



J & WR Sadler



Secretary of State for Transport
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10th April 2025

Dear Sirs

RE: STATEMENT OF CASE Submitted by: John Sadler
Regarding: Cambourne to Cambridge (C2C) Busway Proposal

I am a local resident with a direct and personal interest in the proposed Cambourne to Cambridge (C2C) Busway scheme. My original objection letter, dated 31 January 2025, is attached with the covering email. I now submit this Statement of Case to further develop the points raised in that letter and respond directly to the County Council's Statement of Case (TWOA submission). I must also highlight that I am an individual with limited resources, contributing only my personal time and effort to this process.

Summary of Objection

I object to the proposed scheme on the following grounds:

- Disproportionate cost relative to the achievable benefits, particularly in relation to the Maddingley Mulch to M11 section.
- Unjustified and irreversible loss of Green Belt land.
- Lack of transparency and accountability throughout the consultation and decision-making process.
- Failure to properly explore and assess more cost-effective, practical alternatives.

Response to the County Council's Statement of Case

a. Cost vs Benefit: A Deep and Avoidable Flaw

The Council's preferred route carries an estimated cost of £220 million, a figure that demands robust justification and scrutiny. A more rational, lower-cost alternative exists: a route that runs along or adjacent to the existing highway corridor between Maddingley Mulch and the M11.

This alternative would:

- Avoid the need for major new infrastructure and reduce engineering complexity.
- Dramatically lower land acquisition and construction costs.
- Preserve environmental assets and Green Belt land.
- Maintain or improve journey times and connectivity.

This is not a minor financial difference. The capital savings from adopting the highway-based option could amount to well over £100 million. In an era of strained public finances, it is fiscally irresponsible to pursue the most expensive and environmentally damaging option when a simpler, equally effective route is available. The pursuit of this £220 million scheme without exploring obvious alternatives raises serious questions about the County Council's financial governance and exposes the project to reputational risk.

b. Environmental Impact and Green Belt Destruction

The proposed alignment would result in significant and permanent loss of Green Belt land, land that plays a vital role in safeguarding the countryside from encroachment and maintaining the character and separation of local communities. The Council acknowledges the environmental damage but fails to establish the "very special circumstances" required to justify this harm, as mandated by national planning policy.

Given the availability of a viable on-road alternative, this environmental destruction is not only unjustified, it is indefensible. No benefits can be said to "clearly outweigh" the harm when an option exists that avoids the harm altogether. To proceed regardless would undermine not only the integrity of Green Belt protections, but also the credibility of the planning system itself.

c. Transparency, Engagement, and Public Trust

My original letter detailed serious concerns regarding the Greater Cambridge Partnership's (GCP) approach to transparency and engagement. These concerns remain unanswered and are now compounded by the conduct documented in the Council's Statement of Case.

Key failings include:

Opaque Decision-Making: Alternatives were dismissed without proper costings, comparative analysis, or rationale. I have seen no explanation at any stage why the off-road route was chosen over the more practical on-road corridor, especially for the critical section between Maddingley Mulch and the M11.

Insufficient Information: Consultations lacked technical detail, modelling assumptions, and visual representations, making it impossible for residents and stakeholders to engage meaningfully.

Tokenistic Engagement: While feedback was solicited, there is no evidence that it influenced the process. Many detailed and constructive objections were simply ignored.

Disregard for Affected Residents: I received no meaningful response to my submissions, and the process has left landowners and communities feeling side-lined and unheard.

The handling of this process demonstrates a systemic failure of transparency and public accountability. Major infrastructure projects must be built on trust. This one is not.

Local Consensus and Community-Led Alternatives

My views reflect a much wider local consensus. Residents, landowners, and community groups have consistently voiced strong objections, particularly to the isolated section between Maddingley Mulch and the M11. This section accounts for the majority of opposition and controversy surrounding the scheme.

The GCP's dismissal of alternatives, including the practical and carefully developed CPPF route, is deeply disappointing. This route was created through community effort and expert input, yet it has been summarily ignored. Likewise, the GCP's comments regarding my family burial site, implying misrepresentation throughout this process, on my part, are deeply upsetting and unprofessional. These responses reflect a defensive, dismissive attitude that has defined the engagement process from the start.

Delivering infrastructure without community support is not just politically risky, it is fundamentally flawed in practice.

A Better Way Forward

There remains a clear opportunity to do this properly. A revised route should:

- Follow the existing highway corridor between Maddingley Mulch and the M11.
- Avoid destruction of Green Belt land and natural habitats.
- Integrate effectively with the proposed East-West Rail station at Cambourne.
- Deliver comparable transport benefits at a fraction of the cost.
- Rebuild public trust through meaningful engagement and full transparency.

This option has not been given fair or transparent consideration. I urge the inquiry to request a detailed, side-by-side assessment of this alternative before allowing the current scheme to proceed.

Conclusion

I fully support improved public transport between Cambourne and Cambridge. But this proposal, as it stands, is deeply flawed strategically, financially, and environmentally. The current C2C route imposes excessive costs, causes irreversible harm to protected landscapes, and lacks both transparency and public support.

There is a better, cheaper, and more sustainable alternative. I respectfully ask the inspectors to require a full re-evaluation of the scheme, including a comparative cost-benefit analysis of the Maddingley Road corridor option, and a meaningful process of engagement with the communities whose lives and landscapes will be most affected.

Your faithfully,

John Sadler





J & W R Sadler



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Sent by email only: transportinfrastructure@dft.gov.uk

31st January 2024

To: Secretary of State for Transport

RE: Cambourne to Cambridge (CtoC) Transport and works Act Order (TWOA) Submission of objection from stakeholder.

J & W R Sadler – landowner.

Executive Summary

I am writing to formally object to the proposed Cambourne to Cambridge (CtoC) route under consideration by the Greater Cambridge Partnership (GCP). While I am pro-development and understand the need for better public transport, the current scheme raises serious concerns about its impact on our family farm, the environment and community.

Most importantly, I strongly oppose the making of the Transport and Works Act Order (TWOA) for the CtoC busway, including the compulsory purchase of our land. This land, vital to our working family farm, includes areas protected by long-standing covenants and the burial site where my parents' ashes rest. The proposed scheme will cause irreversible harm to the environment, and I do not believe it has been properly justified. Furthermore, it ignores the CPPF route, a viable alternative that would deliver similar benefits at a much lower environmental and financial cost.

This letter sets out my detailed objections, drawing attention to the damage this scheme will cause and the failures in consultation and engagement by the GCP. I urge the Secretary of State to consider the issues raised and to ensure that any public transport solution for Cambourne to Cambridge reflects the needs of the community and the environment in which we all live.

I believe the GCP has a duty to pause and reconsider this project. Together, we can deliver a solution that protects the environment, respects local communities, and ensures public funds are used wisely.

Introduction

My name is John Sadler, I am 78 years old and a fourth-generation farmer of Madingley Hill. I farm in partnership with my wife, Wendy, who is also 78 and registered disabled. I am pro-development and recognise the importance of improving public transport infrastructure in the region, but the CtoC busway proposal in its current form is deeply flawed.

The land I farm is protected by covenants established in 1958 to give greater environmental protection to the area of countryside lying to the south of the A1303 from urban development. The covenanted land extends for approximately 1km from Madingley Road, the western approach to the city, through Coton Orchard to the M11 and West Cambridge and includes Madingely Hill which at 62 meters is the highest point west of Cambridge.

The proposed CtoC busway is often referred to as the 'off road' scheme although a significant proportion of the route is proposed to be built on existing roads. The proposed scheme fundamentally erodes the unique character of Madingley Hill and surrounding area which has been protected from inappropriate development since the early 1930's and threatens to cause irreversible harm to the unique and valuable natural environment. The destruction of the green belt land of the highest quality, loss of biodiversity, and disruption to established wildlife habitats, particularly Coton Orchard, when there is an alternative cost-effective scheme delivering similar benefits, is inconsistent with the Governments stated commitment to achieving net-zero emissions and protecting natural resources.

CtoC will sever my entire family farm, cut off three family homes, limit access to the farmyard, and make it difficult for my disabled wife to visit our grandchildren. The proposed route will force me to surrender land that includes the burial site and final resting place of my parents. Frank and Eileen Sadler farmed the land until they passed away in 1990 and 1995, respectively. Their dying wish was for their cremated ashes to be buried in a very special place on the farm they thoughtfully selected together. It allowed my father to keep an eye on the farm and all his neighbouring farming friends. It is the most peaceful location with breath taking views across open countryside and the city of Cambridge. The burial of the ashes was led by the local Parish vicar and I understand from the church that if the ashes are to be relocated, an application will need to be made to the Secretary of Justice and will require the landowner and next of kins blessing. The burial spot is where I would also like to be laid to rest and I consider myself and my family incredibly lucky to be custodians of this small part of the countryside.

Consultation Failures

Between 2014 and March 2024, Wendy and I only met with the GCP twice, once in 2020 and the second time in 2021 to discuss the route and how it will affect our farming operation, quality of life and most importantly the burial site of my mother and father. During these meetings, we were strongly led to believe that if the busway were to pass over or near the burial site, it would be our problem and responsibility to relocate the family ashes. We were not professionally represented at these meetings.

I have previously asked for the minutes, covering the two meetings chaired by the GCP in 2020 and 2021, and my requests were ignored. The GCP has now acknowledged that no minutes exist for these meetings.

Impact on the family farm

On an average day, we would be passing across the proposed CtoC busway 30 times, passing close to the burial site along the ditch line which is the main route for us across the fields connecting the three homes and farmyard. This includes my grandchildren walking and cycling, farm machinery from small ride on mowers to 40 tonne agricultural machinery and my disabled wife. As a family it provides us with the opportunity to pause and sit on the memorial bench, take in the views, and respectfully acknowledge the burial place of my parents. This has all been explained many times to the GCP and more recently at the meeting on the 9th of April 2024, and the site meeting held on the 26th of July 2024. The GCP has provided no comfort that we can continue using this route unfettered by the development of the CtoC busway. I've asked whether the passing point will be suitable for disabled users and I have been ignored. Despite our concerns, the GCP first provided us with plans with a passing point in the most inconvenient location possible. If we wanted to visit the burial site it meant a 40-minute delay and made farming the land near impossible. Then, after agreeing to provide two passing points (in writing), one of the passing points has been withdrawn without explanation.

I have always acted professionally and courteous and access has always been granted without delay for inspections and survey work conducted by the GCP. I first met the GCP's land agents, CBRE on 9th April 2024. I had assumed this to be the first meeting to discuss the scheme in detail and an opportunity for us

to explain our concerns once again. With agents acting on both sides, I was expecting to make positive progress even though I was not in favour of the proposed route.

On the 12th of March 2024, CBRE wrote the following to me:

'Please accept my apologies for you having to request sight of the latest design plans; we have been engaging with the land agent you appointed (Bidwells) last year and between us there has been an unfortunate lapse of communication arising from staff leaving the firm. Noting what you say around the location of the passes, which I assume are the crossing points over the busway (?), please be assured that the design is not yet fixed and we are open to feedback crossing point locations and other design matters.'

Clearly stating the design had not been fixed and other design matters can be discussed. However, we now know the scheme had been under a design freeze since February 2024, and yet no mention of this at the meeting on the 9th of April. If the scheme has been under a design freeze for so long, it raises serious questions over the direct clash of land use between the CtoC busway and the planned reservoir expansion near Comberton Long Road to facilitate the dire water shortage Cambridge currently faces. This was raised with the GCP but no explanation was given.

The GCP has known about the location of my parents' burial site since the beginning and has always stated that the busway would not pass over the burial site. The GCP have tried to suggest that we have misinformed the GCP with incorrect coordinates, but the GCP are unable to provide the minutes to support this. The only true way to have dealt with this matter is a site meeting accompanied by our respective agents and this did not occur until July 2024.

At this point I'd like to clarify what I understand to be referred to as the CtoC Busway. Over the past 60 years of farming, I have dealt with many utility companies and highways/county councils requiring land and easements across the farm, so I am very familiar with all procedures. I always deal with such matters in a positive and constructive way, negotiating in a straight line but I will call out when I am being misled or misinformed. As far as I am concerned, the busway is the total width of land that is to be compulsory acquired to facilitate the development, and in this case includes a tarmac road for buses, cycle way and landscaping belts either side. Over the years, I have asked several times how wide the busway (the entire strip of land) to be compulsory acquired will be and where it will run, but I have never been given a straight answer. I made my own investigations and after speaking to a transport planner, I understood the total width to be approximately 50m. This is an extraordinarily large area of land for a tarmac road carrying a handful of buses. Please see the images attached setting out what the busway will look like from an aerial perspective.

On the 26th of July 2024, the GCP agreed to plot the width of the land against the burial site. It was extremely disappointing to discover after so many years the burial site is located within 7m of the busway (the total strip of land to be compulsory acquired).

The GCP quickly responded to confirm yet again that the ashes 'were not within the busway'. Before the site meeting, the Cambridge Independent newspaper contacted me wanting to cover the story. The reporter directly asked the GCP about the busway and specifically asked the question if the ashes were within the busway strip that included the tarmac road, cycle way and landscape buffers? The GCP's response was that the 'ashes would not be within the busway'. When questioned further considering the evidence that the ashes were within the busway (the land to be compulsory acquired), the GCP explained that we (the GCP) have always told you that the ashes are not under busway and what we (the GCP) mean by that is that the ashes are not under the narrow 7.4m tarmac busway road. This was also reconfirmed in writing by the GCP.

I found these comments from the GCP to be misleading and disingenuous.

My parents' burial site has always been within the strip of land to be acquired by the local authority and the GCP have known this for many years. I have requested accurate minutes from the meetings held on

the 9th of April and 26th of July, and the requests have been previously ignored. I did receive draft minutes of the meeting held on the 9th of April; however, they were inaccurate. I commented on the minutes but they were ignored for several months. Eventually draft minutes for both meetings were circulated on the 27th of November 2024, four months after the meeting on the 26th of July and just two weeks after the TWAO orders were submitted. Even my Christian name was incorrect, and the list of attendees on the 26th of July was also completely wrong. The minutes remain inaccurate and incomplete from both these meetings and yet the GCP had months to positively engage with us and provide accurate records.

The total length effected along the road or across the field is approx. 1500m. The GCP has never discussed any alternative route along the A1303 with me. When this point was raised on the 26th of July, Jo Baker responded saying that if the busway were to run along the A1303 road, a significant swathe of land would be taken from the farm. It was if the GCP had made the decision for me, and yet I remain keen and willing to explore a scheme whereby I surrendered a modest swathe of land along the A1303 to accommodate a sustainable busway.

After the 26th of July meeting, the GCP acknowledged our concerns and confirmed fresh plans would be produced. Despite chasing and offering to meet the GCP several times, it took four months for the revised plans to be sent through. The plans arrived only two weeks before the TWAO were submitted. The plans were no different to previous plans, other than moving a passing strip from one side of a field to another. This work would have taken a junior designer no more than one hour work, and yet I had to wait for over four months with no explanation and no time to consider this before the TWAO was submitted.

Two weeks before the TWAO was submitted, extensive and detailed heads of terms were issued to me and yet there had been no dialogue between the parties leading up to this point concerning the principle terms of the agreement. To try and put this into context, the terms that were issued ran to eight pages and yet earlier this year (2024), the GCP wrongly issued heads of terms that had been prepared for me (without any consultation) but sent to the wrong landowner. These heads of terms were forwarded on to me by my neighbour and at no time were they issued by the GCP or its agents to me. These heads of terms were only four pages, and not only were they issued to another landowner, but they were also a cut and paste of the heads of terms between the GCP and St Johns College, with all the marked changes and points of negotiation still visible in the margins. I believed this to be a breach of GDPR rules, but this was dismissed out of hand by the GCP. A copy of the terms and correspondence is available.

I have never felt my concerns were being taken seriously and it was becoming obvious that I was being left behind as one of the last landowners to be addressed. Priority was given to the University of Cambridge and the Cambridge Colleges. In September 2024, I discovered the GCP had agreed to accept long lease agreements instead of compulsory acquiring the freehold of the land from the University of Cambridge (UoC) and the Cambridge Colleges – the UoC by its own admission is set to be the biggest beneficiary of C2C scheme. The UoC is also a board member of the GCP. No such offer was included in the detailed heads of terms that were sent to me on 27th November, despite previously requesting similar terms to the UoC and or the Cambridge Colleges. I am aware that one of the Cambridge Colleges gave the GCP an ultimatum. Either agree to the colleges' terms or we will object to the CtoC proposals.

Madingley Wood

The meeting on the 26th of July provided an opportunity to walk the road (along the A1303) with the GCP for the first time. It was acknowledged by the GCP that the Madingley Wood boundary is set back approximately 8m from the roadside edge. This is sufficient land to widen the road for a bus lane. The strip of land between the roadside edge and the wood, has been left unmaintained and several small trees and shrubs have established. Jo Baker from the GCP stated *'the trees (between the boundary of the wood and roadside) are more valuable than the trees at Coton Orchard that are set to be destroyed to accommodate CtoC'*. At the time, a tree survey was requested to support the GCP's statement. At first the GCP ignored the request, but eventually confirmed the strip of land had not been surveyed. Only a few weeks ago I learnt that Coton Orchard had submitted a TPO application nearly 12 months ago, and despite the standard 12-week statutory period for a decision, the application was held up for nearly a year and then finally refused on the grounds the trees are set to be destroyed to accommodate the CtoC

busway. However, at the time, it was fully acknowledged by the local planning authority that the orchard trees were worthy of TPO status. So, the statement made by GCP is false and misleading. Furthermore, if you placed a bus lane alongside the side close to the wood, the electric buses would act as a buffer to the wood. I have extensive photographs and video of the strip of land if needed.

Economic Weakness

The current and growing estimated costs of CtoC busway are disproportionately high compared to the alternative option. There is no evidence to suggest that the proposed scheme will deliver value for money or achieve the anticipated return on investment. Public funded infrastructure projects are required to demonstrate good value for money using the Department of Transport's Benefit Cost ratio. A figure below 1 is classified as 'POOR' and does not provide good value for money. According to the GCP, the BCR for CtoC scored 0.43, a figure well below the threshold for good value. Furthermore, the BCR calculation is based on a valuation that is 15 years out of date. Adding cost inflation over the 15-year period will only diminish the 0.43 figure further and worsen the financial case for CtoC. I also understand that the data sets used for the calculations have been taken from two different years that predate Covid. Surely for a scheme of this significance the data sets should be from one year alone and as up to date as possible.

The data that has been used to assess the merits of the scheme appears wildly out of date, inconsistent and fails to take account of the following:

- Modern working practices post covid.
- The closure of the Park and Ride facility East of the M11
- The EWR connections from Cambourne to Cambridge and connectivity to Bedford, Milton Keynes, and Oxford in a Westerly direction.
- Upgrades to the A14 and the duelling between Cambourne and the A1.

East West Rail (EWR)

In the 2024 Autumn Budget, Chancellor Rachel Reeves reaffirmed the government's position on East West Rail. Rather than using standard political terminology i.e. - 'supporting EWR', the Chancellor stated the Government '**Will deliver EWR**'... this strong messaging even surprised the East West Rail Company responsible for delivering the railway. EWR will deliver a direct route between Cambourne to Cambridge duplicating infrastructure and expense, and yet EWR has not been considered when assessing CtoC. EWR carries enormous support from the business community, something CtoC has failed to achieve. Accelerating EWR will provide a more integrated and future proofed transport solution for Cambridge and adjacent counties.

Alternative Route

With a limited budget, a detailed viable alternative route has been prepared. The CPPF scheme runs alongside and within the existing A1303. It will deliver similar journey times and capacity. It will cost considerably less and avoid Maddingley Hill and Coton Orchard. Not only can it be delivered much quicker than the off-road option, but it also has wide community support. Yet this alternative has been largely ignored.

Conclusion

Please refer to the two images attached illustrating what the busway will look like. The busway will measure approximately 50m wide and plough over the top of one of the most beautiful rural landscapes in Cambridgeshire and will be seen from miles away. It's an unforgiving tarmac road, carrying up to eight buses an hour, but four of which will be traveling from Cambridge to Cambourne where there is no anticipated congestion. Effectively a 50m wide dedicated busway for four buses an hour, costing more than £300million. There is already a cycle route in place running alongside the A1303 and a further cycle route/bridleway is being upgraded directly south of the proposed CtoC busway to improve greener connectivity into the city.

A great deal of unpaid work has gone into preparing the alternative CPPF scheme. The alternative provides improved benefits and will cost considerably less. It can also be delivered much quicker and

saves Coton Orchard from destruction. The wider community is behind the alternative scheme as I am sure the local authority, counsellors, and MPs will be once they have been properly briefed and understand the total costs of CtoC both in monetary and environmental terms.

I do not object to a sustainable busway from Cambourne to Cambridge. The world has changed over the past five years and the proposed CtoC scheme is out of touch and doesn't fulfil the brief of today. When the CtoC busway proposal was worked up, it didn't take account of EWR, because at the time EWR was too far behind to consider as a reality. If EWR was operational today, we wouldn't even be having this debate over a road for buses.

The long-term environmental impact will negatively affect the quality of life for those effected by the proposed route. Greater engagement with local communities is essential to ensure their needs are adequately addressed and in the case of the proposed route, engagement failed at every level.

I urge the Government to consider the alternative route, accelerate EWR and leverage technology to implement flexible and responsive public transport options that meet actual demand and re-deploy the 100's of millions of pounds saved into more urgent and worthwhile public services. In light of these concerns, I respectfully request that you review the proposed Cambourne to Cambridge busway project and consider the alternative approach that aligns with environmental, sustainability, financial responsibility and community needs.

I am available at any time to discuss this letter of objection and I hope there will be the opportunity for me to speak at the public enquiry.

Thank you for your attention to this important matter. I look forward to your response and an acknowledgement to this letter of objection.

Yours faithfully

John Sadler