

TRANSPORT AND WORKS ACT 1992 (“TWA”):
THE PROPOSED CAMBRIDGESHIRE COUNTY COUNCIL AND GREATER
CAMBRIDGE PARTNERSHIP CAMBRIDGE SOUTH EAST TRANSPORT ORDER.

STATEMENT OF CASE OF APT PLANNING LTD
ON BEHALF OF DR. E. TURNBULL-JONES,
A LOCAL STAPLEFORD RESIDENT,
WORKING AT ADDENBROOKES HOSPITAL.

14th July 2025

1. Introduction.

This Statement of Case relates to:

- 1.1 The applicant's **Statement of Aims** & their use in assessing the proposals, (Docs. CSET-04 & 5, CSET-14 & CSET-15, paragraph 5.14), instead of the Objector's Statement of Aims, based on the National Planning Policy Framework (NPPF), & Local Planning policies, for the application for deemed planning permission, under the Town & Country Planning Act 1990.
- 1.2 The applicant's **Baseline & Growth assumptions**, compared to the Objector's, to understand current & future conditions, establish the need for intervention, & generate options with a range of modes, approaches & scale of intervention, which provides certainty as to where & when development would be delivered, & complies with Green Belt policy, (DfT Transport Analysis Guidance TAG18 Fig.1 & NPPF).
- 1.3 The applicant's **Assessment of Alternative Off-road & On-road Options** in 2016/17, based on the scheme objectives, cost & environmental impact, compared to the Objector's assessment based on the NPPF/ Local Planning policies, a comparison of environmental impacts of alternative options, the use of implementation, compared to benefits. (DfT Transport Analysis Guidance TAG18 Fig. 1 on Option Development).
- 1.4 The applicant's **Assessment of Benefits** between A11 & Cambridge Biomedical Campus (CBC) and City Centre, compared to the Objector's conclusion that the benefits of increased bus frequencies will be largely cancelled out by increased walking distances to/from Addenbrookes Outpatient Dept & village centres to CSET, compared to an enhancement of existing bus lanes, rail (as part of East-West Rail), & cycleways.
- 1.5 It is concluded that the Stated Aims do not justify the need for intervention:
 - the Stated Aim to improve connectivity between the Campuses, relates to mainly off-peak business trips, which only account for 2% of daily trips,
 - the "marginal savings" on A1307 bus journey times are "marginal" as bus frequency has been increased from 2 to 3 buses per hour, & bus journey time between the Campuses are similar to existing services (11 mins),
 - the 24-29 mins journey time savings on the route 7 on the A1301 are reduced by the 800m -1.6kms (10-20 mins) walks from the CSET stops to Sawston College (1,200 pupils), to Great Shelford village centre & to Addenbrookes Outpatients/bus station before & after the bus ride.
 - improved safety on the A1307 corridor is CSET Phase 1, not Phase 2,
 - The current 3 buses per hour Haverhill to Cambridge could be increased by 2 extra buses per hour, as proposed by CSET, without a busway.

2. The Statement of Aims. (CSET-04, DfT Guide to TWA Procedures).

- 2.1 The Objector's case is based on the DfT Guide to Transport & Works Act (TWA) procedures 2006, section 1.17-30 on Planning permission for TWA schemes. The applicant has asked in CSET-14 the Sec. of State to grant deemed planning permission. The benefits are to avoid duplication of documents, & to ensure objections to the order & granting planning permission are considered by one authority. In this case, as land use planning issues have not been considered by the local planning authority in determining a planning application, the Sec. of State will need to "have regard to, amongst other things, relevant national, regional & local planning policies... In line with the plan-led system for determining planning applications, projects that conflict with relevant policies in the development plan are unlikely to be authorised, unless material considerations indicate otherwise."
- 2.2 The applicant's Statement of Aims does not reflect the social & environmental objectives in the local development plan, the 2018 South Cambridgeshire Local Plan (SCLP), paragraph 1.9, or the National Plan Policy Framework (NPPF) paragraph 8, in which the Plan policies support sustainable development which meets economic, social & environmental objectives.
- 2.3 **The Objector's case is for a Social Objective in the Statement of Aims.**
A social objective would support healthy communities with accessible services & open spaces that reflect future needs in Sawston, Stapleford, Great Shelford & to local services e.g. Addenbrookes hospital (NPPF para 8).
- 2.4 The Baseline for bus services serving these communities is that the High Quality No.7 Bus Route, which has 20 stops in 10 kms (i.e. 500m apart) between Sawston & Addenbrookes bus station, with 3 buses per hour, & 80 seats per bus. The Baseline meets CSFAAP Policy CSF/11, in having all development within 400m (5 mins) easy walk of a High-Quality bus service.
- 2.5 The applicant's CSET proposal has 5 stops in 9 kms (i.e. 1.8m apart). The stops are outside the village boundaries, 20 mins walk from jobs/services in Great Shelford village centre, 20 mins walk from the secondary school at Sawston College (1,200 pupils), & 10-15 mins walk to Addenbrookes Outpatients Dept. The CSET proposals do not meet CSFAAP Policy CSF/11 in having all development within 400m (5 mins) easy walk from a High-Quality bus service.
- 2.6 It would reduce the current 3 buses per hour High-Quality bus service frequency of the No.7 bus route by diverting buses from 20 bus stops onto the Busway, to create a Low-Quality bus service for local communities.
- 2.7 The applicant's proposals are therefore contrary to the South Cambridgeshire Local Plan's social objectives, Policy T1/2 on integration & accessibility by walking, cycling or public transport, & the 2008 Cambridge Southern Fringe Action Area Plan (CSFAAP) Policy CSF/11.

2.8 My case is for an Environmental Objective in the Statement of Aims.

An environmental objective would protect & enhance the natural environment, make effective use of land, & protect the Green Belt (NPPF paragraph 8).

2.9 The Baseline conditions are that development in the Green Belt between the A1307 & A1301 & Addenbrookes Road to the north & Haverhill Road to the south, is contrary to Green Belt policies in the NPPF, SCLP, & CSFAAP Policy CSF/5 Countryside Enhancement Strategy. This land is required to provide “substantial mitigation over a wide area” to mitigate the loss of Green Belt for the development of the Cambridge Biomedical Campus. It is protected by the requirement to provide improved access to country parks, open countryside & recreation areas, & routes for walkers, cyclists & horses, under Structure Plan Policy P4/2.

2.10 The South Cambridgeshire Local Plan Policies S/4-7, CC/9, NH/2-6 protect & enhance the Cambridge Green Belt by limiting Green Belt development to sites within rural centres, windfall development & Development Framework/Neighbourhood Plans. It protects & enhances landscape character, agricultural land, biodiversity, green infrastructure & Cambridge fringe sites i.e. land on the fringe of Sawston, Stapleford & Great Shelford, where the CSET proposed route is located.

2.11 The CSET proposals are a threat to the openness of the Green Belt.

They divert public transport from shops, schools, & surgeries in Sawston, Stapleford & Great Shelford on the A1301 & from Addenbrookes bus station, Babraham village & Park & Ride, Wandlebury/Gog Magog Country Park on the A1307, onto open agricultural land to create potential sustainable sites for housing development on a new public transport corridor.

2.12 They create a precedent that increases pressure for development in the Green Belt from emerging Local Plan’s assessment of options including concentrating development on public transport corridors, & by land owners promoting development in the Green Belt on the grounds of its sustainability from diverting existing bus services away from settlements. CSET would increase pressure for, not “check unrestricted sprawl,” a Green Belt purpose.

2.13 The Stapleford/Great Shelford Parish Council proposals for a A1307 On-Road Option, comprising bus lanes between the CBC & A11/A1307 junction, makes effective use of highway land, does not impact existing housing & improves access to Addenbrookes hospital & Wandlebury and Gog Magog hill country parks. The Linton & Sawston Greenways & numerous byways & footpaths between the A1307 & A1301 provide for Active Travel.

2.14 The A1307 On-Road Option causes much less harm to Green Belt.

This is confirmed in CSET-10-02 ES Vol 2, paragraph 4.2.8. Under NPPF paragraph 142, great importance is attached to any harm to the purposes of the Green Belt. CSET would increase pressure for housing, rather than “check unrestricted sprawl,” a Green Belt purpose. In NPPF paragraph 154 h iii, the requirement for CSET in the Green Belt is not met, with an alternative On-Road Option with less harm to Green Belt, contrary to CSET-15-03.

3. The CSET Assessment of Growth Options. Current Conditions.

- 3.1 Addenbrookes Bus Station has a frequency of c.20 bus services per hour, both in the am peak, 8-9 am, and in the off-peak, 11-12 am, (Source: bustimes.org). Most of the 22,000 CBC employees work at Addenbrookes. This frequency provides a good modal split of c.33% each arriving by active travel, bus/rail & car, (CBC Draft Supplementary Guidance).
- 3.2 The routes served are 1 Arbury-Fulborn, 7 Saffron Walden-Cambridge, 13 & X13 Cambridge to Haverhill, 13A Cambridge - Haverhill, 16A Cambridge – Gt Thurlow, 132 Saffron Walden – Cambridge, PR4 Cambridge – Babraham Park & Ride, T3 Granchester – Fulbourn, T4 Addenbrookes – Newmarket Bus Station.
- 3.3 The A1307 bus services 13/13A/X13 provide 3 buses per hour with a 11 mins journey time A11-CBC (Stagecoach timetable), with Babraham Park & Ride service PR4 providing an extra 5 buses per hour, with a c.5 mins journey time to Addenbrookes. (CSET is estimated to take 9-10 mins, showing a marginal saving for A11-CBC users in CSET-20 Outline Business Case Table 5.2).
- 3.4 Severe delays were not observed on the A1307 from A11 to Brabham Park & Ride.” (CSET-19 TA Fig 5-6 & paragraph 5.43/5.65 Table 2). The 5 mins delays from A11 to CBC in the AM peak in paragraph 5.43 primarily occurred between Babraham P & R and the CBC, where there is a bus frequency of 3+5 = 9 buses per hour.

Future Conditions.

- 3.5 DfT Transport Analysis Guidance (TAG 2018, fig. 1) sets out the Transport Appraisal Process. It states that national & local policies & understanding current & future conditions should establish a Need for Intervention.
- 3.6 There is no CSET estimate of business demand for travel between the Campuses, which account for only 2% of all trips (Gov.Transport Statistics) .
- 3.7 There is no certainty of the scale or location of growth beyond 2031 in the SCLP or beyond 2041 in the draft GCLP, with 518 new homes proposed in the Study Area. There are no proposals for intervention between CBC – City Centre, although the CSET proposal to use the existing busway may have marginally less journey times than existing routes, some of which use it.

- 3.8 My submission of 5th March 2025, sections 6 & 8, deal further with Future Conditions & demand estimates. CSET-20 Economic case Table 4.5 estimates a level demand between 2026-36 of c.560-590 P & R users (8-9am). Table 4.7 shows 332 On-route users (7-10am, say 130 8-9am), with On-route users being 29% of demand. The capacity of CSET (8 buses per hour x 46 seats + 31 standing = 616 users) is insufficient to meet the demand for c.590+130 = 720 users (8-9am). One train set has a capacity for 200-1,000 users, so greater capacity could be achieved by alternative rail options.
- 3.8 It is concluded that alternative options should be assessed with larger capacity e.g. Network Rail Cambridgeshire Corridor Study proposals for extra capacity.

3.9 The applicant has not established the Need for Intervention, with:

- i) A good CBC modal split of c.33% by active travel, bus/rail & car,
- ii) A high bus frequency of 20 buses per hour at Addenbrookes bus station.
- iii) A High-Quality bus service provided by PR4, 13, 13A, X13 on A1307, with 3-8 buses per hour.
- iv) A good bus journey time, A11-CBC, of c.11 mins without severe delays A11-Babraham P & R, where route PR4 increases bus frequency to 8 buses per hour, with a c.5 mins journey time.
- v) Improvements to rail services from a new 4 platform Cambridge South station to provide a c.6 mins journey time Writtleford Parkway – Cambridge South station & additional rail services to Cambridge South station from East-West Rail.
- vi) There is no estimate of business demand between the Campuses, (2% of total trips) no certainty on the scale or location of growth after 2041, & no intervention planned for CBC – City Centre.
- vii) Linton & Sawston Greenways incl. DNA & other cycleways in CSET Phase 1, already promote Active Travel, as well as safety measures on the A1307 also provided under CSET Phase 1.
- viii) My 5th March 2025 Submission covers other matters including evidence of Working from Home reducing the growth in travel e.g. South Cambridgeshire D.C. has confirmed a 4-day working week, & evidence that CSET's increased frequencies would be largely cancelled by increased walking distances for local communities. My case therefore disputes the CSET estimates in Table 5.2 of CSET-20 Outline Business Case that villages will benefit from 24-29 mins. journey time savings.

4. Assessment of Alternative Off-road & On-road Options.

- 4.1 The DfT Guide to TWA Procedure, paragraph 2.47, states that the Sec. of State is required to determine whether the proposals are acceptable, but not whether there might be a better alternative. But that does not rule out that the evidence of objectors on possible alternatives be ruled out as irrelevant.
- 4.2 If it is clear that a particular route chosen, or part of it, gave rise to significant environmental damage, & an objector demonstrated that an alternative route could meet the scheme objectives without causing such damage, the Sec. of State might consider that to be a reason for modifying or rejecting the submitted proposals.
- 4.3 The Environmental Statements (ES) of applicants need to demonstrate that they have considered possible alternatives, & present a convincing case for their preferred choice of route, having regard to the environmental effects.
- 4.4 Section 7 of my 5th March 2025 Submission deals with Alternative Strategic Options. Part 11 of Schedule 4 of the Environmental Impact Regulations requires the applicant to provide an outline of the main alternatives, & an indication of main reasons for choice, taking account of environmental effects.
- 4.5 No On-Road options have been assessed in the Transport Assessment. CSET–19, paragraph 1.16 which states that the selection of options & their assessment are set out in chapter 4 of the Environmental Statement (CSET-10-01 paragraph 4.2.4-8). Public Consultation on Off-Road & On-Road options in 2016 showed a preference for an On-Road option on grounds of less land take, less landscape & visual impact, less loss of habitat, & less impact on the R. Granta.
- 4.6 There is no evidence as to why an On-Road route could not meet scheme objectives without causing such damage to Green Belt.

4.7 The CSET Planning Statement (CSET-15 & Appendix C on Green Belt), Transport Assessment (CSET-15), Outline Business Case (CSET-20 chap19) & Environmental Assessment (CSET-10) demonstrate that alternative On-Road options have not taken account of environmental effects in an Environmental Assessment, or compared the impact on Green Belt.

4.8 In section 9 of my 5th March 2025 Objection, I have compared the environmental impact of CSET against an On-Road option proposed by Stapleford/Great Shelford Parish Council. The assessment covers:

- the impact on the physical environment,
- NPPF, SCLP, CSFAAP, & Neighbourhood Plan Policies,
- on wildlife & habitats,
- local communities &
- on cultural aspects.

4.9 It is concluded that an Off-Road option could meet scheme objectives without causing the significant environmental damage from CSET, where great importance is attached to any harm to the Green Belt (NPPF paragraph 142).

5. The Assessment of Costs & Benefits from Transport Modelling.

5.1 Sections 8 & 10 of my 5th March 2025 Objection covers costs & benefits.

5.2 The Applicant's Case on Benefits.

The applicant's Case in paragraph 5.4.1 Outline Business Case – Economic case, is that there were “marginal differences” in 5 route alignments & 3 Hub locations. Only “marginal savings” of 6-8 mins are made by CSET, when compared to existing half hourly (2 buses per hour) 13/13A/X13 services, but “substantial savings” of 24-29 mins compared to Citi7 services every 20 mins, due to increased bus frequencies.

5.3 Increased bus frequencies on A1307 have removed “marginal savings.”

The Current 13/13A/X13 timetable shows 3 buses per hour 7-10am, compared to 2 buses per hour used in the model (CSET – 20 OBC Public Transport Network Appendix D Table 1). The “marginal savings” of 6-8 mins would be reduced to zero by a 5 mins reduction in waiting time. The current 11 mins. journey time is similar to the proposed 9 mins. CSET journey time.

5.4 No evidence of journey times compared to Stagecoach timetables.

- The transport model may have set different in-vehicle journey times to routes scheduled by Stagecoach, but if Stagecoach continued to operate these services, they would set the timetable, not the transport model. I have therefore based my assessment on Stagecoach timetable schedules for existing bus routes, incl. the existing Guided busway, accepting that delays could occur for both timetabled & modelled trips.

5.5 Current In-vehicle journey times	Mins.
13/13A/X13 Babraham High St – Addenbrookes bus station	11
Addenbrookes- City Centre	20
Route 7 Sawston – Addenbrookes bus station	25
Route 1/7/PR4 Addenbrookes bus station – City Centre	20
Route A busway Addenbrookes hospital. – City Centre	21-24

5.6 Lack of evidence from routing City Centre services onto busway.

All CSET services are routed from CBC to the City Centre on the existing Guided busway, omitting 9 stops on the scheduled 20 mins journey by bus routes 7/X13 on Long Road/Hills Road, serving The Perse School & 6th Form College. Education trips nationally generate an equal number of trips as journeys to work (13% each), Gov. Transport Statistics GB 2023.

As the A/B route using the existing guided busway is scheduled to take a similar time (21-24 mins) from Addenbrookes's Outpatients dept to the city centre, as the existing routing, there is no evidence of CSET benefits arising from this re-routing.

5.8 A 5 mins in-vehicle time saving would only be delivered if the present A/B bus routing, with 5 stops serving Addenbrookes, was replaced by an extra 10-15 walk to Addenbrookes Outpatients & dept/bus station from the CSET stop in Francis Crick Avenue, a significant disbenefit.

5.9 Height Limits & Bus v. Rail Capacity.

Height limits prevent the use of double deck buses on the CSET route, restricting capacity to 41 seats & 37 standing.

Bus capacity on the existing busway was not assessed in model.

The Trumpington double decker P & R service PR4 increases capacity to 80 seats by avoiding the height limit on the existing busway.

Great Anglia Aventura 720 Class services operate as 540 seat five-car units, or 1,100 seats for 10-car units, with 167-229 seats on trains stopping at Writtleford Parkway.

5.10 The Absence of a Do Minimum Alternative Option.

No changes are proposed to existing bus routes for comparing shortlisted options, so there is no assessment of a Do Minimum option with extra route 7/X13 buses using existing guided busway. (CSET 20 Outline Case Appendix D para. 2.3).

5.11 Existing bus services are assumed to remain viable.

Under Feeder Services to CSET, diverting Citi7 services onto CSET is envisaged in scenario 3 on the assumption that a residual current or lower frequency “would still be commercially viable.” CSET-20 Appendix D paragraph. 3.2.2, page 10. There is no evidence that the existing route 7 bus serving Sawston/Stapleford/Great Shelford would be viable given the CSET assumptions that the new busway would attract en-route users by providing a 25-29 mins journey time saving.

5.12 There is No comparison with A1307 On-Road Option proposed by Stapleford/Great Shelford Parish Council.

5.13 There is No comparison with Rail/Cycle Options

No evidence of meetings with Network Rail on Cambridgeshire Corridor Study proposals for extra capacity on Cambridge & Newmarket lines.

No comparison with Writtleford – Cambridge rail services with a c.12 mins av. journey time, & potentially c.6 mins to Cambridge South station.

There is No comparison with 15-30 mins door to door Cycling times from Sawston, Stapleford/Great Shelford to CBC (third of all CBC trips use Active travel).

- 5.14** The transport model used 2016 traffic flows with growth rates not reflecting Dec. 2024 Quarterly County traffic data showing -15% growth on local roads 2019-24 due to Covid-related Working from Home (WFM). In Table 5.3, just 20% of 1,200 daily users are new users (240 new users).
- 5.15** (CSET-20 Table 5.1) shows the majority of users (66%) were A11 Park & Ride users, with the remainder (29%) originating from the local community (Sawston, Stapleford, Great Shelford, 15,000 pop in Census).
- 5.16** CSET-20 Economic Case Table 5.2 shows 6-8 mins journey time savings in the AM Peak using the Travel Hub, & 26-29 mins from On-route users in the local community due to a reduced wait time on CSET for bus route 7 users.
- 5.17** No assessment was published of the increased walk times from replacing 20 bus stops on bus route 7 with 4 remote CSET busway stops. Paragraph 4.2 refers to reduced waiting/travel time weightings for CSET compared to existing services. Equal weightings should be applied walk/waiting time to generate generalised travel costs (c.+50%), which would reduce savings.
- 5.18** Paragraphs 2.3-2.7 of this Statement of Case demonstrates why the 13-20 mins walk distances to Sawston College, Great Shelford village centre & Addenbrookes bus station associated with the CSET proposals do not meet SSFAAP Policy CSF/11 for all development to be within 400m (5 mins) of a High-Quality bus service.
- 5.19** Table 5.5 identifies that 49% of benefits come from On-route users despite only 29% of all users are On-Route. Given the assumptions above, these conclusions should be re-examined as unsound.
- 5.20** It is concluded that a Modified Option or refusal of the application be given serious consideration on the grounds that the Need for Intervention to meet the Stated Aims has not been made.

6. Conclusions.

6.1 It is concluded that the Stated Aims do not justify the Need for Intervention:

- **The Stated Aims being to improve inter-connectivity between the Campuses, when only 2% of all trips are business trips made between the Campuses, (Gov. Transport Statistics Domestic 2023.**
- **The Stated Aim to reduce journey times between the A11 & CBC on the A1307 results in “marginal savings.”**
- **The journey time savings on bus route 7 on the A1301 are significantly reduced by 800m-1.6km (10-20 mins) walk times before & after the bus ride from proposed CSET stops and Sawston College (1,200 pupils), Great Shelford village centre, Woollards Lane & Addenbrookes Hospital Outpatients dept & bus station.**
- **Improved safety measures on the A1307, and the Linton & Sawston Greenways are covered in CSET Phase 1.**
- **Relieving congestion & air quality can be achieved by a Do Minimum proposal for alternative bus lane, Cambridge Rail Corridor, East – West Rail & cycleway proposals.**
- **High quality public transport from Haverhill to Cambridge has been provided by the recent increase to 3 buses per hourly X13 service, to which the CSET proposal for 2 extra buses per hour can be added without the CSET proposals.**