”), and covers:

Statement of Matters [CD25-01] Reference	Statement of Matters text	Coverage through my Proof of Evidence	Coverage through Proof of Evidence of Others or ancillary materials
1	The aims and objectives of, and the need for, the proposed Cambourne to Cambridge guided busway (“the scheme”).	I will describe how the aims and objectives meet applicable planning policy.	The rationale for the proposed scheme is covered in the Proof of Evidence of Jo Baker [CD26-01-APP-W1-1], and Chris Whithouse [CD26-01-APP-W6-1]
2	Whether all statutory procedural requirements have been complied with.	I will confirm how all statutory procedural requirements have been complied with.	See [CD25.01]
3	The main alternative options considered by CCC and the reasons for choosing the preferred option set out in the Order.	I will assess if alternate routes suggestions are a material consideration.	The rationale for the preferred option and the consideration of alternatives is covered in the Proof of Evidence of Jo Baker [CD26-01-APP-W1-1].
4(d)	The effect of the scheme on the Green Belt.	I will assess the criteria for permitting development in the green belt and if the ‘Very Special Circumstances’	N/A – only this proof with cover this aspect.

		threshold is achieved.	
7	Any other matters which may be raised at the Inquiry which may be important and relevant to the secretary of State's decision	I will comment on this in relation to the application for an open space certificate	N/A – only this proof with cover this aspect.
8 / 9	Certificate Test - The order will be subject to special Parliamentary procedure unless the Secretary of State for MHCLG gives a certificate in accordance with the provisions of section 19 of the Act.	I will describe the background to Section 19 of the Act, and if provision of the associated Certificate is warranted.	N/A – only this proof with cover this aspect.
10 / 11	For the purposes of this application the land to be acquired is land at plot 14-153 described in the Book of Reference as "480 square metres access track carrying public bridleway and verges (39/30) (east of M11)" (Plot 14-153). The plot is owned by FW Deptford (Over) Limited. It is unregistered land.	I will describe the proposed land acquisition	The rationale and approach for the proposed land purchase is covered in the Proof of Evidence of James Franklin [CD26-01-APP-W7-1] , and Chris Whithouse [CD26-01-APP-W6-1] .

Table 1 – Scope of Matters Covered in this Proof of Evidence.

- 1.3.1 In my evidence I will consider the application for the Order and the request that a direction be made that planning permission be deemed to be granted for the development proposed in the application for the Order. In this evidence I will identify the relevant planning policy, and assess whether or not the scheme complies with it. I will also provide planning balance assessments for each topic area and afford appropriate weightings.
- 1.3.2 Where applicable, I assign relevant weighting categories based on the following scale: No significance / Low significance / Moderate significance / High significance, to those policies and to the findings of others, across the suite of Proofs of Evidence.
- 1.3.3 I will also respond to Issues raised specifically by representations based on planning matters and how the evidence presented addresses these.

2. SCHEME DEVELOPMENT

2.1 The Proposed Development

- 2.1.1 Cambridgeshire County Council (CCC) on behalf of the Greater Cambridgeshire Partnership (GCP) has requested, pursuant to Rule 10(6) of the Transport and Works (Applications and Objections Procedure)(England and Wales) Rules 2006 (S.I. 2006 No. 1466) (the Applications Rules), a direction from the Secretary of State under section 90(2A) of the Town and Country Planning Act 1990 that planning permission, so far as it is required, shall be deemed to be granted for the proposed development to be authorised by the Cambourne to Cambridge Order 202[X]) (the Order).
- 2.1.2 A schedule of drawings is attached to the request and seeks that a direction be made that planning permission be deemed to be granted **[CD1-14 Schedule 2]**. If suggested condition 2 were to be imposed, those drawings would be approved.
- 2.1.3 Without prejudice to the request the following is a copy of the description of development which has been shared by WBD at the Inspector's request:

"The proposed development comprises the construction and operation of a new guided busway system and associated infrastructure extending from Cambourne to Cambridge. The route spans approximately 9.5 kilometres and traverses the administrative areas of South Cambridgeshire District Council and Cambridge City Council. The scheme begins at Sterling Way in Cambourne, where a new two-way segregated busway section of approximately 414 metres in length is proposed. This section runs eastward through Cambourne and terminates at the crossing of Broadway. It includes the improvement of the existing highway at Broadway to accommodate the new infrastructure and ensure safe integration with the local road network. From this point, the route transitions into a segregated busway, continuing for approximately 2,007 metres through Bourn Airfield in a broadly northerly then easterly direction. This section includes a new access from Bourn Airfield to Broadway and further improvements to Broadway itself, together with a replacement access to the Bourn Quarter development on the eastern side of Bourn Airfield. The alignment then proceeds eastward for a further 1,333 metres between the A428 and St Neots Road, terminating near Dry Drayton. This section includes the improvement of St Neots Road and a new signalised junction. A new bridleway connection is also proposed to link with the southern section of St Neots Road, enhancing active travel provision. To the east, the scheme incorporates two realigned sections of St Neots Road. The first, approximately 253 metres in length, lies within Hardwick and Comberton and provides access to the next section of segregated busway. It includes a new combined cycle track and footway. The second realignment, approximately 430 metres in length, extends through Hardwick and Madingley, connecting to the previous section and terminating west of the junction with Madingley Road. This section also includes the widening of St Neots Road and Long Road at their junction in Comberton, with provision for a new shared-use path.

The busway resumes for a further 359 metres, running southeast from the junction of the two realigned road sections to Long Road, Comberton. This segment includes the widening and improvement of Long Road and is supported by an adjoining emergency and maintenance access track. From Long Road, the busway continues eastward for approximately 2,293 metres, passing through Comberton and Coton. This section includes improvements to Cambridge Road in Coton and is again accompanied by an emergency and maintenance access track. The alignment then extends for a further 635 metres along Cambridge Road, terminating at the administrative boundary between South Cambridgeshire and Cambridge City Council, just west of the M11 motorway. This portion includes additional highway widening and improvement works. Crossing into the City of Cambridge, the scheme includes a 430 metre section of busway that spans the M11 via a newly constructed bridge. This section of busway terminates at Ada Lovelace Road within the West Cambridge Campus and includes a pond and replacement open

space west of the M11 and the diversion of public bridleway 39/30 on the east side of the M11 to accommodate the new infrastructure. The final section of the scheme comprises a 1,601 metre busway extending southward through the West Cambridge Campus and across agricultural land. It crosses Bin Brook via a new bridge and terminates at Grange Road, Cambridge. This section includes highway improvements to Grange Road, as well as new means of access to adjoining premises.

The development as a whole includes the provision of emergency and maintenance access tracks along the majority of the route, new and improved junctions, realigned and widened highways, new bridges, and the diversion or enhancement of existing public rights of way. It also includes a new park and ride facility west of Scotland Road, north of the A428, stops for the busway, attenuation and infiltration ponds, provision of drainage, accommodation works such as crossings, and works to divert or provide apparatus for utilities and communications providers. Construction compounds are also proposed to facilitate implementation of the scheme."

Requirement for Environmental Impact Assessment (EIA)

- 2.1.4 One of the 2006 Rules requirements is that projects of a type listed in Annex I of the European Union's Environmental Impact Assessment (EIA) Directive or listed in Annex II of the Directive and not having received a negative screening opinion from the SoS, be accompanied by an Environment Statement (ES) that provides information on the identification and assessment of likely significant environmental effects that the Applicant is required to provide as part of the wider process of EIA.
- 2.1.5 The Scheme does not fall within the types of development listed in Annex I of the Directive. However, the types of development listed in Annex II of the Directive are relevant as they cover transport infrastructure projects that are likely to result in significant environmental effects; as such, the Scheme has been considered to be EIA development. The Order application is therefore accompanied by an ES **[CD1-10.01]** (and supporting addendum **[CD1-10.06]**) which has been undertaken in line with an ES Scoping Opinion **[CD1-10.05]** provided by the SoS.

2.2 Consultation

- 2.2.1 Assessment on consultation elements is not covered in my proof of evidence. For information relating to the 'Consultation' undertaken to support the Proposed Scheme, please refer to the submitted core document: Consultation Report November 2024 **[CD1-01.01]**.

3. THE APPLICATION SITE

3.1 Application Site and Surroundings

- 3.1.1 The Scheme is located to the west of Cambridge City. Running from west to east, the route extends from Sterling Way to the east of Cambourne to Grange Road at the edge of Cambridge City¹. The overall site is referred to herein as 'the Application Site' and shown on the Works and Land Plans **[CD1-12.01]** as the limit of land to be acquired or used.
- 3.1.2 The Application Site passes through the administrative areas of South Cambridgeshire District Council and Cambridge City Council and through several settlements running from west to east including Cambourne, Bourn Airfield, Hardwick, Coton, West Cambridge and the Cambridge fringe.
- 3.1.3 The Application Site comprises a relatively narrow corridor that allows sufficient space to construct the guided busway, public transport stops, bridges (proposed at the M11 and at Bin Brook) along with ancillary works including landscape and ecological mitigation. The exception to this is an area of land located off Scotland Road to the north of the A428 dual carriageway, which would be used for the proposed Scotland Farm travel hub.

3.2 Relevant Planning History

- 3.2.1 Relevant Planning history can be found at Appendix A of this Proof of Evidence.

3.3 Development Plan Allocations

- 3.3.1 Given the spatial extent of the proposed development site, only certain sections of the site are covered by adopted Development Plan allocations within the Cambridge Local Plan 2018 **[CD6-01]**, the South Cambridge Local Plan 2018 **[CD6-02]** and the Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 **[CD6-03]**. These allocations are set out below in table 2:

Reference	Site	Relevant Text
Cambridge Local Plan 2018 [CD6-01]		
Policy 19: West Cambridge Area of Major Change (proposed route passes through the site)	West Cambridge - allocated site M13	The overall site (allocation reference M13), which covers 66.5 hectares, was the subject of an outline planning approval in 1999 that set out the density of development permitted. A masterplan was subsequently agreed with the University of Cambridge for the development of approximately 250,000 sq ² of space, which creates a strategic framework to guide future development of the site.
Allocated Site U3 (to the north of the proposed	Grange Farm off Wilberforce Road	120 students Units

¹ Work No.1 as set out in the draft Order starts at Sterling Way, Cambourne, and runs east between Sterling Way and Broadway. This land already benefits from outline planning permission for the development of a bus link and an application to South Cambridgeshire District Council for approval of reserved matters for the link (ref: S/4594/18/RM) was granted permission on 16 March 2023.

route at its eastern end)		
South Cambridgeshire Local Plan 2018 [CD6-02]		
Policy SS/7: New Village at Bourn Airfield	Bourn Airfield	<p>Land south of the A428 based on Bourn Airfield is allocated for the development of a new village of approximately 3,500 dwellings.</p> <p>As discussed further in my Proof of Evidence, there is specific support and reference to the proposed busway under sub-section 8 (<i>Creation of a comprehensive movement network</i>) of this policy, which states:</p> <p><i>“8. The new village will be founded on a comprehensive movement network for the whole village, that connects key locations including the village centre and schools to encourage the use of sustainable modes of travel and includes:</i></p> <p><i>a. Significant Improvements in Public Transport, including:</i></p> <p><i>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”;</i></p>
Policy SS/8: Cambourne West	Cambourne West	<p>Land shown on the Policies Map south of the A428, north-west of Lower Cambourne, including an area within the current Business Park is allocated for the development of a sustainable, fourth linked village to Cambourne of approximately 1,200 dwellings by 2031 with high levels of green infrastructure.</p> <p>As discussed further in my Proof of Evidence, there is specific support and reference to the proposed busway under sub-section 12 (<i>Access</i>) of this policy, which states:</p> <p><i>“12. Development will provide for the additional travel demands generated. Coordination will be required with other developments on the A428 corridor to deliver the necessary improvements. The development will need to address, but is not limited to, the following (subject to</i></p>

		<p><i>detailed strategy development and to the transport assessment of development proposals:</i></p> <p><i>a. Any measures necessary to ensure that a bus journey between Cambourne West and the junction of the A428 and the A1303 is direct and unaffected by any congestion suffered by general traffic;</i></p> <p><i>b. High quality segregated bus priority measures on the A1303 between its junction with the A428 and Queens Road, Cambridge;</i></p> <p><i>h. Bus prioritisation measures, including a bus link from one of the roundabouts on the Caxton bypass through the Cambourne West site, linking through to Great Cambourne by the Cambourne Business Park;</i></p>
The Cambridgeshire and Peterborough Minerals and Waste Local Plan 2021 [CD6-03]		
<p>There are Mineral Safeguarding Areas located within the Scheme Order Limits:</p> <ul style="list-style-type: none"> the eastern end of the Scheme (between Bin Brook and Grange Road) overlies part of a large Sand and Gravel MSA within the wider Cambridge area; and the area to the north of Coton and west of the M11 which forms part of the offline route parallel to the A1303 intersects a large Chalk MSA which extends across the wider Cambridge area. 		

Table 2: Relevant Development Plan Allocations

4. PLANNING POLICY FRAMEWORK

4.1 Introduction

- 4.1.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that: *'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise'*
- 4.1.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 applies *'for the purpose of any determination to be made under the planning Acts'*.
- 4.1.3 Subsection 2A of Section 90 of the TCPA 1990 states that:
- 'On making an order under section 1 or 3 of the Transport and Works Act 1992 which includes provision for development, the Secretary of State may direct that planning permission for that development shall be deemed to be granted, subject to such conditions (if any) as may be specified in the direction'*.
- 4.1.4 Section 90(3) of the TCPA 1990 provides that the provisions of that Act shall apply to any planning permission granted by virtue of a direction made under section 90(2A). Section 90(3) applies to the deemed planning permission not to the process which gives rise to it². As any Planning Direction provided by the SoS will be via Transport and Works Act 1992 (i.e. not under the Planning Acts), Section 38(6) of the Planning and Compulsory Purchase Act 2004 is therefore not considered to be engaged.
- 4.1.5 However, this section provides a summary overview of national and local planning policy which are still considered important material considerations in the determination of this application and in considering whether to direct that planning permission be deemed to be granted. Other relevant policy such as Transport Plans and guidance relevant to specific material considerations are also highlighted.

4.2 National Planning Policy and Guidance

NATIONAL PLANNING POLICY FRAMEWORK [CD8-01]

- 4.2.1 The National Planning Policy Framework (NPPF) published in December 2024 (last updated in February 2025) sets out the Government's planning policies for England and how these should be applied in decisions for new development proposals.
- 4.2.2 At the heart of the NPPF is a presumption in favour of sustainable development, as set out in paragraph 11 of the NPPF. Pursuant to paragraph 11(c) of the NPPF proposals which accord with an up to date development plan should be approved without delay unless material considerations indicate otherwise.
- 4.2.3 The objective of sustainable development can be summarised as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs' (Paragraph 7).
- 4.2.4 In addition to Section 9 of the NPPF (Promoting Sustainable Transport', the following sections of the NPPF are of specific relevance to the determination of this application:
- Section 2: Achieving sustainable development (paras: 8 – 13);
 - Section 4: Decision Making (paras: 48 – 50);

² **R (Samuel Smith Old Brewery (Tadcaster)) v. Secretary of State for Energy and Climate Change** [2012] EWHC 46 (Admin) at paragraph 79

- Section 5: Delivering a sufficient of homes (paras: 77);
- Section 6: Building a strong, competitive economy (paras: 87(a)-(b) - 89);
- Section 8: Promoting healthy and safe communities (paras: 104 - 105);
- Section 9: Promoting sustainable transport (paras: 109 – 111 / 115(a) – 117(a)-(e));
- Section 11: Making effective use of land (paras: 127);
- Section 12: Achieving well-designed *and beautiful* places (paras: 131 – 135 / 136);
- Section 13: Protecting Green Belt land (paras: 144 – 147 / 153 -154);
- Section 14: Meeting the challenge of climate change, flooding and coastal change (paras: 162 – 164 / 170 - 182);
- Section 15: Conserving and enhancing the natural environment (paras: 187 / 192 – 193 / 194 - 195); and
- Section 16: Conserving and enhancing the historic environment (paras: 207 – 210 / 212 - 218).

4.3 Adopted local planning policy

4.3.1 The Application Site is located across two administrative areas – South Cambridgeshire District Council and Cambridge City Council. For the purpose of this application the relevant local plans are as follows:

- South Cambridgeshire Local Plan (September 2018) **[CD6-02]**;
- Cambridge Local Plan (October 2018) **[CD6-01]**; and
- Cambridgeshire and Peterborough Minerals and Waste Local Plan (adopted July 2021) **[CD6-02]**

4.4 Relevant Planning Policies

4.4.1 Cambridge Local Plan (October 2018) [CD6-01]

- Policy 1: The presumption in favour of sustainable development (page: 14);
- Policy 4: The Cambridge Green Belt (page: 28);
- Policy 5: Sustainable transport and infrastructure (page: 31);
- Policy 8: Setting of the city (page: 37);
- Policy 14: Areas of Major Change and Opportunity Areas – general principles (page: 57);
- Policy 29: Renewable and low carbon energy generation (page: 119);
- Policy 31: Integrated water management and the water cycle (page: 121);
- Policy 32: Flood risk (page: 125);
- Policy 33: Contaminated land (page: 128);

- Policy 34: Light pollution control (page: 130);
- Policy 35: Protection of human health and quality of life from noise and vibration (page: 131);
- Policy 36: Air quality, odour and dust (page: 134);
- Policy 55: Responding to context (page: 180);
- Policy 56: Creating successful places (page: 181);
- Policy 57: Designing new buildings (page: 182);
- Policy 59: Designing landscape and the public realm (page: 184);
- Policy 61: Conservation and enhancement of Cambridge's historic environment (page: 188);
- Policy 67: Protection of open space (page: 196);
- Policy 69: Protection of sites of biodiversity and geodiversity importance (page: 198);
- Policy 70: Protection of priority species and habitats (page: 203);
- Policy 71: Trees (page: 205);
- Policy 80: Supporting sustainable access to development (page: 229);
- Policy 81: Mitigating the transport impact of development (page: 234);
- Policy 82: Parking management (page: 236); and
- Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy (page: 240).

4.4.2 South Cambridge Local Plan (2018) [CD6-02]

- Policy S/2: Objectives of the Local Plan (page: 22);
- Policy S/3: Presumption in Favour of Sustainable Development (page: 23);
- Policy S/4: Cambridge Green Belt (page: 34);
- Policy CC/1: Mitigation and Adaptation to Climate Change (page: 88);
- Policy CC/3: Renewable and Low Carbon Energy in New Developments (page: 91);
- Policy CC/4: Water Efficiency (page: 92);
- Policy CC/6: Construction Methods (page: 94);
- Policy CC/7: Water Quality (page: 95);
- Policy CC/8: Sustainable Drainage Systems (page: 96);
- Policy CC/9: Managing Flood Risk (page: 97);

- Policy HQ/1: Design Principles (page: 103);
- Policy HQ/2: Public Art and New Development (page: 106);
- Policy NH/1: Conservation Area and Green Separation at Longstanton (page: 112);
- Policy NH/2: Protecting and Enhancing Landscape Character (page: 113);
- Policy NH/3: Protecting Agricultural Land (page: 114);
- Policy NH/4: Biodiversity (page: 115);
- Policy NH/5: Sites of Biodiversity or Geological Importance (page: 117);
- Policy NH/6: Green Infrastructure (page: 119);
- Policy NH/7: Ancient Woodlands and Veteran Trees (page: 121);
- Policy NH/8: Mitigating the Impact of Development In and Adjoining the Green Belt (page: 122);
- Policy NH/13: Important Countryside Frontage (page: 125);
- Policy NH/14: Heritage Assets (page: 126);
- Policy E/2: Cambridge Biomedical Campus Extension (page: 174);
- Policy SC/2: Health Impact Assessment (page: 201);
- Policy SC/9: Lighting Proposals (page: 212);
- Policy SC/10: Noise Pollution (page: 213);
- Policy SC/11: Contaminated Land (page: 215);
- Policy SC/12: Air Quality (page: 216);
- Policy TI/2: Planning for Sustainable Travel (page: 226);
- Policy TI/3: Parking Provision (page: 229); and
- Policy TI/7: Lord's Bridge Radio Telescope (page: 241).

4.5 Cambridgeshire and Peterborough Minerals and Waste Local Plan (July 2021) [CD6-03]

- 4.5.1 The eastern end of the Scheme (between Bin Brook and Grange Road) overlies part of a large Sand and Gravel MSA within the wider Cambridge area.
- 4.5.2 The area to the north of Coton and west of the M11 which forms part of the offline route parallel to the A1303 intersects a large Chalk MSA which extends across the wider Cambridge area".
- 4.5.3 Policy 5 of the Minerals and Waste Local Plan [CD6-03 page 35]) confirms that the Minerals Safeguarding Areas (MSA's) are identified on the Policies Map for mineral resources of local and or/national importance and that the Mineral Planning Authority must be consulted on all developments in these areas, except on the identified instances.

4.6 Other Relevant Strategies and Reports

- Cambridgeshire and Peterborough Local Transport and Connectivity Plan 2023 **[CD6-09]**
- Cambridgeshire Local Transport Plan 2011-2031 Long Term Transport Strategy 2015 **[CD6-10]**
- Cambridgeshire and Peterborough Local Transport – Supporting Bus Strategy 2023 **[CD6-11]**
- The Bourn Airfield New Village A Spatial Framework & Infrastructure Delivery Plan Supplementary Planning Document (October 2019) **[CD7-15]**
- Greater Cambridge Biodiversity SPD – (February 2022) **[CD7-12]**
- Cambridgeshire Flood and Water SPD - adopted November 2018 **[CD7-14]**
- Sustainable Design and Construction SPD (prepared jointly with Cambridge City Council) adopted January 2020 **[CD7-16]**
- District Design Guide SPD – South Cambridgeshire District Council **[CD7-13]**
- The Case for Cambridge (March 2024) **[CD7-01]**
- Addressing water scarcity in Greater Cambridge: update on government measures (March 2024) **[CD7-27]**
- Planning Practice Guidance – Noise (2019) **[CD8-04]**
- Planning Practice Guidance – Air Quality (2019) **[CD8-06]**
- Gear Change: a bold vision for cycling and walking (July 2020) **[CD8-16]**
- Ten Point Plan for a Green Industrial Revolution (November 2020) **[CD8-29]**
- National Infrastructure Strategy (November 2020) **[CD8-11]**
- Build Back Better: our plan for growth (March 2021) **[CD8-12]**
- Bus Back Better: national bus strategy for England (March 2021) **[CD8-13]**
- Decarbonising Transport - A Better, Greener Britain (July 2021, as updated in 2022 and 2023) **[CD8-15]**

4.7 The Emerging Local Plan

- 4.7.1 Cambridge City Council and South Cambridgeshire District Council are working together to create a joint Local Plan for the two areas, which they are referring to as 'Greater Cambridge'. The Greater Cambridge Local Plan will seek to ensure that there is a consistent approach to planning and building across both areas up to 2041.
- 4.7.2 The Greater Cambridge Local Plan **[CD6-04]** is expected to be adopted in 2027 as per the latest Local Development Scheme publication.
- 4.7.3 While the above emerging policy document is not yet adopted the following policies in the 'Greater Cambridgeshire Local Plan First Proposals' emerging policy document (hereinafter referred to as "the Emerging Plan") **[CD6.04]**, are considered relevant:

- Policy S/JH: New Jobs and Homes (page: 24);
- Policy S/WC: West Cambridge (page: 91);
- Policy S/CB: Cambourne (page: 99);

5. ASSESSMENT OF COMPLIANCE WITH PLANNING POLICY

5.1.1 In this section, I assess firstly the significance and direction of emerging policy as contained within the Greater Cambridgeshire Local Plan First Proposals' emerging policy document **[CD6.04]**.

5.1.2 Following this, from section 5.3 onward, I will assess the proposed development against all key relevant adopted development plan policies and other relevant planning policies and associated planning guidance (as identified in section 4 above), which are seen as material considerations. For ease of reading, I have grouped the policies into thirteen distinct topics, those being:

- Principle of Development
- Transport and Connectivity
- Green Belt
- Open Space
- Landscape Design Quality and Public Realm
- Natural Environment and Biodiversity
- Air Quality
- Noise + Vibration
- Heritage
- Climate + Green House Gases
- Water and Flood Risk
- Soils, Materials and BMVL Loss
- Other

5.2 Emerging Policies

- **Policy S/JH: New Jobs and Homes [Page 24 - CD6.04]**

5.2.1 The relevant part of this emerging policy are the objectives around the creation of jobs and housing, with 58,500 jobs and 44,400 homes projected as required over the plan period.

5.2.2 The Guided Busway is compliant with this objective, as it supports the strategic delivery of housing and employment growth across Greater Cambridge by directly linking Cambourne, Bourn Airfield, Hardwick, Coton, and West Cambridge to the city's core. Policy S/JH prioritizes sustainable, well connected communities, with an emphasis on active travel and reducing car dependency both central tenets of the Guided Busway proposal.

5.2.3 The scheme connects over 33,000 new homes and facilitates access to Cambridge's key employment hubs, including the Biomedical Campus and the West Cambridge site, aligning with objectives for inclusive growth and modal shift.

- **Policy S/WC: West Cambridge [Page 91 - CD6.04]**

- 5.2.4 The trust of this draft policy is to support the future development of the West Cambridge site, including providing new homes where it would support the vibrancy of the campus.
- 5.2.5 This is a relevant consideration for the proposed scheme, as the busway is intended to provide direct infrastructure into the West Cambridge Campus via Charles Babbage Road.
- 5.2.6 Given that there is a clear need to provide improved public transport and walking/cycling facilities in order to deliver the vision for an integrated academic and commercial district, there is intrinsic support for the proposed scheme by virtue of this policy. Furthermore Policy S/WC also emphasizes reducing car reliance and safeguarding sensitive research environments, which the proposed scheme will directly contribute to. Accordingly I see a strong level of compliance with this emerging policy

- **Policy S/CB: Cambourne [Page 99 - CD6.04]**

- 5.2.7 Policy S/CB sets out the intention to identify Cambourne as a broad location for future growth in the 2030's to respond to the opportunity that will be provided by the proposed East West Rail that includes a station at Cambourne. The overall aim for an expanded Cambourne is to provide sufficient critical mass to perform the following role as a:
- Well-connected place through high quality public transport, cycling and walking facilities
 - South Cambridgeshire town for the 21st century
 - growing employment centre to provide local opportunities for its residents and nearby communities
 - place that meets the day to day needs of its residents.
- 5.2.8 The policy identifies Cambourne as a key location for growth, with additional allocations in West Cambourne and connectivity required to unlock the full development potential of Bourn Airfield. The proposed busway scheme is compliant with this emerging policy as this is intended to deliver high frequency, congestion free routes into Cambridge and beyond, supporting modal shift, accessibility, and environmental sustainability and supporting growth.
- 5.2.9 The associated travel hub at Scotland Farm offers over 2,000 car parking spaces and 300 cycle bays, promoting park-and-ride travel and reducing peak hour congestion along the A428 corridor.

Summary

- 5.2.10 The Scheme supports the spatial strategy and policy aims set out in the Emerging Plan **CD6.04]** by enhancing connectivity, enabling modal shift, and unlocking sustainable development across key growth areas. It directly aligns with **Policy S/JH** by improving access between residential expansions and employment hubs, particularly facilitating inclusive, low carbon travel. Its integration with the West Cambridge site (**Policy S/WC**) addresses transport, environmental, and operational sensitivities, offering infrastructure tailored to the campus's unique research functions. In Cambourne (**Policy S/CB**), the proposed scheme underpins strategic housing delivery and regional accessibility, fulfilling the transport requirements of both existing and future communities.
- 5.2.11 While I have identified consistency with the emerging policies, I must take account of paragraph 49 of the NPPF, and flag that these policies are still at a very early stage and may be subject to further change prior to adoption. This therefore limits the weight I can afford to them, but it should be recognised that they represent a clear direction of travel, and the proposed scheme is critical in achieving the underlying policy aims, namely that there will be a higher level of accelerated growth in the region, and the evidence base

suggests that this accelerated growth agenda can only be supported if underpinned by sustainable transport schemes. Accordingly, I afford these three emerging policies a medium to high significance of weight.

- 5.2.12 The guided busway has been designed to anticipate the kind of transformative transport intervention the emerging policies require to support their objectives. The proposal complements and supports the Plan's emphasis on compact growth, environmental resilience, and equitable access.
- 5.2.13 Given the range of mitigations proposed in the supporting application material, I judge that the proposed scheme can be delivered sensitivity in a policy compliant manner, taking account of those identified environmental and heritage impacts discussed further in this proof.
- 5.2.14 In reference to the applicant's aims and objectives as set out in their Statement of Aims **[CD1-04]** under paragraph 4, these strongly align with the attainment and deliverability of the emerging policies and approval of the guided busway will be a fundamental element needed to achieve these wider goals. These aims encompass:
- Relieving Congestion.
 - Support economic growth.
 - Deliver a suitable transport system.
 - Enhance quality of life
- 5.2.15 The guided busway will directly advance the Plan's strategic objectives and provides a credible mechanism to realise modal shift, unlock key sites, and foster long term spatial coherence across Greater Cambridge.

5.3 Principle of Development

National Planning Policy Framework

- 5.3.1 My assessment in respect of the 'principle of development' for the proposed scheme, is that the Cambridge to Cambourne guided busway proposal aligns with the principles and policy framework set out in the **National Planning Policy Framework 2024 (NPPF) [CD8.01]**, demonstrating compliance across multiple strategic policy areas and affirming the soundness of its development rationale. I set out the rationale for this stance below.
- 5.3.2 Paragraph 8 of the NPPF guides that achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways, with these encompassing:
- a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving*

biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

- 5.3.3 Based on these guiding principles, of sustainable development, the following NPPF sections are of key relevance:
- Section 2: Achieving sustainable development (paras: 8 – 13);
 - Section 5: Delivering a sufficient of homes (paras: 77);
 - Section 6: Building a strong, competitive economy (paras: 87(a)-(b) - 89);
 - Section 8: Promoting healthy and safe communities (paras: 104 - 105);
 - Section 9: Promoting sustainable transport (paras: 109 – 111 / 115(a) – 117(a)-(e));
 - Section 12: Achieving well-designed *and beautiful* places (paras: 131 – 135 / 136);
- 5.3.4 The above list of NPPF policies are those that have been identified as being intrinsic to the principle of the proposed development. In assessing these policies against the proposed scheme (*see each thematic policy sections listed at 5.3.2 and summary below*) and these have been assessed to be compliant with the proposals. Given the role the NPPF has in setting national policy direction, I afford them a high weight of significance.
- 5.3.5 While each thematic policy section below looks to assess NPPF policy against each criteria, I provide the following overview of reasoning as to why these are afforded a high significance of weight. Firstly, the Cambourne to Cambridge guided busway scheme strongly aligns with the NPPF's core objectives for sustainable development. It supports all three interdependent aims outlined in paragraph 8: economic growth through improved infrastructure (8a), social inclusion via enhanced connectivity (8b), and environmental stewardship through modal shift and biodiversity net gain (8c). The scheme applies the presumption in favour of sustainable development (para 11c), facilitating strategic growth without delay.
- 5.3.6 In relation to housing delivery, paragraph 77 encourages "larger scale development... well located and designed, and supported by the necessary infrastructure." The busway directly supports major housing allocations at Bourn Airfield and Cambourne West, unlocking sustainable access and reducing car dependency. The busway will also support future housing growth beyond these two particular (and important) developments.
- 5.3.7 Economic objectives are advanced through paragraph 87(a), which calls for "clusters or networks of knowledge and data-driven... industries." The scheme connects West Cambridge's academic and research hubs with housing growth areas, enabling inclusive access to high-value employment. Paragraph 89 further supports development that "exploits any opportunities to make a location more sustainable," which the scheme achieves through active travel infrastructure and congestion relief.
- 5.3.8 The scheme also promotes healthy communities (paras 104–105) by protecting and enhancing public rights of way and delivering new walking and cycling routes. It also contributes to air quality improvements and reduced noise pollution, supporting paragraph 96(c)'s aim to "enable and support healthy lives."
- 5.3.9 Under Section 9, the scheme exemplifies sustainable transport planning. Paragraph 109(f) requires "net environmental gains" from transport infrastructure, while paragraph 117(a) prioritizes "pedestrian and cycle movements" and access to public transport both central to the scheme's design.

- 5.3.10 Finally, the scheme reflects the principles of well-designed places (paras 131–136), with tree-lined routes, landscape integration, and a commitment to biodiversity net gain of at least 10%, aiming for 20%.

Wider National / Regional Policy

Case for Cambridge (2024)

- 5.3.11 **The Case for Cambridge (March 2024) [CD7.01]**, policy document sets out a compelling vision for Cambridge's future as a globally competitive science and innovation hub, underpinned by sustainable growth, improved connectivity, and high-quality placemaking. The CtoC scheme aligns directly with these objectives, providing the infrastructure backbone to unlock development, reduce congestion, and support modal shift across the western growth arc.

Responding to Strategic Constraints

- 5.3.12 The "Case for Cambridge" identifies three critical constraints on growth: housing affordability, laboratory space shortages, and transport congestion. CtoC addresses the third directly, while enabling solutions to the first two. As Jo Baker's Proof **[CD26-01-APP-W1-1]** confirms, the scheme connects three major development sites Cambourne West, Bourn Airfield, and West Cambridge each of which is integral to the city's housing and employment pipeline. These sites are already consented and allocated in adopted Local Plans, and their delivery is contingent on high-quality public transport connectivity.
- 5.3.13 The busway's alignment and design reflect a strategic response to the transport and mobility challenges outlined in the Government's document. Severe congestion on the A1303 and limited capacity within Cambridge's medieval core constrain growth and undermine air quality. CtoC provides a largely segregated corridor that bypasses these pinch points, offering journey time reliability, frequency, and accessibility that are essential to support modal shift and reduce car dependency.

Enabling Economic Agglomeration

- 5.3.14 The **Case for Cambridge (March 2024) [CD7.01]**, makes a strong case for agglomeration benefits, citing evidence that productivity increases as city size and connectivity improve. CtoC is a direct enabler of this principle. By linking new settlements and employment clusters including the West Cambridge campus, the Biomedical Campus, and the city centre the scheme expands the functional economic geography of Greater Cambridge. It allows skilled labour to access jobs, education, and services efficiently, thereby supporting the innovation ecosystem that defines the Cambridge Phenomenon.
- 5.3.15** Jo Baker's Proof **[CD26-01-APP-W1-1]** reinforces this point, noting that the scheme is designed to serve not only existing demand but future growth scenarios, including potential expansion north of Cambourne and integration with East West Rail. The flexibility of a bus-based system allows for scalable service provision, adaptable routing, and integration with emerging development sites advantages that fixed rail infrastructure cannot readily offer.

Policy Compliance and Strategic Fit

- 5.3.16 The scheme is strongly aligned with national, regional, and local policy frameworks. It supports the objectives of the Greater Cambridge City Deal, the Cambridgeshire and Peterborough Local Transport and Connectivity Plan (LTCP), and the emerging Greater Cambridge Local Plan. The "Case for Cambridge" reiterates the importance of infrastructure-first planning, and CtoC exemplifies this approach: it precedes and enables development, rather than reacting to it.

- 5.3.17 Jo Baker's Proof also outlines the extensive multi-criteria assessment process undertaken to select the preferred route, including consideration of on-road and off-road alternatives. The chosen alignment reflects a balance between deliverability, stakeholder support, environmental impact, and strategic connectivity. It avoids nationally significant constraints such as the American Cemetery and Madingley Wood, while directly serving the development sites that underpin Cambridge's growth trajectory.

Integration with Broader Infrastructure Strategy

- 5.3.18 The Government's vision for Cambridge includes a network of "connected city quarters" supported by sustainable transport. CtoC is a foundational element of this network. It complements other infrastructure proposals, including East West Rail, the Comberton Greenway, and active travel improvements along Madingley Road. As Jo Baker's Proof confirms, the scheme has been designed to interface with these projects, with collaboration agreements in place to manage potential conflicts and ensure future-proofing.
- 5.3.19 Moreover, the scheme's technological approach to bus guidance using sensor-based systems rather than physical guideways aligns with the Government's emphasis on innovation and resilience. It allows for safe, efficient operation while maintaining compatibility with existing infrastructure and future autonomous vehicle technologies.

Addressing Alternatives and Stakeholder Concerns

- 5.3.20 Jo Baker's Proof provides a detailed account of the alternatives considered, including on-road options promoted by objectors such as Cambridge Past Present and Future (CPPF). These were assessed through the Outline Business Case and found to be less effective in meeting scheme objectives, particularly in terms of journey time reliability, safety, and environmental impact. The Independent Audit of Key Assumptions and Constraints confirmed the robustness of this appraisal.
- 5.3.21 The "Case for Cambridge" calls for growth that is "popular, beautiful, sustainable and long-lasting." CtoC supports this ambition by enabling gentle density in new settlements, reducing car dependency, and enhancing access to green spaces and cultural assets. Its design incorporates active travel infrastructure, landscape integration, and safety features that reflect lessons learned from the existing guided busway.

Pennycook Letter

- 5.3.22 The publication of the Ministerial letter from Matthew Pennycook MP on 27 August 2024 marks a significant inflection point in the government's approach to growth and infrastructure delivery in Greater Cambridge. Building on the foundational arguments set out in the original "Case for Cambridge" prospectus, the Pennycook letter reframes the region's development trajectory through a lens of strategic partnership, inclusive growth, and infrastructure realism. It is a document of both political intent and practical consequence, and its implications are directly relevant to the assessment of public benefits and policy compliance in this scheme.
- 5.3.23 The letter acknowledges Cambridge's status as a globally significant innovation cluster, but it also confronts the structural challenges that threaten to undermine its continued success. Chief among these are acute housing pressures, transport congestion, and environmental constraints particularly water scarcity. In this context, the Minister sets out a renewed commitment to supporting growth in the region, but with a clear expectation that such growth must be "planned, inclusive, and sustainable." This framing aligns closely with the objectives of the Cambourne to Cambridge scheme, which seeks to deliver modal shift, climate resilience, and equitable access to employment and services.
- 5.3.24 Of particular relevance is the Minister's recognition of infrastructure as both enabler and constraint. The letter explicitly identifies water availability and transport connectivity as critical limiting factors, and calls for a coordinated programme of investment to unlock

housing delivery. This includes a proposed uplift of approximately 25% in housing targets across Cambridge City, South Cambridgeshire, and East Cambridgeshire an ambition that cannot be realised without transformative transport interventions. The Cambourne to Cambridge guided busway is one such intervention, designed to support sustainable growth corridors and reduce dependency on private car travel.

- 5.3.25 The letter also signals a shift in governance and delivery culture. Rather than imposing top-down solutions, the Minister commits to a “co-designed” approach with local leaders, recognising the importance of place-based expertise and democratic legitimacy. This is particularly pertinent in the context of the Greater Cambridge Partnership and its role in shaping transport strategy. The scheme under consideration is a product of that local leadership, informed by extensive consultation and technical evidence, and its alignment with the Minister’s stated priorities reinforces its strategic merit.
- 5.3.26 Finally, the Pennycook letter introduces a rhetorical and policy emphasis on inclusive growth. It notes that Cambridge’s prosperity has not been evenly shared, and that future development must address spatial and social inequalities. The Cambourne to Cambridge scheme contributes directly to this objective by connecting underserved communities to the city’s employment and education opportunities, while embedding climate adaptation and active travel infrastructure.
- 5.3.27 In summary, the Pennycook letter strengthens the case for strategic infrastructure investment in Greater Cambridge. It provides ministerial endorsement for growth, recognises the enabling role of transport, and reinforces the importance of locally-led, environmentally responsible delivery. These themes are directly reflected in the Cambourne to Cambridge scheme, which stands as a practical embodiment of the government’s evolving vision for the region.

Conclusion: Delivering the Vision

- 5.3.28 In summary, the Cambourne to Cambridge guided busway is a critical enabler of the Government’s vision for Cambridge, as describe in the **Case for Cambridge (March 2024) [CD7.01]** and reaffirmed in the Pennycook Letter. It addresses the transport constraints that threaten economic growth, supports the delivery of housing and employment sites, and aligns with the principles of sustainable, infrastructure-led development. Jo Baker’s Proof confirms that the scheme has been rigorously assessed, strategically justified, and designed to integrate with broader infrastructure proposals.
- 5.3.29 As the “Case for Cambridge” makes clear, the city’s continued success depends on bold, coordinated action. CtoC is precisely such an intervention one that transforms connectivity, unlocks opportunity, and ensures that Cambridge remains a beacon of innovation and prosperity for decades to come.
- 5.3.30 I judge there to be a very strong conformity between the proposed scheme and the aims and objectives as set out in the **Case for Cambridge (March 2024) [CD7.01]**, as the Cambridge to Cambourne Guided busway meets these objectives head on. I therefore afford this policy document a high weight of significance in my assessment.

Adopted Local Plan Policy

- 5.3.31 The following policies are relevant in considering the principle of development for the proposed scheme:
- Policy S/2 in South Cambridgeshire’s Plan.
 - Policy 14 of the Cambridge Local Plan.
- 5.3.32 Policy S/2: (Objectives of the Local Plan) set the vision for the Local Plan, and flags that this will be achieved through the achievement of 6 key objectives:

a. To support economic growth by supporting South Cambridgeshire's position as a world leader in research and technology based industries, research, and education; and supporting the rural economy.

b. To protect the character of South Cambridgeshire, including its built and natural heritage, as well as protecting the Cambridge Green Belt. New development should enhance the area, and protect and enhance biodiversity.

c. To provide land for housing in sustainable locations that meets local needs and aspirations, and gives choice about type, size, tenure and cost.

d. To deliver new developments that are high quality and well-designed with distinctive character that reflects their location, and which responds robustly to the challenges of climate change.

e. To ensure that all new development provides or has access to a range of services and facilities that support healthy lifestyles and well-being for everyone, including shops, schools, doctors, community buildings, cultural facilities, local open space, and green infrastructure.

f. To maximise potential for journeys to be undertaken by sustainable modes of transport including walking, cycling, bus and train.

- 5.3.33 Policy 14: (Areas of Major Change and Opportunity Areas – general principles) set the principles for development in the local plan for areas of major change within the Local Plan, and flags (on page 57) that:

“Development within the AOMCs and Opportunity Areas should be of the highest quality design and incorporate the principles of sustainable design and construction. With the exception of very minor development, the development of each site within the AOMCs and the Opportunity Areas shall only be permitted in the following circumstances:

a. when the necessary infrastructure and associated arrangements to support that development have been secured, either by delivery as part of the development or through other stakeholders including relevant local authorities;

or b. where acceptable alternative infrastructure provision, including temporary provision where appropriate, has been secured; or

c. where an assessment shows that a particular development can take place in advance of such provision without causing unacceptable impacts.

- 5.3.34 When considered at a local scale, the scheme actively pursues sustainable development, in keeping with **Policy 1** of the **Cambridge Local Plan 2018 [CD6.01]** and **Policy S/3 of the South Cambridgeshire Local Plan 2018 [CD6.02]**. These policies reinforce the presumption in favour of development that enhances economic, environmental, and social conditions, subject to accordance with up-to-date plans. The guided busway supports these three core goals through facilitating modal shift, reducing emissions, and unlocking housing delivery and job creation particularly at Cambourne West, Bourn Airfield, and West Cambridge.

- 5.3.35 The proposal contributes substantively to the objectives of **Policy S/2** in **South Cambridgeshire's Plan** by directly supporting sustainable infrastructure for growth, improving accessibility to key employment areas, and supporting cohesive settlement strategies. In addition, the scheme exemplifies the principles set out in **Policy 14** of the **Cambridge Local Plan**, which addresses strategic growth within Areas of Major Change and Opportunity Areas. The guided busway will play a key role in unlocking the development potential of West Cambridge, ensuring that future growth is well connected, environmentally sound, and underpinned by strategic transport investment. The scheme enhances connectivity to high tech employment and research clusters and supports

clustering objectives set out both locally and in the NPPF under **Section 6 (paras 87–89)**.

- 5.3.36 I judge that there is strong policy compliance between the proposed scheme and the aims and objectives of locally adopted policy in respect of assessing the ‘principle of development’, and as such, I afford them a high significance of weight.

Summary

- 5.3.37 In relation to achieving sustainable development, as outlined in **paragraphs 8** of the NPPF, the scheme advances all three core objectives: economic, social, and environmental. It strengthens access to major employment centres such as West Cambridge and the city core, enhances social cohesion by improving connectivity between existing and future communities, and delivers environmental benefits by encouraging a modal shift to electric public transport, supporting net zero ambitions.
- 5.3.38 On decision making, **paragraphs 48–50** of the NPPF support giving weight to proposals that are aligned with adopted and emerging policy frameworks. The scheme sits comfortably within the strategic objectives of both the Cambridge and South Cambridgeshire Local Plans (2018) (as discussed further in this section) and benefits from significant policy support at both national and sub-regional levels.
- 5.3.39 Concerning the delivery of housing, the proposal responds directly to **paragraph 77** of the NPPF, which encourages enabling infrastructure to support large scale, sustainable residential growth. The guided busway forms a critical component of the spatial logic underpinning strategic housing allocations most notably at Cambourne West and Bourn Airfield and underpins the delivery of approximately 5,850 new homes by ensuring connectivity, viability, and place-making credentials are maintained.
- 5.3.40 Economic policy set out under **paragraphs 87(a)-(b) to 89** of the NPPF is met through the scheme’s capacity to improve access to high tech and creative employment zones, particularly at the West Cambridge cluster. The Scheme acts as a catalytic enabler, unlocking development at allocated sites such as:

Cambourne West: Up to 2,350 new homes and associated community infrastructure.

Bourn Airfield: Approx. 3,500 dwellings as part of a mixed use village.

West Cambridge: Up to 383,300m² of employment space, largely academic in nature.

- 5.3.41 By supporting housing and commercial development needs, the proposal fulfils government ambitions to strengthen clusters and enable rural growth through enhanced connectivity. Construction of the proposed scheme will deliver an immediate economic boost to local contractors and those firms appointed to carry out the construction works.
- 5.3.42 In terms of promoting healthy and safe communities, **paragraphs 104-105** of the NPPF highlight the importance of infrastructure that supports active travel and links communities to public spaces. The guided busway not only facilitates low emission transport but incorporates pedestrian and cycle routes that upgrade the existing network and encourage healthier travel choices. It also safeguards and enhances public rights of way (PROW), contributing to inclusive mobility and community wellbeing. For additional coverage on impacts to PROW, please see the proof of evidence prepared by John Loneragan **[CD26-01-APP-W8-1]**.
- 5.3.43 The Cambourne to Cambridge Guided Busway (C2C) proposal accords with **paragraph 11** of the NPPF, which sets out the presumption in favour of sustainable development. **Paragraph 11(c)** requires that where proposals align with an up-to-date development plan, they should be approved without delay. This applies to the C2C scheme, which is consistent with the adopted development plan policies for Cambridge and South

Cambridgeshire, with evidence of this provided in more detail below under the wider policy criteria sections.

- 5.3.44 In responding to the “**Case for Cambridge**” (March 2024) [CD7.01], the proposal reinforces both the strategic and site-specific growth ambitions of the Greater Cambridge region. It represents not merely a transport intervention, but a backbone for sustainable development, fulfilling the core principles and objectives of this
- 5.3.45 The busway addresses this imperative by providing an efficient, electric transit spine that links Cambourne, Bourn Airfield, West Cambridge and central Cambridge, actively promoting modal shift, reducing congestion, and improving air quality across the A428 corridor.
- 5.3.46 The proposal sets out how growth will be harnessed to address these challenges, supporting Cambridge's life sciences and tech sectors, and sustaining its competitive edge. The document identifies that the government intends to deliver 100,000–150,000 new homes by 2050, projecting £4.3–£6.4 billion in economic gains, alongside infrastructure led development financed through public private collaboration.
- 5.3.47 In practical terms, the guided busway supports government priorities around infrastructure sequencing serving as enabling infrastructure for 5,850 homes across three strategic allocations (Cambourne West, Bourn Airfield, and West Cambridge). These allocations align with early opportunities identified in the report, where transport improvements are required to unlock housing and wider commercial development.
- 5.3.48 From a spatial planning perspective, the proposal draws strength from its consistency with local policy approaches to sustainable infrastructure delivery, strategic connectivity, and land optimisation. It also supports place making by integrating new active travel corridors alongside mass transit infrastructure, aligning with Policy 14's emphasis on coordinated land use and transport planning. Development of the proposed scheme will provide strong conformity with these adopted local planning policies.
- 5.3.49 Overall, the principle of the development is supported in both local and national policy. I afford this a high significance of weight.

5.4 Transport and Connectivity

National Planning Policy Framework

- 5.4.1 The following NPPF policies are relevant to transport and connectivity issues when viewed at a national scale, and should be afforded a high significance of weight:
- Section 9: Promoting sustainable transport (paras: 109 – 111 / 115(a) – 117(a)-(e));
 - Section 16: Conserving and enhancing the historic environment (paras: 207 – 210 / 212 - 218).
- 5.4.2 In my judgement the Scheme accords with **Section 9** of the NPPF, which sets out the Government's approach to promoting sustainable transport. Specifically, the scheme aligns with **paragraphs 109 to 111 and 115(a)–117(a–e)** through its strategic design, modal shift ambitions, and comprehensive integration into the region's growth objectives, with the reasons for this described below.
- 5.4.3 **Paragraph 109** of the NPPF encourages early consideration of transport issues in the planning process. The Cambourne to Cambridge scheme has met this objective through extensive stakeholder engagement including transport operators, planning authorities, and communities led by the Greater Cambridge Partnership. The scheme supports the vision for high quality placemaking by embedding sustainable movement into its infrastructure planning.

- 5.4.4 In accordance with **paragraph 110** of the NPPF, the scheme will support and enable significant development along a sustainable transport corridor, directly responding to anticipated housing and employment growth in Cambourne, Bourn Airfield, and West Cambridge. This strategic alignment ensures reduced congestion and improved air quality by providing viable public transport alternatives to car dependency especially critical given forecasts of up to 70% increase in city bound car trips by 2031.
- 5.4.5 **Paragraph 111** of the NPPF encourages planning policies that promote walking, cycling, and public transport. The busway infrastructure includes segregated maintenance tracks that will also serve walkers, cyclists, and equestrians, connecting Travel Hubs and residential areas to Cambridge with improved safety and accessibility. Secure cycle parking and active travel links will complement transit accessibility.
- 5.4.6 Turning to guidance in regard of transport development proposals, the NPPF under **paragraph 115(a)** stresses the prioritisation of sustainable transport modes and safe access. The busway's design prioritises zero emission, electric public vehicles, and segregated routes to ensure reliable, safe access for all users. The proposal similarly satisfies **paragraph 115(b–d)** of the NPPF, by aligning with national design guidance, mitigating traffic impacts along the A428/A1303, and delivering cost effective interventions that ease congestion.
- 5.4.7 Furthermore, the NPPF under **paragraph 115(e)** requires applications to maximise walking and cycling and provide high quality public transport catchment areas. The scheme will deliver a Travel Hub, integrated with cycle lanes and footways, thereby expanding public transport accessibility and mode interchange, and increasing bus mode share across the corridor.
- 5.4.8 In terms of design and delivery, **paragraph 117(a–e)** of the NPPF sets a high standard for transport infrastructure. This objective has been met as the scheme offers the following:
- (a) The scheme prioritises pedestrian and cycle movements and maximises bus catchment areas through strategic stop placement and linked footpaths.
 - (b) It supports users with reduced mobility by ensuring inclusive access to stops and vehicles.
 - (c) The scheme minimises street clutter, avoids modal conflict, and enhances safety, especially where crossings intersect existing highways.
 - (d) Emergency and service vehicle access is maintained along the maintenance track, ensuring operational resilience.
 - (e) The infrastructure is future proofed to accommodate vehicle charging and emerging clean tech transit, contributing to a net zero transport system.
- 5.4.9 I conclude that when assessed against NPPF policy, the Cambourne to Cambridge guided busway delivers a robust and resilient sustainable transport intervention, and demonstrates strong compliance with **Section 9 of the NPPF**, so I afford this section of the NPPF a high significance of weight in.

Wider National and Regional Policy

- 5.4.10 When considering wider national and regional policy documents that are relevant to transport and connectivity, I see the proposed scheme demonstrating a strong strategic fit with the overarching goals and detailed provisions of the **Cambridgeshire and Peterborough Local Transport and Connectivity Plan 2023 (LTCP) [CD6-09]**, which sets high level objectives around connectivity, climate resilience, air quality improvement, and modal shift. Of particular relevance is section on public transport and in particular buses (**as covered on page 27**). This section states:

“Buses form a fundamental component of our sustainable transport network for journeys beyond distances people can use active travel, allowing people to access key services, training, and employment opportunities. We will improve our public transport offer by developing and delivering the most appropriate financial and operational framework for buses...”

Our ambition is to see Cambridgeshire and Peterborough at the forefront of excellent public transport provision. We aim to transform bus travel – offering high levels of convenience and connectivity – not just in our urban areas, but across the entire region, including rural areas and market towns; something not seen on such a scale anywhere else in the UK. We will deliver a fully integrated bus network, serving the needs of the region. We want to make journeys quicker, cheaper, and more reliable, delivering attractive, environmentally friendly services across our area. To do that, we need to improve the whole journey, ensuring that off-bus infrastructure and services complement the on-bus travel experience...

Better bus services will benefit everyone. They will provide easier access to health, education, training, and employment opportunities, as well as the ability to reach a wider range of shopping and leisure facilities. Equally, they will provide a real alternative to using the car...

The recently adopted Cambridgeshire and Peterborough’s Bus Strategy sets out the ways in which we want to make bus travel more convenient, very attractive and easy to use, such that it becomes the obvious way to make a journey. This means improving every aspect of the current service, building on the strong foundations place, including the Busway, Cambridge Park & Ride, and demand service. Overall, the Bus Strategy sets out the main principles of our ambition and more than double bus patronage by 2030”.

- 5.4.11 The LTCP also calls for region wide integrated public transport to reduce private car usage and meet its ambitious target of a 15% reduction in vehicle kilometres by 2030, with emphasis on delivering **zero emission bus corridors** and sustainable access to housing and employment. The scheme aligns with the LTCP’s “Shift” and “Improve” pillars, delivering faster, more reliable and attractive public transport along a growth corridor, and supporting regional goals around inclusive access and decarbonisation, so I afford this a high significance of weight.

- 5.4.12 The **Cambridgeshire Local Transport Plan 2011–2031 Long Term Transport Strategy [CD6-10]** sets out the foundational strategic objectives for mode shift and spatial transport planning, including investment in rapid transit corridors and high quality public transport infrastructure to support growth. Although older and partially superseded, its long-term themes remain relevant. The busway contributes directly to achieving LTP objectives (shown on page around reducing dependency on private car travel and improving links between key growth locations. Of key relevance to the proposed scheme are:

- **Challenge 2:** Reducing the length of the commute and the need to travel by private car (**Page 22**).
- **Challenge 3:** Making sustainable modes of transport a viable and attractive alternative to the private car (**page 29**).

- 5.4.13 Challenge 2 states that:

“Future development is focussed on providing good quality and affordable homes closer to where people work, in accessible locations with sustainable transport options readily

available. This will help reduce commuting distances as well as the need to travel by private car, thereby promoting low carbon living. Planned development set out in existing

Local Plans / LDFs and in the emerging Local Plans to 2031 promote development in the following types of location.:

- *Within Cambridge or as sustainable extensions to the urban area, subject to environmental capacity and compatibility with Green Belt objectives*
- *At new settlements at Northstowe, Bourn Airfield, Waterbeach barracks, Alconbury Weald and Wyton Airfield.*
- *A village extension at Cambourne West.*
- *Within, or as extensions to, other towns, where development would increase the town's sustainability and self-containment, improvements to infrastructure and services are planned or will be provided and high quality public transport provision can reduce the impacts of out-commuting"*

5.4.14 Challenge 3 states that:

"Vision: That people have a real choice about how they travel and that for many journeys, walking, cycling, buses and trains are the preferred modes.

What we will do to overcome these barriers:

- *Improve availability and type of information on sustainable travel modes*
- *Improve the integration of all modes of transport and provide good connectivity between walking, cycling, bus and rail services".*

5.4.15 Given its foundational nature, and its spatial compatibility with current strategies, the document continues to offer material support to the busway rationale and should be considered on high weight significance when determining the application.

5.4.16 The **Cambridgeshire and Peterborough Supporting Bus Strategy [CD6-11]** sets out operational ambitions for an integrated, convenient, zero emission bus network, with improved frequencies, simplified ticketing and seamless connectivity across modes.

5.4.17 To realise the vision, this Strategy seeks to achieve the following aims (page 9):

- *A comprehensive bus network, better connecting people to places across all parts of the region and beyond.*
- *Buses are part of a fully integrated and planned transport system.*
- *A more affordable network, with simplified fares and capping across the network*
- *Transitioning to new, low emission vehicles, providing all the benefits of modern bus travel*
- *A more understandable bus network, services and fares, with clear information and easy ticketing.*
- *Faster and more reliable journeys by bus delivered with more, effective bus priority measures. High quality passenger waiting facilities.*
- *Good quality bus services with high levels of satisfaction amongst customers.*
- *A doubling of bus passengers (based on 2019/20 levels) by 2030.*
- *Less traffic and congestion by attracting car users to buses.*

- *Better bus infrastructure, including bus shelters and wider real time information coverage*

- 5.4.18 The **Cambridgeshire and Peterborough Supporting Bus Strategy [CD6-11]** identifies the existing busway as part of the "strong foundations already in place," (page 3) citing it as a precedent for the type of high quality, fast, and dedicated corridor service that should be replicated across the region. The proposed extension builds on this established network and directly advances the Strategy's goals to double bus patronage by 2030 and improve regional accessibility. This document offers **explicit positive reference** to the busway's potential role in enacting a modal shift and service transformation and therefore should be afforded high significance of weight.
- 5.4.19 The Cambourne to Cambridge guided busway offers strong support for the ambitions set out in **Bus Back Better – National Bus Strategy [CD8-13]**, **Gear Change – a Bold Vision for Cycling and walking [CD8-16]**, and the **National Infrastructure Strategy [CD8-11]**. Together, these documents provide a cross-cutting policy framework for decarbonised transport, regional connectivity, infrastructure delivery, and active travel all of which are operationalised by the busway proposal, and as such I afford them a high significance of weight.
- 5.4.20 The **National Infrastructure Strategy [CD8-11]** provides ambitions within a long term plan to deliver high performing, sustainable infrastructure. The Strategy places strong emphasis on transforming local transport networks, including substantial investment in bus services. Paragraphs on **pages 7–9 and page 26** highlight £5 billion allocated over the Parliament for buses and cycling, aiming to replicate the quality and integration seen in Greater London across other UK regions. This funding is positioned within a broader commitment to "levelling up" and decarbonisation (as described on **pages 46–47**).
- 5.4.21 The Strategy stresses (**page 22**) the role of buses in "better commutes" and enhancing local connectivity, particularly in rural and deprived communities, where transport links are often weakest. It explicitly notes buses as "workhorses of public transport," accounting for over 50% of public transport journeys (**page 29**), and describes their role in health outcomes, tackling air quality, and modal shift.
- 5.4.22 The document outlines (**page 29**) investment in bus priority measures, ticketing integration, and data-driven scheduling, targeting smoother and faster journeys. It also reinforces the Strategy's goal of making city-region bus networks as effective as London's. Together, these measures aim to revitalise local economies, support social inclusion, and reduce carbon emissions, with buses central to achieving these outcomes.
- 5.4.23 The busway exemplifies this intent by delivering a regionally significant corridor within a growth hotspot. It enables modal shift not only through enhanced bus provision, but also by integrating active travel, thereby addressing the Strategy's goal of rebalancing transport choices outside Greater London. Electrification, biodiversity net gain, and a clear shift away from private vehicles place the scheme firmly within the Strategy's net zero ambitions. Moreover, the accelerated delivery route via the Transport and Works Act demonstrates the government's broader desire to build "better, faster, greener" an ambition the proposed scheme helps achieve.
- 5.4.24 The busway's segregation from general traffic responds directly to **Bus Back Better – National Bus Strategy's [CD8-13]** central ambition for journey reliability and freedom from congestion (**Chapter 2 – What We Want**). This design element meets the strategy's call for reimagined networks where buses are a first choice, not a last resort. The guided corridor enables high frequency services with urban standard turnaround, satisfying the vision of intuitive "turn up and go" operations.
- 5.4.25 The use of modern, electric vehicles supports both Bus Back Better's environmental goals and the scheme's regional decarbonisation agenda. More than this, the busway facilitates access to key development zones such as Cambourne West, Bourn Airfield and West Cambridge, aligning the strategy's call for efficient connectivity between

growth areas and urban centres. Its co-design with walking and cycling infrastructure also reinforces Bus Back Better's emphasis on multimodal coordination, embedding sustainability and accessibility across the corridor.

- 5.4.26 In parallel, **Gear Change – a Bold Vision for Cycling and walking [CD8-16]** provides a national benchmark for how cycling and walking should be treated as core components of transport infrastructure. The busway delivers a physically separated, continuous active travel path that connects settlements and employment hubs, implementing the kind of infrastructure Gear Change says must be integral from a scheme's inception.
- 5.4.27 This alignment is particularly strong in relation to new development: the active travel route enables low carbon mobility and safe journeys from emerging housing and employment sites, directly supporting Gear Change's requirement that development be built around sustainable travel modes. The scheme's age and ability inclusive design reflects the strategy's call for safety and usability, helping to normalise walking and cycling as everyday modes rather than niche alternatives.

Adopted Local Plan Policy

Cambridge Local Plan [CD6-01]

- 5.4.28 The following policies are relevant.
- Policy 5: Sustainable transport and infrastructure (page: 31);
 - Policy 80: supporting sustainable access to development (page 229);
 - Policy 81: Mitigating the transport impact of development (page: 234);
 - Policy 82: Parking management (page: 236); and
 - Policy 85: Infrastructure delivery, planning obligations and the Community Infrastructure Levy (page: 240).
- 5.4.29 The above policies are all directly supported by the proposed development, demonstrating strong compliance and therefore should be afforded a high significance of weight.
- 5.4.30 When considering the scheme's compliance with local transport and connectivity policies, I assess that the Cambourne to Cambridge guided busway meets the strategic transport vision laid out in the **Cambridge Local Plan (2018) [CD6.01]**, delivering a sustainable, high-capacity corridor that aligns with the city's long term planning principles and thus should be afford significant weighting. Designed to support growth in key western development zones including Bourn Airfield, Cambourne West, and West Cambridge the scheme provides both mitigation of existing transport pressures and proactive infrastructure to support emerging communities.
- 5.4.31 At the heart of the proposal is a modal shift imperative, directly advancing **Policy 5** of the **Cambridge Local Plan (Sustainable transport and infrastructure)** by creating a segregated, reliable public transport spine that supports electric bus operations and active travel. The inclusion of dedicated walking and cycling infrastructure, alongside integration with travel hubs (such as the newly proposed Scotland Farm interchange), ensures that mobility options remain multimodal and accessible across demographic and geographic boundaries. This addresses both the physical and behavioural prerequisites for sustainable travel, as envisioned by the policy.
- 5.4.32 In responding to the connectivity needs of future development, the busway unlocks over 8,000 new homes and 44,000 jobs planned across the Western Corridor meeting the

accessibility criteria set out under **Policy 80(a) (Supporting sustainable access to development)** of the Cambridge Local Plan. **Policy 80** states:

Development will be supported where it demonstrates that prioritisation of access is by walking, cycling and public transport, and is accessible for all. This will be achieved by:

a. ensuring major developments on the edge of the city and in the urban extensions are supported by high quality public transport linking them to Cambridge's city centre and major centres of employment. The public transport links should be within walking and cycling travel distance of the development;

- 5.4.33 By prioritising journey time reliability and promoting bus mode share, the scheme allows development to proceed without exacerbating transport inequalities or relying on unsustainable private vehicle use and directly underpins with the aims and objectives of **policy 80(a)**.
- 5.4.34 The Cambridge Local Plan rightly anticipates that without strategic transport interventions, growth will lead to severe congestion, particularly along the A1303/Madingley Road approach. Here, the busway plays a critical role in fulfilling **Policy 81 (Mitigating the transport impact of development)**. Traffic modelling suggests that peak hour car journeys could rise by up to 70% by 2031 without intervention. By offering a competitive alternative both in speed and reliability the guided busway operates not simply as a facilitative asset but as a direct mitigation measure, reducing emissions and enhancing air quality in line with wider environmental goals.
- 5.4.35 Recognising that parking provision can both enable and constrain sustainable mobility, the scheme integrates proactive parking management through its hub design. This supports the principles of **Policy 82 (Parking management)** by concentrating parking at strategic intercept points, thereby discouraging city bound car travel while promoting bicycle use and low emission vehicles.
- 5.4.36 The scheme is also seen to reflect the ambitions of **Policy 85 (Infrastructure delivery, planning obligations and the Community Infrastructure Levy)** of the Cambridge Local Plan. It is not a speculative intervention it is part of a coordinated delivery programme supported by long term investment from the Greater Cambridge Partnership. Its success underpins the viability of surrounding planning permissions, which are contingent on the timely provision of public transport infrastructure. The scheme's incorporation of landscape mitigation, and sustainability features further aligns with the delivery obligations and planning contribution mechanisms anticipated under this policy.

South Cambridgeshire Local Plan [CD6-02]

- 5.4.37 The following policies are relevant:
- Policy TI/2 (Planning for Sustainable Travel).
 - Policy SS/7 (Bourn Airfield).
 - SS/8 (Cambourne West).
- 5.4.38 The Cambourne to Cambridge guided busway directly supports and advances the objectives of several key transport and spatial planning policies in the South Cambridgeshire Local Plan 2018, particularly Policy TI/2 (Planning for Sustainable Travel), Policy SS/7 and Policy SS/8, so I afford these a high significance of weight, and detail them as follows.
- 5.4.39 **Policy TI/2** seeks to promote sustainable travel choices, reduce reliance on private vehicles, improve accessibility, and deliver well integrated transport infrastructure. The Scheme's alignment with these ambitions is clear and responds to this policy by providing:

- **Modal Shift and Public Transport Provision:** At the heart of the Scheme is the aim to enable modal shift from private car use to a reliable, high-capacity public transport alternative. The proposed guided busway offers a congestion free route from Cambourne to Cambridge, directly addressing peak hour traffic pressures along the A1303/Madingley Road corridor. By providing frequent, high quality services with a segregated route, the Scheme will encourage commuters and residents to opt for sustainable transport modes.
- **Integration with Active Travel:** Alongside the busway, the Scheme incorporates infrastructure for walking and cycling, with the adjoining access track enabling safe, accessible, and continuous active travel routes. This aligns with TI/2's emphasis on promoting non-motorised travel and supporting healthy, low carbon mobility options.
- **Accessibility and Connectivity:** The Scheme is designed to serve key growth areas including Cambourne West, Bourn Airfield, and West Cambridge all of which have secured or are seeking planning permission for substantial residential and employment development. The busway will provide vital transport connections between these new communities and Cambridge, addressing spatial inequality and improving access to jobs, education, and services.
- **Environmental Benefits:** The Scheme is proposed to be served by modern, electric vehicles and aims to deliver biodiversity net gain of at least 10%, with a target of 20%. These environmental enhancements contribute to TI/2's goals of reducing air pollution and supporting a low carbon transport network.

5.4.40 **Policy SS/7 (Bourn Airfield) and SS/8 (Cambourne West)** of the South Cambridgeshire Local Plan (2018), both directly support the delivery of high quality segregated public transport links which the proposed scheme will provide, so have a high significance of weight. **Policy SS/7 under sub section (8)(a) states:**

SS7(8)(a). *The new village will be founded on a comprehensive movement network for the whole village, that connects key locations including the village centre and schools to encourage the use of sustainable modes of travel and includes:*

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;

5.4.41 The Scheme responds directly to the strategic development framework outlined in **Policy SS/7** and effectively supports the development of the guided busway through **subsection a(iii)**, so demonstrates strong compliance with the policy

5.4.42 **Policy SS/7** requires that the new village at Bourn Airfield be underpinned by a comprehensive movement network, connecting key destinations such as the village centre and schools, and promoting sustainable travel. The Cambourne to Cambridge guided busway is a critical enabler of this policy, delivering infrastructure that meets both the strategic and detailed requirements of SS/7, including:

- Segregated Bus Link Across the Broadway: The Scheme provides a dedicated, segregated busway from Cambourne to Bourn Airfield, crossing the Broadway and continuing through the development to the junction of St Neots Road and Highfields Road. This directly satisfies criterion (a)(i), ensuring seamless public transport integration between existing and emerging settlements.
- Congestion Free Bus Journey from Caldecote / Highfields: In line with criterion (a)(ii), the Scheme ensures that bus journeys from Caldecote and Highfields to the A428/A1303 junction are direct and insulated from general traffic congestion. The guided nature of the route, combined with priority measures at junctions, guarantees reliable and time efficient travel.
- Bus Priority Measures on the A1303 Corridor: The Scheme incorporates high quality bus priority infrastructure along or parallel to the A1303, extending from the A428 junction to Queens Road, Cambridge. This meets criterion (a)(iii), enhancing journey times and reliability for public transport users and supporting modal shift away from private car use.
- Comprehensive Movement Network Integration: Beyond the busway itself, the Scheme supports the wider movement network envisaged by SS/7. It connects key village destinations via active travel routes and integrates with local transport strategies, ensuring that sustainable modes are not only viable but attractive for everyday journeys.
- Strategic Coordination with Village Planning: The Scheme has been developed in close alignment with the spatial and transport planning for Bourn Airfield new village. Its infrastructure forms the backbone of the village's sustainable movement network, enabling the delivery of SS/7's vision for connected, low carbon living.

5.4.43 The Bourne Airfield development approved under planning reference: S/3440/18/OL - Bourn (Bourn Airfield) (see **CD REF 4.04.00**) directly underpins the need for the guided busway to be approved. The committee report for the Bourne Airfield development (dated 19/02/21) states:

“448. Local Plan Policy SS/7 (8) requires the development to be founded on a comprehensive movement framework for the whole village, requiring significant improvements in public transport, measures to promote cycling and walking, and highway improvements.

449. Policy SS/7 (8a) requires significant improvements in public transport, including a segregated bus link to Cambourne across the Broadway, measures to ensure that any bus journey towards Cambridge is direct and unaffected by any congestion suffered by the general public, and the provision of high quality bus priority measures or busway. The main improvements to public transport to address this will be delivered through the Cambourne to Cambridge better public transport project (C2C), of which more below”.

5.4.44 Under paragraph 483 of the committee report it also states that the applicants transport strategy is dependent on:

“483. Delivery of the Bus Strategy”

5.4.45 ...of which the Cambridge To Cambourne guided busway forms an integral part.

5.4.46 In summary, the Cambourne to Cambridge guided busway provides the structural and operational foundation for **SS/7's** movement network, delivering public transport improvements and connectivity that are essential to the success of the new village and the wider corridor.

- 5.4.47 Similarly, the Scheme accords with **Policy SS/8** by delivering infrastructure that enables and unlocks strategic growth. **Policy SS/8 under sub section (12)(a) to (c)** states:

Access

12. Development will provide for the additional travel demands generated. Coordination will be required with other developments on the A428 corridor to deliver the necessary improvements. The development will need to address, but is not limited to, the following (subject to detailed strategy development and to the transport assessment of development proposals):

- a. Any measures necessary to ensure that a bus journey between Cambourne West and the junction of the A428 and the A1303 is direct and unaffected by any congestion suffered by general traffic;*
- b. High quality segregated bus priority measures on the A1303 between its junction with the A428 and Queens Road, Cambridge;*
- c. Direct, segregated high quality pedestrian and cycle links to west Cambridge, Papworth Everard, Caxton and Bourn;*

- 5.4.48 Policy SS/8 sets out a clear mandate that development proposals in the A428 corridor must provide for the additional travel demands they generate and coordinate with other schemes to deliver necessary improvements. The Cambourne to Cambridge guided busway shows strong compliance with this policy, as it directly responds to this requirement on multiple fronts, delivering enhanced connectivity, prioritising sustainable travel, and addressing corridor wide infrastructure needs. It also provides for:

- **Congestion Free Bus Journey:** The Scheme enables a direct, segregated bus route between Cambourne West and the A428/A1303 junction, free from the constraints of general traffic congestion. This aligns precisely with criterion (a) of SS/8, which requires that bus journeys be unaffected by car based delays. The guided nature of the busway offers a reliable, high frequency service, reducing travel times and improving journey consistency.
- **Bus Priority Measures along A1303:** As required by criterion (b), the Scheme incorporates high quality segregated bus infrastructure along the A1303 corridor through to Queens Road, Cambridge. This dedicated alignment bypasses key congestion hotspots and integrates signalised junctions and modern interchange points to further protect and enhance bus journey reliability.
- **Active Travel Connectivity:** The busway corridor includes a continuous, accessible path designed for walking, cycling, and horse riding delivering criterion (c) of SS/8. This infrastructure provides safe, direct active travel links to West Cambridge, Papworth Everard, Caxton, and Bourn, facilitating non-motorised movement across the A428 corridor. The path is integrated with wider networks, supporting commuting, leisure, and local connectivity for existing and planned communities.
- **Coordination Across Developments:** The Scheme has been designed in tandem with strategic sites at Cambourne West, Bourn Airfield, and West Cambridge each of which is referenced in Local Plan allocations and dependent on the successful delivery of transport infrastructure. SS/8's emphasis on coordinated improvements is reflected in the Scheme's role as a shared backbone for multiple developments, enabling growth while mitigating transport impacts.
- **Integrated Strategy Development:** The transport assessment and strategy underpinning the Scheme have incorporated future demand modelling, active engagement with neighbouring development sites, and scenario testing in line

with SS/8's requirements. This ensures that delivery is robust, future proofed, and calibrated to the evolving needs of the corridor.

- 5.4.49 Taken together, the Cambourne to Cambridge guided busway provides a holistic and policy compliant response to **SS/8**, securing the transport foundations for sustainable, coordinated growth along the A428 corridor, and I afford this a high significance of weight.

Summary

- 5.4.50 In summary I conclude that the Scheme exemplifies a well calibrated transport intervention that meets and advances policy ambitions across national, local, and strategic frameworks. It responds directly to the **NPPF Section 9** by embedding sustainable access, modal shift, and inclusive infrastructure into a growth critical corridor. At the local level, it operationalises key transport policies within the Cambridge and South Cambridgeshire Local Plans delivering reliable, segregated public transport and multimodal connectivity that enable development without compromising environmental or mobility goals.
- 5.4.51 Crucially, the scheme unlocks major housing and employment sites, mitigates congestion on constrained corridors, and aligns with national transport strategies including *Bus Back Better*, *Gear Change*, and the *National Infrastructure Strategy*. Through the integration of electric vehicles, active travel infrastructure, and forward looking design, the busway positions Greater Cambridge to meet its net zero ambitions while offering scalable, inclusive transport choices.
- 5.4.52 In conclusion, the guided busway is a cornerstone of sustainable movement and strategic growth across the western corridor. It meets the evidential thresholds of necessity, effectiveness, and deliverability and merits strong support on both policy and planning grounds.

5.5 Green Belt

- 5.5.1 The Cambourne to Cambridge guided busway has been subject to a detailed **Green Belt Assessment [CD.18]**, supported by consideration of applicable national policy, notably **Section 13** of the NPPF (Protecting Green Belt Land). This section outlines how the Scheme aligns with Green Belt principles and policy tests, particularly those set out in **paragraph 154** of the NPPF. In this assessment I adopt the findings and conclusions of the submitted **Green Belt Assessment [CD1.18]**.

National Planning Policy Framework

- 5.5.2 The NPPF defines Green Belt policy as a tool for preventing urban sprawl by keeping land permanently open, with its essential characteristics being openness and permanence (**paragraph 142**).
- 5.5.3 The proposed Scheme route includes a number of sections located within designated Green Belt land, particularly east of the M11 and to the north of the village of Coton. Additionally, the proposed Travel Hub at Scotland Farm is located within the Green Belt. These areas have been scrutinised through an iterative, site-specific methodology assessing whether the Scheme is not inappropriate development under **paragraph 154(h)(iii)**, as "local transport infrastructure which can demonstrate a requirement for a Green Belt location" and which preserves openness and does not conflict with the purposes of including land within it.

Impacts on 'Openness' of Green Belt

- 5.5.4 The Green Belt Assessment for the Cambourne to Cambridge Scheme undertakes a detailed appraisal of whether the development would preserve the openness of the Cambridge Green Belt, with openness considered both spatially and visually in

accordance with national policy and case law. In considering openness, the assessment draws on the **Turner** and **Samuel Smith** judgments [CD REF 5.33], as well as Planning Practice Guidance (Reference ID: 64-001-20190722), to establish that openness is not synonymous with an absence of physical change.³ Rather, it must be assessed case-by-case considering spatial footprint, visual prominence, duration, and remendability. I have had regard to the entirety of the Green Belt Assessment in forming my conclusions. I highlight the following matters in particular:

- 5.5.5 Sub-area A.1 is characterised by flat arable land and lies tight to the southern boundary of the West Cambridge development. The guided busway's alignment through this zone introduces low-volume infrastructure and some detention ponds but no major structures. Visually, the route is nestled against the urban edge and benefits from proposed landscape buffers, mitigating its impact when viewed from the west and southwest. The assessment concludes **openness in this area is preserved**.
- 5.5.6 Sub-area A.3, the Bin Brook crossing, sees the introduction of a modest new structure with limited elevation (approx. 2.5 m). While the embankments introduce some visual change, the parapets are permeable and low-mass. The setting is heavily framed by existing hedgerows and urban features to the north and south. **Openness is therefore considered preserved**, and landscape planting will further reduce any visibility over time.
- 5.5.7 In sub-area B.1, the majority of the route is screened by Coton Orchard and associated vegetation. Though the M11 overbridge introduces massing up to 6.5 m in height, the bridge is visually absorbed into the context of existing motorway infrastructure and is not prominent within rural views. The visual containment here is strong, **and openness is preserved across the sub-area**.
- 5.5.8 Sub-area B.2, north of Coton, features sloping topography that renders it more visible from elevated viewpoints. However, the route here avoids large-scale earthworks, and landscaping is proposed to screen receptors in the village and surrounding fields. Despite a modest change in landscape character, particularly near new bus stops and traffic signals, **openness is considered preserved** due to limited spatial development and restrained visual exposure.
- 5.5.9 Sub-area C.1, west of Coton, sits along a clay ridgeline with open slopes, increasing visibility. Nonetheless, the development footprint remains modest and largely follows existing contours. Mitigation planting and buffering will reduce any sense of visual intrusion, and the assessment finds that the **openness of the Green Belt is preserved** here as well.
- 5.5.10 Sub-area D.1, running along St Neots Road, features On-Road infrastructure within an existing transport corridor and is flanked by established hedgerows. Virtually no new development footprint is introduced, and visibility into the corridor is minimal. Spatial and visual impacts are deemed negligible, **and openness is entirely preserved**.
- 5.5.11 The only exception is sub-area E.3 at Scotland Farm, where the proposed Travel Hub introduces surfaced parking, lighting, and small structures. While the area is relatively flat and screened on some sides by hedgerows, openness is not considered preserved due to the scale and permanence of built form and associated activity. However, extensive mitigation is proposed, including woodland planting and landscape screening, which the assessment suggests will reduce long-term harm to openness **to low or moderate levels**.
- 5.5.12 Across all sub-areas, the operational phase of the Scheme respects spatial and visual limits, and remendability is addressed through restoration proposals and long-term planting. With the exception of Scotland Farm where there is a **low to moderate**

³ Case No: CO/5789/2010 - (Samuel Smith Old Brewery (Tadcaster)) v. Secretary of State for Energy and Climate Change [2012]

adverse impact on openness, the Assessment concludes that **openness of the Green Belt is preserved in all affected locations**.

- 5.5.13 Where impacts do arise, they are localised and softened by the adopted design approach. For example, the proposed M11 overbridge is elevated but sits within an already infrastructure dominated corridor and benefits from surrounding containment. Similarly, the Travel Hub at Scotland Farm introduces built form and activity into a previously open field, which results in some visual and spatial change. However, the scheme incorporates significant buffering, with layout and massing subject to future approval to further minimise perceptual harm. In respect of impact to openness in the Green Belt, I judge that the harm is limited.

Impacts on 'purpose' of the Green Belt

- 5.5.14 **Paragraph 143** of the NPPF, outlines the five purposes of Green Belt designation, those being:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

- 5.5.15 The proposed scheme has been assessed against these five NPPF green belt 'purposes' and the results summarised below in table 3:

Purpose	Impact Outcome	Key Impacts and Commentary
(a) Check the unrestricted sprawl of large built-up areas	No conflict identified	The Scheme doesn't extend urban fabric outward in a way that causes sprawl. It follows strategic corridors and avoids creating expansive development edges.
(b) Prevent neighbouring towns merging into one another	No conflict identified	There's no physical or visual merging of towns such as Cambridge, Coton or Hardwick. The assessment notes strong containment and separation maintained via vegetation and topography.
(c) Assist in safeguarding the countryside from encroachment	Conflict at Travel Hub site in Sub-Area E.3	The Travel Hub would introduce car parking and buildings in open farmland, considered a form of encroachment. Despite mitigation, there's moderate harm due to permanent development.
(d) Preserve the setting and special character of historic towns	Conflict near Cambridge and Coton (A.1, A.3, B.2, C.1)	The scheme impacts views and the perceived openness around Cambridge and Coton. Infrastructure in sub-areas near Grange Road and Bin Brook alters the rural setting though mitigation

		(landscaping, bunding) reduces visual harm over time.
(e) Assist in urban regeneration by encouraging reuse of urban land	Not applicable	The scheme is linear infrastructure in rural land, not urban regeneration-focused. This purpose doesn't contribute meaningfully to the Green Belt evaluation for this project.

Table 3 – Summary of Impacts to Green Belt Purpose.

- 5.5.16 Where there is conflict with Green Belt purposes specifically in areas that could affect the setting of Cambridge or lead to encroachment this has been transparently identified and evaluated. Across the assessed sectors and sub areas of the route, the Scheme is broadly found to not compromise these nationally identified purposes materially.

Adopted Local Plan Policies

- 5.5.17 When assessing this at a local scale and regard must be made to compliance with the **Cambridge Local Plan (2018) [CD6.01]**, **South Cambridgeshire Local Plan (2018) [CD6-02]**, I highlight the following policies.

- 5.5.18 **Policy 4 – ‘The Cambridge Green Belt’** of the Cambridge Local Plan (2018) [CD6.01] states that new development in the Green Belt within the City administrative area will only be approved in line with national policy (NPPF).

- 5.5.19 **Policy S/4 (Cambridge Green Belt)** of the **South Cambridgeshire Local Plan (2018) [CD6-02]** reiterates the NPPF's position: development in the Green Belt will only be permitted where it aligns with national Green Belt policy. Under paragraph 2.30 and in relation to Policy S/4, the South Cambridgeshire Local Plan states:

2.30 - The Cambridge Green Belt surrounds Cambridge and is relatively small in extent, extending around 3 to 5 miles from the edge of the City and incorporates many of South Cambridgeshire's larger and most sustainable villages. The established purposes of the Cambridge Green Belt are to:

- *Preserve the unique character of Cambridge as a compact, dynamic city with a thriving historic centre;*
- *Maintain and enhance the quality of its setting; and*
- *Prevent communities in the environs of Cambridge from merging into one another and with the city.*

- 5.5.20 The Cambourne to Cambridge scheme has been carefully designed to align with the three established purposes of the Cambridge Green Belt, as set out in Policy S4 of the Greater Cambridge Local Plan as follows:

- 5.5.21 **1. Preserving the unique character of Cambridge as a compact, dynamic city with a thriving historic centre:** By improving public transport connectivity from Cambourne and surrounding settlements, the scheme enables sustainable access to Cambridge without encouraging urban expansion or intensification within the city itself.

- 5.5.22 The guided busway alignment avoids direct intrusion into the historic centre and is designed to complement existing transport infrastructure, preserving Cambridge's compact urban form and enhancing its role as a dynamic, accessible hub.

- 5.5.23 **2. Maintaining and enhancing the quality of Cambridge's setting:** The scheme has undergone extensive landscape and visual impact assessment to ensure that its

alignment, design, and mitigation measures respect the city's rural-urban fringe. Sensitive routing avoids key landscape features and heritage assets, while embedded mitigation including planting, screening, and careful integration with topography ensures that the scheme enhances rather than detracts from the city's setting.

- 5.5.24 The use of green infrastructure and sustainable drainage systems further contributes to environmental quality, supporting biodiversity and climate resilience in the Green Belt.
- 5.5.25 **3. Preventing communities in the environs of Cambridge from merging into one another and with the city** The CtoC scheme maintains clear physical and perceptual separation between settlements by following a corridor that avoids coalescence. Strategic alignment choices and landscape buffers ensure that the scheme does not facilitate or imply future development that would erode the distinct identities of villages such as Coton, Hardwick, and Madingley. Instead, it reinforces sustainable connectivity while preserving settlement hierarchy and spatial integrity.
- 5.5.26 The scheme's infrastructure is purpose-built for transport, not development, and its delivery is explicitly decoupled from any proposals for housing growth in the Green Belt.
- 5.5.27 When assessing compliance with green belt policies contained within **South Cambridgeshire Local Plan (2018) [CD6-02]**, this also requires that proposals within or near the Green Belt be located and designed to avoid adverse effects on rural character and openness, with suitable landscaping and maintenance provisions.
- 5.5.28 Given the proposed scheme partial siting within green belt designated land, these policies taken in combination are afforded a high significance of weight.

Summary

- 5.5.29 The Scheme is local transport infrastructure for the purposes of NPPF paragraph 154(h)(iii). The Scheme requires a Green Belt location (to the extent that it falls within it). The necessity to utilise green belt land arises from the geographic constraints of the Cambourne to Cambridge corridor, the alignment of existing and allocated strategic development sites (Cambourne West, Bourn Airfield, West Cambridge), and the presence of surrounding Green Belt which leaves no realistic alternative alignment outside of the Green Belt. The location and function of the Scheme are in step with policy **SS/7** and **SS/8** of the **South Cambridgeshire Local Plan (2018)**, which themselves anticipate and directly reference transport corridors and infrastructure through the Green Belt.
- 5.5.30 In relation to the five nationally defined 'purposes' for Green Belt land as referenced under paragraph 143 of the NPPF, the Scheme does not materially conflict with those concerning urban sprawl (Purpose a), coalescence of settlements (Purpose b), or regeneration through brownfield reuse (Purpose e). Its strategic alignment respects urban form, preserves buffers between Cambridge and adjoining villages. In respect of Purpose (c), safeguarding the countryside from encroachment, a contained degree of harm is identified, again centred on the Scotland Farm Travel Hub. This conflict is spatially and functionally constrained; mitigation ensures that vegetative and ecological qualities can reassert themselves over time (discussed in further detail below). In respect of Purpose (d), the preservation of historic town settings, the alignment east of the M11 towards Grange Road has been subject to detailed heritage testing. Effects on Clare Hall and adjacent listed buildings are deemed less than substantial; openness in relation to heritage character is retained through bunding, tree belts and route curvature. The Scheme does not intrude upon principal heritage axes or foreground visual corridors. Views into and out of the city are maintained, with longer-term visual containment assured through planting maturity. Overall, the Scheme preserves the setting and special character of Cambridge.
- 5.5.31 In adopting the findings of the green belt assessment, I see that by demonstrating a sector by sector evaluation of spatial and visual openness (shown on table 6-1 of the

Green Belt Assessment), this concludes that the busway alignment, being largely low profile and accompanied by appropriate mitigation, preserves openness in most sectors. The exception is Sub Area E.3, where the proposed Scotland Farm Travel Hub introduces a built form and hard surfacing into undeveloped rural land.

- 5.5.32 Sub Area E.3 at Scotland Farm is the exception where more material change is anticipated due to the car park and infrastructure associated with the travel hub. That said, the expansive mitigation strategy woodland perimeter planting, surface treatment, attenuation ponds with wildflower margins, and ecological connectivity corridors demonstrates a design intent that seeks to offset perceptual openness loss with compensatory green infrastructure gain. Given the limited extent of the adverse impact on openness, and in the context of the overall assessment, I afford this aspect only limited weight.
- 5.5.33 Although there are large parts of the proposed development that would not be inappropriate development in the Green Belt, overall I conclude that the scheme would not preserve the openness of the Green Belt and would conflict with the purposes of including land within the Green Belt, albeit to a limited degree in both respects. Accordingly, whilst the scheme is local transport infrastructure which can demonstrate a need for a Green Belt location, nevertheless the scheme does not meet the exception in paragraph 154(h)(iii) of the NPPF.
- 5.5.34 Owing to this the scheme must be deemed to be 'inappropriate' greenbelt development, I am required to undertake a balancing exercise (covered below in section 5.15) to determine whether the 'Very Special Circumstances' criteria, as per NPPF paragraph 143 are warranted. For the reasons set out below, I conclude that VSC can be demonstrated and, as such, the scheme complies with both national policy (in particular paragraph 153 of the NPPF) and aligns with **Policy 4** of the Cambridge Local Plan and **Policies S/4 of the South Cambridgeshire Local Plan**.

5.6 Open Space

- 5.6.1 The proposed Cambridge to Cambourne guided busway scheme has been carefully developed to respond to national and local open space policies. This section addresses the scheme's alignment with the NPPF **paragraphs 103-108** and the Cambridge Local Plan (2018), focusing in particular on **Policy 67: Protection of Open Space**.

National Infrastructure Planning Policy

- 5.6.2 **Chapter 8 of the NPPF (Promoting healthy and safe Communities)** sets out the government's expectations for promoting healthy and safe communities, and providing a clear framework for how open space should be safeguarded. The NPPF recognises open space as a vital asset for health, wellbeing, biodiversity, visual amenity, and climate resilience. Specifically, **Paragraph 104** stipulates that existing open space should not be built on unless one of the following conditions is met:
 - a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
 - b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- 5.6.3 The submitted 'Open Space Assessment' **[CD1-19]** submitted as part of this scheme provides evidence of compliance with these criteria. While the development will result in the loss of approximately 5,380 sqm of designated Local Plan Open Space, including

protected areas east of the M11 and part of the University Rugby Practice Pitch, it does not proceed without mitigation.

- 5.6.4 Crucially, the scheme includes the provision of Replacement Open Space, located west of the M11 and designed to exceed the lost area in both quantity and quality. The preferred replacement site (referred to as Site C) will integrate enhanced ecological and recreational features, such as wildflower rich grassland, native tree planting, seating areas, and a bridleway connection. These upgrades directly reflect NPPF **paragraph 104(b)**, offering “equivalent or better provision” in a location that links effectively with wider green infrastructure.
- 5.6.5 Furthermore, the project engages with the spirit of **paragraph 103** by supporting access to a network of high quality open spaces that benefit public health and environmental resilience. The guided busway itself will promote active travel and more equitable access to open spaces along its corridor, aligning with broader NPPF goals around healthy and inclusive communities. Accordingly, I judge a high level of compliance with this policy approach and therefore afford it a high significance of weight.

Adopted Local Plan Policies

- 5.6.6 When assessed at the local level, the **Cambridge Local Plan 2018 [CD6-01]** amplifies NPPF principles through **Policy 67**, which protects open space of environmental and recreational importance from development unless:
- (a) It is replaced with open space of equal or better quality, quantity, and access, and located within a short walking distance (typically 400m),
 - (b) The development serves a demonstrable educational need and does not harm formal sports provision,
 - (c) Replacement open space is made fully available before existing open space is lost.
- 5.6.7 The scheme’s compliance with this policy is evident in several key respects, that I set out as follows: The Replacement Open Space at Site C not only meets but exceeds the 5,380 sqm required. Enhancements to biodiversity and landscape quality through planting, improved pathways, and integration into the ecological network ensure that the space is comparable, if not superior, to what is being lost. Its accessibility is secured via the adjacent guided busway access track, public bridleway links, and proximity to residential areas such as Coton and West Cambridge.
- 5.6.8 The policy’s stipulation that replacement space be available before the loss occurs is addressed through a bespoke planning condition, which requires public access to the new site prior to first operation of the busway. There may also be temporary disruptions to open space access during construction, and a robust Code of Construction Practice and Local Environmental Management Plan has been prepared to mitigate this. Given these measures, I give any temporary construction impact very limited weight and conclude that it does not prevent policy compliance.
- 5.6.9 The scheme also avoids any net increase in open space deficiency within the Newnham ward, maintaining spatial equity as emphasized in the policy’s supporting text. Moreover, it facilitates stronger connectivity between key natural assets including the City Wildlife Site east of the M11 and the Coton Countryside Reserve thus reinforcing **Policy 67’s** goal of ecological integration and accessibility.
- 5.6.10 Despite these mitigation measures, it is acknowledged that full compliance with every nuance of **Policy 67** may not be achieved. For example, while the replacement site is within reasonable proximity, and thus a suitable location, as required by the NPPF, nevertheless I acknowledge that it is slightly beyond the standard 400m radius from parts of the lost open space, particularly the Rugby Practice Grounds, as required by part (b)

of Policy 67. The difference in proximity between what is required by policy and what is proposed, is deemed to be of limited weight as there is only a slight variance and the local policy is more stringent than the more recent policy in the NPPF.

5.6.11 Additionally, while not the primary focus of this assessment, it is worth noting that **Policy 73 (Community, Sports and Leisure Facilities)** also applies to parts of the affected land, such as the University Rugby Practice Pitch. The scheme does not encroach on the active playing field and includes provision for landscaping and fencing that maintains the pitch's function and quality. Accordingly this should be regarded as a relevant policy for which there is no conflict.

5.6.12 In each instance I judge that the proposed scheme conforms with Policy 67 and 73 to a strong degree and afford them each a high significance of weight.

Summary

5.6.13 On balance, the Cambridge to Cambourne guided busway scheme demonstrates strong compliance with both the NPPF and local and regional policy in relation to open space protection. I judge that the proposed scheme acknowledges the importance of open space to community wellbeing and environmental value, and proactively mitigates permanent losses through evidence led re-provision.

5.7 Landscape, Design Quality and Public Realm

National Planning Policy Framework

5.7.1 When I come to assess the Cambourne to Cambridge guided busway scheme against national level planning policy, namely **NPPF Section 12 (Achieving Well Designed Places)**, I conclude that the proposals reflect a strong design philosophy that prioritises environmental integration, local character, and high quality public realm provision. I seek to outline below how the scheme accords with Section 12 of the NPPF 2024, focusing on **paragraphs 131 to 136**, with specific attention to design quality, landscape responsiveness, and urban realm integration.

5.7.2 My view is that the scheme has sought to embed the principles of **paragraph 131**, which emphasise the central role of good design in sustainable development. The busway facilitates modal shift, supporting both net zero objectives and equitable access to employment, education, and leisure. Its landscape strategy, as set out in the submitted **Landscape Technical Report [CD1-11.08.1]**, has been fundamental in shaping the alignment, visual containment measures, and ecological enhancements. The scheme uses landform bunds, green buffers and tree planting not as afterthoughts but as primary structuring elements that lend the infrastructure visual coherence and environmental sensitivity. Additionally, design interventions such as integrated bridleways, non-motorised user paths and careful lighting control promote inclusivity, health, and safety while protecting nocturnal environments and local biodiversity.

5.7.3 Under paragraph 132 of the NPPF, the scheme demonstrates a considered approach to local character and community aspirations. Six distinct landscape character areas are intersected by the route, most notably the 4B Lolworth to Longstowe Wooded Claylands, which receives targeted mitigation where construction and operational impacts are most pronounced. The **Landscape Technical Report [CD1-11.08.1]** identifies visual receptors with precision, including PRoWs, conservation areas, residential edge clusters and cultural heritage sites. In response, the design aligns with these sensitivities through setback strategies, materials selection, and contextual planting. Notably, features such as Coton Orchard and the setting of Madingley Wood have informed route decisions and screening treatments, reflecting a commitment to retaining and enhancing the region's distinct natural and historic identity.

5.7.4 In accordance with **paragraph 135**, I assess that the busway will achieve high quality infrastructure design, for the following reasons. It delivers long term functionality, with

stops, lighting, and surface treatments built for resilience and future scalability. Aesthetically, it avoids dominance by embedding the route into the landscape with a mix of earthworks and vegetative screening. The scheme makes places rather than simply passing through them the Park & Ride facility at Scotland Farm incorporates amenity planting, seating, and green infrastructure features that encourage lingering and community use. Accessibility is prioritised with tactile wayfinding, low glare lighting and inclusive bridleway connections. In parallel, security and safety are addressed through passive surveillance design, open sightlines, and cycle parking positioned for maximum visibility and natural oversight.

- 5.7.5 NPPF **paragraph 136** stresses the importance of trees as integral design components. The busway embraces this principle through extensive planting of native woodland edge species, orchard style fruiting trees near Coton, and character defining clusters along stop peripheries. Arboricultural advice has guided species selection to ensure compatibility with highway safety, biodiversity ambitions, and long term growth success. The proposed tree placement is not only a visual mitigation tool, but also a means of reinforcing route legibility and establishing clear identity zones along the corridor.
- 5.7.6 In conclusion, when reviewed against applicable national policy, the Cambourne to Cambridge guided busway responds well to the aims of **Section 12** of the NPPF 2024. It offers a landscape led, community responsive infrastructure design that elevates functionality into a broader vision of public realm quality, environmental integration, and place sensitive intervention. The scheme's coherence with national guidance is evident not only in its documentation but in the embedded principles that shape its form, setting, and experience. Given the relevance of the policies to the proposed scheme and conformity demonstrated, I afford these NPPF policies a high significance of weight .

Adopted Local Plan Policies

- 5.7.7 With regard to local level planning policy, **Policy 8 (Setting of the City)** of the **Cambridge Local Plan 2018 [CD6-01]**, the busway avoids intruding into key views of Cambridge's historic core and reinforces landscape separation at the edge of the city through bunding and native planting. The scheme's approach into the West Cambridge townscape respects the leafy corridor of Grange Road and integrates into university led development without compromising the distinct edge between rural and urban character.
- 5.7.8 In relation to **Policy 34 (Light Pollution Control)** and **South Cambridgeshire Policy SC/9**, lighting has been carefully considered particularly at the Scotland Farm Park & Ride site to control spill, mitigate nighttime visual effects, and reflect the environmental zone characteristics of surrounding villages. The lighting strategy includes downward facing luminaires with dimming protocols and avoidance of unnecessary illumination beyond the site boundary.
- 5.7.9 The scheme meets **Policy 55 (Responding to Context)** and **South Cambridgeshire HQ/1 (Design Principles)** through the use of landscape led design, bunding that follows existing field boundaries, and careful alignment that avoids intrusion into key local features such as Madingley Wood and Coton Countryside Reserve. Public rights of way are protected and, where affected, diverted to maintain amenity and permeability. Mitigation planting reflects local typologies, while drainage features and attenuation ponds are designed as part of the landscape narrative rather than as infrastructural afterthoughts.
- 5.7.10 In meeting **Policies 56 and 57 (Creating Successful Places; Designing New Buildings)**, the proposal embeds urban design principles into its infrastructure components particularly at stops, junctions, and the Scotland Farm travel hub where legibility, safety, and spatial coherence are achieved through coordinated material palettes and user focused layout. I concur with the findings in the submitted **Design and Access Statement [CD1-17]**, in that the proposed scheme supports this ambition, and the use of biodiverse planting, rain gardens, and green corridors contributes to the site's

identity as more than transport infrastructure, but as an accessible public realm intervention.

- 5.7.11 **Policy 59 (Designing Landscape and the Public Realm)** of the **Cambridge Local Plan 2018 [CD6-01]**, is strongly addressed through the eleven place specific landscape character areas described in the LVIA. Each character area is treated with bespoke interventions, from tree and hedgerow retention in more rural stretches, to edge condition enhancement in urban approaches. Of note is the consideration given to the setting of Coton and its Conservation Area, where the proposed alignment is placed in cutting, reducing visual prominence and avoiding direct intrusion into views.
- 5.7.12 **South Cambridgeshire Policy NH/2 (Protecting and Enhancing Landscape Character)** is addressed comprehensively. The scheme traverses Landscape Character Areas (LCAs) with variable sensitivity: LCA 4B (Lolworth to Longstowe Wooded Claylands) receives extensive bunding and mitigation due to its scenic and historic importance; LCA 3B (Bourn Tributaries) is respected through context sensitive alignment and planting. While effects are not entirely neutral, the Landscape Assessment predicts only one significant landscape effect at Year 1, with longer term effects reducing as planting establishes.
- 5.7.13 The arrival of new built elements within peaceful stretches of countryside, especially around Coton and Cambridge's western edge, will inevitably impact the existing landscape character. While visual and spatial mitigation measures soften these effects, the scheme falls short of fully safeguarding the area's rural openness and uninterrupted vistas. Likewise, receptors situated near Cambridge Road and Rifle Range Lane may still notice a discernible shift in landscape character, even with screening in place.
- 5.7.14 **Policy NH/13 (Important Countryside Frontage)** may raise some concern near the eastern edge of the scheme, particularly the transition into West Cambridge. However, due to topography and intervening vegetation, the scheme does not intrude on visually prominent frontages such as Castle Mound or Pleasant Drive. In relation to **Policy CC/6 (Construction Methods)**, the scheme benefits from a detailed Code of Construction Practice which governs compounds, traffic management, and environmental protection during works. Additionally, the integrity of Policy NH/13 which seeks to protect unspoilt frontages may be challenged by the placement of infrastructure within previously untouched fields, regardless of whether designated frontages are directly affected.
- 5.7.15 Taken holistically I still judge that the proposed scheme is broadly compliant with this policy.
- 5.7.16 **Policy HQ/2 (Public Art and New Development)** has scope for further consideration. The submitted application documents do not currently commit to specific public art interventions, although the Design and Access Statement refers to 'placemaking' and 'celebration of local identity' in stop design. There may be opportunity to address this explicitly within subsequent design packages or consultation phases.
- 5.7.17 When the local level policies are assessed together, I judge there to be an overall strong compliance across the relevant policies, and afford them a high significance of weight.

Summary

- 5.7.18 Although there are some adverse impacts which have been assessed (*please refer to the Proof of Evidence [CD26-01-APP-W5-1] that has been prepared by Chris Carolan covering wider landscape issues and the findings of the ES*), overall I consider the effects are acceptable when set against the policy. Chris' proof on landscape has concluded:

"While some adverse landscape and visual effects are predicted, particularly in the short term and in close proximity to sensitive visual receptors, these are generally localised and have been addressed through careful alignment, integrated design, and a comprehensive mitigation strategy. As the new planting establishes throughout the

operational period, it will enhance visual amenity and further screen the CtoC Scheme from the receptors. In this instance following establishment of embedded mitigation planting, adverse effects are not anticipated to be significant for any of the visual receptors apart from R19 PRoW (Coton 55/2).

No nationally or locally designated landscapes would be significantly affected, and no landscape or visual effects are considered unacceptable in planning terms. Furthermore, the scheme offers opportunities for landscape enhancement, including new green infrastructure and long-term improvements to visual containment and character along parts of the route. I therefore consider the scheme to be acceptable in landscape and visual terms, and that it does not present a barrier to the grant of consent”.

- 5.7.19 In conclusion, I judge that the Cambourne to Cambridge guided busway scheme accords well with the relevant policies of both the Cambridge and South Cambridgeshire Local Plans, embedding primary mitigation and context responsive design throughout. While residual effects remain, particularly in areas of higher landscape sensitivity, these are predicted to reduce significantly over time and are considered proportionate in relation to the strategic benefits of the scheme.

5.8 Natural Environment and Biodiversity

- 5.8.1 In review of the submitted application material, I assess that the Scheme has been developed with embedded environmental aims, reflecting national planning priorities set out in **Section 15** of the NPPF. This approach extends across scheme design, mitigation strategy, and long term stewardship proposals, aligning with the Framework’s objective of conserving and enhancing the natural environment.

National Planning Policy Framework

- 5.8.2 **Paragraph 187** of the NPPF stresses the importance of protecting and enhancing landscapes, ecological networks, and ecosystem services, and has five key areas that must be considered. The Cambourne to Cambridge guided busway is firmly aligned with the expectations of paragraph 187 of the NPPF (2024), for the following reasons

a) Protecting and Enhancing Valued Landscapes, Sites of Biodiversity or Geological Value, and Soils

- 5.8.3 The scheme has been routed and designed to avoid any impacts on ‘valued landscapes’ and designated ecological sites.
- 5.8.4 In regard to ‘sites of biodiversity or geological value and soils’, where residual risk exists, ecological mitigation areas are incorporated to buffer sensitive habitats such as Hedgerow 11, as highlighted in the latest arboricultural assessments. Soil management strategies consistent with best practice guidance and Natural England’s construction protocols are embedded to preserve soil quality and limit compaction, erosion, and displacement during construction.

b) Recognising the Intrinsic Character and Beauty of the Countryside

- 5.8.5 The guided busway route avoids major landscape fragmentation, particularly across the rural setting between Bourn Airfield and Coton. Where landscape character is impacted, extensive landscape planting and low-profile infrastructure design help reinforce existing vegetative corridors. These enhancements preserve the visual amenity and tranquillity of the rural fringe and contribute to the wider policy objective of maintaining the character of the western Cambridge approaches.

c) Maintaining the Character of the Undeveloped Coast

- 5.8.6 This criterion is not applicable, given the project’s inland location.

d) Minimising Impacts on and Providing Net Gains for Biodiversity

- 5.8.7 The project delivers measurable biodiversity net gain (BNG), with on-site and adjacent habitat enhancements secured through bespoke management agreements. Connectivity for protected species, such as badgers and bats, is safeguarded by strategic underpasses and retained tree corridors. Habitats are enhanced using locally sourced native planting and wildflower meadow establishment across embankments, verges, and offset sites, contributing to the district's Local Nature Recovery Strategy and minimising impacts.
- 5.8.8 Supplementary NPPF paragraphs also support the scheme's alignment in term of environmental aspects. **Paragraph 187(d)** calls for net biodiversity gain. As stated, the 13.79% BNG score exceeds the statutory 10% threshold, with delivery secured through long term monitoring and adaptive management commitments.

e) Preventing Pollution or Risk from Soil, Air, Water or Noise

- 5.8.9 Updated design iterations ensure that the scheme does not pose unacceptable risk to groundwater or surface water systems, including those serving nearby agricultural land. Noise and vibration assessments submitted as expert proofs demonstrate that operational impacts are below significance thresholds for residential and ecological receptors. Air quality improvements stem from reduced congestion and modal shift to zero-emission buses, further supported by embedded low-carbon construction practices.
- 5.8.10 Paragraph 187(e) promotes minimisation of pollution. The scheme contributes positively by reducing car dependency and vehicle emissions. Construction phase pollution control measures including dust suppression, wheel washing, and silt control are outlined in the ES and will be supervised through a dedicated environmental coordinator.
- 5.8.11 From a broader environmental impact perspective, the scheme supports reductions in pollution by promoting modal shift and enabling low emission public transport. The Environmental Statement details construction phase safeguards including dust suppression, surface water management, and noise minimisation operationalising **paragraph 187(e)** and ensuring environmental integrity throughout delivery.

f) Remediating Despoiled or Contaminated Land

- 5.8.12 While not a core driver of the route, elements of the project will improve underutilised and degraded land parcels west of West Cambridge, particularly where scrub clearance and verge rationalisation improve ecological productivity and public amenity. The scheme's drainage upgrades also reduce localised flood risk on formerly marginal land, contributing to wider NPPF objectives under para 161 and 164.
- 5.8.13 As detailed in **Chapter 8** of the **ES (Biodiversity)**, the design team completed baseline surveys across the corridor, identifying habitat mosaics including neutral grasslands, wet ditches, and shelterbelts. Local Wildlife Sites such as Madingley Road Verges and the former Rifle Range SSSI have been mapped and buffered, with targeted avoidance and design evolution ensuring they are not directly impacted. Habitats are assessed using DEFRA's Biodiversity Metric 4.0, with a clear baseline established to demonstrate net gain.
- 5.8.14 In line with **paragraph 193**, the busway scheme avoids significant harm to biodiversity through route planning and construction method selection. Where minor residual effects are unavoidable such as hedgerow severance or temporary disturbance near watercourses proportionate mitigation and compensation measures are in place. These include bat sensitive lighting, seasonal timing of works, and amphibian friendly culverts. The ES outlines a Biodiversity Net Gain (BNG) score of 13.79% post mitigation, achieved through native species planting, creation of new wet ditches, and enhancement of existing ecological corridors.

- 5.8.15 The busway route passes through a predominantly agricultural landscape, where ecological value is moderate but not negligible. By consciously locating infrastructure along lower value land and integrating features such as native planting and linear green corridors, the scheme reflects the intent behind paragraph 188 to prioritise land of least environmental value while still enhancing it through intervention.
- 5.8.16 My assessment of the proposals is that the route alignment and environmental siting decisions reflect a conscious effort to avoid areas of high ecological sensitivity. The ES has sought to confirm that designated sites such as the Madingley Road Verges Local Wildlife Site and the adjacent SSSI have been buffered and safeguarded through corridor adjustments. Ecological networks including hedgerows, riparian corridors, and species rich grassland mosaics have been identified through detailed baseline surveys and retained where possible. Where interactions are unavoidable, the scheme pivots to robust mitigation and compensation, ensuring alignment with national expectations around harm avoidance, as per paragraph 193 of the NPPF. **Paragraph 194** addresses the protection of designated habitats and international nature conservation sites. The ES confirms that the route does not intersect or adversely affect any Ramsar sites, potential Special Protection Areas, or Special Areas of Conservation.
- 5.8.17 Avoidance of direct conflict with international nature conservation sites has been carefully assessed. While no Ramsar, SAC or SPA sites fall within the footprint of the development, hydrological modelling considered downstream pathway interactions, particularly within the Great Ouse catchment. The Environmental Statement confirms that attenuation and sediment controls are embedded within the construction strategy, avoiding any adverse impacts on Ramsar, SAC SPA sites in line with **paragraphs 194 and 195** of the NPPF, which govern protections for internationally significant habitats.
- 5.8.18 Given the above I judge there to be broad compliance with the NPPF on matter of natural environment and biodiversity and afford those identified paragraphs a high significance of weight.

Adopted Local Plan Policies

- 5.8.19 When I assess the proposed scheme against local planning policies within the Cambridge Local Plan (2018) [CD6-01] and the South Cambridgeshire Local Plan (2018) [CD6-02] in relation to biodiversity protection, enhancement of priority habitats and species, I find the following: In terms of designated ecological sites, the ES confirms that the route avoids direct impact on statutory sites such as SSSIs and SACs, notably Madingley Wood and Eversden and Wimpole Woods. Overall, there are no adverse effects on the SSSIs and SACs. I support and adopt the ES conclusion that these sites will not be adversely affected through noise, lighting, or fragmentation, aligning with **Policy 69 of the Cambridge Local Plan and Policy NH/5 of the South Cambridgeshire Local Plan**, which seek to ensure the protection of sites of biodiversity and geological importance. In this instance I adopt the findings of the ES.
- 5.8.20 The scheme also engages proactively with **Policy NH/4 (South Cambs)** and **Policy 70 (Cambridge)**, which require development to maintain, enhance or create habitats to support priority species. An extensive programme of ecological survey work, including bat, badger, invertebrate and nesting bird surveys, informed design revisions and mitigation strategies. These include routing adjustments to avoid Comberton Plantation and sensitive areas near Bin Brook, the provision of mammal underpasses, and the retention of key tree corridors, especially at Coton Orchard and Rifle Range. Notably, survey evidence supports the presence of bat commuting routes, including barbastelle (a European protected species associated with the nearby SAC), and mitigation is embedded to ensure safe crossing, in accordance with **Policy NH/4 and Policy 70**.
- 5.8.21 While 0.42 hectares of traditional orchard habitat and approximately 1.29km of hedgerow priority habitat will be lost (as per the findings in the submitted ES), compensation is proposed through extensive offsite habitat creation. The scheme aspires to deliver at least 10% Biodiversity Net Gain (BNG), with a target of 20%, in line with the Doubling

Nature Vision and the **Greater Cambridge Biodiversity SPD [CD7-12]**. Although **Policy NH/4** does not impose a numeric BNG requirement, this commitment goes beyond minimum expectations. A biodiversity gain plan will be submitted and secured via condition, demonstrating clear compliance with the trajectory of national and local policy.

- 5.8.22 In relation to **Green Infrastructure (NH/6)**, the busway route is flanked by an active travel corridor, accessible for pedestrians, cyclists and equestrians. This supports multifunctional landscape use and maintains connectivity across settlements, open spaces, and ecological corridors. The ES notes the integration of landscape and habitat mitigation, including swales with wetland species, attenuation ponds that offer biodiversity benefits, and woodland blocks that enhance landscape character and ecological connectivity. These elements reflect the principles embedded in **Policy NH/6**, which requires green infrastructure to be designed holistically and deliver environmental and community benefits.

- 5.8.23 The proposed Cambridge to Cambourne guided busway scheme demonstrates strong alignment with national ambitions for decarbonisation and environmental restoration, as articulated in the UK Government's **Ten Point Plan for a Green Industrial Revolution (2020) [CD8-29]**, and it engages meaningfully with the expectations set out in the **Greater Cambridge Biodiversity Supplementary Planning Document (SPD) (2022) [CD7-12]**. Through a combination of embedded biodiversity enhancements, avoidance of designated sites, and targeted mitigation of residual impacts, the scheme positively contributes to the wider environmental objectives underpinning both national and local planning policy frameworks.

- 5.8.24 The Ten Point Plan identifies nature restoration (**Point 9**) as a key priority for tackling climate change and safeguarding biodiversity. It sets a national ambition to protect and improve 30% of UK land by 2030, alongside direct funding for nature projects and strategic landscape recovery. The busway scheme supports these aims by incorporating new green infrastructure along its alignment, strengthening connectivity between existing fragmented habitats and avoiding irreplaceable habitat losses. It also proposes landscape treatment that supports ecological permeability particularly for hedgerows, species rich grassland, and watercourses as well as on-site planting that complements the surrounding rural character. I assess that these interventions will reinforce the principle that infrastructure can deliver net environmental benefit, rather than harm, when appropriately designed and sited.

- 5.8.25 In parallel, the scheme accords with the local policy approach articulated in the Greater Cambridge Biodiversity SPD. The SPD provides guidance on implementing **Local Plan policies NH/4 (Biodiversity), NH/5 (Sites of Biodiversity or Geological Importance), and NH/6 (Green Infrastructure)**, and encourages applicants to demonstrate measurable Biodiversity Net Gain (BNG), adopt the mitigation hierarchy, and avoid impacts on priority and protected species and habitats. The Environmental Statement (ES) prepared for the guided busway addresses these expectations directly.

- 5.8.26 I accept that the described ecological surveys have been undertaken in accordance with BS42020:2013 and CIEEM guidelines. The ES outlines the presence of several priority habitats and species, including hedgerows, amphibians, breeding birds, and foraging bats. Following the mitigation hierarchy (as set out under SPD **Issue B1) [CD7-12]**., the alignment has been revised to avoid ecologically sensitive features where feasible, with significant sections utilising brownfield or previously disturbed land. Where avoidance was not possible, the scheme embeds targeted mitigation, including habitat creation (grassland mosaics and wetland features), species specific measures (e.g. replacement bat roost boxes), and post construction ecological management strategies secured via planning conditions. The project proposes integrated enhancements including hedgehog permeable fencing, native planting, and SuDS features designed for ecological value which contribute directly to net biodiversity gain in line with SPD **Issue B7 [CD7-12]**.

- 5.8.27 The SPD also encourages developments to contribute to landscape scale connectivity, especially in proximity to the Cambridge Nature Network and key ecological corridors. The guided busway will support this objective by introducing green buffers that double as wildlife corridors and by contributing to the Greater Cambridge Green Infrastructure Opportunity Mapping priorities (**SPD 3.6.6**) [**CD7-12**]. Furthermore, the scheme avoids designated Sites of Special Scientific Interest (SSSIs) and international Habitats Sites, respecting Impact Risk Zones as identified by Natural England and referenced in **SPD Issue B10**.
- 5.8.28 Nevertheless, it is important to acknowledge areas of partial compliance. While the scheme is targeting Biodiversity Net Gain, it does not currently commit to the 20% uplift referenced in **SPD 1.1.2** and supported by South Cambridgeshire's Doubling Nature Strategy. At present, a minimum 10% net gain will be achieved, consistent with Environment Act 2021 requirements, but falling short of the local policy aspiration. It must be recognised that the SPD is not an adopted local policy (rather it acts as guidance), so does not result in any breach of adopted development plan.
- 5.8.29 Additionally, the scheme interfaces with several non-designated wildlife sites where residual disturbance (e.g. from lighting, noise, and recreational pressure) cannot be fully ruled out, but any residual impacts are deemed acceptable. The ES proposes mitigations including low spill lighting and habitat buffers but monitoring will be required to ensure long term ecological performance, as recommended under **SPD 5**.
- 5.8.30 In light the identified issues, I judge that the proposed scheme is broadly aligned with adopted local planning policies, and that these must be afforded a high significance of weight.
- 5.8.31 For additional information and coverage of this topic area, please refer to the following Proof of Evidence [**CD26-01-APP-W3-1**] that has been prepared by Andy Saunders covering environmental analysis, Ian Ellis [**CD26-01-APP-W13-1**] and that of Paola Reasons [**CD26-01-APP-W12-1**] which addresses specific areas on bats, Habitat Impact Assessment and SAC's.

Summary

- 5.8.32 While NPPF policy alignment is strong, the scheme is not without localised tension. Three specific locations east of Hardwick involve hedgerow severance, resulting in temporary disruption to ecological connectivity. Although this is mitigated through replanting and habitat creation, it still represents a departure from full avoidance. Construction phase activity near watercourses also introduces short term risks, particularly in riparian zones where sensitive terrestrial and aquatic species may be present.
- 5.8.33 These effects are transparently acknowledged and actively managed. Ecological supervision, timing constraints, and seasonal work programming provide a layered defence against unintended harm. Stakeholder concerns regarding cumulative biodiversity effects across Cambridge's broader transport corridor are taken seriously with the proposed scheme contributing to regional ecological resilience by including buffer zones, habitat enhancements, and monitoring commitments secured through planning conditions.
- 5.8.34 Under **paragraph 195**, the scheme has not triggered the need for an Appropriate Assessment under the Conservation of Habitats and Species Regulations. Early stage screening confirmed the absence of likely significant effects on any Natura 2000 site, and construction phase controls ensure this remains the case. These controls include buffer zones, runoff management, and ecological supervision, all secured under the Environmental Management Plan.
- 5.8.35 Despite high policy compliance, several localised effects merit balanced acknowledgement. In particular, limited habitat severance is unavoidable, with three

locations including east of Hardwick requiring hedgerow removal and replanting. While mitigated by new hedgerows and offset planting, the scheme will cause temporary disruption to corridor continuity, especially for commuting species such as badgers and bats.

- 5.8.36 Residual ecological risk may occur during construction, especially within riparian zones and areas of sensitive terrestrial habitat. Although the ES confirms no likely significant effects overall, ecological supervision and construction timing will be vital in managing these risks.
- 5.8.37 There are also stakeholder concerns regarding cumulative biodiversity impacts in the wider Cambridge transport corridor. While the ES deals specifically with C2C, future proofing measures including habitat buffers and connectivity corridors aim to provide resilience for wider ecological networks.
- 5.8.38 In conclusion of compliance against national planning policy, the Cambourne to Cambridge Guided Busway demonstrates strong alignment with Section 15 of the NPPF 2024 and those identified local and regional planning policies. Where limited conflict arises, it is transparently acknowledged, with mitigation secured through planning conditions and post construction monitoring commitments. The scheme therefore sits comfortably within national planning policy expectations and environmental stewardship principles. I see the busway proposals as presenting a compelling case for sustainable transport investment that respects the natural systems it traverses and prepares for the challenges of biodiversity loss through proactive stewardship as identified through the draft conditions presented as part of the proposals.

Trees

National Planning Policy Framework

- 5.8.39 In consideration of impacts to trees specific regard must be had to NPPF para 193(c), which states:

“193. When determining planning applications, local planning authorities should apply the following principles:

c) 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 and a suitable compensation strategy exists”.*

Foot Note:

** For example, infrastructure projects (including nationally significant infrastructure projects, orders under the **Transport and Works Act** and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat.*

- 5.8.40 Paragraph 193(c) of the 2024 National Planning Policy Framework sets out that development resulting in the loss or deterioration of irreplaceable habitats including ancient woodland and ancient or veteran trees should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists. As the Cambourne to Cambridge scheme is being enacted under the Transport and Works Act Order (TWAo), the application must demonstrate conformity with this principle, ensuring impacts on irreplaceable habitats are minimised or mitigated in line with national planning policy.

Identification of Irreplaceable Habitat

- 5.8.41 Fourteen mature Bramley apple trees within Coton Orchard have been identified as veteran trees for the purposes of paragraph 193, as confirmed by specialist arboricultural assessment (Chris Alder Proof of Evidence, 2025) [CD26-01-APP-W4-1].

Avoidance and Minimisation

- 5.8.42 The scheme design has evolved through iterative assessment and consultation to avoid direct impact on the majority of these trees. Of the 14 identified veteran trees, only three (T6, T7, and T8) fall directly within the footprint of the guided busway, and will be subject to translocation. Trees T5, T9 and T10 are located at the edge of the Order Limits and will be retained and protected via no-dig surfacing, protective fencing, and careful control of construction impacts in accordance with BS5837:2012 and an Arboricultural Method Statement. The remaining orchard trees lie outside the limits of deviation and are unaffected.
- 5.8.43 Overall, there will be no loss or deterioration of veteran trees.

Wholly Exceptional Circumstances

- 5.8.44 Even if there was to be a finding of loss or deterioration to the veteran trees, that harm would be justified by wholly exceptional circumstances.
- 5.8.45 The proposed scheme is a regionally significant infrastructure intervention promoted by the Greater Cambridge Partnership to support modal shift, improve sustainable transport connectivity, and unlock strategic housing delivery across South Cambridgeshire.
- 5.8.46 The project's environmental assessments demonstrate that alternative alignments were reviewed and discounted due to their inferior operational or environmental outcomes. Avoidance of veteran tree impact was explicitly weighted, and the proposed alignment represents the least harmful route when considered holistically.
- 5.8.47 The fact that the scheme is a regionally significant infrastructure project, is reflected in the choice of consenting regime, in that it is being consented under the TWAO regime, and not simply under the Town and Country Planning Act regime.
- 5.8.48 I judge that wholly exceptional circumstances have been demonstrated (*as per NPPF paragraph 193 and its supporting footnote*) as this is a TWA order where the public benefit would clearly outweigh the loss or deterioration of habitat. Please refer to the overall planning balance below at section 5.15 for additional consideration.

Compensation Strategy

- 5.8.49 A compensation strategy has been provided, please see [CD REF: CD1.11.14.03]. Those compensation measures include:
- Restoration of orchard areas lost to scrub encroachment.
 - New planting of heritage orchard species to provide succession and ecological connectivity.
 - Creation of microhabitats (log piles, hibernacula) to support lost niche habitat values.
- 5.8.50 Monitoring and adaptive management will be secured via planning condition and incorporated into the Scheme's Code of Construction Practice (CoCP). The TPOs confirmed on the orchard trees by South Cambridgeshire District Council have been respected in the mitigation design, with protected trees retained and monitored as part of ongoing post-construction ecology commitments.
- 5.8.51 Having regard to the compensation strategy as assessed under Mr Alder's evidence (Chris Alder Proof of Evidence, 2025) [CD26-01-APP-W4-1], the compensation strategy is acceptable in the circumstances of this case. This concludes:

“Trees T6, T7 and T8 are directly impacted by the proposed route, and to avoid their loss they will be translocated to an appropriately prepared and suitable receptor site. I do not consider that this will be detrimental to their habitat value or projected life span or 20-40 years. Management of the translocation process will be achieved through adherence to a detailed methodology and appropriate supervision. In response to the requirements of paragraph 193 of the NPPF, the proposal to install the route close to T5, T9 and T10 can be achieved without adverse impacts on their health and longevity.

All retained trees will be protected from damage by installation of construction exclusion zone barriers, and specially designed surfacing to prevent deterioration and will be managed through an Arboricultural Method Statement and Monitoring Programme. There is considerable scope for positive orchard restoration management as considered within the compensation strategy in the submissions, which coupled with new planting will significantly enhance and improve the tree cover, diversity and contribution to habitat value. Ongoing monitoring and evidence based management where appropriate is essential to maintain the trees for the future however this will require the landowner's agreement outside the order limits. The success of works within the order limits can be achieved without the compensation strategy being employed”.

5.8.52 In conclusion the proposed scheme satisfies paragraph 193(c) by:

- Avoiding loss or deterioration of any veteran trees,
- There are wholly exceptional reasons for any loss or deterioration (see above paragraphs), and
- A suitable compensation strategy exists and will be secured as part of the permission.

5.8.53 Accordingly, I judge that the scheme confirms with the NPPF policy framework and afford this a high significance of weight.

Adopted Local Plan Policies

5.8.54 The route passes through Coton Orchard County Wildlife Site, resulting in the loss of a proportion of regenerating scrub and some older apple trees. While surveys conclude that these impacts will be mitigated the ES does acknowledge a locally significant effect at the County Wildlife Site level, which may fall short of full compliance with **Policies 69 and NH/5** on strict avoidance of non-designated veteran trees. In the context of the scheme as a whole, the impact on non-designated tree is limited and therefore I only afford this limited weight.

5.8.55 The scheme demonstrates compliance with Cambridge Local Plan **Policy 71 (“Trees”)** and South Cambridgeshire Local Plan Policy **NH/7 (“Ancient Woodlands and Veteran Trees”)**, with mitigation and compensation proposals embedded into the technical design and environmental strategy documentation, and accordingly these policies should be afforded a high significance of weight.

5.8.56 **Policy 71** of the Cambridge Local Plan (2018) requires that “development will not be permitted which will result in the loss of trees of significant amenity or biodiversity value” and that “development proposals should include details for the protection of trees that are to be retained.”

5.8.57 In parallel, **Policy NH/7** of the South Cambridgeshire Local Plan (2018) states that “development resulting in the loss or deterioration of ancient woodland (including ancient semi-natural woodland and plantations on ancient woodland sites) or veteran trees should be refused unless the need for and benefits of the development in that location clearly outweigh the loss.” The policy also emphasises “appropriate buffers” and “compensation strategies.” The scheme responds to this through precise mapping of

Order Limits against known veteran tree assets and proposes detailed design interventions to mitigate any potential deterioration of such trees.

Assessment of relevant tree policies

5.8.58 In consideration of the above the following nuances should be noted:

- **Local Plan Policy 71** Cambridge Local Plan **[CD6.01]** is more actively prescriptive, as it expects space for trees to mature and emphasises amenity value from the public realm, which strengthens scrutiny on schemes in visually exposed areas like Coton Orchard.
- **Policy NH/7** South Cambridge Local Plan **[CD6.02]** goes further in requiring ongoing management contributions for affected veteran trees, not just mitigation. This broadens responsibility beyond the construction phase.
- The NPPF 2024, while strong in national terms, hinges tree protection on habitat irreplaceability and biodiversity impact a narrower scope than "public amenity value" or visibility. It also sets the bar higher than in local policy with "wholly exceptional reasons" justification being required for any tree felling, which in this instance is deemed to be met.

5.8.59 The CtoC Scheme demonstrates strong compliance with Cambridge Local Plan **Policy 71** and South Cambridgeshire **Policy NH/7**, by avoiding felling, applying robust protection, and integrating well-evidenced mitigation and compensation. The approach balances irreplaceable habitat protection with strategic public benefit and reflects industry best practice for tree retention and translocation. Accordingly these policies are afforded a high significance of weight.

Summary

5.8.60 The proposed Scheme has been subject to a robust arboricultural assessment and targeted measures to avoid adverse impacts on irreplaceable habitats, particularly the Bramley apple trees at Coton Orchard. Even if there is some deterioration to the veteran trees, under paragraph 193(c) of the National Planning Policy Framework (2024), development affecting irreplaceable habitats such as veteran trees must demonstrate 'wholly exceptional reasons' alongside a suitable compensation strategy. The Scheme's approach meets both limbs of this test and conforms fully with national and local policy.

5.8.61 When considered alongside the adopted local planning policies, my judgment is that the Cambourne to Cambridge guided busway substantially accords with **Policies 69, 70 and 71 of the Cambridge Local Plan and Policies NH/4, NH/5, NH/6 and NH/7 of the South Cambridgeshire Local Plan**.

5.9 Air Quality

National Planning Policy Framework

5.9.1 The NPPF (2024) **[CD8-01]** embeds air quality as a cross cutting priority within its overarching objective to achieve sustainable development. **Paragraphs 187 to 199** of the framework set out key expectations for planning decisions to minimise exposure to pollution, improve local environmental conditions, and support net gains for health and biodiversity. Specifically, **paragraph 199** requires development in Air Quality Management Areas (AQMAs) and Clean Air Zones to demonstrate consistency with relevant local air quality action plans, and encourages the use of green infrastructure and sustainable transport as part of wider mitigation strategies.

5.9.2 In this context, I see the Cambourne to Cambridge guided busway as exemplifying the type of development that NPPF 2024 seeks to promote: infrastructure that delivers environmental net gain, supports modal shift to low emission public transport, and

integrates with wider spatial and health objectives. The scheme contributes directly to the environmental limb of sustainable development (**para. 8c**), reducing cumulative emissions from road transport, enhancing air quality in and around Cambridge, and improving travel options in locations that are currently underserved.

- 5.9.3 By delivering improvements in air quality for sensitive receptors including those located within and adjacent to the Cambridge AQMA the Scheme contributes positively toward the objectives in **paragraphs 198–199** relating to pollution avoidance, mitigation, and proactive enhancement. Given this strong conformity with national NPPF policy I afford this a high significance of weight.

Adopted Local Plan Policies

- 5.9.4 When I assess this against local level planning policies, **policy 36** of the Cambridge Local Plan **[CD6-01]** states that development will only be permitted where it does not lead to significant adverse effects on health, the environment or amenity from air pollution, and specifically addresses odour and dust risks, as well as the cumulative impacts of development. In adopting the findings of the ES in regard to Air Quality, I see that the Scheme aligns with this policy in several ways, which I will address below.
- 5.9.5 Firstly, the ES confirms that air quality levels for NO₂, PM₁₀ and PM_{2.5} will remain well within national air quality objectives across all modelled receptors (ES section 7.4.4 - 7.4.8), with many locations experiencing slight improvements. Emissions modelling confirms that no exceedances of relevant air quality thresholds are predicted, and the Scheme contributes positively to air quality within the western Cambridge Air Quality Management Area (AQMA), which extends to Grange Road. Dust and PM₁₀ emissions during construction have been assessed for locations up to 350m from the site boundary, with mitigation measures embedded in the Code of Construction Practice (CoCP) to reduce emissions from earthworks, haul routes, materials handling, and demolition. On this basis, I adopt the ES conclusions that the effects will be negligible. The scheme includes robust secondary mitigation through monitoring and contingency measures, ensuring alignment with the policy's emphasis on adaptive control and prevention. Although odour is scoped out of the assessment due to the absence of odorous processes, dust impacts have been explicitly addressed and controlled.
- 5.9.6 Overall, the Scheme supports the objectives of **Policy 36** through its low emission transport function, thorough construction phase controls, and commitment to maintaining air quality standards and amenity across sensitive locations. The proposed scheme demonstrates strong conformity with Policy 36 and is afforded a high significance of weight.
- 5.9.7 **Policy SC/12** of the South Cambridge Local Plan (2018) **[CD6-02]** requires that development proposals demonstrate that they will not adversely affect air quality and must contribute to air quality improvements where possible. It further requires that significant developments are supported by appropriate assessments and mitigation. The Scheme accords well with the intent of this policy, and should be afforded a high significance of weight.
- 5.9.8 The ES contains a comprehensive air quality assessment and screening of sensitive receptors, including those near Cambourne, Hardwick, Coton and West Cambridge. All receptors are expected to remain comfortably below air quality objective thresholds. Operational effects indicate a reduction in NO₂ and particulates across most modelled locations, and the Scheme is expected to produce modal shift impacts that contribute to overall improvement of air quality, in line with the policy's objective of enhancement. Cambridge's existing AQMA is protected through the Scheme's operational measures, with the transition to electric buses from day one or as early as practicable supporting further reductions in urban air pollution. The travel hub and associated infrastructure will incorporate landscaping, active travel facilities and electric vehicle charging, aligning with broader ambitions to reduce transport based emissions. The Scheme thus supports

not only the avoidance of harm, but also positive contribution toward cleaner air within South Cambridgeshire.

- 5.9.9 The Planning Practice Guidance on Air Quality (PPG, 2019) **[CD8-06]** reinforces the imperative for developments to avoid adverse impacts on public health and sensitive habitats, particularly in or near Air Quality Management Areas (AQMA) or areas at risk of breaching statutory thresholds. The guidance encourages the use of proportionate assessments and mitigation strategies during both construction and operation. In the context of the Cambourne to Cambridge guided busway, the proposal aligns well with the PPG by incorporating embedded mitigation for construction dust and emissions, supporting mode shift away from car dependency, and contributing to regional objectives for emissions reduction. These measures reflect the principle of locating development responsibly and integrating air quality considerations early into scheme design and decision making.

Summary

- 5.9.10 While the Scheme demonstrates broad alignment with air quality policies, some construction phase impacts are non-negligible in proximity to the travel hub and at Bin Brook. Though effects are not predicted to be significant, they represent localised temporary emissions requiring continuous monitoring and engagement. Furthermore, while the transition to electric buses is an aspiration, the Scheme permits hybrid vehicle operation, which may delay full air quality benefits in the early operational phase. As such, full policy compliance may only be realised once electrification is achieved and modal shift consolidates post implementation.
- 5.9.11 When considered in the round, the scheme is seen to be compliant with the relevant national NPPF and adopted development plan policies on air quality, and will result in a cleaner air environment for Cambridge across the life of the project owing to the reduction in private car usage.

5.10 Noise and Vibration

National Planning Policy Framework

- 5.10.1 When I assess the scheme against national level policy, I see that the proposed Cambourne to Cambridge Guided Busway Scheme is consistent with the strategic objectives and development management principles of the NPPF 2024, particularly those set out in **Chapter 15: Conserving and Enhancing the Natural Environment, and Chapter 8: Promoting Healthy and Safe Communities. Paragraphs 198(a) and 198(b)** establish that development should mitigate and reduce noise to a minimum and avoid significant adverse impacts on health and quality of life. These expectations extend to safeguarding tranquil spaces prized for amenity and recreation. Additionally, **Paragraph 8(c)** promotes designs that support healthy lives and reduce health inequalities, which includes the minimisation of environmental pollutants such as noise and vibration. I conclude that the proposed scheme aligns with these aims by embedding mitigation in both its design and construction methodologies, and by actively managing environmental impacts across receptor types, and that these policies should be afford a high significance of weight.
- 5.10.2 In addition to national NPPF policy, the scheme has also been assessed in light of the Planning Practice Guidance: Noise **[CD8-04]**, which reinforces the principles outlined in the NPPF. The Guidance highlights the importance of avoiding significant observed adverse effects on health and quality of life, especially in residential contexts. Through embedded mitigation during construction, alignment of service timetables with sensitive receptor thresholds, and the use of quiet technologies, the proposed busway scheme actively avoids crossing these thresholds. Moreover, the scheme responds to the agent of change principle by pre-emptively designing safeguards around sensitive receptors (e.g. Clare Hall and West Cambridge research sites), and by maintaining public transparency and engagement about potential noise sources. The acoustic character of

surrounding green spaces and amenity corridors has also been considered, with no forecast disruption to tranquil public routes. These measures indicate that the scheme aligns not only with the formal policy tests, but also with best practice expectations for proactive, evidence-led noise management.

- 5.10.3 The Cambourne to Cambridge Guided Busway Scheme has been fully assessed in relation to its potential impacts on noise and vibration, as reported in **Section 7.3** of the ES **[CD1-10.01]**. The assessment methodology aligns with national guidance and uses a reasonable worst case scenario. Mitigation has been embedded into both design and operational plans to ensure compliance with local planning policies on noise.

Adopted Local Plan Policies

- 5.10.4 Under **Policy 35** of the Cambridge Local Plan (2018) **[CD6-01]**, development proposals must demonstrate that adverse effects of noise on health and quality of life are avoided, reduced or mitigated to acceptable levels. This includes safeguarding residential amenity and ensuring that noise sensitive uses are protected, especially at night.
- 5.10.5 Similarly, South Cambridgeshire Local Plan **[CD6-02] Policy SC/10** requires that development be designed and operated to minimise noise pollution. It stipulates that planning permission will only be granted where noise from the proposed development does not cause adverse harm to health, environmental or community quality of life, taking into account daytime and night time thresholds and the cumulative impacts of noise.
- 5.10.6 In accordance with these policies, the scheme has been carefully designed to mitigate potential noise and vibration effects arising from both construction and operation. This is supported by the assigned working hours, as follows: Construction activity will take place over approximately 24 months, and all construction works will adhere to hours set out in the Code of Construction Practice (CoCP): 08:00–18:00 on weekdays and 08:00–13:00 on Saturdays, with no work on Sundays or bank holidays. The CoCP outlines clear noise management procedures including the use of low noise equipment, acoustic screening, and advance public notification of particularly noisy activities. In applying these measures, the scheme satisfies the policy requirement to “avoid significant adverse impacts on health and quality of life” during temporary works (**Policy 35 criterion a** of the Cambridge Local Plan (October 2018) **[CD6-01]** and **SC/10 paragraph 4** of the South Cambridge Local Plan (2018) **[CD6-02]**).
- 5.10.7 At the operational stage, buses will run primarily between 06:00 and 00:00, but with significantly lower frequency after 22:00. Noise modelling demonstrates that predicted operational noise levels fall below relevant internal and external thresholds at all receptor locations bar a small number. In Cambourne and near Clare Hall student accommodation in Newnham, a modest exceedance (up to 10dB) of nighttime noise thresholds is possible at certain facades closest to the alignment. However, the ES concludes that low frequency of bus movements at these hours, coupled with underlying traffic noise from existing roads, may limit the significance of this effect. Moreover, the transition to fully electric vehicles is a committed aim of the Greater Cambridge Partnership, which will further reduce operational noise.
- 5.10.8 The travel hub at Scotland Farm has been designed to avoid significant impact on neighbouring properties. Although receptors such as residential properties on Scotland Road and users of the adjacent footpath are located close to the site, the ES confirms that acoustic emissions from parking activity are comfortably below thresholds that would trigger adverse effects. Operational sound levels (including occasional engine starts and door slams) are well under the LAFmax and LAeq criteria used to assess annoyance and sleep disturbance, demonstrating general compliance with **Policy SC/10(1)(a)** of the South Cambridge Local Plan (2018) **[CD6-02]** and **Policy 35(b)** of the Cambridge Local Plan (October 2018) **[CD6-01]**.

- 5.10.9 In terms of construction vibration, the assessment considered worst case plant scenarios including the use of vibratory rollers. Calculations show that perceptible vibration may occur within 15m of active works, but this will only result in significant effects if works are of extended duration (10+ days in a fortnight). Only a handful of receptors fall within this exposure window, notably around Childerley Gate, parts of Scotland Road, and properties adjacent to Bin Brook Bridge. The principal contractor will be required to notify affected parties, schedule works to avoid prolonged exposure, and use vibration reducing techniques. The potential for residual adverse effects is acknowledged but considered limited in scale and duration, consistent with the mitigation hierarchy outlined under **Policy 35(b)** of the **Cambridge Local Plan (October 2018) [CD6-01]** and **SC/10(2)** of the **South Cambridge Local Plan (2018) [CD6-02]**.
- 5.10.10 An area of enhanced sensitivity relates to vibration sensitive research facilities at West Cambridge. The ES also identifies a risk to equipment such as electron microscopes at the Metallurgy and Materials Sciences Laboratory. To mitigate this, the alignment has been revised so that the route follows Charles Babbage Road with controlled access and signal priority, significantly reducing vibration risk. This demonstrates robust mitigation in line with SC/10(2)(a) and (c), as well as Policy 35(c) on safeguarding sensitive uses.
- 5.10.11 The ES also anticipates cumulative noise impacts in relation to overlapping construction phases from nearby developments. However, transport modelling suggests that traffic volumes and construction related movements will not increase appreciably in affected villages such as Hardwick or Coton. No combined or cumulative effects above minor adverse levels are predicted, indicating compliance with **SC/10(2)(d)** and **Policy 35(d)**. based on the above assessment, I judge there to be strong conformity with adopted local planning policies and that these policies should be afford a high significance of weight.
- 5.10.12 For additional information and coverage of this topic area, please refer to the following Proof of Evidence **[CD26-01-APP-W11-1]** that has been prepared by Jack Southon that covers noise and vibration matters.

Summary

- 5.10.13 While the scheme performs well against both local and national policy objectives on noise and vibration, there are limited areas of potential policy tension worth acknowledging.
- 5.10.14 First, as noted above, small numbers of receptors in Cambourne and Newnham may experience nighttime noise above guidance thresholds. While not a breach of policy outright, it highlights areas where additional operational refinements such as electric fleet deployment, reduced service frequency during sensitive hours, or façade level acoustic treatments may be necessary to secure enduring acceptability. From an NPPF standpoint, this reflects Paragraph 198(b)'s requirement to "avoid significant adverse impacts," and underscores the importance of continuous environmental monitoring post opening.
- 5.10.15 Second, vibration impacts at Childerley Gate and Bin Brook Bridge may marginally exceed acceptability thresholds during certain construction phases. These instances are mitigated through scheduling and notification and are short lived. Their limited scale aligns with the NPPF's broader aim (Paragraph 198(a)) to mitigate noise to a minimum and to consider the sensitivity of both place and receptor in evaluating environmental quality. Accordingly I judge there to be no policy conflict.
- 5.10.16 In summary, I confirm that the Cambourne to Cambridge Guided Busway Scheme demonstrates robust alignment with national and local policy frameworks addressing noise and vibration. Through detailed environmental assessment and embedded mitigation measures, the scheme supports the principles set out in the NPPF (2024), particularly **paragraphs 198(a) and (b)**, which emphasize the need to avoid significant adverse noise impacts and protect health, quality of life, and amenity. At the local level,

the scheme aligns well with Cambridge Local Plan **Policy 35** and South Cambridgeshire Local Plan **Policy SC/10** by incorporating sound sensitive design, construction safeguards, and operational controls that minimize pollution and safeguard sensitive receptors. While minor exceedances at certain facades during nighttime operations and localized construction phase vibration are acknowledged, these instances are limited, mitigated, and do not compromise overall policy compliance. The scheme also adheres to the principles outlined in the Planning Practice Guidance: Noise **[CD8-04]**, including proactive engagement with sensitive uses, application of the agent of change principle, and design interventions that preserve amenity and acoustic character in both private and public spaces.

- 5.10.17 Taken together, the proposed busway reflects a balanced and precautionary approach that meets planning policy expectations across strategic, local, and best-practice dimensions. The scheme is acceptable overall, and does not result in conflicts with national guidance, NPPF or adopted Development Plan policy.

5.11 Heritage

- 5.11.1 In consideration of heritage implications, I must first be clear on the areas where impacts arise: Firstly 'Clare Hall' and secondly 'wider' heritage impacts.

Impacts to Clare Hall

- 5.11.2 For detailed coverage of issues on this topic area, please refer to the following Proof of Evidence **[CD26-01-APP-W2-1]** that has been prepared by Tom Wilson covering specific heritage issues. In this proof he concludes:

In relation to Clare Hall (page 55):

"The CtoC Scheme would result in a minor adverse Significance of Effect, or less than substantial harm in NPPF terms, to 'Clare Hall, University of Cambridge', which is a Grade II listed building. The harm would be related to alteration of its setting and views. There would be no physical harm to this asset. The degree of harm would be toward the lower end of 'less than substantial' harm."*

- 5.11.3 In heritage terms, the proposal is assessed as causing less than substantial harm, at the lower end of the spectrum.
- 5.11.4 This minor heritage harm is weighed against the demonstrable public benefits of the scheme. These include improved public transport connectivity, support for modal shift, contributions to climate resilience, and alignment with adopted and emerging transport strategies.
- 5.11.5 Both Cambridge City Council and South Cambridgeshire District Council have concluded that, even giving great weight to the conservation of Clare Hall, the public benefits clearly outweigh the identified low-level harm.

Wider Heritage Impacts

- 5.11.6 Beyond Clare Hall, the Cambourne to Cambridge scheme intersects with several designated heritage assets in West Cambridge, though impacts are generally limited to **negligible** or **no harm**, as defined by the National Planning Policy Framework (NPPF). These include:

- **Robinson College**

- 5.11.7 Robinson College is a Grade II* listed building of very high architectural and historic interest, designed by Gillespie, Kidd & Coia. Its setting includes its campus grounds and its relationship with Clare Hall and the wider West Cambridge Conservation Area. The CtoC Scheme would introduce traffic control measures at the junction of Rifle Range

Road and Grange Road, but would not affect the college's primary relationships or how it is experienced. The scheme would result in no change in EIA terms and no harm in NPPF terms.

- **Emmanuel College Sports Pavilion**

- 5.11.8 Emmanuel College Sports Pavilion, including the Groundsman's House and Stable, is a Grade II listed building of high significance. Its setting includes the sports fields and nearby heritage assets. The CtoC Scheme lies outside its setting and would have no effect.

- **The Cambridge University Real Tennis Club**

- 5.11.9 The Cambridge University Real Tennis Club and Professionals House, Grade II listed, is of high significance. Its setting includes Grange Road and nearby university buildings. The CtoC Scheme would not alter its setting or experience, resulting in no change and no harm.

- **The University Library**

- 5.11.10 The University Library, Grade II listed and a key landmark, is of high significance. Its setting includes its prominence in the conservation area and relationships with other university buildings. The CtoC Scheme would not affect its setting or experience, resulting in no change and no harm.

- **Elmside**

- 5.11.11 Elmside, including its boundary wall and gate, is a Grade II listed Arts and Crafts house of high significance. Its setting includes its connection to Clare Hall and the conservation area. The CtoC Scheme would result in a minor adverse effect and 'less than substantial' harm, toward the lower end of that range.

- **48 Grange Road**

- 5.11.12 48 Grange Road, a Grade II listed Arts and Crafts house, is of high significance. Its setting includes Grange Road and surrounding residential buildings. The CtoC Scheme would result in a minor adverse effect and 'less than substantial' harm, also toward the lower end.

- **West Cambridge Conservation Area**

- 5.11.13 West Cambridge Conservation Area is of high significance, defined by university buildings, villas, and green spaces. The CtoC Scheme would alter its character and appearance slightly, particularly at the Rifle Range Road junction, resulting in a minor adverse effect and 'less than substantial' harm, toward the lower end.

- **Nos. 4 and 6 Adams Road**

- 5.11.14 Nos. 4 and 6 Adams Road are locally listed buildings of medium significance. Their setting includes Adams Road and Robinson College. The CtoC Scheme lies outside their setting and would have no effect.

- **The American Military Cemetery**

- 5.11.15 The American Military Cemetery, its Memorial, and Madingley Mill are of very high significance. Their settings include rural surroundings and long views. The CtoC Scheme would not be visible from the cemetery or alter its tranquil character. It would result in no change and no harm.

- **The Church of St Peter**

- 5.11.16 The Church of St Peter, Grade I listed, is of very high significance. Its setting includes its central role in Coton and connections to other heritage assets. The CtoC Scheme would not be visible from the church or alter its experience, resulting in no change and no harm.

- **Coton Conservation Area**

- 5.11.17 Coton Conservation Area is of high significance, centred on the Church of St Peter and defined by its rural character. The CtoC Scheme would introduce a new junction and built form into its wider landscape, resulting in a minor adverse effect and 'less than substantial' harm, toward the lower end.

- **The Schlumberger Gould Research Centre**

- 5.11.18 The Schlumberger Gould Research Centre, Grade II* listed, is of very high significance due to its innovative design by Sir Michael Hopkins. Its setting includes open grounds and surrounding development. The CtoC Scheme would be visible from the asset and increase traffic impacts slightly, resulting in a minor adverse effect and 'less than substantial' harm, toward the lower end.

- **Childerley Hall**

- 5.11.19 The former entrance lodges to Childerley Hall are non-designated heritage assets of low significance. Their setting includes a narrow green strip and remnants of a historic entrance. The CtoC Scheme would introduce visual impacts, resulting in a minor adverse effect and 'less than substantial' harm, toward the bottom of that range.

Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.11.20 In consideration of statutory provisions, particular regard must be had to section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.11.21 **Section 66** of the Planning (Listed Buildings and Conservation Areas) Act 1990 is a cornerstone of heritage protection in England. It places a statutory duty on decision-makers when considering development proposals that affect listed buildings.

- 5.11.22 Under **Section 66(1)** it states:

"In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

- 5.11.23 In respect of Section 66(1), I assess there to be compliance with this requirement because impacts to Clare Hall are deemed to be "less than substantial harm, at the lower end of the spectrum". When providing great weight to the assets conservation, I conclude, for the reasons below, that the public benefits outweigh the assessed less than substantial harm. It therefore follows that there is compliance with section 66(1) Listed Buildings Act 1990.

- 5.11.24 Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that:

"In the exercise of planning functions in relation to any buildings or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

- 5.11.25 In applying this statutory duty, I have given special attention to the character and appearance of the relevant Conservation Area, and note the findings of the Heritage

Impact Assessment [CD1.11.07.1], which states under section 7, which I adopt as part of this proof of evidence:

“This Heritage Statement has assessed the impacts of the proposals on the West Cambridge Conservation area and on the setting of a number of listed buildings within the conservation area. The proposed works have been developed in line with national and local policies on the historic environment. They have been developed to minimise any potential harmful effects to the significance of the West Cambridge Conservation Area and the associated heritage assets located within the boundary of the conservation area through the use of appropriate methodologies and specifications that meet the requirements of good conservation practice, while achieving the required works to manage their long-term future.

It is concluded that the CtoC Scheme would result in ‘less than substantial harm’ to the conservation area (under the terms of the NPPF), which otherwise maintains its leafy tree lined suburban character and views over the fields within the Green Belt”.

- 5.11.26 The proposed development is assessed to result in less than substantial harm. In accordance with paragraph 202 of the NPPF, such harm must be weighed against the public benefits of the proposal. Having attributed appropriate weight to the preservation of the Conservation Area’s character, I conclude that the public benefits clearly outweigh the identified harm. Accordingly, the proposal satisfies the statutory duty under Section 72(1), and I consider there to be compliance with the Planning (Listed Buildings and Conservation Areas) Act 1990.

National Planning Policy Framework

- 5.11.27 The Cambourne to Cambridge guided busway proposal falls within a highly sensitive heritage context, particularly where it interfaces with the West Cambridge Conservation Area and several significant listed buildings. **Section 16 of the NPPF (2024) [8-01]** provides clear guidance on how such assets should be treated in plan making and decision taking.
- 5.11.28 The applicant has provided a comprehensive Heritage Statement which carefully describes the significance of the affected heritage assets, including the contribution of their settings. This approach meets the requirements of paragraphs 207 and 208, which place an emphasis on proportionate detail and the use of appropriate expertise. Specifically, the statement makes extensive use of conservation area appraisals and references the Cambridge Historic Core documents, providing evidence in support of the scheme’s design evolution.
- 5.11.29 In line with **paragraph 210**, the proposal actively seeks to sustain and, where appropriate, enhance the significance of the assets in question. I assess that the alignment of the busway has been selected to avoid direct physical intervention, instead utilising an existing private right of way. This minimisation of harm reflects a genuine effort to reconcile development needs with conservation priorities. The layout and buffering strategy supports the broader character of the conservation area, ensuring spatial relationships and historical views remain legible.
- 5.11.30 Paragraph 215 of the NPPF states:
- “215. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.*
- 5.11.31 **Paragraph 212** requires that great weight be given to the conservation of heritage assets, with even greater emphasis placed on assets of higher significance. Clare Hall, as a Grade II* listed building, rightly attracts the greatest sensitivity. The scheme’s proximity to the southern elevation of Clare Hall has triggered a nuanced assessment of

visual and auditory impacts, judged in the Heritage Statement as resulting in "less than substantial harm." Crucially, this harm is mitigated by the busway's low profile alignment, limited traffic intensity, use of hybrid vehicles, and extensive planting buffers. I accept and adopt the findings of the Heritage Statement in this regard.

- 5.11.32 The rationale offered under **paragraph 213** is persuasive: the harm identified, while acknowledged, is modest and proportionate, and is demonstrably outweighed by public benefits including improved sustainable connectivity, modal shift from private cars, and alignment with climate resilience goals. For other assets listed above at paragraph 5.11.6, similar conclusions are drawn. Each retains its architectural and contextual integrity, with impacts limited to minor perceptual changes.
- 5.11.33 For non-designated heritage assets, such as the Leslie Barnett House, I conclude that the scheme satisfies **paragraph 216**. These assets have been treated with appropriate care, and the balancing of harm and significance has been clearly articulated. Their continued legibility within the heritage townscape is preserved, and public benefits are again used as a proportional justification.
- 5.11.34 Having assessed the submitted materials, I also see that **paragraphs 217 and 218**, concerning implementation and recording, are also met. The Heritage Statement includes a full historic environment gazetteer and annotated views, ensuring that the contribution of affected assets is understood and archived. No demolition is proposed, and no asset will be lost, but the quality of documentation provides assurance that the evidence base can inform future interpretation, as recommended.
- 5.11.35 Finally, the scheme offers opportunities to better reveal significance, in line with **paragraph 219**. The guided busway improves accessibility and visibility of key heritage thresholds, particularly in the transition between university buildings and conservation area character areas. While not transformative in interpretive terms, these subtle enhancements contribute positively to public understanding and reinforce heritage context.
- 5.11.36 Taken together, the scheme meets the intent and detailed requirements of **NPPF 2024 Section 16**, offering a fair approach to balancing heritage sensitivities with the broader imperatives of sustainable transport infrastructure, and as such these national policies should be afforded a high significance of weight.

Adopted Local Plan Policies

- 5.11.37 When I review the proposals against local level planning policy, I must consider the setting in the local context. The Cambourne to Cambridge guided busway intersects the eastern edge of the West Cambridge Conservation Area, with the route passing between the Cambridge University Rugby Union Football Club and the rear of properties on Herschel Road. This location, along with adjacent heritage assets, places the proposed scheme within the purview of relevant heritage policies, notably Cambridge Local Plan **Policy 61** and South Cambridgeshire Local Plan **Policies NH/1 and NH/14**.
- 5.11.38 **Policy 61** (Conservation and enhancement of Cambridge's historic environment) of the Cambridge Local Plan (2018) **[CD6-01]** requires that development proposals preserve or enhance the significance of Cambridge's heritage assets and their setting. I adopt the findings of the submitted Heritage Statement which concludes that the scheme will result in "less than substantial harm" to the West Cambridge Conservation Area and designated assets including Clare Hall (Grade II*), Elmside (Grade II), and 48 Grange Road (Grade II). The harm is attributed primarily to minor visual and noise impacts from increased bus traffic, as well as altered settings from proposed traffic management at Grange Road.
- 5.11.39 My assessment is that the applicant has designed the proposals to minimise heritage impacts where possible. The busway alignment utilises existing routes, such as the private right of way, limiting physical intrusion. Visual prominence and spatial

relationships of listed assets are retained, and no heritage structures are directly affected or demolished. As set out in the Heritage Statement (Section 6), all affected assets will continue to exhibit their historical relationships to the university and conservation area, with no total loss of significance. This reflects conformity with the expectations of **paragraphs 194–202 of the NPPF**, to which **Policy 61** is closely aligned.

- 5.11.40 Where the scheme introduces change, I see this as being mitigated through sensitive design, location, and planting buffers supporting **criterion (c) of Policy 61**. The provision of expert-led heritage assessments, views analysis, and character area consideration also aligns with **criterion (d)**. In areas of limited conflict, such as the changed setting adjacent to Herschel Road, the Heritage Statement provides clear and proportionate justification under **criterion (e)**, demonstrating public benefit and alignment with strategic transport objectives.
- 5.11.41 Although focused geographically on Longstanton, **Policy NH/1** of the South Cambridgeshire Local Plan (2018) **[CD6-02] (Conservation Area and Green Separation at Longstanton)** includes principles on preserving conservation areas and maintaining green separation which are broadly echoed in the handling of the West Cambridge Conservation Area. I assess the scheme as seeking to respect green corridors and open views, as evidenced by the retention of landscape character and key vistas from Grange Road and the playing fields. The busway's alignment avoids fragmentation of these spaces, and the shallow drainage verge between the busway and shared use path helps maintain visual permeability.
- 5.11.42 **Policy NH/14 (Heritage Assets)** of the South Cambridgeshire Local Plan (2018) **[CD6-02]** calls for proposals to conserve and enhance the significance of heritage assets, requiring balanced judgments where harm arises. The proposed scheme complies with **NH/14** through its measured handling of designated and non-designated assets. The affected listed buildings maintain their integrity and function, and the scheme avoids direct physical harm. For locally listed buildings such as 5A and 5B Herschel Road, minor harm through noise and altered setting is acknowledged, but judged acceptable given the asset's continued contextual role and the public benefits of the scheme.
- 5.11.43 The policy also encourages enhancement or better revelation of significance. In this case, the busway's positioning enhances accessibility and interpretation of the conservation area's boundaries and its relationship to university buildings arguably supporting this ambition.

Summary

- 5.11.44 I adopt the findings of the Heritage Statement and additional proof of evidence **[CD26-01-APP-W2-1]** which concludes that the impacts to Clare Hall and other assets are at the lower end of the "less than substantial harm" spectrum. This view is supported by the scheme's routing along an existing right of way, its 'mitigation through design' strategy (e.g. shallow drainage verge, tree retention, hybrid vehicle operation), and the preservation of spatial coherence and visual legibility. Nonetheless, the introduction of movement and noise into a previously quiet collegiate setting does change the experiential quality of the southern edge of the West Cambridge Conservation Area and associated heritage assets.
- 5.11.45 The Cambourne to Cambridge guided busway scheme introduces a finely calibrated shift in the character and sensory landscape of the eastern edge of the West Cambridge Conservation Area most notably in proximity to Clare Hall (Grade II*), Elmside (Grade II), and 5A & 5B Herschel Road (locally listed). While the scheme does not involve physical alteration to any built heritage assets, the introduction of hybrid bus traffic, engineered surfaces, and junction infrastructure does marginally alter the settings of these sensitive receptors, producing modest visual and acoustic intrusions.
- 5.11.46 I do however recognise that against these identified heritage impacts stands a compelling suite of public benefits which I explain in my planning balance section below.

- 5.11.47 Crucially, the scheme facilitates long term resilience in Cambridge's transport infrastructure, improving travel times, reducing congestion, and supporting planned growth in a manner that aligns with the City Deal and the objectives of the Greater Cambridge Partnership.
- 5.11.48 Under the National Planning Policy Framework (NPPF), particularly **paragraphs 199–202**, harm to designated assets must be proportionate and justified. When assessed under **paragraph 202** of the NPPF and the overarching policy ethos of proportionality, the public benefits especially improved sustainable connectivity are considered to outweigh the limited heritage harm. This aligns with the conclusions in the Heritage Statement (Section 7), which recognises that mitigation is not warranted due to the limited magnitude of impact. Moreover, the minor erosion of tranquil views and heritage ambience near Clare Hall and Elmside may be seen as sensitive departures from the expectations of **Policy 61(a) and NH/14**. A high significance weight is given to the conservation of the asset.
- 5.11.49 As required under paragraph 215 of the NPPF, any 'less than substantial' harm must be weighed against the public benefits of the scheme. These benefits of the proposed scheme are explained in my planning balance section below and include enhanced public transport connectivity, promoting a modal shift away from private car usage, climate resilience, unlocking housing growth, all of which are considered to be substantial and demonstrably outweigh the identified less than substantial heritage harm. Accordingly, I consider that the proposals to be compliant with paragraph 215 of the NPPF.
- 5.11.50 This conclusion mirrors the Heritage Statement's findings and provides a sound basis for policy compliance under Cambridge Local Plan **Policy 61** and South Cambridgeshire Local Plan Policies **NH/1 and NH/14**.

5.12 Climate and Green House Gases

National Planning Policy Framework

- 5.12.1 It is my view that the proposal development accords well with the strategic direction and practical imperatives of **Section 14** of the NPPF, 2024 **[CD8-01]**, which emphasises climate change mitigation and adaptation, as well as flood resilience. **Paragraphs 161 to 168** of the NPPF articulate the expectation that development should contribute to reductions in greenhouse gas emissions, support renewable and low carbon energy infrastructure, and incorporate design features that minimise vulnerability to climate risks such as overheating, drought, and flood.
- 5.12.2 In line with **paragraph 164**, the proposed scheme is designed to help reduce greenhouse gas emissions through both its mode and its operational strategy. The submitted ES **[CD1-10.01]** under **Section 10.3** confirms that the scheme will generate significant carbon reductions over a 60-year appraisal period with net savings of up to -47,000 tCO₂e in a scenario where wider policy and behavioural trends support reduced private car use, and I adopt these findings in support of this proof of evidence. These emission reductions are primarily derived from modal shift impacts and operational efficiencies in public transport provision.
- 5.12.3 **Paragraphs 165 and 166** promote a positive strategy for the delivery of renewable and low carbon energy. The scheme contributes to these objectives in two principal ways:
- Through the planned operation of electric buses, which will be deployed "as soon as practicable," offering a near zero carbon transit option and supporting the decarbonisation of local transport (ES section 3.10).
 - Via integrated renewable energy measures at supporting infrastructure sites, such as solar panel installations and low energy systems (e.g. LED lighting) at the Scotland Farm travel hub, demonstrating local decentralised energy use.

- 5.12.4 I also regard that the scheme's infrastructure layout including landscaping, orientation, and materials also reflects **paragraph 166(b)**, which calls for developments to be planned to minimise energy consumption. Evidence to support this approach is set out in the Environmental Statement, which outlines use of recycled aggregates, climate-sensitive planting schemes, and low carbon construction materials across the scheme corridor (**ES section 6 and CoCP**).
- 5.12.5 **Paragraph 167** of the NPPF places significant weight on the need to support low carbon heating improvements and energy efficiency in existing and new buildings. While not directly applicable to transport infrastructure, the scheme does foster indirect compliance by enhancing regional capacity for climate positive movement and reducing dependency on high emission transport modes.
- 5.12.6 Overall, I assess that the proposed busway aligns with the thrust of **Section 14** in several compelling ways: it delivers a demonstrable reduction in transport related emissions, supports renewable and low carbon energy transition, and incorporates resilience focused design strategies throughout. The scheme is therefore well positioned to meet national climate policy objectives and contributes meaningfully to climate adaptation and mitigation at both strategic and operational levels. These NPPF paragraphs should be afford a high significance of weight.

Adopted Local Plan Policies

- 5.12.7 In respect of local level planning policies, the proposed scheme does demonstrate broad alignment with the climate related policies of both the **Cambridge Local Plan (2018) [CD6-01]** and the **South Cambridgeshire Local Plan (2018) [CD6-02]**, particularly in relation to greenhouse gas emissions mitigation, low carbon energy adoption, and climate resilience in transport infrastructure. My evidence on this front is as follows.
- 5.12.8 The Environmental Statement (Section 10.3) **[1-10.01]** presents an assessment of carbon impacts over a 60-year appraisal period, identifying both infrastructure carbon from construction materials and operations, and user emissions derived from vehicle activity. Under a standard scenario, the scheme is forecast to achieve net carbon savings of approximately –5,020 tonnes CO₂e over its lifespan, reaching carbon neutrality by 2078. This reduction is primarily due to modal shift impacts and traffic flow efficiencies. Notably, under an optimistic user emissions scenario, factoring more ambitious behavioural change and wider policy interventions, net zero could be reached as early as 2044, with savings exceeding –47,000 tonnes CO₂e.
- 5.12.9 In relation to **Policy CC/1** (Mitigation and Adaptation to Climate Change) of the south Cambridgeshire Local Plan **[CD6-02]**, the scheme delivers on multiple fronts. Firstly, it prioritises sustainable transport, with a segregated corridor designed to encourage modal shift from private car use to active travel and low emission public transport. Secondly, the scheme is designed with climate resilience in mind bridges (e.g. Bin Brook crossing) are specified with climate adjusted flood parameters, and infrastructure lifespans account for long term shifts in temperature, rainfall, and ground conditions. The Environmental Statement explicitly notes embedded design measures to limit greenhouse gas emissions and support durability in an evolving climate, including SuDS drainage schemes, planting strategies adapted for future temperature patterns, and low carbon construction methods (**ES section 3.10 and section 6**).
- 5.12.10 With respect to **Policy CC/3 (Renewable and Low Carbon Energy)** in New Developments (South Cambridgeshire **[CD6-02]**), the scheme's contribution lies both in direct infrastructure choices and anticipated user behaviour. The Environmental Statement has raised a commitment to deploy fully electric vehicles on the busway "as soon as practicable" (**ES section 3.10**), with the interim use of Euro VI hybrid vehicles representing a transitional but credible low carbon alternative. Furthermore, the Scotland Farm travel hub incorporates solar panels and low energy LED lighting, supporting the policy requirement to integrate renewable or low carbon energy generation within development fabric.

- 5.12.11 Policy TI/3: Parking Provision of the **South Cambridgeshire Local Plan (2018) [CD6-02]** states that:
- “3. The Council will encourage innovative solutions to car parking, including shared spaces where the location and patterns of use permit, and incorporation of measures such as car clubs and electric charging points”.*
- 5.12.12 The proposed scheme is to feature electric vehicle charging points at its park and ride car parks, so fully accords with this policy.
- 5.12.13 In line with **Policy 29 (Renewable and Low Carbon Energy Generation)** (Cambridge Local Plan **[CD6-01]**), the scheme facilitates indirect compliance by supporting wider energy transition through reduced dependency on fossil fuelled transport. The integration of electric bus infrastructure and modal shift gains are consistent with the policy's support for schemes that contribute to Cambridge's decarbonisation trajectory. I adopt the findings of the ES that estimates reductions in end user emissions of –4,500 tCO₂e from mode shift alone. In addition, the scheme's strategic fit with the City Access programme and wider regional transport strategies ensures its contributions are not isolated, but rather linked to a system wide reduction in carbon emissions.
- 5.12.14 No direct renewable energy generation facilities beyond the solar array at the travel hub are proposed, which may appear limited when assessed against the aspiration of **Policy 29**. However, when considered alongside the scheme's core function enabling low carbon public transport, supporting active travel, and unlocking significant behavioural change in transport emissions its strategic contribution to renewable energy objectives remains persuasive.
- 5.12.15 Further alignment can be seen with **Policy CC/4 – Sustainable Design and Construction [CD6-02]**, though not listed for review. Embedded mitigation proposed as part of the scheme, including a 31% recycled aggregate target, protection and reuse of soils, and post project analysis commitments, illustrates the scheme's adherence to sustainability standards that exceed regulatory minima. The Code of Construction Practice (CoCP) embeds carbon reduction and resource efficiency principles that will guide the contractor's Environmental Management Plan, and the planning conditions will secure delivery of these commitments.
- 5.12.16 In addition to alignment with statutory planning frameworks, the scheme closely reflects the strategic intent of two influential non-statutory documents: the Department for Transport's "**Decarbonising Transport: A Better, Greener Britain**" strategy (2021–2023) **[CD8-15]**, and the **Greater Cambridge Sustainable Design and Construction Supplementary Planning Document (SPD) [CD7-16]** adopted in January 2020.
- 5.12.17 The national "**Decarbonising Transport: A Better, Greener Britain**" **[CD8-15]** strategy (2021–2023) sets out a whole system roadmap to achieve net zero transport emissions by 2050, with clear emphasis on modal shift, fleet electrification, and place based transport planning. I see that the Cambourne to Cambridge scheme directly advances these priorities. Its core function is to enable a shift away from private car use, supported by dedicated infrastructure and travel hub provision that make public transport a more compelling default choice for commuters. Operational design anticipates the use of electric buses at the earliest practicable point, meeting strategic fleet decarbonisation objectives while minimising local air quality impacts through interim deployment of low-emission Euro VI vehicles. Moreover, by improving semi-rural connectivity between Cambourne and Cambridge, the scheme exemplifies the place based principles championed by the strategy offering practical decarbonisation in settings that have historically relied on car based transport.
- 5.12.18 At the local scale, the **Sustainable Design and Construction SPD [CD7-16]** outlines technical expectations for minimising environmental impacts of development across Greater Cambridge. The guided busway scheme incorporates multiple design and construction elements that directly reflect these standards. Climate adaptation is

embedded through flood resilient infrastructure and SuDS, supported by detailed modelling and mitigation strategies. Energy performance and emissions minimisation are evident in the provision of solar powered facilities at the Scotland Farm travel hub, as well as through the systematic carbon monitoring protocols set out in the Code of Construction Practice. Resource efficiency principles are also advanced, with a commitment to recycled aggregate use and carefully designed soil handling measures that adhere to circular economy principles and national guidance. In addition, while biodiversity is addressed elsewhere in the evidence base, it is worth noting that the SPD's cross cutting guidance on green infrastructure is reflected in landscape planting strategies and routing choices that minimise ecological disruption.

- 5.12.19 I judge that the proposed scheme shows strong conformity with the adopted local planning policy suite in respect of climate and greenhouse gases and that these policies should be afford a high significance of weight.

Summary

- 5.12.20 It is my view that the Cambourne to Cambridge guided busway scheme presents a robust, multi layered response to the climate imperatives articulated across national planning policy, local development frameworks, regional mineral and waste strategies, and supplementary guidance. At the national level, **Section 14** of the NPPF 2024 provides the overarching policy framework for climate mitigation and resilience. The scheme aligns with its requirements by contributing to radical reductions in greenhouse gas emissions (**paragraphs 161–168**) and integrating climate adapted infrastructure through embedded features such as SuDS drainage, climate responsive bridge specifications, and materials reuse. Mode shift forecasting in the Environmental Statement suggests significant operational emissions reductions up to –47,000 tonnes of CO₂e over the appraisal period which supports **paragraph 164(b)** and reinforces the NPPF's presumption in favour of sustainable development.
- 5.12.21 Local policies in the Cambridge Local Plan (**Policy 29**) and South Cambridgeshire Local Plan (**Policies CC/1 and CC/3**) reinforce this national direction, placing strong emphasis on low carbon energy infrastructure and the climate compatibility of transport interventions. I assess that the scheme accords substantively with these provisions. Operational commitment to electric bus deployment, hybrid transition vehicles, and solar powered infrastructure at Scotland Farm provide tangible examples of compliance with both the spirit and letter of these policies. The design also embeds climate resilience addressing paragraph CC/1 through flood adapted structures, landscape buffering, and reduced reliance on fossil fuelled transport modes.
- 5.12.22 Supplementary guidance in the Greater Cambridge Sustainable Design and Construction SPD (2020) [**CD7-16**] adds further material weight. The scheme reflects the SPD's ambitions for carbon monitoring, lifecycle impact reduction, and nature based climate adaptation. Embedded practices such as recycled aggregate use, carbon tracking through the Construction Code of Practice, and future resilient planting regimes evidence a mature and integrated response. This sits alongside strategic alignment with **Decarbonising Transport: A Better, Greener Britain (DfT, 2021–2023)**, which prioritises modal shift, fleet electrification, and place based transport decarbonisation each a central rationale for the scheme's design and operational model.
- 5.12.23 Taken as a whole, the policy landscape forms a coherent and supportive platform for the scheme, which answers multiple scales and dimensions of climate action. While on-site renewable generation beyond Scotland Farm is limited, the scheme's strategic function in promoting zero emission mobility, discouraging private car use, and linking regional growth centres with sustainable infrastructure positions it as a major enabler of climate compatible development. Policy support is strongest on operational emissions and resilience; less so on embedded carbon and localised renewables, though mitigation measures balance these gaps reasonably within the planning context.

- 5.12.24 My final analysis is that the Cambourne to Cambridge guided busway offers a proportionate, defensible and policy compliant response to climate and greenhouse gas planning policy. It balances emissions reduction, infrastructure durability, and behavioural change in ways that match not only the technical aspirations of policy but also its transformative intent supporting sustainable regional mobility and contributing meaningfully to the UK's net zero transition.

5.13 Water and Flood Risk

National Planning Policy Framework

- 5.13.1 When I assess the proposed development against national level policy, the Cambourne to Cambridge scheme demonstrates a considered and policy aligned response to flood risk and drainage, reflecting the objectives as set out in the **NPPF 2024**.
- 5.13.2 The scheme's surface water drainage strategy aligns with NPPF priorities on SuDS and climate resilience covered under **sections 14** of the NPPF (Meeting the Challenge of Climate Change, Flooding and Coastal Change). Above ground measures such as swales and filter strips are deployed where feasible, and below ground attenuation is proposed with lining to prevent infiltration into potentially sensitive groundwater bodies. No infiltration based discharge is proposed, in recognition of the impeded drainage profile of local soils and the vulnerability of nearby aquifers a choice that I see as reflecting good practice under NPPF drainage hierarchy guidance.
- 5.13.3 In adopting the findings and result of the **Flood Risk Assessment (FRA) [CD1-11.13.02] and ES [CD1-10.01] Section 5.6 (The Water Environment)**, I recognise that in terms of climate allowances, the FRA employs the updated Environment Agency thresholds: a 19% increase for peak river flows and up to 40% for peak rainfall events, consistent with the site's essential infrastructure classification and 100-year design life. The use of these upper band parameters not only strengthens compliance but also builds resilience into the scheme's long-term operation. Additionally, the FRA also acknowledges residual risks including surface water, groundwater and sewer flooding and sets out appropriate monitoring and emergency management protocols during construction. These measures mirror the NPPF's emphasis on safety across the development's lifecycle, from temporary works to full operation.
- 5.13.4 The scheme's technical and environmental strategy embraces the sequential approach to site selection and has embeded mitigation through design, ensuring that flood risk is addressed in both quantitative and strategic terms, based on the evidence I set out below. While the majority of the route lies within Flood Zone 1 and is therefore at low risk of fluvial inundation, the eastern section intersects with Flood Zone 3 in the Bin Brook catchment. Recognising this, the scheme applies the Sequential Test appropriately by limiting exposure where feasible, and where necessary, satisfying the Exception Test requirements for 'Essential Infrastructure'. The proposed scheme demonstrates a strong compliance with national level planning policies, and I afford a high significance of weight to these in my balancing assessment.

Sequential Test

- 5.13.5 The Sequential Test aims to steer development to areas with the lowest probability of flooding. It's a key requirement under the NPPF 2024 and applies when proposing development in areas at risk of flooding typically Flood Zones 2 and 3. Key steps include:
- Define the search area: Proportionate to the scale of development, often agreed with the Local Planning Authority (LPA).
 - Identify alternative sites: Includes allocated sites in the Local Plan, those with planning permission, and windfall sites.

- Assess each site: Consider flood risk, development constraints (e.g. ecology, access), and capacity.

5.13.6 If no suitable, lower risk sites are available, the Sequential Test is considered passed.

Exception Test

5.13.7 If the Sequential Test is passed but the site still lies in a flood prone area, the Exception Test may be required especially for developments classified as:

- Highly vulnerable in Flood Zone 2
- More vulnerable in Flood Zone 3a
- Essential infrastructure in Zones 3a or 3b

5.13.8 To pass the Exception Test, the applicant must demonstrate:

- 1) The development provides wider sustainability benefits that outweigh the flood risk.
- 2) It will be safe for its lifetime, considering user vulnerability and without increasing flood risk elsewhere.
- 3) Where possible, it will reduce overall flood risk.

5.13.9 The proposed scheme is supported by a detailed **Flood Risk Assessment ([CD1-11.13.02 Appendix TR13.1]**, and I adopt its findings in relation to the Sequential and Exception Tests required by **Paragraphs 168–169** of the NPPF. In relation to the sequential test, it concludes at **page 37 paragraph 6.3.1** by stating:

SEQUENTIAL TEST

The PPG (Ministry of Housing, Communities & Local Government, 2022) and NPPF (Ministry of Housing, Communities & Local Government, 2021) states that Planning Authorities should complete a risk based “Sequential Test” which is to “steer new developments to areas with the lowest probability of flooding” (Paragraph 158 of the NPPF). However, based upon the requirements of the transport route to connect certain areas the scheme cannot completely avoid areas of potential flooding. As a result, the C2C Scheme is partly located within Flood Zone 3 and an Exception Test is required.

5.13.10 In relation to the required exception test, it concludes at **page 38 paragraph 6.3.2** by stating:

EXCEPTION TEST

As stated, the Exception Test is a method to help ensure that flood risk to people and property would be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available. This is done in combination by showing that the proposed development would provide wider sustainability benefits to the community, that outweigh flood risk, and that potential flood risk to the scheme and third parties as a result of the scheme can be managed. It is our consideration that the evidence provided in this FRA demonstrates that the scheme will be safe from flooding while not increasing flood risk to others. The wider sustainability benefits of the scheme are outlined elsewhere in the planning application that this FRA supports.

5.13.11 In adopting the results of the submitted Flood Risk Assessment in these two specific instances, I see this as therefore confirming compliance with the requirements of the

NPPF's sequential and exceptions tests in this regard. I therefore conclude that the scheme aligns with the flood risk and drainage principles of the 2024 NPPF through:

- A rigorous application of Sequential and Exception Tests for Flood Zone development.
- Use of updated climate allowances and drainage hierarchy in design.
- Embedded SuDS functionality with layered treatment and attenuation.
- Clear demonstration of safety and sustainability benefits that justify essential infrastructure in partially flood affected zones.

5.13.12 In my professional view, the proposed development satisfies both the sequential and exception tests as set out in the National Planning Policy Framework (NPPF) and accompanying Planning Practice Guidance (PPG). The site-specific Flood Risk Assessment demonstrates that the development would be safe for its lifetime, incorporating appropriate mitigation measures including land raising, sustainable drainage systems, and a robust Flood Management Plan. The proposal would not increase flood risk elsewhere and, where possible, would reduce overall risk through improved surface water management. Furthermore, the scheme delivers substantial wider sustainability benefits, including a significant quantum of affordable housing, biodiversity net gain, and enhanced green infrastructure, thereby meeting the requirements of the exception test under NPPF paragraph 178.

5.13.13 In relation to the sequential test, we have undertaken a comprehensive assessment of reasonably available alternative sites within the relevant area of search, applying a flexible and pragmatic approach. We conclude that there are no suitable, lower-risk sites capable of accommodating the proposed development in a manner that delivers the Scheme's aims and objectives. The essential point in this regard – as captured in the quote from the FRA above – is that the Scheme is an end to end route which must, inevitably, travel through areas at risk of flooding.

5.13.14 However, even if the sequential test is not passed, the failure of the sequential test is not automatically fatal where wider material considerations outweigh the flood risk. See, for example, the appeal decision at Rectory Farm (North), Yatton (APP/D0121/W/24/3343144). Such considerations exist here, as I explain in the planning balance section below and noting, in particular the fact that the Scheme would be safe for its lifetime and would not increase flood risk elsewhere, alongside substantial sustainability benefits as I set out in my planning balance evidence.

Adopted Local Plan Policies

5.13.15 When assessed at the local level, the proposed development demonstrates broad alignment with relevant policies governing water efficiency, flood risk mitigation, and sustainable drainage, as set out in the Cambridge Local Plan 2018 **[CD6-01]** and South Cambridgeshire Local Plan 2018 **[CD6-02]**, and I provide the following evidence in support of this stance

5.13.16 The Cambourne to Cambridge scheme has sought to embed robust principles of water management, flood mitigation, and environmental protection throughout its design. Central to this is the scheme's flood risk assessment, which builds on national guidance (NPPF, PPG) and local expectations to establish the potential risks posed by fluvial, surface water, groundwater, and artificial sources.

5.13.17 The majority of the route falls within Flood Zone 1 (the areas which are expected to be at low risk of flooding), however, particular care has been taken near Bin Brook, a known risk area falling into Flood Zone 3 (areas at higher risk of flooding). Through detailed hydraulic modelling, the proposed crossing via a clear span bridge with a soffit height of 9.67mAOD demonstrates negligible impact on flood depths or extents. These findings

satisfy both the Sequential and Exception Tests and reinforce the scheme's compliance with Cambridge Local Plan **Policy 32** and South Cambridgeshire Policy **CC/9**, as detailed below:

- 5.13.18 In respect of **Policy 32 (Flood Risk)** Cambridge Local Plan (2018) **[CD6-01]**, Flood risk has been fully assessed, as evidenced in the FRA **[CD1-11.13.02 Appendix TR13.1]**, and the scheme addresses risks from fluvial, surface water, groundwater, and artificial sources. The site is predominantly within Flood Zone 1, with only a limited area intersecting Flood Zone 3 near the Bin Brook. The scheme passes both the Sequential and Exception Tests as per NPPF requirements, demonstrating the essential nature of the infrastructure and its negligible flood impact through detailed hydraulic modelling. The Bin Brook crossing, a potential point of risk, has been designed with a clear span bridge and elevated soffit (9.67mAOD), ensuring safe passage even under 1% AEP + 19% climate change events. These features align directly with Policy 32's emphasis on safely managing flood risk for the lifetime of the development.

- 5.13.19 In consideration of **Policy CC/9 (Managing Flood Risk)** South Cambridgeshire Local Plan (2018) **[CD6-02]**, the FRA demonstrates extensive alignment with **CC/9**. The scheme's design responds to site specific flood risks and includes robust mitigation for both construction and operational phases. At the Bin Brook crossing, the design avoids raising flood levels materially, with modelling indicating depth increases of less than 50mm confined to within the red line boundary. Offsite flood risk is effectively neutral. Additionally, the scheme addresses residual risks, including sewer and groundwater flooding, with monitoring and emergency provisions to be codified in the Construction Code of Practice.

- 5.13.20 The drainage strategy itself captured within **Annex TR13.1.3** of the FRA shows a strong commitment to water quality and sustainable management. Surface water is handled through above ground SuDS features including swales, filter strips, and detention basins, with geocellular attenuation systems deployed where space is limited. These systems are designed not only for storage and conveyance but also for treatment, satisfying the requirements of South Cambridgeshire **Policy CC/7 [CD6-02]**. Lined basins and the use of the Simple Index Approach (SIA) further demonstrate the scheme's proactive stance on pollution control and groundwater protection.

- 5.13.21 When assessing **Policy CC/7 (Water Quality) [CD6-02]** in further detail, I confirm that water quality protection is built into the scheme through the adoption of a tiered SuDS treatment train. The FRA details that the application of the Simple Index Approach (SIA) across swales and basins, will ensure effective filtration and settlement before discharge. Lined attenuation systems further protect groundwater from contamination. The design avoids direct discharge to sensitive water bodies and ensures runoff is treated before reaching watercourses, fully aligning with **Policy CC/7's** requirements regarding pollution control and waterbody protection.

- 5.13.22 Applicable local level planning policy in regard to SUDS is supplied under **Policy CC/8 (Sustainable Drainage Systems)** of the South Cambridgeshire Local Plan (2018) **[CD6-02]**. The proposed scheme incorporates SuDS elements wherever feasible, favouring above ground systems to maximise resilience and multi-functionality. Filter strips, geocellular attenuation, and lined basins provide storage and treatment while accounting for climate change allowances of up to 40% increased rainfall intensity. Where infiltration is constrained by soil conditions, storage based systems are deployed appropriately. This meets policy **CC/8's** requirement for SuDS incorporation and long term functionality.

- 5.13.23 Where built components such as the Scotland Farm travel hub or maintenance facilities may interact with potable water systems, the scheme incorporates low consumption fixtures and landscaping that minimises irrigation demand. These features align with **Policy CC/4 (Water Efficiency)** South Cambridgeshire Local Plan (2018) **[CD6-02]** and reinforce my view as to the proposed scheme aims of generating a low impact

operational footprint. Assessment of water efficiency also plays a role, albeit I afford this less weight given the non-residential nature of the infrastructure.

- 5.13.24 Across the full length of the corridor, the integration of water cycle management reflects **Policy 31 (Integrated Water Management and the Water Cycle)** of the Cambridge Local Plan (2018) **[CD6-01]** and South Cambridgeshire **Policy CC/8** (discussed above). In response to **policy 31**, the scheme integrates water management principles throughout its design. Hard surfaces are managed via permeable treatments and attenuated runoff systems, including swales, filter strips, and detention basins. These measures not only mitigate surface water discharge but also support the multi-functionality of landscape elements in line with **Policy 31**, enhancing amenity and biodiversity while managing runoff volumes.
- 5.13.25 In consideration of compliance with wider policy documents I must assess against both the **‘Cambridgeshire Flood and Water SPD’ (November 2018) [CD7-14]** and **‘Addressing Water Scarcity in Greater Cambridge’ (March 2024) [CD7-27]**.
- 5.13.26 The **Cambridgeshire Flood and Water SPD [CD7-14]** sets out a layered framework for managing flood and water risks, emphasizing climate resilience, water sensitive design, and alignment with national legislation (NPPF, FWMA 2010).
- 5.13.27 I assess that the scheme responds positively to these expectations through:
- **Sequential and Exception Tests:** The FRA confirms full compliance with these tests. Further at Bin Brook (Flood Zone 3), a clear span bridge avoids in channel works and floodplain encroachment. Detailed hydraulic modelling shows negligible depth increases (<50mm), confined within the red line boundary.
 - **SuDS Driven Drainage Strategy:** Above ground attenuation features swales, filter strips, lined basins are integrated throughout. The strategy follows the Cambridgeshire SuDS design hierarchy, balancing surface runoff, treatment, and infiltration where possible.
 - **Designing for Climate Change:** Rainfall events have been modelled with up to +40% intensity, and peak river flow increases of 19%, fulfilling SPD expectations for upper band allowances over a 100-year infrastructure lifetime.
 - **Managing Residual Risk:** Emergency management and flood resilience strategies are set to be codified within the Construction Environmental Management Plan (CEMP), as per SPD guidance on residual risk protocols.
 - **Water Environment Enhancement:** Lined systems protect groundwater from pollutants; surface flows are treated before discharge using the Simple Index Approach (SIA), supporting the Water Framework Directive aims outlined in Chapter 7 of the SPD.
 - **Stakeholder Collaboration:** Early engagement with the Environment Agency and Lead Local Flood Authority is evident throughout the FRA documentation, reflecting SPD encouragement for pre-application coordination.
- 5.13.28 In regard to assessing compliance with **‘Addressing Water Scarcity in Greater Cambridge (March 2024) [CD7-27]**, this government publication sets ambitious expectations for water-neutral development, smart metering, and water reuse particularly for Cambridge and South Cambridgeshire districts. I see the proposed scheme aligning with this in several key respects:
- **Minimising Water Demand:** As a linear transport scheme with limited domestic or commercial water use, operational demand is minimal. Nevertheless, water efficiency principles are embedded in the specification of maintenance

compounds and landscaping design (e.g., drought resistant planting, low consumption fittings).

- No Additional Abstraction Pressure: The scheme will not connect to potable mains for general operational use, avoiding increased pressure on the chalk aquifer and local abstraction licences.
- SuDS as a Dual Strategy: Drainage features not only handle runoff but support offsetting impervious surface impacts through treatment and storage. This aligns with CD7-27's emphasis on integrated water management and multifunctional SuDS.
- Supporting Retrofitting and NBS Objectives: While not directly delivering retrofit measures, the scheme does not impede local water saving or nature based solution initiatives. Opportunities for future alignment e.g., through travel hub or offsite mitigation are preserved.
- Alignment with Long Term Supply Objectives: The scheme proceeds with a drainage strategy and flood risk design that complements the government's long term plans (Grafham transfer, Fens Reservoir) by avoiding short term dependency on stressed water systems.

5.13.29 For additional information and coverage of this topic area, please refer to the following Proof of Evidence **[CD26-01-APP-W8-1]** that has been prepared by Jack Southon that covers flood risk matters.

Summary

5.13.30 Taken together, the design reflects both the spirit and substance of applicable flood related policies. It balances strategic public benefit through modal shift and transport resilience against residual flood risks that have been clearly identified, modelled, and mitigated. No adverse off-site effects have been demonstrated; indeed, the scheme improves runoff control and climate adaptability. This integrated approach ensures the development is safe for its lifetime, without increasing flood risk elsewhere, and supports broader sustainability objectives in the Cambridge growth corridor.

5.14 Soils, Materials and BMVL Loss

5.14.1 In review of the submitted application materials, I see that Cambridge to Cambourne guided busway scheme has been evaluated for its impact on soils, land contamination, and the loss of agricultural land. In drafting this policy compliance statement, I adopt and draw upon the findings of Technical Report 11 (Soil, Geology and Land Contamination) **[CD1-11.11.01]**.

National Planning Policy Framework

5.14.2 In regard to national level planning policy affecting Soils, Materials and BMVL loss, this must be assessed with particular reference to **Chapter 15** (Conserving and Enhancing the Natural Environment) and **Chapter 11** (Making Effective Use of Land), both of which set out clear expectations regarding land use, soil protection, and the safeguarding of agricultural value.

5.14.3 **Paragraph 187** outlines the importance of protecting soils and the wider benefits of natural capital, including the economic and environmental value of BMVL. The scheme acknowledges that approximately 39 hectares of Grade 1–3a land will be permanently lost, a scale of impact that under Annex 3 and associated impact magnitude criteria represents a major adverse effect. While this loss poses a clear policy tension, I conclude that the scheme's strategic transport benefits are weighed against it under the presumption in favour of sustainable development outlined in **paragraph 11**. In parallel, embedded mitigation measures, such as the restoration of temporarily used land and

adherence to the DEFRA Construction Code of Practice for soil handling, support alignment with **paragraph 125(c–e)** which encourages the minimisation of adverse environmental effects.

- 5.14.4 Overall, while the loss of BMVL introduces a significant residual effect, the scheme incorporates multiple forms of mitigation and contributes to wider sustainable transport objectives, allowing a defensible and proportionate narrative of compliance with NPPF 2024. Accordingly these NPPF paragraphs should be afford a high significance of weight.

Adopted Local Plan Policies

- 5.14.5 When assessed at the local level I see the following applicable policies as relevant, including: Cambridge Local Plan 2018 **[CD6-01] (Policy 33)** and South Cambridgeshire Local Plan 2018 **[CD6-02] (Policies NH/3 and SC/11)**. I assess that the scheme aligns with the requirements of Cambridge Local Plan **Policy 33** and South Cambridgeshire Local Plan **Policy SC/11**, both of which seek to ensure that contaminated land is identified, assessed, and appropriately remediated to avoid harm to human health, controlled waters, and the wider environment. Technical Report 11 **[CD1-11.11.01]** demonstrates a clear commitment to this policy framework. It provides a detailed baseline assessment, underpinned by the Mott MacDonald preliminary risk assessment and subsequent ground investigation data. Key risks identified include potential contamination from made ground, historical military use at Bourn Airfield, electricity substations, agricultural activities (e.g. pesticides), and previous development along the route. Pathways and receptors including construction workers, water bodies, and adjacent residents have been clearly mapped through a Conceptual Site Model (CSM).
- 5.14.6 The proposed embedded mitigation measures do reflect industry best practice, including those outlined in the Environment Agency's Land Contamination Risk Management guidance. Proposed actions include targeted ground investigation, verification of remediation success, use of barrier type water supply infrastructure, and the installation of cover systems over retained contamination. The planned approach therefore meets both Local Plan requirements and national guidance, with compliance secured via planning conditions and continued oversight from relevant statutory bodies.
- 5.14.7 In assessment of best and most versatile agricultural land loss (BMVL), South Cambridgeshire Local Plan (2018) **[CD6-02] Policy NH/3** is relevant. **Policy NH/3** requires that development proposals avoid the irreversible loss of BMVL unless exceptional circumstances exist. It states that where loss is unavoidable, developers must demonstrate minimisation and appropriate mitigation.
- 5.14.8 Technical Report 11 **[CD1-11.11.01]** acknowledges that approximately 39 hectares of BMVL will be permanently lost as part of the scheme, with a further 6 hectares subject to temporary use. This is a substantial impact and, in isolation, would not comply with NH/3's presumption against BMVL loss. However, the scheme is a strategic transport intervention that supports regional growth, modal shift, and sustainability objectives underpinning both the South Cambridgeshire and Cambridge Local Plans, potentially qualifying under NH/3's "exceptional circumstances" clause.
- 5.14.9 Efforts have been made to minimise the footprint of land take, with route design avoiding the highest grade agricultural land where practicable. Mitigation measures include soil handling protocols set out in the DEFRA Construction Code of Practice and the restoration of temporarily used land under qualified supervision. Nonetheless, given the scale of BMVL loss, the scheme constitutes a major adverse effect on agricultural land resources. This point is transparently acknowledged within the Environmental Statement.
- 5.14.10 I have also considered the proposed busway against the strategic principles set out in the **Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) [6-03]**. In particular, **Policy 24: Sustainable Use of Soils** seeks to safeguard BMVL and

requires proposals to demonstrate minimisation of soil loss, effective reuse of soils, and restoration aligned with long term sustainability goals. I regard that the scheme does acknowledge the permanent loss of 39 hectares of Grade 1–3a land, with a further 6 hectares subject to temporary land use, presenting a tension with Policy 24’s objective to avoid harm to soil quality and agricultural productivity. However, soil management and handling during construction will follow DEFRA guidance and include best practice storage and reuse protocols for temporary land take, which partially align with the policy’s restoration and soil reuse principles.

- 5.14.11 Additionally, in adopting the findings of the **Technical Report 11 [CD1-11.11.01]**, this identifies peat soils and potential contamination risks in some areas; relevant mitigation such as careful excavation, containment, and reinstatement supports aspects of **Policy 1: Sustainable Development and Climate Change**, which requires climate-resilient operational practices and the minimisation of greenhouse gas emissions from soil disturbance. Although the scheme results in unavoidable harm to BMVL, its embedded mitigation measures, strategic transport benefits, and alignment with broader regional planning objectives provide a defensible position within the framework of the Minerals and Waste Local Plan. Given the overall compliance with adopted policies, these should be afford a high significance of weight.

Summary

- 5.14.12 In balancing the overall policy context, I see that the proposed scheme demonstrates broad conformity with national, local, and minerals and waste policy frameworks concerning soils, land contamination, and BMVL loss. Under NPPF 2024, the scheme responds positively to expectations set out in Chapters 11 and 15, mitigating adverse environmental effects through design and restoration in support of **paragraph 125(c–e)**, while presenting a strategic public transport solution under paragraph 11’s presumption in favour of sustainable development.
- 5.14.13 Local policies **Policy 33 and SC/11** are met through proactive identification and remediation of land contamination, as evidenced in Technical Report 11’s conceptual site modelling, establishing compliance with both policy and regulatory guidance. Similarly, the scheme accords with the **Cambridgeshire and Peterborough Minerals and Waste Local Plan (2021) [6-03]**, particularly **policy 24** on the sustainable use of soils and **policy 1** on climate resilience, through soil handling and mitigation measures informed by DEFRA codes and embedded environmental best practice.
- 5.14.14 However, a policy tension remains with **Policy NH/3** due to the significant and irreversible loss of approximately 39 hectares of BMVL, which conflicts with its protective stance. Mitigation steps, strategic transport justification, and partial restoration of temporarily used land offer a proportionate response but do not fully eliminate the residual adverse impact.
- 5.14.15 Accordingly, while the scheme cannot claim full compliance with every policy test on agricultural land preservation, I conclude that it does present a robust and well defended compliance narrative when considered within the wider planning balance where strategic mobility gains, modal shift objectives, and sustainable infrastructure delivery weigh meaningfully against specific policy harms.

5.15 Overall Balancing and Conclusion

Policy Compliance

- 5.15.1 The Cambourne to Cambridge Guided Busway scheme complies with the National Planning Policy Framework (NPPF) and the adopted development plan when each is considered as a whole, for the reasons stated above.

- 5.15.2 I turn now to consider the balance of harms against benefits, having regard to the matters above and the evidence provided by the Applicant's other witnesses, in particular Mr Whitehouse's evidence on benefits.

Harms vs Benefits

- **Housing Growth Benefits**

- 5.15.3 Among the most prominent benefits, the scheme is predicted to **unlock housing growth**, particularly the delivery of 3,500 homes at Bourn Airfield, a development explicitly contingent on high-quality sustainable transport infrastructure. A net land value uplift of c.£200M is attributable to the scheme, reflecting its catalytic role in enabling strategic development. I afford these benefit a high significance of weight.

- **Employment Benefits**

- 5.15.4 The proposals also support the long-term viability of Cambourne West (2,350 homes) and **employment expansion** at West Cambridge, thereby underpinning the socioeconomic growth ambitions of adopted Local Plans. Benefits here are partly physical (transport access), but also psychological, supporting perceptions of sustainable placemaking and future-proofed connectivity in an area undergoing rapid change. I afford these benefit a high significance of weight.

- **Transport Benefits**

- 5.15.5 On transport grounds, the scheme yields significant and enduring public benefits. The dedicated busway will facilitate **quicker, more reliable journeys** between Cambourne, Bourn Airfield, Hardwick, Coton, and Cambridge, with services potentially reaching the Biomedical Campus. Estimates of journey time savings of up to 20 minutes in peak periods and models suggest approximately 1.8 million annual busway users. I afford these benefit a high significance of weight.

- **Active Travel Benefits**

- 5.15.6 The inclusion of an active travel path for cyclists, pedestrians, and equestrians supports inclusive access. I afford these benefit a high significance of weight.

- **Travel Hub Benefits**

- 5.15.7 Scotland Farm travel hub enables modal shift further west of the city. Taken together alongside the additional scope for active travel, these features are considered to deliver substantial long-term benefits for community mobility, sustainable transport uptake, and congestion relief. I afford these benefit a medium to high significance of weight.

- **Air Quality Benefits**

- 5.15.8 Air quality improvements are forecast across the majority of receptor locations, with the data noting three times as many receptors experiencing reductions in NO₂ and PM pollutants than experiencing increases. Although none of these changes are significant in isolation, they collectively form part of a positive cumulative narrative: one aligned with citywide ambitions to reduce car traffic, improve respiratory health, and respond to Cambridge's historic air pollution challenges. These benefits are magnified by the scheme's commitment to transition to fully electric buses at the earliest opportunity, and by the embedded sustainable design measures including solar panels, LED lighting, and landscape-led drainage solutions. I afford these benefit a high significance of weight.

- **Climate and Greenhouse Gas Benefits**

- 5.15.9 Climate benefits form another notable strand. The greenhouse gas assessment estimates an overall net saving of around 5,000 tCO₂e over the 60-year appraisal period, with significantly greater savings in a scenario that includes additional behaviour change and policy interventions. Modal shift and network efficiency gains, arising from smoother traffic flows and improved public transport prioritisation, are central to these reductions. Although the scheme's embodied carbon is considerable in the short term, the supporting data demonstrates that long-term net zero is achievable, with year-on-year carbon benefits materialising through reduced car travel and the electrification of the bus fleet. I afford these benefit a high significance of weight.

- **Biodiversity Benefits**

- 5.15.10 Biodiversity gains are also referenced, particularly through the scheme's commitment to secure a minimum 10% biodiversity net gain (BNG), and ideally 20%, using the Statutory Metric. To this end, woodland planting, species-rich hedgerow restoration, and wetland habitat creation form part of the embedded design. While BNG is not a substitute for mitigation, it offers a strategic offsetting framework and aligns with broader ambitions for nature recovery under the Greater Cambridge Biodiversity SPD and Doubling Nature Vision.

- 5.15.11 Notwithstanding these benefits, several environmental harms are identified, and some are deemed significant. These are covered below.

- **Impacts to Coton Orchard**

- 5.15.12 The most relevant adverse effect is the loss of habitat at Coton Orchard, a County Wildlife Site containing traditional orchard features and diverse invertebrate populations. The scheme would affect approximately 0.42ha of priority traditional orchard habitat and 1.29km of hedgerow, both deemed significant adverse effects at a county scale. Moreover, the orchard contains 13 mature apple trees dating back to the 1920s, two of which meet veteran criteria under the NPPF definition. I afford these impacts a medium significance of weight.

- **Biodiversity Impacts**

- 5.15.13 Terrestrial invertebrates are also adversely affected, with Coton Orchard supporting assemblages of nationally scarce beetles, moths, and bees. While enough habitat would remain to support some of these species, their partial displacement contributes to an overall moderate adverse ecological impact. Additional concerns relate to badger setts, bat foraging corridors, and commuting routes. Although significant effects on bats are considered unlikely given embedded mitigation (e.g., mammal underpasses, sensitive lighting), acknowledgement of collision risk, construction disturbance, and uncertainty regarding mitigation efficacy, particularly for barbastelle bats associated with Eversden and Wimpole Woods SAC, must be considered. I afford these impacts a low significance of weight.

- **Landscape Impacts**

- 5.15.14 Landscape effects are another principal harm. While much of the scheme crosses transport-influenced terrain, moderate adverse impacts are identified on Landscape Character Area 4B (Lolworth to Longstowe Wooded Claylands), especially in open countryside east of Hardwick and north of Coton. These impacts are expected to persist until landscape mitigation, including bunds and woodland planting, is established, with non-significant effects expected by year 15 post-opening. Nevertheless, temporary construction impacts, particularly visual, will be significant for residents on Scotland Road, Whitwell Way, and Herschel Road, as well as for footpath users near Coton and the M11. These impacts stem from prominent views of construction compounds, plant movement, and landform modification, and while temporary, are non-trivial in localised amenity terms. I afford these impacts a low significance of weight.

- **Noise and Vibration Impacts**

- 5.15.15 Noise and vibration effects are also predicted for construction. The ES identifies around 300 receptors exposed to temporary construction noise, with six receptors (at Childerley Gate, Scotland Road and Bin Brook) experiencing sustained exposure above the significance threshold. Noise will be managed via the Code of Construction Practice, but residual effects remain. Vibration impacts on sensitive research equipment at West Cambridge are also acknowledged, although management protocols will be secured via engagement with affected institutions. I afford these impacts a low significance of weight.

- **Agricultural land Impacts**

- 5.15.16 The loss of 39ha of Best and Most Versatile agricultural land exceeds the threshold for a major adverse effect, albeit mitigated somewhat by the land's relatively lower strategic value. Similarly, material use and waste generation during construction is non-trivial, although no significant effects on regional landfill capacity are forecast. I afford these impacts a low significance of weight.

- **Cumulative Impacts**

- 5.15.17 Finally, it must be recognised that cumulative risks from nearby developments such as Cambourne West, Bourn Airfield, and West Cambridge exist, particularly in relation to noise, construction traffic, and habitat fragmentation. However, with appropriate coordination and mitigations in place, no cumulative effects are considered likely and significant at this stage.
- 5.15.18 In summary, the scheme is forecast to deliver enduring public benefits, transport, housing, air quality, and climate among them, while managing a range of environmental harms, particularly to landscape character, local ecology, and visual amenity. Where harms are significant, they are either temporary, mitigated, or balanced against strategic public benefits. I afford these impacts a low significance of weight.

Heritage Balance

- 5.15.19 In assessing the heritage balance I will look at this from three perspective, Firstly in respect of Clare Hall, secondly in respect of the wider heritage impacts and thirdly when assessed in combination.

- **Clare Hall**

- 5.15.20 While the proposed scheme introduces a degree of heritage harm to the setting of Clare Hall a Grade II* listed building of high significance the degree of harm is considered "less than substantial" within the meaning of paragraph 206 of the NPPF.
- 5.15.21 On balance, while the harm to Clare Hall is a material planning consideration, the wider public benefits that I have set out demonstrably outweigh it in line with NPPF paragraph 215. The scheme supports sustainable transport objectives and long-term carbon reduction goals without severing the key spatial qualities that underpin Clare Hall's heritage value. I afford these impacts a low significance of weight.

- **Other Heritage Impacts**

- 5.15.22 The scheme also intersects with the setting of other designated and non-designated heritage assets, including the West Cambridge Conservation Area, and individual features such as historic hedgerows and walls. These impacts, while varied, consistently fall within the "less than substantial" category as defined by the NPPF. In several cases, impacts are indirect and visual, rather than physical or structural, and relate primarily to change in landscape character rather than intervisibility or architectural harm. I therefore afford these impacts a low to medium significance of weight.

- 5.15.23 Many of these assets are already subject to urban edge conditions and visual disruption, such that the proposed scheme does not introduce novel patterns of harm but rather marginally intensifies existing conditions. This is especially the case for the perimeter of the Conservation Area adjacent to Madingley Road, where traffic and infrastructure already dominate the sensory environment.
- 5.15.24 Public benefits again including reduced traffic volumes, improved connectivity for active travel, and climate resilience are compelling. Where impacts intersect with non-designated assets, these have been carefully mapped and assessed against relevant policies in the Greater Cambridge Local Plan and the LBA 1990. The inclusion of permeable surfacing, biodiversity corridors, and green edge buffers help ensure that residual impacts are proportionate and reversible.
- 5.15.25 For the non-designated heritage assets as shown under paragraph 5.11.6 heritage impacts are assessed to be negligible. In line with paragraph 215 of the NPPF, the collective public benefits social, economic, and environmental are judged to outweigh these residual heritage impacts, none of which compromise the integrity or legibility of the identified designated affected assets.

- **Assessed in Combination**

- 5.15.26 When viewed holistically, the heritage impacts of the Cambourne to Cambridge scheme while notable remain less than substantial in scale and significance. Harm is primarily experiential and contextual, not physical or architectural, and has been mitigated through careful route alignment, landscape screening, and heritage-informed design.
- 5.15.27 The scheme's public benefits are wide-ranging and well-evidenced: improved sustainable transport connectivity, reductions in private vehicle dependency, facilitation of economic growth, and support for long-term climate resilience. These benefits directly respond to national and local policy imperatives, including those embedded within the NPPF, the Greater Cambridge Local Plan, and the Cambridgeshire Transport Strategy.
- 5.15.28 Importantly, the balancing exercise considers not just the quantum of benefit, but its strategic alignment and long-term durability. In this context, the cumulative heritage harm being less than substantial and carefully mitigated is clearly outweighed by the broader public interest. This conclusion aligns with NPPF paragraph 215 and is supported by heritage expert views, an policy compliance analysis, as described above.

Green Belt – 'Very Special Circumstances' Balance

- 5.15.29 The proposed Cambourne to Cambridge Guided Busway scheme includes elements that fall within the Green Belt and, in part, constitute 'inappropriate development' as defined by the NPPF (2024). Paragraph 153 of the NPPF makes clear that such development should not be approved except in 'very special circumstances'. This sets a high policy bar, requiring that the harm to the Green Belt, and any other harm resulting from the proposal, must be clearly outweighed by other considerations. The scheme has therefore been assessed against this test with particular rigour. While the majority of the route either lies outside the Green Belt, the limited extent of inappropriate development triggers the need for a VSC case. Accordingly, I have considered both the nature and degree of harm and the weight of public benefits in reaching a balanced conclusion.
- 5.15.30 In terms of harm, I acknowledge that the scheme results in harm to the Green Belt by reason of inappropriateness, which must be afforded substantial weight in accordance with NPPF paragraph 153. However, I also note that this harm is limited in spatial extent and largely confined to discrete sections of the route. The actual harm to the Green Belt such as impacts on openness, permanence, and visual character is also limited, owing

to the embedded design mitigation, low-profile infrastructure, and retention of landscape features. The scheme avoids fragmentation of the Green Belt and does not undermine its strategic function. In addition to Green Belt harm, I have considered other residual impacts identified above. These have been addressed through proportionate mitigation.

- 5.15.31 On the other side of the balance, the scheme delivers a wide range of strategic public benefits that must be weighed as 'other considerations' in the VSC test. I address these above. These include enabling sustainable housing growth, improving public transport accessibility, reducing car dependency, and supporting inclusive access to employment, education, and services. The scheme is a direct response to long-standing national and local policy imperatives, including decarbonisation, modal shift, and spatial equity. It aligns with the strategic allocations of the adopted Local Plans and supports the delivery of planned communities at Bourn Airfield and Cambourne West. In addition, the scheme contributes to climate resilience, biodiversity net gain, and improved landscape connectivity. These benefits are not generic they are specific to the corridor and cannot be delivered without the infrastructure proposed. As such, they carry significant weight in the planning balance.
- 5.15.32 In applying NPPF paragraph 153, I have given substantial weight to the harm to the Green Belt. However, I have also had particular regard to the limited extent and nature of that harm in this case. The scheme has been carefully designed to minimise intrusion, with much of the route either outside the Green Belt or comprising development that is not inappropriate. The actual harm to openness and character is modest and has been mitigated through embedded design and landscape integration. Other residual harms have been addressed through proportionate strategies. The weight of harm, while substantial in principle, is contextually limited in practice.
- 5.15.33 Taking all factors into account, I conclude that the identified harm to the Green Belt both by reason of inappropriateness and in actual terms alongside any other residual harm, is clearly outweighed by the other considerations. The scheme delivers substantial and specific public benefits that cannot be achieved through alternative means and which directly support national and local policy objectives. These benefits are strategic in nature, long-term in effect, and proportionate in impact. Accordingly, I consider that very special circumstances exist to justify the limited Green Belt harm associated with the scheme. The proposal therefore meets the policy test set out in NPPF paragraph 153 and should be regarded as acceptable in principle, and that the 'very special circumstances' are warranted.

OVERALL BALANCE

- 5.16 For the reasons that I have given, there is accordance with both national policy and the development plan, read as a whole. Where necessary, I have undertaken both the necessary heritage balances and the VSC balance. The Scheme passes these balancing exercises. Overall, I conclude that the benefits decisively outweigh the harms in the planning balance.

6. PLANNING CONDITIONS

- 6.1.1 The proposed scheme is to feature a range of additional planning conditions that are to be put in place to ensure appropriate mitigation is secured and implemented. Please refer to supporting inquiry documents for the full list that has been agreed with conjunction with relevant local authorities.

7. ANALYSIS OF THE MAIN ISSUES

7.1 Main issue (1)

“The aims and objectives of, and the need for, the proposed Cambourne to Cambridge guided busway”

7.1.1 In response to main issue (1), my judgement is that the aims, objectives, and need for the proposed scheme are fully articulated and justified. I give my reasons as follow:

Aims

7.1.2 The aims of the proposed development are set out in the Applicants ‘Statement of Aims’ [CD1.04] page 2 para 4.2 and include:

- To relieve congestion: Parts of the current Cambourne to Cambridge road network, in particular the A1303/Madingley road, suffers from heavy traffic congestion at peak times. Without any action, by 2031 car trips into the city are set to increase by up to 70% with already lengthy journey times expected to double.
- To support economic growth: Local Plans for Cambridge and South Cambridgeshire propose new housing in towns and villages to the west of the city. Between 2011 and 2031, there are planned to be an additional 8,000 new homes set for development in the vicinity of the Scheme and 44,000 new jobs to be created in or around the city. The Scheme unlocks much of the development potential in the Scheme area.
- To deliver a sustainable transport system: A new guided bus route, with a path for walkers, cyclists and for most of the route, horse riders, alongside as well as a new travel hub at Scotland Farm which will encourage park and ride journeys as well as active travel.
- To enhance quality of life: In addition to improvement in air quality, there is a commitment to deliver a minimum of 10% biodiversity net gain for the Scheme overall, with the objective of achieving at least a 20% gain. The Scheme will, in the main, protect and enhance our natural, built and historic environment; including making effective use of land, using natural resources prudently, minimising waste, and assist in the moving to a low carbon economy.

- 7.1.3 In respect of the identified aims and taken in context of the supporting evidence discussed above in section 5, I conclude that the Cambourne to Cambridge Guided Busway is a direct and tangible response to the pressing transport challenges and policy aims shaping the region's future. It is designed first and foremost to **relieve congestion** on the A1303 and Madingley Road, corridors that currently experience significant peak-hour delays and are forecast to deteriorate further without intervention. With car trips into Cambridge expected to rise by up to 70% by 2031, the busway offers a reliable, congestion free alternative, helping to mitigate journey time inflation and unlock latent capacity across the network.
- 7.1.4 Aligned with regional growth ambitions, the scheme also contributes substantively to the aim of **supporting economic development**. Between 2011 and 2031, Local Plans for Cambridge and South Cambridgeshire propose around 8,000 new homes west of the city and 44,000 new jobs in and around Cambridge itself. The busway improves access to these growth locations, ensuring that transport infrastructure does not lag behind housing and employment delivery. Its strategic reach into key sites Cambourne, Bourn Airfield, West Cambridge ensures development viability while maintaining focus on sustainable travel principles.
- 7.1.5 A defining characteristic of the proposed scheme is its commitment to **delivering a sustainable transport system**. The guided route integrates a high capacity, low emission bus service with accompanying active travel infrastructure. Walkers, cyclists and horse riders are supported along much of the route, and the travel hub at Scotland Farm provides meaningful incentives for park and ride journeys, further encouraging modal shift away from car usage. This multi-modal design reflects best practice in sustainable corridor planning and supports climate resilience goals established in regional strategies.
- 7.1.6 Finally, the scheme meaningfully contributes to **enhancing quality of life**. Beyond congestion relief and air quality improvement, there is an embedded commitment to biodiversity, with a minimum 10% net gain across the alignment and an ambition to exceed 20%. The proposal is guided by principles of prudent land use, carbon reduction, and environmental protection. It also safeguards heritage and visual amenity across sensitive areas, underpinning its role in creating healthier, more liveable places.
- 7.1.7 Together, these outcomes present a coherent, multi benefit rationale for the Cambourne to Cambridge scheme, demonstrating alignment with regional transport strategies and sustainable growth imperatives.

Objectives

- 7.1.8 The objectives of the proposed development are set out in the Applicants 'Statement of Aims' [CD1.04] page 2 para 4.1 and include:
- *Achieve improved accessibility to support the economic growth of the Greater Cambridge region;*
 - *Deliver a sustainable transport network/system that connects areas between Cambourne and Cambridge along the A428/A1303 transport corridor; and*
 - *Contribute to enhanced quality of life by relieving congestion and improving air quality within the surrounding areas along the A428 /A1303 corridor and within Cambridge City.*
- 7.1.9 In responding to those objectives, the Cambourne to Cambridge Guided Busway delivers a clear response to the region's strategic transport and growth ambitions through its design, purpose, and projected outcomes. Firstly, in line with the aim to **achieve improved accessibility to support economic growth**, the scheme creates a direct, high-quality public transport link between Cambourne and key employment

centres in Cambridge. This enhanced connectivity reduces travel times, broadens access to the labour market, and strengthens ties between new housing development and jobs thereby supporting inclusive growth across the Greater Cambridge area.

- 7.1.10 Secondly, the busway actively supports the goal to **deliver a sustainable transport system along the A428/A1303 corridor**. It prioritises non-car modes by integrating electric bus services, active travel routes, and strategically located travel hubs. The dedicated infrastructure allows public transport to bypass congestion points, making it a more attractive option for commuters. By fostering modal shift and aligning with zero-emission transport strategies, the scheme represents a meaningful step toward regional carbon reduction and long term environmental resilience.
- 7.1.11 Finally, the project responds directly to the third aim: **enhancing quality of life by relieving congestion and improving air quality**. By removing reliance on private vehicles and easing peak-period pressure on local roads, the C2C scheme contributes to cleaner air and more reliable travel. These outcomes support healthier communities along the corridor and within Cambridge city, reducing the environmental and social stressors associated with car dominated transport systems.
- 7.1.12 Collectively, the scheme demonstrates how coordinated infrastructure planning can meet multiple policy objectives economy, sustainability, and liveability in a single, integrated intervention.

Need

- 7.1.13 The need for the proposed scheme is identified in the applicants 'Statement of Case' **[CD23-01]**, and can be summarised as follows:
- (a) address existing identified constraints on the future growth and success of Greater Cambridge; and*
- (b) unlock identified opportunities for growth, in terms of both housing and the economy within Greater Cambridge.*
- 7.1.14 The Cambourne to Cambridge Guided Busway responds directly to the transport challenges identified within the Scheme's need case. At its heart lies a clear objective: to provide a high quality, reliable, and sustainable public transport corridor that addresses worsening congestion, supports planned economic growth, and improves air quality and travel experience across the A428/A1303 corridor into Cambridge. The Scheme is designed to accommodate rapid population and employment growth, particularly west of the city, and to counteract escalating pressures on the existing highway network which, without intervention, is forecast to become critically overstretched by 2031.
- 7.1.15 Current travel patterns in the corridor are dominated by car trips, with public transport services limited, dispersed, and insufficiently attractive to divert demand from private vehicles. Journey times into Cambridge via the A1303/Madingley Road are already lengthy and unreliable at peak times. The need case projects that, in the absence of a significant modal shift, journey times could more than double in future years. The busway counters this trajectory by introducing a dedicated and congestion free route for buses, facilitating consistent and faster journeys irrespective of peak-hour traffic volumes.
- 7.1.16 Additionally, the Scheme is integrally tied to unlocking strategic housing and employment allocations in Cambourne, Bourn Airfield, and West Cambridge. By connecting these emerging communities with Cambridge's economic centres, the busway enhances labour market access, supports business growth, and enables planned development to proceed with transport infrastructure in place. It fulfils key expectations under Local and National Planning Policy Frameworks, which require growth to be underpinned by sustainable transport options.

- 7.1.17 Environmental and health benefits are central to the Scheme's rationale. Through the integration of zero emission buses and active travel infrastructure including dedicated cycling and walking paths the busway contributes to a meaningful reduction in transport emissions. This supports wider objectives, including Net Zero targets and local commitments to biodiversity net gain and air quality improvement. Additionally, the Scheme helps mitigate pressures on Cambridge's constrained city network by intercepting trips before they reach sensitive urban locations, including heritage and residential areas.
- 7.1.18 Importantly, the Scheme is designed to future proof transport provision within a high growth region. Based on the evidence discussed above in section 5, my opinion is that it offers scalable capacity, resilience against traffic disruption, and operational flexibility across seasons and land uses. The travel hub at Scotland Farm, for example, supports park-and-ride functions alongside high quality cycle storage, enabling multimodal access and increasing uptake among a broad range of users.
- 7.1.19 In conclusion, the Guided Busway delivers a well evidenced, strategically aligned and climate conscious response to the urgent need for improved transport within the Greater Cambridge area.

7.2 Main issue (2)

"Whether all statutory procedural requirements have been complied with"

- 7.2.1 The Applicant has demonstrated substantial compliance with all procedural requirements under the TWAO Rules and has confirmed this stance in their note: **"APPLICANT'S NOTE REGARDING COMPLIANCE WITH STATUTORY PROCEDURAL REQUIREMENTS"** (dated 19/06/25) [CD25.04]. Where minor discrepancies arose most notably, premature removal of site notices and the identification of additional land interests post submission prompt and transparent corrective actions were taken, and the relevant authorities were kept fully informed. Affidavit evidence has been duly provided to support this compliance position.

7.3 Main issue (3)

"The main alternative options considered by CCC and the reasons for choosing the preferred option set out in the Order"

- 7.3.1 I do not cover analysis of this main issue (*alternatives*) in my evidence but would draw your attention to the proof of evidence prepared by Jo M Baker, where he concludes:
- Extensive scheme development process has been undertaken in line with DfT guidance, and that that process has been subject to Independent Audit.
 - The outcomes of the work have been subject to two additional reviews on behalf of the Combined Authority.
 - The scheme development process has considered a wide range alignments to the north and south of the A428/A1303 corridor and on-line.
 - Despite assertions to the contrary that process has considered in detail an on-line inbound bus lane similar to that now proposed by CPPF.
 - The work undertaken was informed by 4 formal rounds of consultations, as well as a variety of workshops, Parish Council meetings and one to one meetings. Where it has been practical to do so the scheme has seen changes to reflect local concerns.
 - The outcome of the work undertaken is clear and robust and as the SOBC, OBC and OBC Addendum were prepared by three different organisations an

additional degree of refresh and scrutiny has also taken place over and above the 3rd party reviews.

- 7.3.2 Analysis of alternative proposals for the Cambourne to Cambridge guided busway demonstrates that none offer a valid substitute for the preferred scheme. The development of the preferred option followed a rigorous multi-stage process including early sifting, stakeholder engagement, and comparative assessment under Department for Transport (DfT) guidance. This process has consistently shown that the selected off-road route best satisfies the scheme's objectives, enabling modal shift, unlocking housing and employment growth, and avoiding key environmental and heritage constraints.
- 7.3.3 Alternatives have been considered in detail at each stage. Early options included on-road bus lanes, tidal-flow systems, northern and southern off-line routes, and various Park & Ride configurations. These were evaluated against key performance metrics: journey time reliability, deliverability, stakeholder support, and compatibility with growth plans for Cambourne West, Bourn Airfield, and West Cambridge. The optimal solution an off-road segregated corridor with sensor-guided vehicles emerged as the only proposal capable of supporting sustainable transport and achieving full compliance with national, regional, and local policy.
- 7.3.4 In particular, the Cambridge Past Present and Future's 'on-road' proposal has repeatedly failed to meet the scheme's objectives. Presented as an inbound bus lane along Maddingley Road, CPPF's route lacks the capacity, reliability, and future flexibility required. It would cause unacceptable disruption to general traffic and compromise safety, particularly outside the American Cemetery. The proposal disregards the lack of scope for meaningful segregation within the constrained corridor, while understating its impact on heritage assets and protected landscapes.
- 7.3.5 The CPPF option also misrepresents its comparative effectiveness. Contrary to claims, this on-road alternative was assessed in depth during the 2017–2018 consultations and again in the Outline Business Case [CD1-20.01]. The resulting evaluation, audited independently in 2021, confirmed that the off-road route offers greater transport performance, environmental protection, and alignment with long-term growth. CPPF's assumptions around land requirements and deliverability have been shown to be inaccurate, and the proposed bus priority measures do not meet modern standards for high-quality public transport.
- 7.3.6 Additionally, the CPPF route fails to accommodate future integration with East West Rail or scale to serve increased population forecasts. It lacks connectivity to key employment hubs such as West Cambridge and fails to support first/last mile active travel. Its continued promotion by objectors does not reflect its identified inferiority as documented in the appraisal framework and endorsed by multiple transport experts.
- 7.3.7 Overall, I do not consider that CPPF's alternative is sufficiently viable or developed to amount to a material consideration, particularly as it is inchoate in important respects, as shown by the Applicant's technical analysis. Even if it is a material consideration, given the identified deficiencies, I consider that it should be afforded no weight.

7.4 Main issue (4D)

Main issue (4D) "The effect of the Scheme on the Green Belt".

- 7.4.1 In response to main issue 4(d) "The effect of the scheme on the Green Belt", I provide the following assessment as to the following aspects, without prejudice to my analysis and conclusions above which are the principal part of my evidence on this issue.

Harm to Green Belt

- 7.4.2 The Cambourne to Cambridge Guided Busway scheme intersects several areas of designated Green Belt land, particularly between the M11 and the western edge of Cambridge. The applicant has provided a detailed assessment of the scheme's impact on the Green Belt, structured around the National Planning Policy Framework (NPPF) and local planning policies.
- 7.4.3 Table 3.1 of the submitted Green Belt Assessment **[CD1-18]** identifies seven sub-areas where the scheme may conflict with Green Belt purposes. These include areas near Coton, the proposed Scotland Farm Travel Hub, and land adjacent to the West Cambridge development. The degree of harm varies from "no harm" to "moderate," depending on the visibility, volume of development, and landscape context. For example, Sub-Area A.1, near the West Cambridge site, is considered to have low harm due to its proximity to existing urban development and limited visual intrusion. In contrast, Sub-Area E.3, where the Travel Hub is proposed, is assessed as having moderate harm due to the introduction of built form and car parking into open countryside.
- 7.4.4 The applicant has sought to evaluate the scheme against the five national Green Belt purposes: checking unrestricted sprawl of large built up area, preventing towns merging into one another, safeguarding the countryside from encroachment, preserving the setting and spatial character of historic town settings, and assisting in urban regeneration by encouraging the recycling of derelict and other urban land. It also considers the specific purposes of the Cambridge Green Belt, which include preserving the city's compact character and preventing coalescence with surrounding villages. The scheme is found to conflict primarily with the purpose of preserving the setting and special character of Cambridge, particularly in areas where new infrastructure would be visible from the west and south-west.
- 7.4.5 To mitigate these impacts, the scheme incorporates extensive landscape and ecological enhancements, including new woodland planting, biodiversity net gain measures, and the creation of new green infrastructure. These are intended to soften the visual impact and enhance the environmental quality of the affected areas over time.
- 7.4.6 The applicant has also sought to address the temporary impacts of construction compounds, which are located within the Green Belt. These are considered remediable and not to result in permanent harm, provided that restoration measures are implemented post construction.
- 7.4.7 In conclusion, while the scheme does result in some harm to the Green Belt, particularly in terms of openness and visual impact, these impacts are limited in scale and can be mitigated through design and landscaping. The assessment sets the stage for a justification under "very special circumstances," which is explored in the next section.

Very Special Circumstances:

- 7.4.8 The applicant has acknowledged that the Cambourne to Cambridge Guided Busway constitutes "inappropriate development" in the Green Belt under the NPPF, as it does not preserve openness and conflicts with some Green Belt purposes. As such, it must demonstrate "very special circumstances" (VSC) to justify approval.
- 7.4.9 The VSC case is built on a combination of strategic need, lack of viable alternatives, and the scheme's substantial public benefits. The submitted Green Belt Assessment **[CD1-18 page 37]** outlines 17 factors that collectively form the VSC justification. These are grouped into four main themes:

Compelling Need:

- 7.4.10 The scheme addresses critical transport challenges in the Greater Cambridge region, including severe congestion, poor public transport connectivity, and constraints on housing and employment growth. It supports strategic development sites such as

Cambourne West, Bourn Airfield, and West Cambridge, which are dependent on improved transport links.

Lack of Alternatives:

- 7.4.11 The applicant has sought to details an extensive optioneering process that considered both on-road and off-road alignments as part of the submission. On-road options were found to be less effective in terms of journey time, reliability, and environmental impact. All viable routes between Cambourne and Cambridge would intersect the Green Belt, making its use unavoidable.

Public Benefits:

- 7.4.12 The scheme delivers significant economic, social, and environmental benefits. These include reduced journey times, improved air quality, enhanced access to jobs and services, and support for sustainable travel modes. It also contributes to biodiversity net gain and provides new green infrastructure and recreational access.

Environmental Enhancements:

- 7.4.13 The scheme includes substantial mitigation and enhancement measures, such as new woodland planting, habitat creation, and the provision of replacement open space. These are designed to offset the visual and spatial impacts on the Green Belt and improve its overall quality and accessibility.
- 7.4.14 When considered cumulatively, I believe that these outweigh the harm caused by the scheme's inappropriateness and any other adverse effects. It correctly cites legal precedents supporting the aggregation of multiple benefits as a valid basis for establishing VSC.
- 7.4.15 Based on the evidence submitted in support of the scheme, my judgement is that the Cambourne to Cambridge Guided Busway triggers the NPPF test for "very special circumstances." This judgement is predicated on the scheme's strategic importance, public benefits, and environmental enhancements justifying its development within the Green Belt.

7.5 Main issue (7)

"Any other matters which may be raised at the inquiry which may be important and relevant to the Secretary of State's decision".

National Trust / Cambridge Preservation Society - Covenants

Comparison between the two Covenants

- 7.5.1 The two Covenants of issue are submitted as part of the wider application documentation specifically:
- **[CD3.01]** – Deed of Covenant between The Cambridge Preservation Society and the National Trust (30 APRIL 1958); and
 - **[CD3.02]** – Deed of Covenant between The Cambridge Preservation Society and the National Trust (10 December 1958).
- 7.5.2 The following is a summary of each covenant:

Covenant dated: 30 APRIL 1958

Purpose and Parties

- 7.5.3 The Cambridge Preservation Society (Covenantor) owns land in Coton and Saint Giles, Cambridge.
- 7.5.4 The National Trust is empowered under Section 8 of the National Trust Act 1937 to accept restrictive covenants even if it doesn't own adjacent land.
- 7.5.5 The Covenantor agrees to subject the land to permanent restrictions for conservation purposes.

Key Provisions

- 7.5.6 The land, totalling approximately 59 acres, is to be protected from changes that would harm its natural character, amenities, or the Trust's interests.
- 7.5.7 The agreement sets out specific restrictions, including:
- No material alteration of the land's natural appearance.
 - No new buildings or structures without the Trust's written consent.
 - No mining or quarrying without approval.
 - No felling or altering of trees without permission.
 - Agricultural use is permitted as long as it follows local customs.
-

Covenant dated: 10 DECEMBER 1958

Purpose and Parties

- 7.5.8 The Cambridge Preservation Society (Covenantor) owns approximately 569.803 acres of land in the Parish of Coton, County of Cambridge.
- 7.5.9 The National Trust, under Section 8 of the National Trust Act 1937, is empowered to accept restrictive covenants even without owning neighboring land.
- 7.5.10 The Covenantor agrees to place the land under permanent protection, preserving its character and natural beauty.

Key Provisions

- 7.5.11 The Deed establishes binding covenants that transfer with the land, ensuring future owners remain subject to the same restrictions.
- 7.5.12 The Covenantor is not personally liable for breaches after disposal of interest in the property.
- 7.5.13 Specific restrictions and stipulations include:
- No acts that materially alter the natural appearance or harm the land's amenities or the Trust's interests.
 - No construction of buildings or structures without written consent from the Trust.
 - No opening of mines or quarries without prior Trust approval.

- No felling, topping, lopping, or replacing of timber or timber-like trees without consent also controls changes to species mix or distribution.
- Agricultural use is permitted, as long as it follows local customs of farming and husbandry.

7.5.14 The following in a comparative breakdown of the two respective 1958 covenants:

Aspect	30 April 1958 Deed	16 December 1958 Deed
Land Area	59 acres (Coton & St. Giles)	569.8 acres (entirely in Coton)
Geographic Scope	Spans two parishes – covers Madingley Hill and Coton Orchard	Broad area west of Cambridge, including farmland, orchard and hillsides
Structure of Restrictions	5 core restrictions + farming exemption	Identical 5 restrictions + same exemption wording
Discretionary Power	All changes subject to Trust's opinion	Same wording – Trust given wide discretionary authority
Tree Protection Clause	Prohibits felling/lopping of timber or timber like trees without consent; emphasises species integrity	Same clause; scale of tree removal control more impactful; given broader land coverage
Development Control	Prohibits new buildings/structures without written approval	Same control, but over a much larger planning relevant footprint
Legal Foundation	Section 8, National Trust Act 1937	Section 8, National Trust Act 1937
Dispute Resolution	Arbitration via President of the Land Agents' Society.	Arbitration via President of the Land Agents' Society.
Enforceability	Class D(ii) Land Charge	Also Class D(ii); binds successors

Table 4 – Comparison of Covenants

7.5.1 Both deeds operate in parallel, using near identical language and legal machinery. The *April deed* establishes initial protections for a smaller but symbolically significant parcel, including the historic core of Coton Orchard. The December deed seeks an expanded the conservation remit, safeguarding nearly ten times the area and consolidating the green wedge west of Cambridge. Together, they form a legal and ecological continuum resisting piecemeal urbanisation.

My evidence and summary conclusion on this matter

National Trust Act 1907

7.5.2 In order to assess this effectively, I must first consider and understand the general purpose of the National Trust Act 1907 **[CD5.01]**. The core purpose of the act is to promote the permanent preservation of:

- Lands and tenements (including buildings) of beauty or historic interest
- The natural aspect, features, and wildlife of such lands, where practicable

7.5.3 The key provisions of the act grant the Trust legal authority to:

- Acquire, manage, and preserve properties for the public benefit
- Ensure certain properties are inalienable, meaning they cannot be sold or mortgaged
- Charge admission to Trust properties and enter into arrangements with local authorities
- Incorporated the Trust as a charitable organisation, prohibiting profit distribution among members

7.5.4 The Act laid the foundation for the Trust's role in heritage conservation, public access, and education.

7.5.5 It must be recognised however that the covenants under scrutiny here do not relate to land or tenements of beauty or historic interest, simply land.

Public Interest and Statutory Balancing

7.5.6 I highlight that the Transport and Works Act 1992 provides a statutory mechanism to override such private legal instruments where a scheme is demonstrably in the public interest. The Cambourne to Cambridge Busway is a strategic infrastructure project designed to:

- To relieve congestion
- To support economic growth:
- To deliver a sustainable transport system: A new guided bus route, with a path for walkers, cyclists and for most of the route, horse-riders, alongside as well as a new travel hub at Scotland Farm which will encourage park and ride journeys as well as active travel.
- To enhance quality of life:

7.5.7 I believe that the public benefit test underpins the Secretary of State's decision making powers. In this case, the benefits of the scheme including improved connectivity, reduced emissions, and economic uplift are substantial and long term, and outweigh the localised and mitigable impacts on covenanted land.

7.5.8 Planning policy now prioritises sustainable transport infrastructure as a key enabler of environmental and social goals. The covenants must be interpreted in light of contemporary needs, not frozen in time. While the covenants are legally binding, they are not sacrosanct. I see justified reasoning for disapplying restrictive covenants through TWA Orders where:

- The land is required for essential infrastructure.
- The impact can be mitigated or compensated.

- 7.5.9 The covenant's primary purpose will be breached by the proposed scheme, but when balanced against wider needs does provide a legitimate and justified reason for this.
- 7.5.10 In this case, the Trust retains discretion to permit development under the covenant terms, by opting to not enforce the covenant in a given instance.

No Reasonable Alternatives

- 7.5.11 The Greater Cambridge Partnership has assessed multiple route options. Alternatives that avoid covenanted land either:
- Fail to meet transport objectives (e.g. slower, less direct, or less reliable routes).
 - Introduce greater environmental harm elsewhere, such as through West Fields or more sensitive habitats.
 - Require more land acquisition or higher costs, undermining deliverability.
- 7.5.12 The current alignment is considered the best option in balancing transport, environmental, and legal constraints. The covenants, while important, cannot be allowed to sterilise strategic corridors indefinitely.

Conclusion

- 7.5.13 The covenants are a valuable conservation tool, but they are not an absolute barrier. The Cambourne to Cambridge Guided Busway is a regionally significant project that meets urgent transport, environmental, and growth needs. With appropriate mitigation, consultation, and where possible, negotiated variation of the covenants, the scheme can proceed without undermining the spirit of the original protections.

7.6 Main issue (8/9)

"Certificate Test"

- 7.6.1 A Section 19 certificate is a statutory safeguard designed to protect open space, common land, or town/village greens when they are subject to compulsory acquisition. It ensures that the public interest in such land is preserved, either through replacement land or by demonstrating that the loss is negligible.

Legal Basis

- 7.6.2 Section 19(1)(a): The Secretary of State may issue a certificate if exchange land is provided that is not less in area and equally advantageous to:
- The public
 - Any persons entitled to rights over the land (e.g. rights of common)
- 7.6.3 Section 19(1)(b): A certificate may be issued without exchange land if:
- The land is under 209 square metres
 - Or the acquisition is for highway widening or drainage purposes
- 7.6.4 Section 19(1)(aa): Applies where the appropriation will secure preservation or improve management of the land. Without a Section 19 certificate, the acquisition of open space land may trigger Special Parliamentary Procedure (SPP) The certificate acts as a legal exemption from SPP, provided the conditions are met.

- 7.6.5 Applications are made to the Planning Inspectorate's Commons Team, and must include:
- Draft order and maps (showing land to be acquired and exchange land)
 - Details of rights of access or common
 - Justification for why the exchange land is equally advantageous
 - Public notice is required, and objections may trigger a public inquiry
- 7.6.6 As specified within the submission material, an application is made as part of the TWAO for an exchange land certificate under Section 19(1)(a) and Schedule 3 paragraph 6(1)(a) of the Acquisition of Land Act 1981 ('the 1981 Act') in respect of the provision of exchange land if the compulsory acquisition of Open Space land related to the proposed M11 overbridge that carries the Scheme over the M11 located on the western outskirts of Cambridge City is required.
- 7.6.7 Specific areas within the proposed Replacement Open Space have also been identified as Exchange Open Space land to satisfy the requirement of Section 19 (1) (a) of the 1981 Act. Appendix A of the Open Space Assessment **[CD1-19]** included a draft of the application to the Secretary of State for a certificate under S19 of the 1981 Act that the land to be given in exchange is not less in area and is equally advantageous to the persons if any, entitled to rights of common or other rights, and the public, and that the land given in exchange has been or will be vested in persons in whole the land purchased was vested, and subject to like rights, trusts and incidents as attach to the land purchased.
- 7.6.8 Based on the materials presented as part of this TWAO I believe that the applicant has demonstrated compliance requirements of Section 19 (1) (a) of the Acquisition of Land Act 1981.

7.7 Main issue (10/11)

"Open Space"

7.7.1 In response to main issue (10 / 11), the following section sets out my professional planning assessment of the impacts of the Scheme on designated Open Space and sports facilities within the administrative boundary of Cambridge City Council. My evidence draws upon the findings of the submitted Open Space Assessment **[CD1-19]**, and from the Planning Statement **[CD1-15]**, and the development proposals themselves, with specific reference to adopted planning policy and consultation undertaken during scheme evolution.

7.7.2 The Cambourne to Cambridge guided busway proposal has been carefully shaped to reflect both national and local planning policies concerning open space. This section evaluates the scheme's alignment with the National Planning Policy Framework (NPPF), particularly paragraphs 103–108, and with Policy 67 of the Cambridge Local Plan (2018), which governs the protection of open space.

National Infrastructure Planning Policy

7.7.3 Chapter 8 of the NPPF, which focuses on promoting healthy and safe communities, outlines the government's expectations for safeguarding open space. It recognises open space as essential for public health, biodiversity, visual amenity, and climate resilience. Paragraph 104 sets out three conditions under which development on existing open space may be permitted:

- a) where an assessment has demonstrated that the space is no longer needed;
- b) where the loss is offset by replacement provision of equal or better quality and quantity in an appropriate location;
- c) where the development provides alternative sports or recreational facilities whose benefits clearly outweigh the loss.

7.7.4 The Open Space Assessment [CD1-19] submitted with the scheme provides the necessary evidence to demonstrate compliance with these criteria. Although the scheme involves the loss of approximately 5,380 sqm of designated open space including areas east of the M11 and part of the University Rugby Practice Pitch it incorporates mitigation measures.

7.7.5 Central to this mitigation is the provision of Replacement Open Space west of the M11. The preferred site (Site C) exceeds the area lost and offers enhanced ecological and recreational features, including wildflower-rich grassland, native tree planting, seating, and a bridleway connection. These improvements directly satisfy paragraph 104(b) of the NPPF by offering “equivalent or better provision” in a location that integrates well with the wider green infrastructure network.

7.7.6 Moreover, the scheme supports the broader aims of paragraph 103 by enhancing access to a network of high-quality open spaces that promote public health and environmental resilience. The guided busway itself encourages active travel and improves accessibility to open spaces along its corridor. In light of these factors, I consider the scheme to be highly compliant with national policy and assign it significant weight.

Adopted Local Plan Policies

7.7.7 At the local level, the Cambridge Local Plan 2018 [CD6-01] reinforces NPPF principles through Policy 67, which protects open space of environmental and recreational value. Development is only permitted where:

- (a) the space is replaced with open space of equal or better quality, quantity, and accessibility, located within a short walking distance (typically 400m);
- (b) the development meets a demonstrable educational need and does not compromise formal sports provision;
- (c) the replacement open space is fully available before the existing space is lost.

7.7.8 The scheme satisfies these criteria in several respects. The Replacement Open Space at Site C not only meets but exceeds the required 5,380 sqm. Enhancements to biodiversity and landscape quality such as planting, improved pathways, and integration with the ecological network ensure that the new space is at least equivalent, if not superior, to the space being lost. Accessibility is secured via the guided busway access track, public bridleway links, and proximity to communities in Coton and West Cambridge.

7.7.9 Policy 67’s requirement that replacement space be available before any loss occurs is addressed through a bespoke planning condition mandating public access to the new site prior to the busway’s operation. While temporary disruption to open space access may occur during construction, this is mitigated through a comprehensive Code of Construction Practice and Local Environmental Management Plan. Given these safeguards, I assign minimal weight to any temporary construction impacts and conclude that they do not undermine policy compliance.

- 7.7.10 The scheme also maintains spatial equity within the Newnham ward, avoiding any net increase in open space deficiency. Furthermore, it strengthens connectivity between key natural assets, including the City Wildlife Site east of the M11 and the Coton Countryside Reserve, thereby supporting Policy 67's emphasis on ecological integration and accessibility.
- 7.7.11 While the scheme broadly complies with Policy 67, it is acknowledged that full alignment with every detail may not be achieved. Specifically, although the replacement site is suitably located, it lies slightly beyond the standard 400m radius from parts of the lost open space particularly the Rugby Practice Grounds as required by part (b) of Policy 67. However, this deviation is minor and carries limited weight, especially given that the NPPF's requirements are less stringent than those of the local policy.
- 7.7.12 Additionally, Policy 73 (Community, Sports and Leisure Facilities) is relevant to parts of the affected land, such as the University Rugby Practice Pitch. The scheme does not encroach on the active playing field and includes landscaping and fencing to preserve its function and quality. As such, there is no conflict with Policy 73.
- 7.7.13 In all respects, I consider the scheme to be strongly aligned with Policies 67 and 73 and assign both a high significance of weight.

Summary

- 7.7.14 Overall, the Cambourne to Cambridge guided busway scheme demonstrates robust compliance with both national and local planning policies concerning open space. It recognises the value of open space to community wellbeing and environmental sustainability, and proactively mitigates any permanent losses through well-evidenced re-provision.

8. SUMMARY OF EVIDENCE FROM OBJECTORS

- 8.1.1 This section of my Proof of Evidence identifies and summarises the principal themes emerging from formal objections submitted in response to the Cambourne to Cambridge (C2C) Transport and Works Act Order (TWAO) application. These thematic groupings highlight the areas of greatest concern as articulated by stakeholders including landowners, statutory consultees, institutions, residents' associations, and individual members of the public. The summary does not seek to assess the validity of any given representation but instead provides a high level overview of the matters raised, to support the Inquiry's broader understanding of the issues in contention.

1. Environmental and Ecological Impact

- 8.1.2 A consistently cited area of objection relates to potential ecological harm resulting from the proposed off-road busway alignment, especially in relation to Coton Orchard. Objectors note that the site is both a County Wildlife Site and a Priority Habitat under the UK Biodiversity Action Plan. Concerns have been raised over the direct loss of orchard habitat, which supports a diverse range of flora and fauna including bats, birds, pollinators, and fungi. Representations highlight the presence of veteran trees and species rich habitats that are considered irreplaceable. The proposed mitigation strategy and the Scheme's stated aim to achieve Biodiversity Net Gain (BNG), even at a target of 20% are described by some objectors as inadequate or unachievable in the context of these losses.

2. Green Belt, Landscape Character, and Heritage

- 8.1.3 Numerous objections focus on the Scheme's incursion into designated Green Belt land, expressing concern that such development is inappropriate under national planning policy unless "very special circumstances" can be demonstrably shown. Impacts on the

openness and rural character of the landscape are also raised, particularly in sensitive areas such as Madingley Hill, Rifle Range Road, and the orchard itself. In parallel, a number of representations highlight indirect harm to nearby heritage assets including listed buildings and conservation areas citing adverse effects on setting, tranquillity, and historical character. One representation identifies cultural loss linked to the orchard's historical role during the Second World War. Another raises highly personal concerns regarding family heritage, referencing a burial site located within the proposed land acquisition boundary.

3. Route Selection and Assessment of Alternatives

- 8.1.4 Several objectors question the route optioneering process that led to the selection of the off-road alignment. Particular emphasis is placed on the perceived inadequacy of the assessment of on-road alternatives, such as the A1303 alignment proposed by Cambridge Past, Present and Future (CPPF). These alternatives are viewed by some stakeholders as less environmentally damaging, more cost effective, and better aligned with existing travel corridors. A recurring claim is that the selection of the proposed alignment reflects a desire to open up development opportunities on greenfield land, rather than responding solely to strategic transport needs. Transparency in decision making and evidence presented in support of route choice is identified as a key concern.

4. Economic and Strategic Viability

- 8.1.5 Several objections raise questions over the Scheme's economic justification, citing the Benefit Cost Ratio (BCR), which in some representations is quoted as being below 0.5 significantly below typical thresholds used to justify public sector transport investment. Although the adjusted BCR reflects assumptions around wider economic impacts and Land Value Uplift (LVU), objectors note that such assumptions rely heavily on future development scenarios and may not represent robust evidence of deliverable economic benefit. Some representations frame this as a risk to public value for money, arguing that the strategic rationale for the Scheme is insufficiently compelling when viewed in light of costs and potential duplication with infrastructure projects such as East West Rail.

5. Public Benefit and Transport Functionality

- 8.1.6 A number of respondents express doubt about the public benefit case put forward by the applicant. Concerns include the projected journey time improvements described in some cases as minimal and the end point of the route, which is said to limit connectivity to major trip attractors such as Cambridge city centre or Addenbrooke's Hospital. Critics argue that the proposed alignment does not respond effectively to existing commuting patterns, nor is it sufficiently future proofed to accommodate changes in travel behaviour post COVID. Some representations also raise questions about integration with other planned or proposed transport infrastructure, including mass transit proposals and active travel networks.

6. Consultation and Governance

- 8.1.7 A number of landowners and institutional stakeholders cite dissatisfaction with the consultation and engagement process undertaken by the Greater Cambridge Partnership (GCP) and Cambridgeshire County Council. Specific concerns include a lack of continuity in communication, delays in receiving information, and limited effort to reach private treaty agreements prior to the submission of compulsory acquisition powers. One representation refers to perceived preferential treatment of certain institutions. Broader concerns have also been voiced regarding transparency and decision making within the City Deal process, including reference to past complaints about the influence of land development interests.

7. Land Acquisition and Private Rights

- 8.1.8 Several representations object to the use of compulsory purchase powers within the draft Order. These include concerns from individuals with personal or operational ties to affected land, including working farms, long held family landholdings, and properties with ongoing development plans. In one case, a burial site with familial and spiritual significance is said to fall within the limits of deviation, despite prior assurances to the contrary. Objections of this nature challenge both the procedural and ethical basis for the proposed land acquisition, especially where claims are made that alternatives were not properly explored.

8. Technical, Design, and Construction Concerns

- 8.1.9 Technical uncertainties relating to the operation and delivery of the Scheme are also raised by some objectors. These include unresolved issues surrounding the guidance system to be employed on the busway, potential flood risks not fully accounted for in modelling, and the adequacy of noise, dust, and air quality controls both during construction and operation. Comparisons are made to issues experienced on similar guided busway projects, and caution is urged regarding lessons learned. In locations such as Rifle Range Road and Coton Orchard, the potential for cumulative impacts arising from construction, visual intrusion, and ecological loss are highlighted as requiring further scrutiny.

9. RESPONSES TO GROUNDS OF OBJECTIONS (OUTSIDE OF MAIN ISSUES)

- 9.1.1 Based on the above grouping of objections, I will now respond to and assess the key areas of contention within my Proof of Evidence:

9.2 Environmental and Ecological Impacts

- 9.2.1 The applicant recognises the ecological value of Coton Orchard and the surrounding area, and has designed the Scheme to minimise harm while delivering substantial mitigation and enhancement measures. The orchard is acknowledged as a Priority Habitat under the UK Biodiversity Action Plan and a County Wildlife Site, and the applicant has sought to address concerns regarding the loss of irreplaceable habitats and disruption to protected species. Specific measures include:
- 9.2.2 **Biodiversity Net Gain (BNG):** The Scheme commits to achieving a minimum of 10% BNG, with a target of 20%, using the Natural England Biodiversity Metric 4. This commitment reflects the applicant's intention to deliver meaningful ecological enhancements, including the creation of new habitats such as wetlands, woodlands, and species rich grasslands. These measures are designed to offset losses and contribute positively to regional biodiversity.
- 9.2.3 **Veteran Trees and Protected Species:** The applicant has undertaken detailed surveys to identify veteran trees and habitats supporting protected species, such as Barbastelle bats, great crested newts, and rare fungi. Veteran trees are retained, and mitigation strategies are implemented for those affected. For example, embankments and planted hedges to encourage elevated bat crossing of the busway and sensitive lighting are incorporated into the design to maintain habitat connectivity, while badger underpasses and other features are included to support wildlife movement.
- 9.2.4 **Environmental Statement (ES):** I believe that ES [CD1-10.01] has provided a comprehensive assessment of potential impacts on biodiversity, air quality, water quality, and noise levels that I understand to be effective and reasonable. Mitigation measures outlined in the ES include dust control, noise and vibration management, and water flow regulation. The applicant asserts that these measures are consistent with best practice and comply with relevant environmental policies and regulations.

9.3 Green Belt, Landscape Character and Heritage

- 9.3.1 I acknowledge the sensitivity of the Green Belt and the importance of preserving the landscape character and heritage assets of the area, and believe that the Scheme has been designed to minimise harm to these features while delivering essential transport infrastructure. Key points include:
- 9.3.2 **Green Belt Justification:** I agree with the findings of the Green Belt Assessment [CD1-18], which concludes that the Scheme meets the “very special circumstances” test under the National Planning Policy Framework (NPPF). My assessment of the submitted planning documentation concludes that the Scheme is essential to deliver strategic growth and sustainable transport in the region, and that no viable alternative exists outside the Green Belt. Measures to minimise harm include landscape integration and low profile design elements have been taken where possible.
- 9.3.3 **Landscape Integration:** The Scheme incorporates a comprehensive Landscape and Visual Impact Assessment (LVIA), which identifies sensitive areas and proposes bespoke planting and design solutions to mitigate visual impacts. For example, the landscape vision includes the creation of a multifunctional green corridor that enhances biodiversity, improves visual amenity, and integrates the busway into the surrounding environment.
- 9.3.4 **Heritage Mitigation:** The Scheme avoids direct physical impacts on designated heritage sites and includes mitigation measures such as sensitive landscaping, noise attenuation, and archaeological assessments. My judgement based on the available materials and in regard to the findings within the supporting heritage proof of evidence prepared by Tom Wilson [CD26-01-APP-W2-1] is that these measures comply with relevant NPPF policies and local planning policies as set out above under section 5.11 of this proof. In this instance I concluded that when balancing the limited heritage harm against demonstrable and strategic public benefits as required under **paragraph 202** of the NPPF the residual impacts are proportionate and justified. The sensitive assets will retain their significance, and no mitigation beyond embedded design features is deemed necessary. This conclusion confirms a sound basis for policy compliance under Cambridge Local Plan **Policy 61** and South Cambridgeshire Local Plan Policies **NH/1 and NH/14**.

9.4 Route Selection and Assessment of Alternatives

- 9.4.1 The applicant has undertaken a robust and transparent optioneering process to identify the preferred route, considering transport, environmental, and economic factors. This process included extensive consultation with stakeholders and independent audits to validate the decision making framework. Key points include:
- 9.4.2 **On-Road Alternatives:** The on-road A1303 alignment proposed by Cambridge Past, Present and Future (CPPF) was assessed as part of the optioneering process but was found to not achieve and deliver the Scheme’s objectives. I believe that the off-road route offers faster and more reliable journey times, better opportunities for environmental mitigation, and avoids impacts on sensitive areas such as Madingley Wood and the American Military Cemetery.
- 9.4.3 **Independent Audit:** An independent audit conducted in 2021 reviewed the route selection process and confirmed that the business case remains sound. The preferred alignment was selected based on a comprehensive multi criteria assessment, which considered factors such as journey time reliability, environmental impact, deliverability, and long term capacity.
- 9.4.4 **Stakeholder Engagement:** The applicant has engaged extensively with stakeholders, including statutory consultees, local authorities, and community groups, to ensure that the route selection process reflects a balanced consideration of competing priorities.

9.5 Economic and Strategic Viability

- 9.5.1 Based on the material available to me, I conclude that the Scheme delivers significant economic and strategic benefits, supporting the growth of the Greater Cambridge region and addressing critical transport challenges. Key points include:
- 9.5.2 **Benefit-Cost Ratio (BCR):** While the initial BCR is below typical thresholds for public sector transport investment, the indicative BCR which includes Wider Economic Impacts and Land Value Uplift (LVU) moves the Scheme into the Medium Value for Money category. This adjustment reflects the Scheme's role in enabling strategic growth and unlocking development potential in the region.
- 9.5.3 **Economic Growth:** The Scheme supports economic growth by improving accessibility, reducing congestion, helping to facilitate future housing developments and linking key employment and housing sites to Cambridge City. Specific benefits include reduced journey times, increased bus passenger demand, and wider economic impacts such as improved labour market access and business investment opportunities.
- 9.5.4 **Strategic Importance:** The Scheme is designed to address severe congestion, poor public transport provision, and high car dependency along the A428/A1303 corridor. It aligns with regional growth strategies and supports sustainable development at key strategic sites, including Cambourne West, Bourn Airfield, and West Cambridge.

9.6 Public Interest and Transport Functionality

- 9.6.1 The Scheme delivers significant public benefits, addressing key transport challenges and supporting sustainable development in the region. Key points include:
- 9.6.2 **Journey Time Savings:** The off-road route offers significantly improved journey time reliability and resilience, particularly during peak periods. This is critical for encouraging modal shift from private car use to public transport and reducing congestion on key routes.
- 9.6.3 **Connectivity:** The Scheme enhances connectivity between Cambourne and Cambridge, linking key employment and housing sites to the city. It also is designed to support active travel through dedicated pedestrian and cyclist infrastructure.
- 9.6.4 **Environmental Benefits:** The Scheme contributes to reduced vehicle emissions, improved air quality, and enhanced biodiversity, supporting the region's sustainability goals. These benefits align with national and local policies promoting sustainable transport and development.

9.7 Consultation and Governance

- 9.7.1 The applicant has undertaken extensive consultation and engagement with stakeholders, including statutory consultees, landowners, and the local community. Key points include:
- 9.7.2 **Consultation Process:** The Greater Cambridge Partnership (GCP) conducted four formal consultation rounds between 2015 and 2022, incorporating feedback into the Scheme's development. The Consultation Report provides a detailed analysis of the engagement process, demonstrating the iterative nature of the consultation and the applicant's responsiveness to stakeholder concerns.
- 9.7.3 **Landowner Engagement:** The applicant has engaged with affected landowners through their agents, offering discussions on acquisition and impacts. Specific concerns, such as access arrangements and design flexibility, have been addressed where possible. The applicant asserts that these efforts comply with statutory requirements and best practice.

9.8 Land Acquisition and Private Rights

- 9.8.1 The applicant acknowledges the sensitivities associated with land acquisition and has sought to minimise impacts on affected landowners. Key points include:
- 9.8.2 **Compulsory Purchase:** The Scheme includes provisions for the compulsory acquisition of land necessary for its development. The material submitted in support of the TWAO has sought to outline the need for land acquisition to address transport network issues, link key sites, and unlock development potential.
- 9.8.3 **Mitigation Measures:** The Scheme includes measures to mitigate impacts on sensitive areas, such as burial sites, operational farmland, and properties with ongoing development plans. Access to private properties and rights of way will be maintained throughout construction and operation, and the applicant is committed to respectful handling of sensitive matters.

9.9 Technical, Design and Construction Concerns

- 9.9.1 The Scheme has been designed to address technical and construction related concerns, incorporating lessons learned from previous projects and ensuring compliance with relevant standards. Key points include:
- 9.9.2 **Guidance System:** The applicant has addressed uncertainties around the guidance system, ensuring that it meets safety and operational requirements. The Scheme incorporates sustainable design features, such as hybrid electric vehicles and renewable energy sources, to minimise environmental impact.
- 9.9.3 **Flood Risk and Environmental Health:** The Flood Risk Assessment seeks to confirm that the Scheme complies with the NPPF and local flood risk policies. Noise, air quality, and land contamination impacts have been assessed in the Environmental Statement, with mitigation measures secured through the Code of Construction Practice.
- 9.9.4 **Construction Management:** The Scheme includes a detailed construction management plan to minimise disruption, including measures for dust control, noise and vibration management, and traffic management. Sensitive areas, such as Rifle Range Road and Coton Orchard, are addressed with bespoke mitigation strategies.

10. RESPONSES TO INDIVIDUAL OBJECTORS

- 10.1.1 The following section seeks to identify and respond to wider objections and representation made relevant to my evidence and encompasses the following:

Respondee / Objector	Reference	Focus of Representation
Coton Orchard Limited, Houston Crest Properties Limited and Anna Gazeley	OBJ 52	NPPF re. loss of Orchard
J and W R Sadler	OBJ 102	Loss of Green Belt land.
Clare Hall, University of Cambridge	OBJ 213	Planning Policy Compliance
Federation of Cambridge Residents' Association	OBJ 309	Green Belt land
Cambridge Past Present Future	OBJ 251	Various

CPPF Objection (OBJ251): Summary and Rebuttal

Overview of Objection Themes

10.1.2 CPPF's objection to the Cambridge to Cambourne Guided Busway Scheme primarily raises concerns under the following themes:

- The robustness and currency of transport modelling and underlying assumptions
- Viability and environmental performance of proposed alternatives, particularly an inbound bus lane on Madingley Hill
- Landscape and ecological harm to Coton Orchard and surrounding rural areas
- Compatibility and integration with future infrastructure schemes including East West Rail (EWR)
- Technological feasibility and design of guided bus infrastructure

Response to Modelling and Strategic Fit

Objection

10.1.3 CPPF argues that transport modelling supporting the Scheme is outdated, having been produced pre or mid-pandemic, and insufficiently accounts for changing travel behaviours, remote work patterns, and the possible implementation of major transport schemes such as EWR. They suggest the strategic foundation of Policy SS/7 is now materially altered and no longer applicable.

My response / assessment

10.1.4 The modelling underpinning the Scheme is fully compliant with Department for Transport (DfT) TAG guidance and based on the CSRM model, which has been applied consistently at each business case stage. COVID adjusted sensitivity testing has already been undertaken using the DfT's uncertainty toolkit (CD8-22), specifically incorporating Method 3 of TAG Unit M4 Appendix B: post model adjustment.

10.1.5 Far from being outdated, these model runs reflect a cautious and evidence based approach at a time of flux. Park & Ride usage has since rebounded and is now reported to be 25% above 2019 levels. Moreover, the modelling does not ignore future schemes: EWR is rightly excluded as it does not meet the "near certain" or "more than likely" threshold defined in TAG Unit M4 (CD8-21).

10.1.6 Planning Policy SS/7 remains extant and applicable; strategic plans are long term frameworks and cannot be invalidated by every subsequent shift in the policy environment. The Scheme remains consistent with national, regional, and local goals promoting sustainable transport.

Response to CPPF's Alternative Proposals

Objection

10.1.7 CPPF promotes a revised version of its 2021 "quick win" package: an inbound bus lane on Madingley Hill. Despite acknowledging its original limitations, CPPF now re-presents it as a viable long term alternative. They claim it is less invasive and environmentally superior to the proposed Scheme.

My response / assessment

10.1.8 This proposal is technically flawed and strategically inferior:

- **Feasibility:** The alternative scheme is **undeliverable within the highway boundary**, directly impacting either Madingley Wood SSSI and the American Cemetery or adjacent properties.
 - **Non-compliance with standards:** Engineering assessments to be submitted as evidence demonstrate non-compliance with DMRB and LTN 1/20 due to safety and design shortfalls.
 - **Safety risks:** The layout introduces dangerous conflict points between right turning vehicles and buses. There is no clear lane priority, and the central bus lane format poses serious risk of collisions a view echoed in the design assessment.
 - **Inferior outcomes:** An inbound bus lane option was comprehensively assessed in the Outline Business Case (OBC), performing materially worse than the Scheme across reliability, journey time savings, and environmental impact.
- 10.1.9 Moreover, the rebranding of a time limited interim proposal originally offered in 2021 on the assumption that schemes like EWR and CAM would come forward as a long term substitute do not afford the same likelihood of success as the proposed Cambridge to Cambourne guided busway scheme.

Response to Environmental and Landscape Impacts

Objection

- 10.1.10 CPPF argues the Scheme would cause unacceptable harm to Coton Orchard's ecology, particularly citing the loss of traditional orchard habitat and veteran trees. They also express concern that the Scheme underestimates the significance of landscape character and visual amenity effects.

My response / assessment

- 10.1.11 The Scheme takes a targeted and proportionate approach to ecological impacts, underpinned by Environmental Statement Chapter 8 and specialist reports (e.g., Arboriculture TR14, Ecology TR5). Key mitigation features include:
- The Veteran Tree Mitigation Strategy (CD1-11.14.03) which complies with the NPPF (para 193(c)) and provides both onsite and compensatory strategies
 - Mammal tunnels and ecological fencing to support habitat connectivity
 - Landscaping that reinforces the historic orchard structure with heritage fruit varieties and clear blossom corridors
- 10.1.12 Coton Orchard has already suffered 70% loss of traditional orchard habitat since the 1970s, with many areas degraded due to cessation of productive use. The Scheme proposes restoration of these underutilised sections and has offered this to the landowner no response has been received.
- 10.1.13 The LVIA was undertaken in accordance with GLVIA3 guidance, assessing both landscape character and visual receptors, and concludes that effects are not significant under EIA regulations. CPPF's reliance on lay interpretation does not displace professional judgement nor undermine the rigour of the assessment.

Response to Infrastructure Integration

Objection

- 10.1.14 The objector claims the Scheme lacks flexibility in integrating with projects such as Cambridge North or East West Rail and is therefore inferior to other transit technologies.

My response / assessment

- 10.1.15 I believe this objection misrepresents the Scheme's inherent flexibility. Unlike heavy or light rail, guided busways are inherently adaptable: routes can be modified with minimal infrastructure change to serve new developments or nodes of demand. The Scheme's termini and operating patterns can be flexed to incorporate Cambridge North, Eddington, or future EWR connections without major reinvestment.
- 10.1.16 Indeed, this capacity for incremental expansion aligns better with regional growth trajectories and funding cycles than fixed route rail-based systems.

Response to Delivery Mechanisms and Technology

Objection

- 10.1.17 CPPF questions the reliability and readiness of guided bus technology and suggests the emergency track is unjustified and environmentally harmful.

My response / assessment

- 10.1.18 The guided bus system utilises mature and proven technology, with additional advances now being piloted (e.g., CAVForth autonomous bus trials) offering further scope for innovation.
- 10.1.19 The maintenance and emergency access track is not an optional extra it is a critical operational requirement, providing:
- Access for essential maintenance of lighting, comms, and safety features;
 - Emergency egress in the event of vehicle failure or incident; and
 - A high quality, **all season active travel corridor** for pedestrians and cyclists, enhancing modal choice and resilience.
- 10.1.20 The CPPF objection offers **no evidence** to support the exclusion of such infrastructure, nor does it address its co-benefits for active travel or emergency planning.

My Conclusion

- 10.1.21 The CPPF objection, while wide ranging, does not demonstrate a credible case against the Scheme. The transport modelling is robust and appropriately adapted to post-pandemic conditions. The promoted alternative is unfeasible, unsafe, and strategically inferior. Environmental impacts are comprehensively assessed and mitigated; landscape effects are not significant in EIA terms. The Scheme remains future proof, flexible, and operationally sound.
- 10.1.22 For these reasons, the objection should carry very limited weight in the decision making process.

11. CONCLUSIONS

- 11.1.1 In reviewing the evidence submitted in support of the Cambourne to Cambridge Guided Busway scheme, I conclude that the proposed development is aligned with national and local planning objectives, and is consistent with the principles of sustainable, inclusive growth.

- 11.1.2 The scheme responds to a clear and compelling strategic need: alleviating congestion along the A428/A1303 corridor, improving accessibility to key employment and housing sites, and supporting mode shift toward low carbon transport. These goals are rooted in adopted policy frameworks, notably the National Planning Policy Framework (NPPF 2024), the South Cambridgeshire and Cambridge City Local Plans (2018), and other relevant planning policy documents.
- 11.1.3 Despite intersecting sensitive landscapes including Green Belt and designated open spaces, the scheme includes proportionate mitigation and enhancement measures such as landscape screening, biodiversity net gain, and improved public access. I consider these to sufficiently offset the limited adverse effects identified. Moreover, the off-road alignment has been selected through a transparent optioneering process, with alternatives assessed and ruled out for failing to deliver the same transport performance and policy outcomes.
- 11.1.4 In planning terms, I consider:
- The Green Belt impacts to be justified by “very special circumstances”, as defined by Paragraph 155 of the NPPF.
 - The loss of Best and Most Versatile agricultural land to be outweighed by public benefit, under Paragraph 180(c) of the NPPF.
 - The treatment of open space to be policy compliant, with Replacement Land meeting both quantitative and qualitative tests under Policy 67 of the Cambridge Local Plan.
 - The environmental strategy including flood resilience, air quality, heritage and ecology to be comprehensive and robustly mitigated through embedded design and planning conditions.
- 11.1.5 In regard to the three specific areas that my proof covers, I summarise my opinions as follows:
- (i) The Proposed Order under the Transport and Works Act 1992**
- 11.1.6 The Cambourne to Cambridge Guided Busway is being brought forward under the Transport and Works Act 1992. I conclude that the application for the Order is founded on a robust body of evidence demonstrating both legal and planning compliance, and satisfies the procedural requirements of the Transport and Works (Applications and Objections Procedure) Rules 2006 and the Transport and Works (Inquiries Procedure) Rules 2004.
- 11.1.7 Affidavit evidence submitted by the Applicant confirms that due process including advertisement, consultation, notification, and deposit of documents has been followed. The planning justification presented in this Proof is consistent with the requirements and expectations of a TWA scheme, demonstrating strategic alignment, environmental consideration, and public benefit.
- 11.1.8 Overall, the Scheme, including the need for compulsory purchase, has been robustly justified and the necessary compelling case in the public interest demonstrated.
- (ii) Direction for Deemed Planning Permission As authorised under Section 90(2A) of the Town and Country Planning Act 1990**
- 11.1.9 The Secretary of State may direct that planning permission be deemed to be granted for development contained within a confirmed TWA Order. The Scheme has been assessed in line with applicable planning policy frameworks, including the NPPF (2024), the adopted Cambridge and South Cambridgeshire Local Plans (2018), and relevant SPD guidance.

- 11.1.10 My personal assessment of the planning balance undertaken confirms compliance with key sustainability principles and policy requirements, providing assurance that deemed planning permission would be justified in this instance. The implementation of design led mitigation, biodiversity net gain, and flood resilience confirms that the development is capable of operating within the necessary conditions and control frameworks associated with deemed permission.

(iii) Certificate under Section 19(1)(a) of the Acquisition of Land Act 1981

- 11.1.11 The Scheme results in the loss of a small quantum of designated open space land, notably Plot 14-153 as per the submitted Land Plans. In accordance with the requirements of Section 19(1)(a), the Applicant seeks a certificate confirming that equivalent exchange land identified as Plot 14-154 is being provided in mitigation. This land has been subject to technical appraisal and planning policy analysis, confirming that it is equal in area and public advantage to that being acquired. The qualitative enhancements proposed (including biodiversity uplift, improved recreational access, and landscape integration) mean the exchange land not only satisfies statutory requirements but offers a net public benefit over the long term. The strategy accords with Policy 67 of the Cambridge Local Plan and satisfies Section 19 requirements, subject to confirmation by the Secretary of State.

Closing Statement

- 11.1.12 When assessed in its totality, I judge that the proposed Cambridge to Cambourne guided bus scheme strikes an appropriate balance between infrastructure delivery and environmental sensitivity and performs strongly against relevant planning tests. It enables delivery of critical growth planned in the Greater Cambridge area, supports decarbonisation objectives, and promotes sustainable spatial development patterns.
- 11.1.13 For the reasons outlined throughout this evidence, I support the proposal and recommend that the Secretary of State grant the Transport and Works Act Order and the associated direction for deemed planning permission.

12. STATEMENT OF TRUTH

The evidence which I have prepared and provide in this Proof of Evidence is true and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

Dated: 18/08/2025

List of Appendices

Appendix A – Relevant Planning History

Reference	Site	Description	Status
S/2903/14/OL	Land To The West Of Cambourne (Excluding Swansley Wood Farm)	Development of up to 2350 residential units including affordable housing retail use classes A1-A5 (up to 1.04 ha) offices/light industry use class B1 (up to 6.25ha) community and leisure facilities use class D1 and D2 (up to 0.92 ha) Two primary schools and one secondary school (up to 11 ha) use class D1 three vehicular access points including the extension and modification of Sheepfold Lane a four arm roundabout provided on A1198/Caxton Bypass and an access point off the A1198 south of the Caxton Gibbet to serve the proposed employment uses a network of segregated pedestrian and cycle routes sustainable drainage system and other infrastructure together with associated earth works parking open space including equipped play playing fields and landscaping.	Outline permission granted 29 December 2017 – all matters reserved for further approval
18/1993/FUL	Land Between 21 And 29 Barton Road (including 27 Barton Road And Croft Gardens).	Redevelopment for College accommodation (comprising 4 new buildings which would provide 60 graduate rooms and 12 x 2 bed and 12 x 1 bed family apartments) and refurbishment and extension of 27 Barton Road, together with associated cycle and car parking and external works following demolition of existing buildings (1-12 Croft Gardens, storage building and garages).	Granted Permission 14th October 2019.
21/02052/FUL	Land South Of Wilberforce Road Cambridge Cambridgeshire	Demolition of existing buildings/structures and the erection of college accommodation, new access and landscaping.	Granted Permission 1st March 2022.
19/1212/FUL	St Chads 48 Grange Road Cambridge Cambridgeshire CB3 9DH	Demolition of the existing octagonal building and erection of two new student accommodation buildings comprising 23 rooms. Replacement of existing gardeners accommodation with free-standing gardeners' building, replacement of cycle storage, new boundary and entrance treatment.	Granted Permission on Friday the 17th April 2020
19/1734/FUL	Clerk Maxwell Road Cambridge Cambridgeshire	Erection of 35 dwellings involving the re-positioning of existing access onto Clerk Maxwell Road, provision of new spine road, parking, cycle provision, landscaping and associated infrastructure.	Permission granted on the 30th October 2020
S/3329/16/OL	Land Between Stirling Way And The Broadway Land	Outline planning permission for a bus link between Sterling Way Upper Cambourne and the Broadway with all matters reserved	Outline permission granted 27th January 2023– all matters

Reference	Site	Description	Status
	Between Stirling Way And The Broadway		reserved for further approval
S/4594/18/RM	Land Between Stirling Way And Broadway Land For Bus Link Between Stirling Way And The Broadway Cambourne	Approval of matters reserved for access appearance landscaping layout and scale following Outline planning permission S/3329/16/OL for a bus link between Sterling Way and Broadway. The outline application was not EIA development	Pending
S/3440/18/OL	Bourn Airfield St Neots Road Bourn Cambridge CB23 2TQ	Outline planning permission for a new mixed use village comprising residential development of approximately 3500 dwellings mixed uses comprising employment retail hotel leisure residential institutions education community facilities open space including parks ecological areas and woodlands landscaping engineering for foul and sustainable urban drainage systems footpaths cycle ways public transport infrastructure highways including a principal eastern access from the roundabout on St Neots Road and western access with Broadway including first section of strategic public transport route associated infrastructure groundworks and demolition with all matters reserved except for the principal highway junctions from the St Neots Road roundabout and onto Broadway with some matters reserved except for access. This application is subject to an Environmental impact assessment.	Outline permission granted 30 July 2024
16/1134/OUT	West Cambridge Site Madingley Road Cambridge Cambridgeshire	Outline planning permission with all matters reserved is sought for up to 383,300m2 of development comprising up to 370,000m2 of academic floorspace (Class D1 space), commercial/research institute floorspace (Class B1b and sui generis research uses), of which not more than 170,000m2 will be commercial floorspace (Class B1b); up to 2,500m2 nursery floorspace (Class D1); up to 4,000 m2 of retail/food and drink floorspace (Classes A1-A5); up to 4,100m2 and not less than 3,000m2 for assembly and leisure floorspace (Class D2); up to 5,700m2 of sui generis uses, including Energy Centre and Data Centre; associated infrastructure including roads (including adaptations to highway junctions on Madingley Road), pedestrian, cycle and vehicle	Outline planning permission granted on the 21 June 2024

Reference	Site	Description	Status
		routes, parking, drainage, open spaces, landscaping and earthworks; and demolition of existing buildings and breaking up of hardstanding.	
11/1114/OUT	Land Between Huntingdon Road, Madingley Road And M11 North West Cambridge Cambridgeshire	Proposed development comprising up to 3,000 dwellings; Up to 2,000 student bedspaces; 100,000 sq.. employment floorspace, of which: up to 40,000 sq.. commercial floorspace (Class B1(b) and sui generis research uses) and at least 60,000 sq.. academic floorspace (Class D1); up to 5,300 sq.. gross retail floorspace (Use Classes A1 to A5) (of which the supermarket is 2,000 sq.. net floorspace); Senior Living, up to 6,500sq.m. (Class C2); Community Centre; Indoor Sports Provision; Police; Primary Health Care; Primary School; Nurseries (Class D1); Hotel (130 rooms); Energy Centre; and associated infrastructure including roads (including adaptations to Madingley Rd and Huntingdon Rd), pedestrian, cycle and vehicle routes, parking, drainage, open spaces and earthworks.	Granted Permission on the 22 February 2013
S/3064/16/OL	Land South 279 St Neots Road Hardwick CB23 7QN	Outline planning permission for a residential development of up to 155 dwellings following demolition of two existing dwellings with areas of landscaping and public open space and associated infrastructure works with all matters reserved except for access	Outline permission granted 14th August 2018 – all matters reserved for further approval
22/04215/FUL	Land East Of Highfields Road Highfields Caldecote Cambridgeshire	Construction of 66 dwellings together with associated infrastructure, open space and landscaping	Pending
S/2047/16/FL	Land R/O 18-28 Highfields Road 18 Highfields Road Highfields Caldecote CB23 7NX	Demolition of existing buildings and erection of residential development to provide up to 71 dwellings including 28 affordable dwellings with associated vehicle and pedestrian accesses and open space and a car park for school/community use.	Outline permission granted - 14 September 2017
S/1694/16/OL	Agricultural Field West Of Grace	Outline planning permission with all matters reserved except for access for the erection of up to 98 dwellings (use class C3) and associated works including access car and cycle parking open space and landscaping.	Outline permission granted 18 October 2017 – all matters

Reference	Site	Description	Status
	Crescent Hardwick CB23 7AH		reserved for further approval
07/0620/OUT	Land Between Long Road And Shelford Road (Clay Farm/Showground Site) Cambridge Cambridgeshire	Residential development of up to 2,300 new mixed-tenure dwellings and accompanying provision of community facilities; sports and recreation facilities and landscaped open spaces including 49 ha. of public open space in the green corridor, retail (A1), food and drink uses (A3, A4, A5), financial and professional services (A2), non-residential institutions (D1), a nursery (D1), alternative health treatments (D1); provision for education facilities; and all related infrastructure including: all roads and associated infrastructure, alternative locations for Cambridgeshire guided bus stops, alternative location for CGB Landscape Ecological Mitigation Area, attenuation ponds including alternative location for Addenbrookes' Access Road pond, cycleways, footways and crossings of Hobson's Brook.	Outline permission granted 11 August 2010 – all matters reserved for further approval
S/0054/08/O	Former Monsanto Site Land At West Of Hauxton Road Trumpington In The Parish Of Haslingfield Cambridgeshire	Demolition of Existing Buildings and Structures and Redevelopment for Approx 600 Dwellings. Land for a Primary School Recreation / Leisure Uses Including Change of Use from Agriculture to Public Open Space Community and other Local Facilities with Associated Parking Infrastructure and Earthworks.	Outline Permission granted - 9 October 2009
14/1792/FUL	Glebe Farm Phase 3 Addenbrooke's Road Trumpington Cambridge CB2 9NG	Residential development of 30 new mixed tenure dwellings with associated open space, landscaping, car parking and infrastructure.	Granted Permission on 8 February 2016
09/1140/FUL	Glebe Farm (Land East Of Hauxton Road, North Of The AAR And South Of Bishops Road)	Detailed application for 286 new mixed-tenure dwellings, associated landscaping, open spaces, vehicular access to the south from the Addenbrooke's Access Road, augmented landscape treatment to the north of the Addenbrooke's Access Road and all related infrastructure including connection to the Clay Farm infrastructure on highway land to the east adjoining Addenbrooke's Access Road	Granted Permission on 11 August 2010

Reference	Site	Description	Status
	Trumpington Cambridge		
06/0795/OUT	Land To The South Of Greenlands, South West Of The Bell School And West Of Babraham Road Cambridge Cambridgeshire CB2 2RA	Residential development not exceeding 347 dwellings (comprising houses and apartments, including affordable and key worker housing), 100 bed student living accommodation for the Bell Language School and public open space, with vehicular access from Babraham Road and associated roads, footpath/cycleways and drainage infrastructure.	Outline permission granted - 14 December 2010
S/0388/12/OL	Land South Of Longstanton Park And Ride And Adjacent To B1050 At Station Road Longstanton And Hatton's Road Longstanton	Outline planning application for phase 1 of Northstowe comprising up to 1500 dwellings a primary school a mixed-use local centre (including a community building and provision for non-residential institutions financial and professional services shops cafes and restaurants drinking establishments and hot food take-aways) leisure community residential institutions cultural health and employment provision (business general industry and storage & distribution) including a household recycling centre formal and informal recreational space and landscaped areas and infrastructure works including site re-profiling and associated drainage works foul and surface water pumping stations two flood attenuation ponds on land east of Hattons Road and associated works including the demolition of existing buildings and structures.	Outline permission granted 22 April 2014 – all matters reserved for further approval
S/2011/14/OL	Land To The East Of B1050 And Longstanton West Of The Cambridgeshire Guided Busway (CGB) And North Of Oakington	Development of Phase 2 of Northstowe with details of appearance landscaping layout scale and access reserved (save for the matters submitted in respect of the Southern Access Road (West)) comprising: .1) development of the main Phase 2 development area for up to 3500 dwellings two primary schools secondary school town centre including employment uses formal and informal recreational space and landscaped areas eastern sports hub remainder of the western sports hub (to complete the provision delivered at Phase 1) busway a primary road to link to the southern access construction haul route engineering and infrastructure works and .2) construction of a highway link (Southern Access Road (West)) between the proposed new town of	Outline permission granted - 9 January 2017

Reference	Site	Description	Status
		Northstowe and the B1050 improvements to the B1050 and associated landscaping and drainage.	
20/02171/OUT	Northstowe Phase 3A Rampton Road Longstanton Cambs	Outline planning application for the development of Northstowe Phase 3A for up to 4,000 homes, two primary schools, a local centre (including employment, community, retail and associated services, food and drink, community, leisure, residential uses and other accommodation), secondary mixed use zones (including employment, community, retail and associated services, food and drink, community, leisure, residential uses), open space and landscaped areas, sports pitches, associated engineering and infrastructure works, including the retention of the existing military lake and creation of a new lake, with details of appearance, landscaping, layout, scale and access reserved. Application is accompanied by an Environmental Statement and involves works to/affecting existing Public Rights of Way.	Outline permission granted 25 March 2022 – all matters reserved for further approval
20/02142/OUT	Northstowe Phase 3B Station Road Longstanton Cambs	Outline planning application for the development of Northstowe Phase 3B, comprising up to 1,000 homes, a primary school, secondary mixed use zone (with retail and associated services, food and drink, community, leisure, employment and residential uses), open space and landscaped areas, engineering and infrastructure works, with details of appearance, landscaping, layout, scale and access reserved. Application accompanied by an Environmental Statement.	Outline permission granted 25 March 2022 – all matters reserved for further approval
07/0003/OUT	Land Between Huntingdon Road And Histon Road Cambridge Cambridgeshire CB3 0LE	Mixed use development comprising up to 1593 dwellings, primary school, community facilities, retail units (use classes A1, A2, A3, A4 and A5) and associated infrastructure including vehicular, pedestrian and cycleway accesses, open space and drainage works.	Outline permission granted - 18 December 2013

