

**RE: THE CAMBOURNE TO CAMBRIDGE ORDER**

**TRANSPORT AND WORKS ACT INQUIRY**

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**OPENING STATEMENT ON BEHALF OF CAMBRIDGE PAST PRESENT (CPPF)  
AND FUTURE AND COTON PARISH COUNCIL (CPC)**

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1. CPPF and CPC acknowledges and agrees that there is a need to meet the objectives set for the Scheme: to improve accessibility in the Greater Cambridge region to support economic growth, to deliver a sustainable public transport service between Cambourne and Cambridge and to improve the quality of life within surrounding areas.
2. The question for this inquiry is, however, whether the Scheme that has been put forward to meet those objectives is justified. CPPF/CPC is firmly of the view that it is not, and will seek to demonstrate why, in detail, through the evidence presented to the Inspectors.
3. CPPF/CPC's concerns about the Scheme are rooted in the Applicant's proposal to construct an off-line busway between the Madingley Mulch Roundabout and Grange Road, on the western side of Cambridge. That proposal is of considerable concern to CPPF/CPC because:
  - a. It will involve the compulsory purchase of land, including land owned by CPPF as part of its charitable purposes and held for the specific purpose of protecting the setting of the historic village of Coton and the countryside setting of the historic city of Cambridge;
  - b. It will cause significant harm to the Green Belt as well as landscape harm, ecological harm and other environmental harms.
4. Given that the scheme involves the need for compulsory purchase, there must be a compelling case in the public interest. Given that the scheme will cause obvious harm to the openness of the Green Belt, there must be very special circumstances to justify it. CPPF/CPC is firmly of the view that such justification is lacking.
5. While the Scheme would involve a number of disparate elements, including the busway, a maintenance track (which will also be available as an active travel route) and a park and ride facility, the central transport benefit claimed for the Scheme is that the busway infrastructure

will enable a faster and more reliable bus service to take more passengers from Cambourne to Cambridge than the 'do-minimum'<sup>1</sup> would permit.

6. Pausing there, it is important to note that the evidence put forward by the Applicant is only claimed to demonstrate that the Scheme would make a material improvement to inbound journeys (i.e. Cambourne to Cambridge). All that the Applicant has said in relation to the benefit of the provision for outbound bus journeys is that congestion is likely to worsen so as to justify its provision in future. There is no actual evidence that outbound congestion will worsen significantly, nor that provision of an outbound lane will be required. There is therefore no justification for the outbound busway lane provided by the Scheme.
7. Given that inbound bus journey time savings and increased bus patronage by comparison with the do-minimum are fundamental to the justification for the Scheme, it is obvious that the evidence in support of the forecasted journey time savings and patronage is of fundamental importance to an understanding of the merits of the scheme and, in particular, whether the compulsory purchase of land is justified.
8. CPPF/CPC will demonstrate that the evidence relied on by the Applicant to demonstrate that the Scheme will deliver the transport benefits which are said to justify it, inbound bus journey time savings and increased patronage, is wholly inadequate.
9. In particular, the transport modelling underpinning the claimed inbound bus journey time savings is the Cambridge Sub Regional Model (CSRM), the most recent iteration of which, the F-Series, is based to 2019, prior to the Covid-19 pandemic. The Government has made clear that<sup>2</sup>:

*The COVID-19 pandemic has had a significant impact on the pattern and volume of travel, with overall volumes for most modes still below pre-pandemic levels, as can be seen in DfT official statistics, and importantly below pre- pandemic projected demand levels. There are a multitude of drivers of behaviour and demand; it is difficult to isolate the individual impact of COVID-19 and the extent to which impacts will be sustained long term is unclear. However, it is the Department's view and recommendation that this evident suppression of travel demand relative to a pre-pandemic projection of demand at this time should be appropriately*

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<sup>1</sup> i.e. existing infrastructure plus other committed schemes

<sup>2</sup> CD 2-21, Appendix B, paragraph B.1.1.

*represented in transport analysis. This is important particularly in appraisal and analysis supporting transport investment decisions.*

10. There can be no question, having regard to this guidance, that, as at today's date (and when the TWAO application was made), the transport modelling supporting the Outline Business Case, the Addendum OBC and the Transport Assessment (all of which is based on the CSRM) is, at least in isolation, an inadequate basis to justify the Scheme.
11. The most obvious way that the Applicant could have remedied this deficiency would have been to produce a new transport model, or to have re-based the CSRM using a post-Covid base year to forecast bus journey time savings. Such an approach is identified to be the 'ideal' method identified in the DfT Transport Appraisal Guidance.<sup>3</sup> Given the fundamental importance of the journey time forecasts to the justification for the Scheme, it is CPPF/CPC's position that it is the only way that the use of CPO powers could sensibly be justified.
12. While TAG does envisage scenarios in which rebasing of a model may not be feasible or proportionate, that cannot sensibly be claimed to be the case here. There was ample opportunity between the establishment of the post-Covid 'new normal' and the submission of the TWAO application to re-base the existing model.
13. The Applicant's only attempt at any transport analysis representing '*the evident suppression of travel demand*' post-Covid is a 'sensitivity test'<sup>4</sup>, reported over six paragraphs of a 'technical note', whereby the CSRM model was run with a 10% reduction in car travel and a 10% increase in LGV travel. CPPF/CPC will show that this 'sensitivity test' fails, in fundamental respects, to accord with the Government's own TAG guidance, fails to account for one of the most obvious changes in post-Covid travel behaviour (i.e. the suppressed public transport demand, for which there is ample evidence both nationally and locally) and is, ultimately, a wholly inadequate basis on which to make a decision as to whether the scheme is justified, let alone whether there is a compelling case to justify the compulsory purchase of land.
14. The Applicant, latterly, appears to accept that the transport related benefits of the Scheme are 'modest' and has pivoted to an argument that, irrespective of whether the Scheme will in fact deliver any transport user benefits that it will nonetheless deliver significant economic benefits by 'unlocking' housing development to the west of Cambridge. In particular, the Applicant claims that 3,850 homes, at Cambourne West and Bourn Airfield, are dependent on the delivery of the Scheme and that the Scheme will, independently of any modelled transport

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<sup>3</sup> CD 8-21, para 3.3.2

<sup>4</sup> CD 9-25

user benefits, deliver a large land value uplift (circa £184m) through their delivery. Such claimed 'dependency' derives from historic transport assessment (which suffers from the flawed dependence on the CSRM) and CPPF/CPC will demonstrate that the LVU claimed for the Scheme is exaggerated.

15. Aside from this fundamental deficiency in the evidence base, CPPF/CPC will demonstrate that the Applicant's analysis is flawed in other ways, by reference to the assessment of:

- a. the effects of East West Rail
- b. BNG and ecological harm generally
- c. CO2 emission benefits
- d. Alternatives to the scheme
- e. The extent of harm caused in landscape and visual terms and to the Green Belt.
- f. Whether the maintenance and access track falls within the scope of the TWAO and, in any event, whether there is a need for, or commensurate benefit from, its delivery
- g. Whether the proposed replacement open space is acceptable
- h. Whether there has been adequate engagement by the Applicant in relation to the proposed route alignment and the land required

16. CPPF/CPC contends that deficiencies above are such that the Order Scheme, as presented, is not justified. However, as part of its case, CPPF/CPC will also demonstrate that there is a further reason why the Order Scheme is not justified, namely an alternative, in-highway scheme ('the CPPF Alternative') which would, subject to refinement through detailed design (as would be expected for any scheme of this nature):

- a. Be effective in meeting the objectives of the Scheme
- b. Be feasible in engineering terms
- c. Be safe
- d. Cause less harm to ecological receptors than the Scheme
- e. Preserve the significance of heritage assets
- f. Be in compliance in principle with relevant development plan policy
- g. Be less harmful in Green Belt and landscape and visual terms
- h. Deliver upon the objectives for the Scheme

- i. Be significantly less costly
  - j. Be deliverable far more quickly
17. It is notable that the Applicant has emphasised the need for interventions to accelerate and unlock growth in the short term as well as raising the possibility that the busway may be repurposed in the future once longer-term proposals for wider transport solutions have been delivered. Both of those factors provide further justification for the CPPF Alternative. It could be delivered more quickly so as to unlock growth in the short term and it would avoid the need for a significant, time-consuming and costly incursion into the Green Belt for a scheme which is likely to become obsolete (or at least its benefits significantly curtailed) in the medium term if and when EWR is constructed or some other mass transit scheme is advanced.
18. Through its evidence, CPPF/CPC will demonstrate that the Order scheme is not justified and will respectfully invite the Inspectors so to recommend.

**16 September 2025**

**Jack Parker**  
**Cornerstone Barristers**

### **List of Appearances**

**Jack Parker**, Counsel, instructed by Lisa Foster of Richard Buxton Solicitors, will call:

- **Steve Johnstone**, B.Sc., C.Eng., M.I.C.E., M.C.I.H.T., Engineering Director in relation to transport modelling and the CPPF Alternative Scheme
- **Edward Leigh**, MA MSc MTPS, a Senior Transport Policy Officer, qualified in economic appraisal and originator of the CPPF Alternative Scheme
- **Dominic Woodfield**, B.Sc, CEcol, CEnv, MCIEEM, in relation to matters of ecology
- **Louise Hirst**, Professor of Materials Physics, in relation to CO2 emissions benefits
- **James Littlewood**, B.Sc, M.Sc, Chief Executive of CPPF in relation to planning matters