



Coton Busway Action Group

Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR
transportinfrastructure@dft.gov.uk

Objection to Transport and Works Act Order to the Department for Transport for a new busway linking Cambourne to Cambridge as submitted by Cambridgeshire County Council on 12 November 2024

I, Dr Marilyn Treacy, of [REDACTED] am writing on behalf of the 11-strong management committee and 220+ members of the Coton Busway Action Group to object to the above application.

The Coton Busway Action Group (CBAG) <https://www.cotonbuswayaction.com> was formed 10 years ago when it became apparent that the Greater Cambridge Partnership (GCP) were considering an off-road busway route that would bisect Maddingley Hill and Coton Orchard and require an additional bridge over the M11. CBAG fully supports the initiative to provide better public transport links between developments west of Cambridge with employment and educational facilities in and around the city. However, along with many other organisations and individuals, CBAG strongly advocates the adoption of an adjusted scheme that includes an on-road section from Maddingley Mulch to the M11, rather than the proposed off-road route through green belt and Coton Orchard. This alternative route will cause minimal environmental damage, save tens of millions of pounds, and provide more direct journeys to key destinations.

Our grounds for objection can be summarised as follows:

1. The repeated failure of the GCP to consider and properly appraise a credible alternative proposal

Although the GCP has promoted their chosen route as being segregated and largely off-road, a significant proportion of it is on road. The off-road section runs across Madingley Hill and through Coton Orchard, necessitating an expensive new bridge over the M11 but there is no logical reason for this element of the scheme.

Cambridge Past, Present and Future (CPPF) has published a detailed, alternative scheme that would provide an in-highway alternative for this off-road section. The alternative scheme would be less expensive and less environmentally damaging, would not take land from outside the highway boundary, and would not – as the GCP has falsely claimed – be detrimental either to the SSSI Madingley Wood or to the American Military Cemetery.

However, the GCP has never conducted its own appraisal of this scheme nor given any valid explanation for rejecting it, despite numerous calls to do so at both GCP Executive and Cambridgeshire County Council meetings. Instead, it has made comparisons only with other, obviously less viable on-road alternatives, which were, arguably, set up to fail.

2. Flawed modelling

The GCP has used outdated models to support its proposals for both inbound and outbound segregated lanes and have thus overstated the case for their scheme.

The models for inbound traffic used were created pre-pandemic, and at a time when the A14 upgrade was causing significant disruption to traffic in the area, particularly down Madingley Hill on the A1303.¹ The completion of the A14 upgrade together with new working patterns mean that inbound traffic congestion is now significantly less problematic than it was pre-pandemic.² The independent audit of the GCP's scheme carried out in 2022 confirmed the effect of the pandemic, and suggested that the scheme should be looked at in the light of new working patterns post-Covid.³ This has not been done.

Outbound traffic flows have not produced congestion problems.

The evidence of the data strongly suggests that an inbound-only segregated bus lane down Madingley Hill would provide fast and efficient transport, now and into the future, without any need to construct an off-road busway and new bridge over the M11 motorway.

3. Poor choice of route

Since the initial busway proposals in 2015, commuter journey patterns across and around Cambridge have altered. The main centres of employment and education are now the Biomedical Campus, CB1, CB2, and the Science Park. The GCP's scheme would not provide easy journeys to any of these. On the GCP proposed route, buses cannot turn south down the M11 at Junction 13 to get directly to the Biomedical Campus; nor can they turn north up the A428 from Madingley Mulch roundabout to the Science Park. Since the route enters the city at Grange Road, passengers travelling to CB1, CB2 and secondary schools would face onward journeys through the congested city centre.

The CPPF alternative scheme would offer far more direct routes to all these destinations. Moreover, when East West Rail (EWR) is completed, the GCP route would become virtually redundant for journeys to the Biomedical Campus, CB1, CB2 and the sixth-form colleges.

4. Impact of East West Rail ignored

The chancellor's Autumn 2024 budget confirmed support to deliver the EWR scheme in full. With a station at Cambourne, EWR will transform transport from the west of Cambridge to sites of employment and education – regardless of whether the southern or northern route is chosen.

The independent audit emphasised the requirement for analysis of the effect of EWR on GCP's business case for C2C.⁴ However, the GCP's main business case does not take the effects of EWR into account, offering only a brief consideration in an addendum which asserts, without analysis or evidence, that, "East West Rail and C2C schemes are mutually complementary".⁵

5. Significant environmental damage

The adverse environmental effects of the off-road scheme have been significantly underplayed and the advantages exaggerated by the GCP, as evidenced in the MCAF re-scoring exercise in 2017 when the Local Liaison Forum requested that a rescoring exercise be undertaken.⁶

The off-road scheme will remove a vast swathe of Coton Orchard – the largest traditional orchard in the county, a Priority Habitat with exceptional biodiversity and numerous red-list species, and a County Wildlife Site. The site and the habitat will effectively be destroyed. The route also bisects vital wildlife corridors as well as removing valuable agricultural land from one of the most prominent hills within the Cambridge greenbelt.

These are losses that Cambridgeshire, the most nature-depleted county in the UK, cannot afford. The GCP claims that compensation measures will deliver 20% Biodiversity Net Gain, but the fragmentation and resulting destruction of such a site cannot be compensated for in this way.⁷

Also of environmental concern is the significant infrastructure carbon associated with the construction of a new roadway and a motorway bridge on the off-road route. By the GCP's own calculations, it will take nearly 60 years to break even on carbon emissions from the reduction of private vehicle use. This is likely an underestimate, given that they do not include the loss of carbon sequestration in the soil and vegetation, or end-of-life costs in their figures.⁸

By contrast, the CPPF in-road highway scheme would not be responsible for any significant land take, would not affect Coton Orchard or the Green Belt, and would have a small fraction of the infrastructure carbon associated with the on-road scheme.

6. Poor value for money

The Benefit Cost Ratio (BCR) of the GCP's off-road scheme has been variously quoted as between 0.43 and 0.48, and this is before removing their double counting from EWR in terms of patronage and land-value uplift. (These figures cannot be counted in both business cases and GCP has done no modelling on this.) A BCR of >2 is generally required for a public-sector project to receive government approval, while a BCR of <1 is regarded as poor value for money.

In contrast, the CPPF scheme, without the need for land acquisition and an expensive new motorway bridge would come in with a BCR which would meet government criteria for approval. GCP's calculations of Wider Economic Benefits do not take the effect of EWR with a station at Cambourne into the equation.

If the two schemes delivered comparable benefits, it would be hard to see why anyone would choose the GCP's scheme. However, when the issues outlined above are added into the equation, there appears to be no justification whatsoever for the GCP's scheme.

NOTES

1. The GCP has used 2015 data, adding 2019 pre-Covid data to extend the life of the model "until such a time as a whole new base could be created once the disruption of Travel behaviour and patterns caused by the COVID-19 pandemic had settled to a new normal state". Atkins, *Cambridgeshire Sub-Regional Model 2*, Cambridgeshire County Council, May 2022.
2. 2023/24 data collected by the Smart Cambridge data hub set up by the GCP where buses are fitted with GPS trackers shows a marked reduction in peak time transit for buses between Madingley Mulch roundabout and the M11 junction. From: "Alternative in highway proposal for high-quality Cambourne-Cambridge public transport scheme" produced for CPPF by Edward Leigh, updated October 2024.
<https://www.excogitate.co.uk/download/CPPF-Cambourne-Cambridge-alternative-4f.pdf>
3. The audit highlighted a report which suggested that if people who used to commute by car and who are now working from home were to continue to do so for two days a week, almost 14% of morning car trips would be cut. This would result in traffic reductions similar to those seen in school half terms. <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/C2C-Independent-Audit-Final.pdf>
4. "EWR: the issues around potential impact on demand should be subjected to further analysis. This could be done through more detailed modelling of passenger demands or through sensitivity analysis of projected demands for the C2C under different scenarios".

<https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/C2C-Independent-Audit-Final.pdf>

5. CtoC-21-00 *Outline Business Case Appendix A Strategic Case Addendum*.

<https://cccandpcc.sharepoint.com/sites/CambourneToCambridgeTWAOCCC/Shared%20Documents/Forms/AllItems.aspx?ga=1&id=%2Fsites%2FCambourneToCambridgeTWAOCCC%2FShared%20Documents%2FCambourne%20to%20Cambridge%20TWAO%20application%20documents%2F2024%2D11%2D12%20TWAO%20Submission%2FCtoC%2D21%20Outline%20Business%20Case%20Addendum%2FCtoC%2D21%20Outline%20Business%20Case%20Addendum%2Epdf&viewid=7582fa57%2D96cf%2D4d52%2Db266%2D130fd8d054ce&parent=%2Fsites%2FCambourneToCambridgeTWAOCCC%2FShared%20Documents%2FCambourne%20to%20Cambridge%20TWAO%20application%20documents%2F2024%2D11%2D12%20TWAO%20Submission%2FCtoC%2D21%20Outline%20Business%20Case%20Addendum>

6. *Cambourne to Cambridge Better Busway Journeys Multiple Criteria Assessment Framework (MCAF): Second High Level Assessment*. Atkins End Stage Report Sept2017 Appendix F.

<https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/C2C-End-of-Stage-Report-Sept-2017-Appendix-F.pdf>

7. “The destruction of such a valuable Habitat of Principal Importance cannot be compensated. There has been an orchard on this site for around 100 years, so to compensate for its loss would mean that you have to plant and manage a traditional orchard on an alternative site for at least 50 years before removing the old one, which is of course not a viable option.” Steve Oram, County Biodiversity Officer for the People’s Trust for Endangered Species.

Letter: https://www.cotonbuswayaction.com/uploads/2/6/1/9/2619440/ptes_letter.pdf

8. The GCP’s Environmental Impact Statement estimates 29,130 tCO₂e infrastructure carbon associated with the off-road route (not including the loss of carbon sequestration in the soil and vegetation or end-of-life), with a forecast reduction in private vehicle use of 1.25m km annually, amounting to 516 tCO₂e. On this basis, the off-road route would take 57 years to break even on carbon.