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**Transport and Works Act Order to the Department for Transport (DfT)
for a new busway linking Cambourne to Cambridge**

PROOF OF EVIDENCE TO BE PRESENTED AT THE PUBLIC INQUIRY

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About Coton Busway Action Group

The Coton Busway Action Group (CBAG) was formed 10 years ago when it became apparent that the Greater Cambridge Partnership (GCP) was 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 alternative scheme that includes an on-road section from Maddingley Mulch to the M11, rather than the proposed off-road section through Green Belt and Coton Orchard. The alternative route will cause minimal environmental damage, save tens of millions of pounds, and provide more direct journeys to key destinations.

CBAG has a coordinator (currently Dr Marilyn Treacy) a Finance Officer and Secretary. Membership is in the hundreds and the management committee numbers around ten. CBAG has held approximately eight formal minuted meetings every year over the last ten years, including an annual general meeting where the constitution has been reviewed, officers and committee members elected and a formal finance report tabled.

We hold regular village meetings to gauge public feeling, have co-organized two Cambridge-wide marches and held pre-election hustings. Members of our committee have attended and asked questions at almost every GCP and Cambridgeshire County Council meeting over the last 10 years where CtoC has been on the agenda.

Our continually-updated website (www.cotonbuswayaction.com) provides information on all aspects of the proposed scheme and the campaign, and we issue regular newsletters. Through fundraising events and activities, we have raised a significant contribution towards the Cambridge Past, Present & Future CtoC fighting fund appeal.

As a result of this long, consistently engaged campaign, we have detailed historical knowledge of all the steps in decision-making that have led, ultimately, to this public inquiry. For the reasons set out below, we are asking the Inspectors and the Secretary of State to reject the Applicant's proposed scheme.

1. The repeated failure of the GCP to appraise credible proposals for alternative routes

The Greater Cambridge Partnership (GCP) has repeatedly failed to consider and appraise credible proposals for alternative routes, including one for an inbound bus lane from Madingley Mulch to the West Cambridge site.

The GCP promotes a partially off-road CtoC route but no clear justification has ever been given for the off-road portion that transects Madingley Hill and Coton Orchard, requiring an expensive motorway bridge. Cambridge Past, Present and Future (CambridgePPF) offers a cheaper, less environmentally damaging in-highway alternative, revised in September 2024 and again in its final version in 2025.¹ Contrary to the GCP's claims, this alternative route demonstrates that it is certainly possible to fit an on-road segregated bus lane largely within the A1303's boundary and avoid any impact on either the SSSI or the American Military Cemetery. Despite what was stated by its chair in a 2023 Cambridgeshire County Council meeting, the GCP has neither appraised CambridgePPF's very credible plan nor justified their rejection of it. The GCP has instead compared its own preferred plan to a series of impractical on-road alternatives seemingly designed to fail.

The government's own guidance on compulsory acquisition of land states that:

A compulsory purchase order should only be made where there is a compelling case in the public interest.

It is difficult to see how the GCP can clear this hurdle when they have not properly explored an on-road alternative that does not require the compulsory purchase of any land.

In addition, from the start of this process the GCP and the Applicant have failed to acknowledge the countywide and national significance of Coton Orchard, and of the southern aspect of Madingley Hill as productive farmland and a setting for the American Cemetery. Instead, from the very beginning, the GCP and the Applicant have sought to denigrate the status of the Orchard. This is exemplified in their most recent response to the CBAG SoC (OBJ143) where, on p.114 of the Applicant's SoC, (CD32-01 CCCSoC), they state: 'Over recent decades large parts of Coton Orchard have been neglected as an orchard reverting to Woodland or being grubbed out while parts have been lost to the development of the garden centre.' As will be attested briefly here and in greater detail by others, this statement is a gross distortion of the facts and wilfully ignores the well-documented value of the site both for wildlife and as a productive orchard.

In almost every public meeting that we have attended over the last 10 years, the GCP have attempted to discredit the credentials of Coton Orchard with lame, unfounded arguments. County Councillors have followed suit.

Sequence of events and decisions

The following analysis of the GCP's decisions since 2014 demonstrates their evident bias towards their preferred scheme, which has created a misleading narrative and flawed

outcomes. They have continually rejected valid objections raised by members of the public, by the Local Liaison Forum (which the GCP themselves set up to engage with local stakeholders) and by CambridgePPF, which has a clear mandate to preserve the countryside to the west of Cambridge.

At the start of the process, the body that has become the GCP was 'The City Deal', but they are referred to as 'the GCP' throughout, for clarity.

2014/15

The 2014 Atkins Maddingley Road / A428 Cambourne to Cambridge Corridor Study² outlined five options, narrowed to four, as referenced in the 2018 Mott MacDonald report. Options A and B followed Maddingley Rise and Road; C ran north of the A1303, and D south of it near Coton. The creation of an all-ways junction at the Girton Interchange, though within the corridor, was excluded early without clear justification. Despite destination demand projections – City (45%), Science Park (31%), West Campus (9%) – no long-listed option provided a segregated route to the Science Park, with the city being prioritized instead. The off-road option ignored broader growth, notably at the Biomedical Campus.

Local residents questioned the dismissal of the Girton Interchange improvements at J14 and a sustainable link to the M11 south, especially in view of the planned A428 upgrades. The interchange could support an on-road busway via Eddington or reduce A1303 traffic by 30%, making the need for an off-road busway unnecessary. Yet the GCP discounted it early on and failed to lobby National Highways to prioritize it. It was not until October 2017 that the GCP wrote to National Highways on the matter, by which time decision-making was progressing towards the GCP preferred option.

2015

In 2015, a GCP consultation outlined three options for improving bus journeys from Cambourne to Cambridge, specifically the eastern section from Maddingley Mulch to Grange Road, as detailed in the Cambourne to Cambridge Better Public Transport Report (p36).³ The options prioritized access to the West Cambridge University site and the city centre, overlooking high-employment areas such as the Science Park and Biomedical Campus. They were as follows:

- Option 1a: an on-road, eastbound bus lane from the A1303/A428 junction along Maddingley Rise and Maddingley Road to Lady Margaret Road.
- Option 1b: a new off-road bus route northeast from the A1303/A428 junction, linking to Maddingley Road west of the M11, with an additional eastbound bus lane to Lady Margaret Road.
- Option 1c: an off-road route north of Coton, parallel to Maddingley Road and Maddingley Rise, connecting to Grange Road and the West Cambridge site.

Public feedback favoured the on-road route (67% support), while the southern off-road route faced 65.5% opposition and the northern route 57% opposition.

Despite the public's clear preference for the on-road option and rejection of off-road routes through Madingley Hill and Coton, the GCP appeared to ignore these results. This was justified to residents at public meetings by saying that a consultation is not a referendum. This is, of course, true, but if no clear rationale is then given for choosing the least-preferred option, then the consultation appears to be little more than a tick-box exercise.

2016

A Local Liaison Forum (LLF) was set up for CtoC in 2016. It was made up of a GCP project team and members of the local community representing villages and areas along the whole length of the proposed CtoC busway. The LLF was eventually disbanded by the GCP and superseded by the West Area Community Forum.

Early in 2016, Atkins prepared a report entitled 'Rectory Farm Bridge Options'.⁴ This report confirmed that the existing bridge over the M11 at junction 13 would accommodate a segregated bus lane. Despite having commissioned this report, the GCP continued to maintain publicly that accommodating a bus lane on the M11 bridge would not be possible and continued to promote their preferred off-road scheme. The following is quoted from the LLF's Statement to the Joint Assembly meeting in December 2016:⁵

Did misinformation regarding the capacity of the junction 13 bridge and then non-disclosure of contrary information influence the opinions assessed and the decision taken?

Was it the belief, repeatedly stated by the senior officer both in public meetings and by email, that it was not possible to get additional bus lanes over Madingley Road Bridge; that it did not have the capacity to take the weight and so would have to be demolished with serious cost and disruption implications? As recently as September, the Executive Board, the Joint Assembly and many other stakeholders were told by Bob Menzies that Atkins had done a survey 15 years ago that showed this to be the case and that the situation would only have deteriorated since. A report produced by Atkins in May 2016 that was not made publicly accessible states precisely the opposite. The bridge does have the capacity to take four lanes, could potentially take the weight, could be widened to the north or the south or could be supplemented with a bus only or cycle only bridge directly alongside. All options have been costed and the most straightforward one reducing the southside pavement would cost just £600,000. Misleading information on the bridge could well have had a material effect on the options that were chosen for assessment and on the whole decision-making process. This must therefore call into question the preferred option recommendation.

For the GCP to maintain publicly that the existing M11 bridge could not take another lane when they had in their possession a recent report stating the contrary surely calls into question the integrity of those involved.

The Joint Assembly was asked to agree the Preferred Option 3a on the following basis:

- without a valid two-way comparison that uses existing infrastructure
- with highly misleading journey time information
- with false advice that the buses could not be accommodated on 'bottleneck bridge'
- without a feasibility study having been done of existing infrastructure

- with an unsupported claim that the off-road option was somehow going to generate £680m in wider economic benefit, some £500m more than options that use existing infrastructure.

This is simply not credible.

The LLF gave advice and recommendations to the Joint Assembly, which can be summarised as follows:

- Given the new information on the J13 bridge, there should be a full appraisal of the hybrid solution, proposed by the LLF, to include transparent evaluation of strategic fit, benefit–cost ratio and wider economic benefits.
- All further work on Preferred Option 3a should be paused until this is completed. Then reconsider whether the Preferred Option 3a is indeed the Best Strategic Fit, or indeed the most sensible solution, in the light of the results.

The LLF asked the GCP Joint Assembly Board to note that key information, relevant to the feasible on-road solutions which make use of existing road infrastructure, was misrepresented or not disclosed. In their response, GCP officers apologised, saying that the senior officer responding to a specific question was not aware of this feasibility report. This seems highly questionable, as that officer was at that stage one of the two officers most closely involved with the work on CtoC. Even if that were the case, the GCP continued to promote their preferred option – despite the fact that the content of the report had now been brought to their attention.

2017

In June 2015, Atkins/Skanska and GCP staff developed a multi-criteria assessment framework (MCAF) to evaluate options for the CtoC busway scheme.⁶ The published scores were:

Option 3a (GCP's preferred) – 52
 Option 6 – 45
 Option 1 (in-highway) – 51

The LLF contested the methodology, and suggested that a more accurate set of scores would be:

Option 3a (GCP's preferred) – 35
 Option 6 – 46
 Option 1 (in-highway) – 44.5

The GCP then revised their scores to:

Option 3a (GCP's preferred) – 36
 Option 6 – 46
 Option 1 (in-highway) – 42

In August 2017, however, when the GCP published the revised scores, they announced that they would undertake an enhanced MCAF assessment using a different spectrum of criteria.

Not unexpectedly, the GCP then scored their off-road option at 91 and the on-road option at 77. This constituted a manipulation of data to reverse the previously-agreed scoring.

The LLF, already critical of the initial MCAF, opposed the new criteria, designed to favour the off-road route. Concurrently, an LDA Design report commissioned by the GCP, warned of moderate Green Belt harm near Coton owing to conflicts with its setting and Cambridge's Green Belt purposes.

The 2017 LDA Design report,⁷ which suggested special circumstances were needed for the off-road route, was not displayed on the GCP's website until 2019. Selective use of data and non-transparent scoring consistently supported the GCP's choice.

Later in 2017, another public consultation showed 57.6% of respondents preferred on-road options versus 32.5% for off-road.⁸ As with the first consultation, these results were completely disregarded by the GCP.

The GCP did explore a seemingly totally inappropriate tidal bus route with huge gantries very prominently positioned outside the American Military Cemetery, further questioned by the LLF and the community. This on-road scheme was very clearly set up to fail.

2018

By the end of 2018, it was clear that there was a breakdown in trust between the community and GCP officers, as outlined in a question from James Littlewood (CEO of CambridgePPF) to the Executive Board in December 2018.⁹

Following a presentation by officers and their consultant at the recent LLF it seems that there has been a significant breakdown in trust between the community and GCP officers (as represented by most of the LLF and community groups such as CambridgePPF and the National Trust). This relationship seems to be becoming increasingly acrimonious and could potentially last for several years with likely legal challenges and fights through the planning system. The breakdown is due to officers' preference for the off-road route leading to some bias in their reports, to the extent that the community no longer believes much of what they're being told. This is not healthy for the community and I would also be concerned, as politicians, as to the information you are receiving. At the last LLF it was recommended to establish an expert panel that is independent of the community, officers and politicians in order to restore trust in the system. The community could have faith that what they are being told is correct – and if not correct, then as politicians you can act accordingly. A panel might only need to consist of 2–3 people (transport economist, transport planner, environmental and heritage) and need only review the evidence and reports produced by officers and their consultants. In other words, they need not attend meetings and get involved in any discussions although that might be helpful. **Will the Exec Board consider establishing an independent expert panel for this scheme?**

The GCP would not support this approach and declined to establish a panel.

2019

In 2019, the GCP asked Mott MacDonald to look at a 'Quick Win' inbound priority scheme on Madingley Road.¹⁰ This work was fed into a 'Quick Wins' workshop and subsequently

published as a technical note. On 11 June 2019 the chair of the LLF wrote to the GCP about the on-road solution on Madingley Road; the letter included the following response to the 'Quick Wins' initiative:¹¹

The LLF technical group was very disappointed with the work undertaken by Mott MacDonald that fed into the Quick Wins workshop and was subsequently published as a technical note particularly as its core premise was contradicted in the second workshop held on 22 May 2019.

Transport officers and consultants appear to have been given a brief to develop an off-road busway rather than to provide the most efficient transport solution, provide the fastest route to key destinations or provide a scheme that the community buys into. As such, we have still not seen an optimized on-road solution and your Quick Wins solutions were far too narrowly specified and set up to fail.

The LLF therefore passed the following resolution 'We would encourage the GCP to optimize further the low cost on-road option taking into consideration the hybrid scheme proposed by the LLF'

The Quick Wins paper, which was considered by the local community to be a particularly poor piece of work and set up to fail, was approved by Jo Baker, who was at that time employed by Mott MacDonald but subsequently became project lead for CtoC for the GCP, once the off-road route had been approved by the GCP Executive Board.

In May 2019, a letter of community consensus¹² in support of a Girton Interchange upgrade, was sent to the Secretary of State for Transport. It included signatures from numerous district and parish councillors and community interest groups, representing more than 300,000 people in total, all urging that it should be made into an all-ways junction. In October 2017, the GCP and local politicians had written to Highways England to ask, amongst other things, for improvements to the Girton Interchange, but local councillors and representatives were frustrated by what they felt was a lack of commitment to this initiative on the part of the GCP.

2020

In 2020, an Outline Business Case for CtoC, recommending the off-road southern route, was published. At the subsequent LLF, the possible impact of East West Rail (EWR) on this route was considered, and following resolution made:¹³

If the route of East West Rail goes via Cambourne, then this would have significant impacts on the business case for the busway in terms of future passengers, it would also open up the possibility of an interim solution. In the short term, an inbound bus lane could be provided along the A1303. This could be achieved much more quickly, at significantly lower cost, with much less impact on the environment, greenbelt and local communities. This could be in place whilst the new railway is being progressed. The railway would eventually provide the mass transport solution for the Cambourne area with a bus lane continuing to provide access to the West Cambridge campus. Cycle provision could be achieved from a branch of the Comberton Greenway, a route which would be much better for cyclists because it would be flatter and away from traffic. **Therefore, is it not premature for the GCP to be making a decision without us knowing the outcome of East West Rail?**

Local residents and organizations have been making this point since 2020 but have never received any indication from the GCP that they have factored the effect of EWR into their business case, or even that they appreciate the duplication across the two schemes. These points have been raised repeatedly by the public at Joint Assembly and Executive Board meetings, and the only response has been that they are ‘complementary’, with no rationale or evidence supplied that would justify the construction of two massively environmentally destructive schemes with clearly overlapping purpose.

In February 2020, the mayor of the Combined Authority, who had been promoting an ambitious region-wide autonomous metro system (CAM), intervened and asked for a temporary pause in the GCP’s work in order to consider whether the CtoC route would be a good strategic fit for the autonomous metro system. This led to a temporary pause in the GCP’s progress as the Combined Authority sought to propose alternative routes avoiding the controversial southern alignment near Coton. The alternative proposals failed to gain traction and the Combined Authority did not have a mandate to override the GCP. The GCP therefore resumed its work on the CtoC busway.

2021

An independent audit of the GCP’s Cambourne to Cambridge CtoC busway scheme,¹⁴ presented to the GCP Executive Board on 1 July 2021, was conducted by an independent party, Phil Swann, with transport expert support. The audit evaluated the Outline Business Case (OBC) and reviewed alternatives and stakeholder input. It highlighted the positive attributes of on-road options, particularly for inbound travel, noting that:

- On-road options, such as using the A1303 with bus priority measures, had been considered feasible in earlier assessments such as the GCP’s Options Assessment Report.
- On-road options reduced environmental impact by avoiding Green Belt development, landscape changes and biodiversity loss, including from the felling of 500 trees at Coton Orchard. Stakeholders, including the Coton Busway Action Group, praised this preservation of rural character.
- On-road options were implicitly cheaper than the £160–200 million off-road scheme, as they required far less new infrastructure (e.g., bus lanes instead of a dedicated busway). Groups such as CambridgePPF argued that this provided better value: a point the audit did not refute.
- Strengths of the on-road options included feasibility and flexibility, with the OBC confirming that bus lanes and junction improvements – such as an inbound lane on Maddingley Hill – could enhance public transport without a separate busway. The audit recognized this merit, suggesting less disruptive improvements.
- On-road options aligned better with travel patterns, addressing criticisms that the off-road route’s Grange Road terminus missed key destinations such as the city centre and Cambridge rail station. Stakeholders, including Dr Marilyn Treacy (chair of Coton

Busway Action Group), emphasized the improved connectivity with these options – a concern the audit noted for further study.

- On-road options would create far less construction disruption than the off-road route, which required an Environmental Impact Assessment because of its significant impacts. Using existing highways would involve less invasive works, minimizing effects on communities such as Coton village.

Despite recognizing the strengths of an on-road option – less harm to the environment, lower costs, more practical implementation, improved connectivity, and minimized disruption – the 2021 audit did not explicitly champion an inbound on-road proposal and came down in favour of the off-road route.

In July 2021, the GCP voted at its Executive Board meeting to approve moving forward with the controversial off-road busway. They had ignored all requests from residents and local organisations to fully appraise, side by side, the off-road route and the CambridgePPF on-road inbound bus lane.

2023

In March 2023, Liberal Democrat and Labour Councillors at Cambridgeshire County Council voted in a whipped vote to advance the CtoC busway proposal, authorizing a Transport and Works Act Order submission to the Department for Transport.

At the meeting, LibDem councillors passionately highlighted the difficulties faced by sixth-form students from Cambourne travelling to Cambridge schools and sixth-form colleges, implying that their education was at real risk. However, they omitted the information that a new sixth-form college was set to open in Cambourne in September 2024. (It is now open and serving its first-year students.) Moreover, even if some Cambourne students still choose to attend Cambridge sixth-form colleges, the off-road route over Madingley Hill is estimated to save only 2–3 minutes as compared to the on-road scheme proposed by CambridgePPF. The GCP board's repeated claim that only the off-road route serves Cambourne residents is simply not valid.

At the meeting, Councillor S. Count proposed an amendment requesting an impartial report from the chief executive to compare CambridgePPF's on-road bus prioritization and separate cycle scheme with the GCP's largely segregated busway and maintenance track plan, and that this should include consultation with CambridgePPF for clarifications. The amendment was rejected.

No direct comparison between the GCP's off-road route and CambridgePPF's in-highway proposal was conducted, despite the GCP chair continuing to assert at the meeting that an in-highway scheme down Madingley Hill was not feasible. In a LibDem and Labour party whipped vote, the GCP's preferred scheme was approved for submission of a Transport and Works Act Order.

2024/25

In November 2024, the GCP applied for a Transport and Works Act Order for the CtoC busway, and in February 2025 the LibDem and Labour councillors at the County Council voted to confirm their decision to approve the submission – again with a whipped vote. To date there has been no side-by-side appraisal of the GCP's preferred off-road section between Madingley Mulch and the M11 and the CambridgePPF in-highway inbound bus lane scheme.

Conclusion

It is extraordinary that the GCP's preferred option has progressed to this stage without a fair and transparent appraisal of the very credible, far cheaper and much less environmentally damaging alternative favoured by the GCP's own Local Liaison Forum and CambridgePPF, and which had the most public support in every single consultation.

At every stage they have failed to engage with the arguments in favour of alternative routes, dismissing carefully researched points with cursory, unsupported, and occasionally blatantly untrue assertions.

We would urge the Inspector to read the minutes of the LLF,¹⁵ which was made up of councillors and other representatives from the whole length of the route from Cambourne to Newnham. These minutes demonstrate the depth of feeling of the LLF members against the off-road section.

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4. Rectory Farm Bridge options report. Atkins, 2016: (pp. 15, 16)
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7. A 428 Cambourne to Cambridge segregated bus route, consideration of Greenbelt issues. LDA Design, August 2017 (pp. 46, 47): .LDA 428 CtC Greenbelt issues.pdf

8. GCP summary report on public consultation 2017. (p. 8) C2C-Phase-1-Report-February-2018.pdf
9. GCP Exec Board Dec 18.pdf
10. Madingley Road 'Quick Win's Options Outline. Mott MacDonald. May 2019: C2C LLF Technical Note - Madingley Road Quick Wins 14-05-2019.pdf
11. Letter from the chair of the LLF re: quick wins options paper. 11 June 2019
12. Letter of Community Consensus to the Secretary of State. 2019
13. Notes from LLF meeting re: East West Rail. January 2020
14. Independent audit of key assumptions and constraints, Cambourne to Cambridge better public transport project. May 2021: C2C Independent Audit Final.pdf
15. Minutes and notes from LLF 2016–2020, when it was dissolved by the GCP. All these documents are currently available on the GCP website www.greatercambridge.org.uk/sustainable-transport-programme/public-transport-schemes/cambourne-to-cambridge/cambourne-to-cambridge-consultations-engagement

2. Poor choice of route

The GCP's own data has shown that the requirement is *only* for an inbound route to the city, and *only* for the morning rush hour. There is *no* problem, inbound or outbound, outside this period.

The main centres of employment and education are now the Biomedical Campus, CB1 and CB2 (near the main train station), city sixth-form colleges, and the Science and Business Parks on and around Milton Road and to the north of the city. The GCP's off-road scheme would not provide easy bus journeys to any of these:

- Buses could not turn south down the M11 at Junction 13 to get directly to the Biomedical Campus.
- Buses could not turn north up the A428 from Madingley Mulch roundabout to the A14 and the Science and Business Parks to the north.
- With buses entering the city at Grange Road, passengers would face onward journeys, with most requiring a change to another bus, through the congested city centre to reach CB1, CB2 and sixth-form colleges.

The last point was emphasised by Andy Campbell, the former boss of the local Stagecoach bus company, on BBC Radio when he stated that there is 'a fundamental flaw in the proposed busway' because there is 'no convenient route to allow you to get into the city easily'. People with experience of Grange Road at rush hour would recognise the congestion issues there.

The GCP claims that their off-road route would reduce the CtoC journey by 2–3 minutes, but this is inconsequential in the context of the whole journey. Moreover, the delays that will be faced by passengers arriving in Grange Road will not only cancel out that saving but increase the total journey time considerably.

The alternative CambridgePPF in-highway scheme would offer far more direct routes to all these destinations. The only centre of employment that *would* be efficiently served by the GCP's proposed off-road route is the West Cambridge site, but that can be served equally effectively by the alternative in-highway route proposed by CambridgePPF. The extremely convoluted bus route plans published in the Bus Strategy Report¹ show the difficulties of reaching the Science Park (necessitating an extension to the existing U service) and the Biomedical Campus via the M11.

A further problem with the GCP scheme is that at the T-junction where the proposed route enters Grange Road, the turn is extremely tight. In fact it is so tight that it will not be possible for buses to turn left and travel down Grange Road to the city centre via Northampton Street.

In summary, the proposed route does not deliver commuters to the main centres of employment, and their onward journeys will be problematic as a result of limited onward transport and acute congestion at the drop-off point. The minimal time saved by the off-road section of the GCP's route will be cancelled out by delays in onward journeys to final destinations. It therefore seems doubtful that this scheme would provide the necessary incentives for the desired 'modal shift' from car to public transport use.

Moreover, when East West Rail (EWR) is completed, the GCP's off-road route would become virtually redundant for journeys from Cambourne to the Biomedical Campus, CB1 and CB2, and the sixth-form colleges. (See Section 3.)

Conclusion

The government plans to make Cambridge a centre of economic growth, and this will require substantial and wholesale improvements to transport infrastructure. A more holistic, properly joined-up approach is now vital. The CtoC scheme was part of a piecemeal plan that was initiated long before the government announced these ambitions. Additionally, the completion of EWR has now been confirmed, and other solutions such as a light rail system are being considered. CtoC should therefore be reappraised within this new context. In the meantime, however, the on-road alternative would provide a relatively inexpensive and quickly achievable solution, without the significant risk of future redundancy.

References

¹C2C-OBC-2020-Bus-Strategy-Report-Appendix-F.pdf

3. Impact of East West Rail

Since the Cambourne to Cambridge (CtoC) busway was first envisaged in 2015, plans for East West Rail (EWR) have progressed. The preferred route for the rail line includes a new station at Cambourne and a direct link to the new Cambridge South rail station. This rail line will serve the people of Cambourne more efficiently than the CtoC bus route.

Although the EWR scheme has now been given approval and has firm government support, the GCP has not taken any meaningful account of the impact of the new rail line on their off-road busway scheme. Moreover, the fact that EWR is now going ahead has been completely ignored in key sections of their application. In the Transport Modelling Framework section of the Outline Business Case Addendum, other transport schemes have been included in assessing the 'Do Minimum' scenario but EWR has been conspicuously omitted.^{1a}

EWR will make the GCP's off-road busway largely redundant

GCP argues that the off-road CtoC busway and EWR will complement each other, but it is not at all clear, nor have they ever explained, how this could be the case.

The GCP claims that its off-road busway will deliver passengers to the Biomedical Campus, CB1 and CB2, and sixth-form colleges more quickly than existing bus routes. This is highly debatable, since the off-road busway finishes at Grange Road on the west of the city. From Cambourne to Grange Road the GCP estimates a 29-to-32-minute journey,² but onward journeys through the traffic-congested centre of Cambridge to the Biomedical Campus and other employment centres would add considerably to the total journey time, quite probably necessitating a change of buses (see Section 2). However, the EWR consultation document states that the rail line will offer a 15-minute journey³ from Cambourne to Cambridge South station, which is adjacent to the Biomedical Campus (the major employment hub in the City).

The GCP has acknowledged that EWR will provide an efficient and effective link to Cambridge South and the Biomedical Campus but, again, has not explained why the expensive off-road bus route is still necessary. The only possible consideration might be that, as the GCP argues, EWR does not connect Cambourne with the West Cambridge site. However, the alternative bus route with the in-highway bus lane along the A1303, as proposed by CambridgePPF (see Section 1), would provide commuters from Cambourne and west of Cambridge with journey times comparable to those provided by the GCP's off-road route.

EWR's impact on the GCP's off-road busway Benefit–Cost ratio

The GCP's Funding Statement puts the total anticipated costs of their off-road CtoC busway route at £192,284,900⁴ with benefits being tied mainly to time savings. However, the Benefit–Cost ratio (BCR) as estimated by the GCP itself indicates it is poor value for money. The Outline Business Case Addendum, Annex A^{1b} states:

Level 2 benefits for the 60-year appraisal period were £9.6m PV with agglomeration benefits accounting for £8.8m PV. Combining the Level 1 and Level 2 benefits produced an adjusted BCR of 0.5:1

Schemes with a BCR of less than 2.0 are not normally given approval⁵. If EWR is taken into account, then the BCR will be reduced still further. (See also Section 5.)

The GCP's off-road bus route has always carried significant risks, including the very real possibilities that bus companies may not be able to provide adequate levels of service, and that the estimated budget will fall a very long way short. Now, however, the confirmation that EWR will go ahead adds the further significant risk of the busway becoming underused and underperforming, or even redundant – at which point any benefits, and the BCR, will be non-existent or minimal at best.

By contrast, the low-cost, on-road alternative scheme, would have a BCR that is inevitably much higher than the GCP's best estimate of 0.5 and almost certainly at an acceptable level – as well as being genuinely complementary to EWR.

Conclusion

There can be no doubt that if EWR were already in operation, no one would propose an extremely expensive, environmentally damaging and less efficient transport scheme to serve the same communities – nor would central government be likely to support it. As the Government is fully committed to EWR, there seems to be no clear justification to pursue the CtoC off-road scheme, and the GCP has certainly not provided one.

References

- 1a. CtoC-21-00: Cambourne to Cambridge Outline Business Case: Appendix A - Strategic Case Addendum, Paragraph 3.2.2 (p.4). 2024
- 1b. CtoC-21-00: Cambourne to Cambridge Outline Business Case: Appendix A - Strategic Case Addendum, Paragraph 2.4.2 (p38). 2024
2. C2C-Jan-2020-App-1-Strategic-Case: Cambourne to Cambridge Better Public Transport Project Outline Business Case / Strategic-Case, Table 2: C2C preferred option benefits vs Do Minimum, (p.8). Mott Macdonald, 2020
3. Extracts from the EWR 2024 Consultation Document (p.1)
4. CtoC-7-00: The Cambourne to Cambridge Order Funding Statement, Paragraph 1 (p1). 2024
5. dft-value-for-money-framework.pdf page 24

4. Environmental impact

The off-road section of the Greater Cambridge Partnership's (GCP) bus route would have a massive environmental impact. The adverse environmental effects of the scheme have been significantly underplayed, as evidenced in the MCAF re-scoring exercise in 2017.¹

The GCP's off-road scheme would:

- have unacceptably high levels of infrastructure carbon associated with its construction
- destroy much of Coton Orchard, the county's largest traditional orchard and a County Wildlife Site
- bisect wildlife corridors and fragment priority habitats
- impose unacceptable disruption and urbanisation on the village of Coton
- cut through Green Belt and despoil some of the most attractive and valued countryside views and walks around Cambridge
- compromise the setting of the American Military Cemetery at Madingley.

The first point, about infrastructure carbon, is a complex and technical one that will be dealt with in detail by other objectors; we simply note here that 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.² On this basis, the off-road route would take 57 years to break even on carbon. By contrast, the alternative in-road highway scheme proposed by CambridgePPF would have a very small fraction of the infrastructure carbon associated with the off-road scheme because it does not involve the construction of a new road or new motorway bridge.

Similarly on the second point, the argument for protecting Coton Orchard is detailed and multi-faceted, and that will be dealt with in full by the owner of Coton Orchard. Again, we simply note that it is recorded as the largest traditional orchard in Cambridgeshire and the eighth largest in the country: undisturbed by ploughing or pesticides for more than 30 years, and with a valuable mosaic habitat of fruit trees, meadow, hedgerows, wild scrub and copse. Orchards such as this are hotspots for biodiversity and so classed as Priority Habitats. The one at Coton is home to an exceptional range of flora and fauna, including many rare and endangered species, records of which are maintained and made publicly available on the Coton Orchard web page.³

The off-road scheme would lay a 30-metre width of tarmac and concrete right across the site. The habitat would be desecrated, the largest and most valuable trees felled, and the benefits of site's fragmented remains for wildlife severely reduced. The GCP claims that it will be able to provide a Biodiversity Net Gain (BNG) of 10–20% through various planting schemes, on- and off-site. However, as confirmed by environmental experts, including Steve Oram, Orchard Biodiversity Officer for the People's Trust for Endangered Species, the fragmentation

and effective destruction of Coton Orchard cannot be compensated for in this way.⁴ Even if a 60-acre orchard were to be planted somewhere else (and the proposed mitigation measures are not, in any case, remotely comparable), it would take a minimum of 50 years to regain the benefits of all the veteran trees and the undisturbed soil with its fungal networks and carbon stores, and for such a complex ecosystem to be replaced. As far as the current environmental crisis is concerned, this is time we simply do not have.

The impact on wildlife and crucial habitats

Cambridgeshire has one of the lowest proportions of Priority Habitat in the UK, one of the lowest percentages of land designated for nature, and the second lowest woodland cover (4.8%). The area around Cambridge itself is no exception: the Cambridge Nature Network Report⁵ – a study produced in response to the rapid growth in the region and with the collaboration of several organisations including CambridgePPF – makes it clear that the countryside around Cambridge is in a critical condition.

The landscape to the west of Cambridge is identified by the report as one of six Priority Areas, based on topography, hydrology and landscape, with its ‘Boulder Clay Woodlands’ sector identified as a Priority Area within a strategic plan for a local Nature Network. (See Paragraph 5.6.5 on p.80 of the Report.) In line with the UK government’s National Planning Policy Framework (2021), this plan includes the protection and further establishment of ecological networks and corridors. These networks and corridors are now recognized as vital to the survival of species, enabling them to forage and breed; without them populations become isolated which in turn renders them more vulnerable to stresses and threats and to reduced genetic diversity.

The plan is that the Cambridge Nature Network will aid nature’s recovery and help to ensure that the countryside is sufficiently resilient to withstand the increasing numbers of visitors, which is especially relevant for the area west of the city.

Connectivity is crucial, and yet the off-road CtoC busway cuts directly across that designated Priority Area and severs two wildlife corridors, as shown in Maps 2 and 3 on pages 10 and 12 of the Cambridge Nature Network Report.⁵

The Cambridge Nature Network, which is working to protect, nurture and link these priority habitats, is backed by numerous organisations, including Cambridge City Council and South Cambridgeshire District Council. It makes no sense for the City and District Councils to back this vital initiative whilst simultaneously supporting the construction of the ecologically destructive off-road busway that will seriously undermine its aims.

The village of Coton

Coton is a quiet, unspoilt village, bounded by Coton Countryside Reserve to the south and east and Coton Orchard to the north. It has the 11th-century, Grade I listed St Peter’s Church and further listed buildings at its historic centre. As well as two moated sites, adjacent fields have ancient ridge-and-furrow field patterns, and both are designated Historical Monuments.

The village is a place that takes its heritage and environmental issues seriously: for example, the Coton Loves Pollinators group has undertaken wildlife-friendly planting in public spaces, including new trees on the recreation ground, while volunteers help with the management of the Coton Reserve.

The GCP's plans include the construction of a large bus stop at the edge of Coton, which would inevitably attract commuter parking and congestion around the village. The GCP has indicated that they would therefore introduce measures to prevent that parking, but how far they will extend is unclear, and they would in any case be unsightly in this rural setting as well as inconvenient for residents and visitors. The Village Hall, just for example, has no car park (nor is there space for one) and on-road parking is essential for many people to access the activities there.

Additionally, the off-road busway will run close to Coton's village school, severing a well-used footpath that children currently walk along, safely and away from traffic. No clear alternative has been proposed, and any replacement will unavoidably involve crossing two lanes of traffic, a cycleway, and pedestrian paths, thus turning a safe, simple route into a complicated and hazardous journey.

Coton would undoubtedly be urbanised by the off-road busway, becoming more like a suburb of Cambridge than a peaceful village enjoyed by both its residents and its regular visitors.

Green Belt, countryside views and walks

Cambridgeshire is mostly flat and not noted for its natural beauty, but this makes the few elevated and relatively unspoiled areas particularly precious. As such, the landscape to the west of Cambridge has long been protected by local planning policy and has been identified as an area of great significance both locally and regionally.

In 1928, members of the University and the town founded the Cambridge Preservation Society (now Cambridge Past, Present and Future) specifically to protect the area and views around Madingley Hill, described in a 1929 brochure as 'the most beautiful of all the views of Cambridge'. The Society purchased substantial areas of land in order to ensure its protection. In the 1950s, when the Society needed to sell some of this land to raise money to maintain its property at Wandlebury, the National Trust accepted the benefit of restrictive covenants over Coton Orchard and other prominent parts of the hill so that the landscape would be protected in perpetuity.

The 2015 Cambridge Inner Green Belt Boundary Study by LDA Design, commissioned by South Cambridgeshire District Council and Cambridge City Council, gave the following assessment of the countryside to the west of the city:

West of the city, the Inner Green Belt plays a critical role in maintaining the impression of a compact city, with countryside close to the historic core. The rural character of the land emphasises this and is seen as the foreground in views from approaches to the city, the M11 and the countryside west of the M11.

From the village of Coton, walks up Red Meadow Hill to the south and up the rise towards Maddingley to the north, offer some of the most unspoiled views anywhere around Cambridge. The gently rolling fields, hedges and woods are valued enormously both by villagers and by the many visitors who make the short trip from the city to get the health and wellbeing benefits of walking in this, one of the very few easily accessible green spaces around the city. The 2015 LDA Design report⁶ listed the view from Red Meadow Hill as one of four important viewpoints whose qualities should be ‘preserved and, where possible, enhanced’:

From these viewpoints many of the qualities described in this section can be appreciated including the compact nature of the city, the rural landscape setting, the proximity and nature of surrounding villages, the green, treed appearance of much of the city and its urban/rural interface, landform providing a framework to Cambridge, and many of the elements and features of the townscape and landscape that contribute positively to its setting and special character. It is essential that the qualities of these and other key views be preserved

Far from enhancing the views, the off-road busway will cut a swathe through this rural landscape and be visible from the elevated viewpoints, completely changing its character.

The setting of the American Military Cemetery at Maddingley

Maddingley Hill is home to the Cambridge American Military Cemetery, the only permanent American World War II cemetery in Britain. Established in 1945, the site was chosen for its natural beauty and commanding views. It offers vistas extending to Ely Cathedral on clear days and provides a suitably contemplative space for reflection and remembrance. Introducing a tarmac bus route across the south side of Maddingley Hill would be a significant disruption to that setting.

Superintendent Matthew Brown, speaking at the Greater Cambridge Partnership Executive Board meeting in 2021, emphasised that the location was selected specifically for its “natural beauty and unparalleled viewshed.”⁷ He unequivocally opposed the off-road route proposed by GCP stating that, “Today the Cambridge American Military Cemetery is a world-renowned monument and a Grade 1 listed landscape by Historic England. Extending south the unspoilt open countryside located in the Green Belt is extensively protected by National Trust covenants. We are concerned that GCP’s proposal to build a tarmac bus route across the south side of the hill would irreparably damage this unique and precious landscape compromising the setting of the American Military Cemetery, severing historic community access routes and paving the way for further urban encroachment in its vicinity.”

Conclusion

We are indisputably in a deepening environmental crisis which means that unnecessary destruction of green spaces, especially locally valuable habitats such as the countryside to the west of Cambridge and Coton Orchard is now unconscionable. This is especially true in our nature-depleted county. The irreversible environmental destruction that will result from the GCP’s CtoC off-road busway, for which a viable alternative exists, makes this scheme completely unacceptable.

It will effectively destroy Coton Orchard, which is of immense value to wildlife, for orchard heritage and as a producer of local cider. It will completely alter the distinctive character of this peaceful village, and it will remove some of the only remaining unspoiled views and walks on the edges of this historic city, including in the area selected specifically by the US government for the American Military Cemetery.

References

1. C2C -End of Stage Report Sept 2017 Appendix F1: Atkins Technical note 9. August 2017:
2. CtoC-10-ES0: GCP's Environmental Statement, Paragraph 10.3.10 (p.122)
3. Records of Coton Orchard Flora and Fauna, on the Coton Orchard web page (www.cotonbuswayaction.com/coton-orchard.html)
4. Letter from Steve Oram, Orchard Biodiversity Officer for the People's Trust for Endangered Species
5. The Cambridge Nature Network Report Final Report. 2021
6. Cambridge Inner Green Belt Boundary Study, Paragraph 0.6.1 (p.4) and 5.2.31 (p.65), LDA Design, 2015
7. Matthew Brown, Superintendent, American Military Cemetery, speaking at the Greater Cambridge Partnership – Executive Board 01.07.21. Video – time code 2:28

5. Poor value for money

The Applicant's Funding Statement puts the total anticipated costs of their off-road CtoC busway route at £192,284,900¹ with benefits being tied mainly to time savings. However, the Benefit–Cost ratio (BCR), as estimated by the Applicant themselves indicates that it is poor value for money. The Outline Business Case Addendum, Annex A² states:

Level 2 benefits for the 60-year appraisal period were £9.6m PV with agglomeration benefits accounting for £8.8m PV. Combining the Level 1 and Level 2 benefits produced an adjusted BCR of 0.5:1

The statement goes on to claim that this low BCR can be ignored. The first suggested justification is that:

journey time benefits for existing and new users of public transport and highway users. Additionally, there are benefits related to active travel improvements, particularly improved journey quality for cyclists, and an increase in physical activity, which in turn leads to health benefits including reduced risk of premature death.^{2b}

However, journey time improvements remain unproven and are likely to be minimal at best, particularly in relation to an on-road bus lane on the A1303. (See Section 2). Moreover active travel improvements alongside the CtoC off-road busway are duplicated by GCP's own Greenway scheme through Coton and are therefore unnecessary.³

As a second justification, it says that:

Under a range of sensitivity scenarios the implied case for the scheme remains as Poor Value for Money. However, as stated in the 2020 OBC Value for Money Statement schemes assessed within the City Deal Assurance Framework with a BCR of less than 2:1 (Medium Value for Money) are still to be considered for funding if a compelling case for investment can be made with respect to delivery of City Deal objectives.^{2c}

And in support of that 'compelling case', it lists:

improving accessibility to transport, supporting economic growth, providing a sustainable transport network/system, provision of enhanced connectivity between Cambourne and Cambridge, and finally, contributing to enhanced quality of life by reducing highway congestion and improving air quality.^{2d}

However, all these objectives are equally achievable at a far lower cost by CambridgePPF's on-road alternative scheme. Therefore there seems to be little justification for ignoring the unacceptable BCR.

A further flaw in the OBC is that, throughout, the Cambourne West development is heavily instrumental in weighting the BCR in CtoC's favour, despite the fact that this development will be over a mile from the CtoC terminus on Sterling Way. It is most unlikely that the busway will be of any social benefit to the new residents of Cambourne West who are more likely to continue to commute by private vehicle.^{2e}

In addition, there are some questionable figures in the Public Transport Demand Forecast for 2041:

The daily forecast passenger demand for bus services using the CtoC busway is 10,300 bus trips over a 12-hour period. Of this total, 8,800 trips are new bus trips.^{2f}

This would appear to mean 147 full double-decker busloads of passengers over a 12-hour period daily (assuming 70 passengers per bus). This represents an increase of nearly 600% on the present user figure (1,500), which seems wildly improbable.

Conclusion

The cost of CtoC remains extremely poor value for money, a situation which could be greatly improved by the adoption of the on-road bus lane on the final stretch of the route, along the A1303. This CambridgePPF on-road scheme, with construction costs of approximately £60 million as opposed to >£192million, would have a BCR of at least three times that of the GCP scheme.

References

1. CtoC-07-00: Funding Statement, Paragraph 1
- 2a. CtoC-21: Outline Business Case Addendum, Paragraph 4.4.87.
- 2b. CtoC-21: Outline Business Case Addendum, Paragraph - 4.4.87.
- 2c. CtoC-21: Outline Business Case Addendum, Paragraph 4.4.89.
- 2d. CtoC-21: Outline Business Case Addendum, Paragraph 3.3.5.
- 2e. CtoC-21: Outline Business Case Addendum, Paragraph 4.3.3.
- 2f. CtoC-21: Outline Business Case Addendum, Paragraph 4.2.2.
3. Greenway through Coton Village 2024.pdf

Complete list of supporting documents

Section 1 The repeated failure of the GCP to appraise credible proposals for alternative routes

1. CD23-18-2 OBJ-251 Cambourne Cambridge Alternative 6e.pdf
2. C2C_Draft_Interim_Report_01.06.2015.pdf
3. C2C-Jan-2020-App-1-Economic-Case.pdf
4. C2C_Rectory_Farm_Bridge_Options_Report_10.06.2016.pdf
5. LLF statement to Joint Assembly. December 2016
6. C2C -End of Stage Report Sept 2017 Appendix F1.pdf
7. LDA 428 CtC Greenbelt issues.pdf
8. C2C-Phase-1-Report-February-2018.pdf
9. 9.GCP Exec Board Dec 18.pdf
10. C2C LLF Technical Note - Madingley Road Quick Wins 14-05-2019.pdf
11. LLF letter re Quick wins.pdf
12. Letter to Secretary of State - Open Letter of Consensus.pdf
13. LLF notes re EWR.pdf
14. C2C Independent Audit Final.pdf
15. Folder containing minutes and notes from LLF 2016–2020

Section 2. Poor choice of route

1. C2C-OBC-2020-Bus-Strategy-Report-Appendix-F.pdf

Section 3. Impact of East West Rail

1. CtoC-21-00 Outline Business Case Addendum.pdf
2. C2C-Jan-2020-App-1-Strategic-Case CtoC Outline Business Case Strategic Case.pdf
3. Extracts from the EWR 2024 Consultation Document.pdf
4. CtoC-07-00 Funding Statement.pdf
5. dft-value-for-money-framework.pdf

Section 4. Environmental impact

1. C2C -End of Stage Report Sept 2017 Appendix F1.pdf
2. CtoC-10-ES0-00 Environmental statement.pdf
4. Letter from Steve Oram, PTES.pdf
5. Cambridge Nature Network Report.pdf
6. LDA Cambridge-inner-green-belt-study.pdf

Section 5. Poor value for money

1. CtoC-07-00 Funding Statement.pdf.
2. CtoC-21-00 Outline Business Case Addendum.pdf
3. Greenway through Coton Village Map, WSP 2024