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Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London
SW1P 4DR

7 January 2025

By email only to: transportinfrastructure@dft.gov.uk

Re: The GCP Cambourne to Cambridge Scheme (Transport and Works Act Order application)

Dear Secretary of State,

I object to the application by Cambridge County Council and Greater Cambridge Partnership for a Transport and Works Act Order on the following grounds:

1. The social benefits are not substantial enough to pass the planning tests, succinctly summarised in the ministerial statement of January 1996: "*Any applicant for a works order involving compulsory land acquisition would need to be able to demonstrate that the project is technically feasible and financially viable, and that the public benefits of the proposals outweigh any private disbenefits before the order is approved.*"[1] With a BCR of 0.5 ("Poor" value for money, the second lowest category in the DfT Value for Money framework[2]), the social benefits are estimated to be half the costs.

   Consideration of Wider Economic Impacts cannot plausibly increase the BCR to a ratio of 1, yet alone the usual target of 2 or higher for DfT-funded projects. One of the BCR calculations for Phase One of HS2 was 1.0.[3] With Wider Economic Impacts included, it increased by 20% to 1.2. It would be implausible for the GCP to claim that the Wider Economic Impacts of the CtoC busway are relatively greater than for a major high-speed rail scheme.

   Active Travel benefits amount to £21.34m or 31.5% of the £67.67m of the CtoC's social benefits.[4] Those benefits would mostly accrue to the more attractive Comberton Greenway if this were extended west from Hardwick to Highfields Caldecote, Bourn Airfield and Cambourne, at relatively little cost. Removing these benefits from the Initial BCR for the CtoC busway would reduce it from 0.5 to 0.34.

2. GCP has not updated its modelling base year since 2019, and is therefore basing its transport and economic impact forecasts on a highly unreliable foundation. There is no reasonable justification for GCP not to have re-calibrated its strategic transport model (CSRM 2) using traffic counts taken in 2023 or 2024 that captured post-COVID travel patterns.

3. Neither the Outline Business Case nor the Transport Assessment take into account the impact of East West Rail (EWR). The government has reconfirmed its commitment to build EWR to Cambridge. GCP states in the Outline Business Case Addendum that, *"EWR will have an impact*

[1] https://api.parliament.uk/historic-hansard/written-answers/1996/jan/22/transport-and-works-act-1992#S6CV0270P0_19960122_CWA_216

[2] DfT Value for Money Framework
https://www.gov.uk/government/publications/dft-value-for-money-framework

[3] Full Business Case, High Speed 2 Phase One, Table 2.3
https://assets.publishing.service.gov.uk/media/5fc51d7b8fa8f54755392863/full-business-case-hs2-phase-one.pdf

[4] Outline Business Case Addendum p13, Table 4-10 (doc ref CtoC-21-00 rev 00)

on travel in the CtoC corridor. However, the impact on CtoC is not likely to be significant as EWR will serve longer distance travel whilst CtoC will serve shorter distance travel between Cambourne West / Bourn Airfield and Cambridge."[5] There is no basis for the claim that people living in Cambourne West and Bourn Airfield will not travel to Cambridge from the Cambourne station.

The Transport Assessment is even more dismissive of EWR: *"East West Rail has not been included in the modelling undertaken for the CtoC Scheme. Whilst a preferred route for East West Rail has been announced, the scheme is still at an early stage. It is not a committed scheme and has no guaranteed funding or delivery programme."*[6] Although funding will not be committed unless and until a Development Consent Order has been granted and the Full Business Case has been scrutinised, it is clearly a material consideration. In accordance with TAG Unit 4 *Forecasting and Uncertainty*, the Full Business Case will need to include an Uncertainty Log and a test of a scenario with EWR. It is remiss of the GCP not to have tested this scenario in the addendum to the Outline Business Case.

In a scenario with EWR, a significant proportion of trips that were allocated to CtoC in the OBC will transfer to EWR, along with the associated social benefits. This will further depress the BCR for the CtoC busway scheme.

The East West Rail November 2024 consultation document states, *"Travelling with East West Rail would mean a journey time of just 15 minutes from Cambourne to Cambridge station."*[7] The travel time to Cambridge South station would be approximately 12 minutes. This compares with 17 minutes for buses to reach Grange Road, according to the CtoC Outline Business Case,[8] a location that is 3.5 miles from the western edge of the Biomedical Campus (where the new railway station is being built).

4. One of the stated aims of the TWAO is "*To relieve congestion: Parts of the current Cambourne to Cambridge road network, in particular the A1303/Madingley road, suffers from heavy traffic congestion at peak times. Without any action, by 2031 car trips into the city are set to increase by up to 70% with already lengthy journey times expected to double."*[9] Yet, the submitted Transport Assessment is unequivocal in concluding that the proposed busway will not achieve this aim: *"It can be seen that there is very little difference in the performance of the high[way] network across both the Do Minimum and Do Something scenarios. That situation applies both without and with Making Connections."*[10] And, later, *"Reviewed in conjunction with network performance results presented in section 8.2 above, it can be concluded that the CtoC Scheme will not have a material impact on the local highway network."*[11]

5. The order application fails to distinguish between key destinations in Cambridge and omits to provide journey times to those destinations via the proposed busway. Two of the four most significant destinations can be reached by the existing road network more quickly than via the proposed busway: North Cambridge, home to the Cambridge Regional College, Science Park and various business parks, can be reached significantly more quickly via the A428 and A14 (which was widened recently). This was demonstrated by the 905 bus service in 2020, when it called at the Science Park 17 minutes after departing from Cambourne. This is the same journey time GCP forecasts for buses to reach Grange Road,[8] which is 3.5 miles away from the Science Park.

   Central Cambridge can also be reached more quickly via the A428, A14 and Milton Road than via the proposed busway: the same 905 service reached the city centre in 25 minutes. The fastest journey given in the Outline business for the Do Something scenario (in 2026) is 31 minutes.

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[5] Outline Business Case Addendum p7 (doc ref CtoC-21-00 rev 00)

[6] Transport Assessment §5.4.1 (doc ref CtoC-25-00 rev 00)

[7] East West Rail Consultation Document November 2024 Version 1
https://eastwestrail.co.uk/consultation2024

[8] Outline Business Case Addendum p10, Table 4-4 (doc ref CtoC-21-00 rev 00)

[9] Statement of Aims §4.2.1 (doc ref CtoC-4-00 rev 00)

[10] Transport Assessment §8.2.3 (doc ref CtoC-25-00 rev 00)

[11] Transport Assessment §8.5.6 (doc ref CtoC-25-00 rev 00)

6. Congestion experienced on Madingley Road between St Neots Road and West Cambridge is almost entirely confined to inbound traffic in the morning peak. Therefore, a proportionate transport solution would seek to provide a segregated route inbound for buses. This can be achieved cost-effectively and with relatively little environmental harm, by widening or reconfiguring Madingley Road from Madingley Mulch Roundabout to the Madingley Park & Ride junction to include an inbound bus lane. This can be accommodated within the existing public highway land and requires no new bridge over the M11 motorway.

   This proposal has been submitted to GCP at various stages in the project development, but the GCP has appraised materially different designs, which it has found wanting. It has not appraised the scheme as submitted. A separate submission by Cambridge Past Present and Future objecting to the TWAO application will set out in detail how this alternative would work.

7. The alternative solution referred to in (6) above has some additional benefits not provided by GCP's proposed busway. Firstly, a bus lane could be used by all buses, public and private service coaches, emergency service vehicles, and other public service vehicles (subject to appropriate drafting of the associated Traffic Regulation Order). Whereas the proposed busway will only be legally usable by guided vehicles, fitted with the appropriate guidance technology and operated by someone with relevant training. Secondly, the route to join the M11 will be more direct, enabling buses to reach the Biomedical Campus via the M11 and Hauxton Road more quickly than by travelling via the busway. Buses using the proposed busway and running directly to the Cambridge Biomedical Campus via the M11 will need to either loop back through the West Cambridge site (via the unnamed road that runs north to the Eddington Avenue junction with Madingley Road), or join Madingley Road north of Coton.

8. The Transport and Works Act exists to facilitate the construction of railways, tramways and waterways. Because of the tight constraints within these must be built (in particular with respect to gradients and bends), the TWA grants stronger compulsory purchase powers than does the Highways Act. The scope of the TWA was extended to included physically guided buses and then, in 2022, to include non-physically guided buses.

   The proposed CtoC busway will be built to similar specifications as an ordinary road with no abnormal constraints. It is therefore unclear how the TWA, rather than the Highways Act, is the appropriate legal instrument to seek planning consent and compulsory purchase orders. If for no other reason, point 7 above strongly suggests that the Highways Act would be the more appropriate legal vehicle.

9. The order application includes plans for an "emergency and maintenance access track." Yet the plans for the bus road show it to be a standard width of 7.6m with no features that would physically prevent an emergency service or maintenance vehicle driving on it. The application lacks any detail on how the guidance system will operate but does state that it will be optical: "It is intended that buses using the Busway will be optically guided."[12] And, elsewhere, "It has been assumed that CtoC will be delivered as an optical guidance system."[13] There is therefore no justification for building a second parallel road for emergency and maintenance purposes. The fact that the second road will serve as an active travel route is irrelevant in the context of the TWA, which makes no provision for infrastructure that is not "ancillary" to the guided transport infrastructure. There is no sense in which a cycle/footpath is necessary for, or supportive of, the guideway or vehicles using it.

Yours sincerely,

Edward Leigh MA MSc MTPS
(private citizen)

[12] Transport Assessment TA §1.2.1 and §10.1.1 (doc ref CtoC-25-00 rev 00)

[13] Outline Business Case Addendum §4.2.3 (doc ref CtoC-21-00 rev 00)