

Application by the Greater Cambridge Partnership for a
Transport and Work Act Order for a new busway, linking
Cambourne - Cambridge (C2C)



Objection by Cambridge Connect
07 January 2025 (v1)



1 Background

- 1.1. Cambridge Connect was formed as a small company in 2015 with the aim of promoting a strategic and sustainable approach to public transport in Cambridgeshire. Emphasis is placed on an integrated and multi-modal approach to meeting the transport needs for Cambridge and the surrounding region. Cambridge Connect contributed to work undertaken by the Cambridgeshire and Peterborough Combined Authority (Combined Authority) between 2016-18 to develop a 'metro' for the Cambridge region, although withdrew on strategic and technical grounds when the Combined Authority at the time decided to pursue the 'Cambridgeshire Autonomous Metro' (CAM). Cambridge Connect continues as a small non-profit-making initiative which continues to coordinate with a range of individuals, organisations, companies and government authorities to develop its proposals towards meeting its goals.
- 1.2. This submission is made on the Greater Cambridge Partnership (GCP) application to the Secretary of State for the Department for Transport (DfT) for a Transport and Work Act Order for a new busway, travel hub and path for walkers and cyclists linking Cambourne to Cambridge.

2 Objection

- 2.1. Cambridge Connect supports development of a new public transport route to the west of Cambridge following a fully or mostly segregated alignment immediately adjacent to, and / or co-aligned with, the A428 highway in particular, and as relevant to this objection, over the section between Hardwick and the Girton Interchange, thence via Eddington and the West Campus to Cambridge. This alternative avoids the need to route the public transport alignment over Green Belt land surrounding Coton when linking Cambourne to Cambridge by a segregated public transport corridor (see Figure 1, p.5). For simplicity, this alternative is referred to as the 'A428 co-aligned / Girton Interchange route' in this objection.
- 2.2. Cambridge Connect submits that the route preferred by the GCP for the busway has unacceptably high and unnecessary impacts on the Green Belt and on the highly valued rural landscape, including heritage landscapes associated with the American Cemetery, Coton and Coton Orchard, including its associated wildlife and ecology, which lie in close proximity to Coton and Cambridge in general. The impacts are unnecessary because alternatives exist that are likely to be viable, but these have not yet been adequately considered in the process developed for C2C by the GCP.
- 2.3. The GCP busway route stands in conflict with local and national policies that seek to minimise the impacts of infrastructure and development on Green Belt land, and against policies that seek to protect landscapes of high value. The GCP busway will create unnecessary severance and further fragmentation of the landscape and ecology of the Coton Countryside Reserve and of Coton Orchard, over National Trust lands on Madingley Hill, as well as affecting heritage landscapes valued by the American Cemetery.
- 2.4. Cambridge Connect submits that these impacts have not been sufficiently taken into account during the process by which the GCP considered alternatives, including that several of the alternatives not yet properly considered would avoid many of these impacts.
- 2.5. Cambridge Connect submits in particular that the A428 co-aligned / Girton Interchange route alternative has not been given sufficient consideration by the GCP. The GCP has thus failed to consider properly all reasonable and potentially viable alternatives before reaching their decision on the preferred route through Green Belt adjacent to Coton.
- 2.6. Cambridge Connect submits that the alternative A428 co-aligned / Girton Interchange route was wrongly screened out of consideration at an early stage in the process, and has never been given detailed consideration by the GCP or put forward for public consultation. This is despite the route being called for by Cambridge Connect since 2016, and supported by many others, including being highlighted by the Cambourne to Cambridge Local Liaison Forum (a community forum set up by the GCP).
- 2.7. While some attention was subsequently given to an alternative routed across land below and immediately NE of the American Cemetery, as explored by the GCP and the Combined Authority in a brief report



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related to CAM, this analysis excluded the A428 co-aligned / Girton Interchange route proposed by Cambridge Connect. The analysis undertaken in that report was superficial and insufficient in consideration of alternative options for a route in this sector. Therefore the analysis carried out failed to consider the alternative referred to in this submission and cannot be considered a sufficient assessment of the Girton Interchange alternative option.

- 2.8. An assessment by professional transport consultants i-Transport (2021), commissioned by Coton Parish Council, identified the A428 co-aligned / Girton Interchange route as a potentially viable option that would mitigate many impacts on landscape, environment and Green Belt that would arise from the GCP C2C route. An extended extract from this report is relevant to our objection and therefore quoted in full at the end of our submission: the arguments quoted are evidence in support of our objectionⁱ.
- 2.9. When considering the submissions made by the Coton Parish Council and Cambridge Connect which included the i-Transport analysis of the A428 co-aligned / Girton Interchange route alternative, the ‘Cambourne to Cambridge Independent Audit’ of the GCP C2C busway scheme (Amey 2021) acknowledged this route as potentially viable and possessing some merit. A relevant extract from Amey (2021) is included below, notably the conclusion that the A428 co-aligned / Girton Interchange alternative “is likely to perform less well on cost and other performance metrics while potentially scoring higher on environmental and social impact” [emphasis added].ⁱⁱ
- 2.10. The GCP failed to recognize the advice of the Independent Audit and did not undertake any detailed analysis of the option, and it has therefore never been properly considered or put to public consultation. Without detailed work-up of the option, including a robust analysis of the costs and benefits of the alternative against the C2C scheme, the decision to proceed with C2C is based on no more than an assumption about relative merits of financial vs environmental / social benefits. Importantly, cost alone should not be the sole, or even necessarily the prime, arbiter of whether a particular alternative is viable and/or desirable. Proper analysis of these factors, and others, using robust metrics and methods is needed and, we assume, is likely to be required in the context of pressing a major transport corridor through Green Belt land in order to demonstrate that no viable alternative exists.
- 2.11. Cambridge Connect submits that, as it stands, the Amey (2021) Audit and GCP conclusions are based on no more than assumptions, which are insufficient to justify continuing with the C2C scheme at this juncture. Therefore, Cambridge Connect submits the GCP wrongly rejected consideration of the A428 co-aligned / Girton Interchange route alternative prior to gathering and analyzing sufficient evidence, and on this basis the C2C scheme as it has been proposed should be rejected.
- 2.12. Cambridge Connect has repeatedly drawn attention to the alternative not only in the consultations undertaken in the Amey (2021) Audit, but also in submissions made directly to the GCP in other public consultations, and through publication of the proposals widely both on the internet and in local and national media. The GCP cannot claim it did not know about this alternative. However, Cambridge Connect has not received any formal response by the GCP to the alternative proposed at any stage during the public consultation process.
- 2.13. Continued and increasing erosion of Green Belt surrounding Cambridge in the context of a rapidly growing population, and including the importance of considering the need to address biodiversity loss and Climate Change, makes it especially important that alternatives are fully considered that would help avoid and / or mitigate impacts of major transport interventions. This importance has not been given sufficient weight by the GCP, including in their Environmental Impact Assessment, when reaching their conclusions on the preferred busway route. Indeed, the alternative route noted here is excluded from the scope of the EIA.



3 Conclusion and actions

- 3.1. Cambridge Connect objects to the application made by the GCP for a busway on the alignment proposed on the grounds that the GCP have failed to consider sufficiently potentially viable alternatives to the damaging route alignment selected, and have therefore failed in their obligation to follow due process to properly and fully consider reasonable alternatives before proceeding with their decision to align a major public transport route through previously undeveloped Green Belt land which has high landscape, heritage, ecological and social values.
- 3.2. Cambridge Connect objects to the application made by the GCP for a busway on the alignment proposed on the grounds that the GCP have failed to work up and present the alternative via the A428 co-aligned / Girton Interchange to a level sufficient for presentation to the public in consultation. As such, Cambridge Connect submits that the GCP have failed to allow the public full and due consideration of this alternative in the process of option selection.
- 3.3. GCP failure to consider adequately this, and perhaps other, alternatives could expose the C2C project and the GCP to unacceptable risks at a later stage.
- 3.4. Cambridge Connect requests the Secretary of State for Transport to refuse the application made by the GCP for a new busway, travel hub and path for walkers and cyclists linking Cambourne to Cambridge on these grounds.
- 3.5. Cambridge Connect further requests that – should proposals to construct a new public transport route to the west of Cambridge continue to be brought forward – the Secretary of State for Transport support due consideration of the alternative route proposed by Cambridge Connect in a full and robust analysis by the appropriate authorities, thus ensuring that decisions taken are based on full and proper evidence.
- 3.6. Cambridge Connect would welcome the opportunity to present the arguments summarized in this Objection at a Public Inquiry on C2C should this be convened.

4 References

- Amey 2021. Independent Audit of Key Assumptions and Constraints: Cambourne to Cambridge Better Public Transport Project. CO03022496 / Final Revision 0. 25/05/2021. Downloaded from: <https://www.greatercambridge.org.uk/asset-library/Sustainable-Transport/Public-Transport/Cambourne-to-Cambridge/Independent-Audit/C2C-Independent-Audit-Final.pdf>
- i-Transport 2021. Cambourne to Cambridge (C2C) Audit Response. Client: Coton Parish Council Ref: PH/VP/TTL16745-R01 Date: 23 April 2021.

5 Contact

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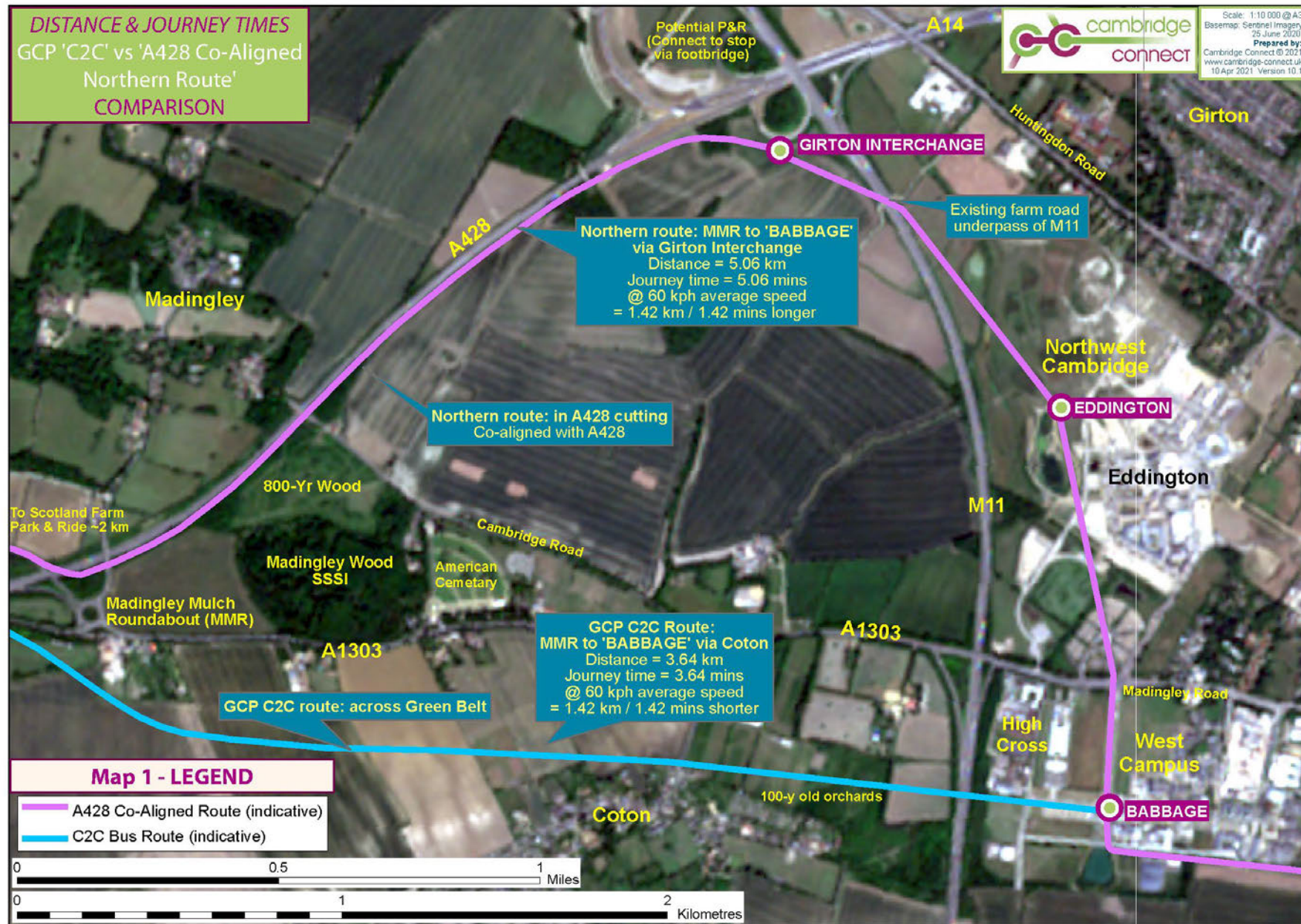


Figure 1. A428 co-aligned / Gorton Interchange northern alternative to the GCP C2C busway – section from Madingley Mulch to West Campus overview.

ENDNOTES

ⁱ Extract from i-Transport (2021) report (pp 33-34):

5.2.3 We have considered the principles of the [A428 co-aligned /Girton Interchange] scheme and reviewed its likely feasibility. Whilst (as with most highway schemes) there would be engineering challenges and the need for more detailed appraisal, it [the Girton Interchange] is a viable option which is worthy of further consideration. At a strategic level when considered against the principal objectives of the C2C project it would deliver benefits in comparison to the current preferred option by connecting to the emerging Eddington community (and potential onward connection to Bar Hill and Northstowe) enabling further economic growth and providing an improved Sustainable Transport Network. It would perform equally well in respect of relieving congestion, particularly on the A1303. Indeed, developing a scheme with future potential to tie in to the Girton Interchange improvements provides the opportunity to re-assign traffic via the A428 relieving the A1303.

5.2.4 In addition, in the context of the option appraisal process (INSET) used by GCP for C2C, it is considered that this alternative would perform better in the environmental 'Contribution to Quality of Life' criteria and equally well in 'Scheme Deliverability' as well as being a good fit with policy. It should not be overlooked or forgotten that one of the strategic policy objectives of the TSCSC is to ensure transport schemes "respect and conserve the distinctive character of the area and people's quality of life".

5.2.5 It could simply replace the preferred alignment between the A1303/A428 roundabout and Ada Lovelace Road connecting with the preferred Phase 2 route to the west (or any alternative) and continuing through into central Cambridge to the east. Essentially, it can be considered as a variant to the preferred alignment and warrants further consideration in the context of Auditor Statement F.2.

5.2.6 As well as a stand-alone substitution/variant to the preferred Phase 1 alignment it could be complemented in the short term by low-cost alternatives on road along the A1303 (see A1303 On-highway options below). This alternative would also provide the opportunity to coordinate with the improvements planned by Highways England (through the Road Investment Strategy) at the Girton Interchange which will provide connections between the M11 south and A428 west. The two schemes could be developed to complement each other providing a multimodal improvement to the wider corridor with the potential to deliver greater benefits.

ⁱⁱ Extract from the Amey (2021) report (p 69):

"The hybrid A428 Co-alignment [Girton Interchange] scheme [as proposed by Coton Parish Council and Cambridge Connect] is a compromise between the other two [northern options] that incorporates some of their features but avoids the riskier elements. In this sense it is more viable and closer aligned to the [C2C] scheme objectives than the others. Nevertheless, it is likely to perform less well on cost and other performance metrics while potentially scoring higher on environmental and social impact.