

**RE: THE CAMBOURNE TO CAMBRIDGE ORDER
TRANSPORT AND WORKS ACT INQUIRY**

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

Introduction

1. As set out in Opening, 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. CPPF/CPC is firmly of the view, however, that the Scheme that is the subject of the Order (“**the Scheme**”) and that has been put forward to meet those objectives has not on the evidence that is before the Inspectors and the Secretary of State been justified.
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 ecological harm, as well as harm to landscape, the Green Belt 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.¹ Given that the scheme is acknowledged by the Applicant to cause ecological harms up to county level and 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. As part its evidence, CPPF/CPC has demonstrated that there is an alternative to the off-line busway 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 substantially less harm to ecological receptors than the Scheme
 - e. Preserve the significance of heritage assets
 - f. Be in compliance 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 in a comparable timeframe to the Scheme and aligned with the build out of the development at Bourn Airfield
6. CPPF/CPC relies upon the evidence given by James Littlewood, Steve Johnstone, Edward Leigh, Dominic Woodfield and Louise Hirst through their proofs of evidence and rebuttal proofs of evidence and their oral evidence to the inquiry. This closing statement should be read alongside that evidence. Reference is made to other evidence before the inquiry where appropriate.

¹ [CD8-28 Guidance on the Compulsory purchase process \(Ministry of Housing, Communities and Local Government\) \(CPO Guidance\) 2025](#), paragraph 2.1, 12.3, 13.2,

Claimed Transport Benefits

7. It goes without saying that, in order to be satisfied that the Order should be made, the Secretary of State must be able to understand what the transport benefits of the Scheme are, and be satisfied that those benefits have been robustly demonstrated so as to justify the compulsory purchase of land and incursion into the Green Belt.
8. It is important to bear in mind that although the Scheme would involve the delivery of new physical infrastructure, the purpose of that infrastructure is simply to enable the operation of an improved bus service, by comparison with the bus service that could be operated on the existing road network. The Scheme (and all the environmental harms associated with it) can only be justified if, in fact, it would fulfil that purpose. Without that justification, the Scheme is to all intents and purposes pointless.
9. It is striking, therefore, that the Applicant has spent so little of its time or energy at the inquiry trying to persuade the Secretary of State that the Scheme will in fact deliver the transport benefits which are claimed on its behalf. Rather, the Applicant has sought to focus the Inquiry's attention on the claimed economic benefits of the Scheme (principally through the delivery of housing) and on its importance to the delivery of objectives and policies in the extant Local Plan and now emerging Local Plan.
10. It is important not to lose sight, however, of the fact that those policy objectives and requirements and the conditions/planning obligations attached to the planning permissions for development that is said to be 'unlocked' by the Scheme are all premised on the Scheme delivering material transport benefits. After all, a public transport scheme that satisfies a planning condition but fails to deliver material transport benefits is unjustifiable in transport and planning terms.
11. The transport benefits claimed for the buses using the Scheme² are that the Scheme will:

² [CD26-01-APP-W6-1 Chris Whitehouse Proof](#) paras 3.2.5 – 3.2.9 as also reflected in [CD26-01-APP-W10-1 Ralph Lewis Proof](#), para 5.15.5 of Mr Lewis Proof and in the Table in [CD29-62 CCC Supplementary Note](#) at p. 14

- a. Provide a reduction in journey times for commuters travelling from Cambourne to Cambridge in the morning peak by 16 minutes;
- b. Facilitate 8,800 additional daily bus passengers; and
- c. Improve bus service punctuality.

12. These claimed benefits all depend on a comparative analysis between the bus service facilitated by the 'do minimum' infrastructure and the service facilitated by the busway using a transport model called the 'Cambridge Sub-Regional Model' ("CSRM"). Subject to what the Applicant has described as 'sensitivity testing' (addressed below), the claimed transport benefits depend on analysis undertaken using the 'E-Series' and 'F-Series' versions of the CSRM. The E-Series model was released in 2019 using a 2015 Present Year Validation and was used by the Applicant to determine bus patronage. The F-Series was released in 2021 using a 2019 Present Year Validation and was used to determine vehicle journey times.³

13. Both CSRM series suffer from obvious and fundamental limitations. Based on census data from 2011 and traffic counts taken in 2015 and 2019, they do not account for the fundamental change in travel patterns which occurred after 2019 consequent to the COVID-19 pandemic. The F-Series Model Forecasting Report itself makes clear⁴ that even the 2019 validation year on which the F-Series is based was only added "to extend the life of the model until such time as a whole new base year can be created (once the disruption to travel behaviour and patterns caused by the COVID-19 pandemic has settled to a "new normal" state)." The shortcomings in the CSRM have been identified in a report produced for the relevant transport authority⁵, which also recognised⁶ that it would by 2023 be possible to collect data representative of the 'post-Covid' period.

³ [CD1-25.01 Transport Assessment November 2024](#), para 5.2.1, p. 31.

⁴ [CD1-25.07 Cambridgeshire Sub-Regional Model 2 F-series Model Forecasting Report \(Atkins\) May 2022](#), para 1.1, PDF11,

⁵ [CD29-08 WSP CapCAM Model Specification Report Extract](#), see paras 3.1.10-11, PDF10-11

⁶ [CD29-08 WSP CapCAM Model Specification Report Extract](#), para 4.4, PDF22

14. The Government has also made its position clear in respect of the need to account for the after-effects of the COVID-19 pandemic in transport assessments in its TAG Unit M4 guidance (emphasis added):⁷

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

15. Mr Whitehouse, for the Applicant, agreed in cross-examination⁸ and it is in any event obvious, that any analysis based solely on the F-Series CSRM is not capable of representing 'the evident suppression of travel demand relative to a pre-pandemic projection of demand' given that it is based entirely on pre-Covid data.
16. As noted above, the Applicant has sought to account for the effects on travel demand of COVID-19 by reference to a 'sensitivity test', the results of which were published in July 2025.⁹ The extent of that 'sensitivity test', however, is merely to assess the effect of 10% fewer cars and LGVs on the network. Such an assessment fails to comply with the TAG Unit M4 Guidance and is a wholly inadequate basis for carrying out the transport analysis which is necessary for a scheme of this nature, for the reasons set out below.

⁷ [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#)

⁸ XX by Mr Parker

⁹ [CD9-32 Technical Note with updated Value for Money Assessment July 2025](#)

17. In particular, TAG Unit M4 provides prescriptive guidance as to how to account for the effects of the pandemic on travel demand. Paragraph B.2.2¹⁰ provides that *“to account for COVID-19 related changes, trip matrices based before the beginning of the pandemic should ideally be rebased, or if this is not possible, an appropriate adjustment applied to model inputs or outputs in a proportionate way (see section B.3.4 for potential options).”* Here, it clearly would have been possible, at some point post-COVID and before November 2024, to have rebased trip matrices to capture post-COVID travel patterns. While Mr Whitehouse expressed the view that a decision was taken that such analysis would not have been ‘proportionate’, there was no contemporaneous evidence of any such decision having been consciously taken, nor any reasons for such a decision having been recorded. In any event, given that it was ‘possible’ for trip matrices to have been re-based, such analysis should, according to the Guidance, have been undertaken. Appropriate adjustments should only be made ‘in a proportionate way’ where it is not possible to rebase trip matrices, which was not the case here.
18. In any event, the ‘adjustment’ to the model considered by way of the sensitivity test was obviously deficient. The Guidance makes clear that where model rebasing is judged not to be practical, analysts should “assess the extent of the divergence of travel patterns and volumes from pre-pandemic projections, using the best available data and evidence. If it is clear COVID-19 has had an impact on travel, this should be represented using an appropriate change in travel demand across the trip matrix, considering trip purpose and patterns as appropriate, and apply this to produce an updated core forecast”.¹¹ Mr Whitehouse accepted that there were plentiful data sources available¹² and that such analysis ‘could’ have been undertaken in accordance with the Guidance within the time available (i.e. at some point between November 2023 and November 2024 when the TA was

¹⁰ [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#), PDF52

¹¹ [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#), paragraph B.3.2 and B.3.4(2), PDF54

¹² See, for example, the data sources referred to in [CD29-08 WSP CapCAM Model Specification Report Extract](#), para 3.2 PDF12

published). Mr Johnstone has produced a raft of examples of such work having been undertaken on other schemes.¹³ Mr Whitehouse asserted that it was not considered to have been 'proportionate' to have undertaken that analysis.¹⁴ There was again no evidence of any contemporaneous decision-making or evidence in this respect.

19. The Guidance provides two options for making bespoke adjustments to the model using observed data (see B.3.4(1) and (2)). Neither of these options were carried out.
20. Instead, a 'global' adjustment was made to the model (i.e. a 10% reduction in cars/LGVs). Although identified by the Guidance to be the 'simplest' way of applying adjustment, it also "presents the most risk to the model results and appraisal. This is because applying adjustments to model results means that the model has effectively not used the change in travel patterns, reflecting the changed conditions."¹⁵ The Guidance makes clear that such a method "should only therefore be considered if quick, proportionate decisions need to be taken, so long as the risks to analytical assurance are explicitly highlighted."¹⁶ Here, there was no imperative for a 'quick' decision to be taken not least because the Scheme has been in gestation for such a considerable period of time and Mr Whitehouse in any event having accepted that there was sufficient time to enable more detailed analysis to have been undertaken. The 'risks' to analytical assurance are not acknowledged in the sensitivity test, nor anywhere else.
21. Given that the claimed travel benefits underpin the whole purpose of the Scheme, it cannot be sensibly contended that it was not 'proportionate' in the time available and at limited cost to undertake the most detailed analysis possible of those claimed travel benefits. The use of CPO powers cannot possibly

¹³ [CD26-10-W2-1 Steve Johnstone Proof of Evidence](#) at paras 2.10-2.23, PDF6

¹⁴ XX by Mr Parker

¹⁵ [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#), paragraph B.3.4, PDF55

¹⁶ [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#), paragraph B.3.4, PDF55

be justified where the evidence in support of the claimed transport benefits of the Scheme is so obviously inadequate.

22. These complaints about the failure to undertake any semblance of adequate post-COVID transport appraisal are not arid or technical. Whether or not transport patterns have settled to a 'new normal' post-COVID, there is general consensus that travel patterns are significantly different in terms of when during the day people travel, and how many days a week people travel to work. That much is recognised by the Government's TAG Guidance (see above). A generic 10% reduction in car/LGV journeys across the model takes no account of trip purpose or pattern, nor any account of any change to travel demand for the Scheme. If, for example, as a result of new working patterns, a significant proportion of commuters are choosing to avoid travelling during the AM peak, the sensitivity test would not capture that change. If, for example, people now work from home for 2-3 days per week, the sensitivity test would not capture the effect on demand for the service.
23. Indeed, there is plentiful data before the inquiry to suggest that the congestion issues that would affect buses in the 'do minimum' scenario have improved significantly post-pandemic such that the journey time and reliability benefits claimed for the Scheme are considerably overstated. Mr Leigh has produced detailed analysis of bus journey times on Madingley Road which demonstrates that delays in 2024 were nowhere near as severe as they were in 2019.¹⁷ In terms of bus patronage, the Scheme is forecast to attract 8,800 new daily passenger trips¹⁸, excluding trips generated by 3,000 new homes at Bourne Airfield and 850 new homes at Cambourne West. The proposed Park and Ride Facility has 2,000 car parking spaces and 300 bike parking spaces. Assuming that all of those are taken up (to give 4,600 daily trips), it is assumed that the Scheme will otherwise give rise to 4,200 daily additional trips from elsewhere (i.e. people who live

¹⁷ [CD26-10-W3-1 Edward Leigh Proof of Evidence](#), Appendix A Report, paras 4.1.1 – 4.1.3 (internal p. 10/PDF42) by reference to the Figures in Section 13 at p.34/PDF66 (see also the corrected figures at [CD29-75 CPPF Note re corrections to report appended to CD26-10-W3-1](#)

¹⁸ [CD1-21.02 Appendix B – Economic Case Addendum 2024](#), para 3.2.4

elsewhere who would travel on the bus by reason of the Scheme). On any view, that is a highly ambitious forecast (and one which it is impossible to analyse meaningfully in a post-COVID world without up-to-date travel data) and one which will not come about unless there are real and material transport benefits from the Scheme.

24. The Applicant's response to these concerns appears to be that the TAG Unit Guidance is relevant only to investment decision-making and that the transport related benefits of the Scheme are but a small proportion of the claimed economic benefits. Therefore, it has taken the view that updating the modelling is not 'proportionate' in the context of the Economic Case.

25. Nevertheless, the transport benefits are essential to the Strategic Case, which is to 'unlock' development at Cambourne and Bourn Airfield. This scheme's entire purpose is to increase bus patronage by reducing bus journey times and variability between Cambourne and Cambridge by reference to a 'do minimum' scenario. Unless the Scheme would, in fact, deliver upon those objectives, that primary purpose will not be achieved. The transport related benefits of the Scheme are claimed to attract 'substantial' weight in the planning balance and are an important factor relied upon to justify the use of CPO powers and the use of Green Belt land. It is vital that the Secretary of State's decision as to whether to make the Order is based on adequate post-COVID data in order to understand whether enough people are actually going to travel on buses using the Scheme to ensure new development at Cambourne and Bourn Airfield will not result in a severe degradation in the performance of the road network. As matters stand, that evidence is woefully inadequate.

Failure to assess the potential effects of East West Rail on the benefits of the Scheme

26. In its Outline Business Case Addendum for the Scheme, the Applicant excluded the potential effects of East West Rail from its transport assessment on the basis that 'the impact on CtoC is not likely to be significant.'¹⁹ By the time of the Transport Assessment, the Applicant's position was no longer that the impact on CtoC was not

¹⁹ [CD1-21.04 Appendix D – Management Case Addendum 2024](#), Table 3-2, PDF9

likely to be significant, but rather that EWR was not ‘committed’ and had ‘no guaranteed funding or delivery programme’.²⁰ There is therefore no evidence before the Secretary of State as to the possible effects of EWR on the need for, and benefits of, the Scheme. CPPF/CPC contend that it is obvious that EWR will significantly curtail the benefits of the Scheme, principally because anyone wishing to travel between Cambourne and the Biomedical Campus or the CB1 Business District is far more likely to use the train, rather than the bus, as Mr Whitehouse accepted on behalf of the Applicant.²¹ While there may be some residual benefits of the Scheme for those wishing to travel between Cambourne and the villages to the west of Cambridge and the West Cambridge Campus, those reduced benefits would need to be properly understood in economic terms, and by reference to the environmental harms to which the Scheme gives rise, before any decision is made as to whether they would justify the Order. The balance of benefits and harms to which the Scheme would give rise would be fundamentally different in a world in which EWR provides a faster and more reliable journey between Cambourne and Cambridge, unaffected by the principal source of delay and unreliability on that journey, i.e. congestion within Cambridge (which, of course, the Scheme will do nothing to alleviate).

27. While the Applicant was at pains to make the point that EWR was not required to be modelled as part of the ‘Core Scenario’ (within the relevant TAG Guidance²²), CPPF/CPC contend that EWR should have been modelled as an ‘alternative scenario’²³. Paragraph 2.2.12 of the Guidance makes clear that “When transport schemes are evaluated after opening, the evaluation results often suggest that benefits can be extremely sensitive to local sources of uncertainty, so careful consideration is essential.” The Guidance goes on at 2.2.13:

“The uncertainty log should highlight all sources of uncertainty that are likely to affect the traffic/patronage, revenues and delivery of scheme benefits. This may include

²⁰ [CD1-25.01 Transport Assessment November 2024](#), para 5.4.1

²¹ XX by Mr Parker

²² [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#)

²³ [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#), paras 2.1.1 - 4, 2.2.1 – 2; and 2.2.12 - 13.

planned land-use developments (not just housing, but also employment and retail; also distribution centres which may affect freight traffic) and transport schemes. Sources that have an individually minor effect may need to be included, as their cumulative effect may be a material consideration in the appraisal.”

28. In this case, EWR has not even been highlighted as a source of uncertainty by the Applicant, let alone assessed as an alternative scenario. The fact that EWR does not yet have a confirmed delivery timetable is nothing to the point. Table A2²⁴ of the Guidance makes clear that schemes which are ‘reasonably foreseeable’ (but where there may be significant uncertainty) and schemes which are merely ‘hypothetical’ may be included within the alternative scenarios. The Government has re-affirmed its commitment to EWR in June 2025 as part of the Spending Review, committing £2.5bn to the Scheme.²⁵ CPPF/CPC contend that the decision whether to make the Order in respect of the Scheme (given the need for compulsory purchase, the incursion into the Green Belt and the environmental harms associated with it) cannot sensibly be taken without some, evidence-based understanding as to the likely effects of EWR and whether, if EWR is delivered, the Scheme will provide sufficient residual transport benefits to be justified.

Claimed economic benefits

29. Aside from the claimed transport benefits, the Applicant seeks to justify the Scheme by reference to what it says are wider strategic and economic benefits. In particular, the Applicant claims that the Scheme will ‘unlock’ a considerable amount of housing development at Cambourne West and Bourne Airfield which is claimed to be dependent on the Scheme for its delivery. Indeed, in economic terms, the benefit claimed for the land value uplift, taking into account costs, as a result of that housing delivery (£184m in discounted 2010 prices²⁶) is significantly greater than the forecast user transport benefits (£71m).²⁷

²⁴ [CD8-21 Department for Transport - Transport Analysis Guidance Unit M4 Forecasting and Uncertainty 2023](#), PDF51

²⁵ [CD26-10-W2-1 Steve Johnstone Proof of Evidence](#), para 3.05

²⁶ [CD1-21.02 Appendix B – Economic Case Addendum 2024](#) at paragraph 4.4.52 and Table 4-17

²⁷ [CD1-21.02 Appendix B – Economic Case Addendum 2024](#) at Table 4-12

30. It is important to note at the outset that the Government itself recognises that the methodologies used to calculate ‘level 3 impacts’ (including economic benefits deriving from land value uplift) “are often subject to a high degree of uncertainty”²⁸ and the Value for Money Framework advises that “it is important that this uncertainty is rigorously assessed and transparently presented within the VfM statement [...] it is important that model uncertainty is examined in addition to the uncertainty of exogenous inputs. For example, by carrying out sensitivities on key model parameters[...].”²⁹

31. CPPF/CPC consider that the Land Value Uplift benefits claimed for the Scheme are overstated and that the Applicant has not properly assessed and presented the uncertainty associated with them. CPPF/CPC consider that those risks should be transparently set out for the Secretary of State, before the Order is made. In particular, the Applicant has significantly overstated the amount of development that is ‘dependent’ upon the Scheme for its delivery and has failed to properly identify and quantify the risk that the economic benefits claimed will be significantly lower than predicted.

32. The Applicant claims that 850 dwellings at Cambourne West and 3,000 dwellings at Bourne Airfield are dependent on delivery of the Scheme. Guidance on ‘dependency’ is provided by the Government in TAG Unit A.2.2³⁰:

A.2.1 The purpose of dependency testing is to determine at what point proposed site specific developments will breach a ‘reasonable level of service’ on the transport network. In practice, transport networks often operate beyond the limits of a ‘reasonable level of service’, so it is not practical to define specific thresholds for a dependency test. However, it should be possible to form an opinion of whether or not a “reasonable level” is being met, based on readily available network characteristics. Therefore, this guidance is not prescriptive, but relies on the application of judgement supported by evidence.

²⁸ [CD8-31 Department for Transport - Transport Analysis Guidance Unit A2.1 Wider Economic Impacts Appraisal 2018](#), para 7.3.11

²⁹ [CD8-32 Department for Transport: Value for Money Framework May 2025](#), para 4.3.17

³⁰ [CD9-50 Transport Analysis Guidance Unit A2.2: Appraisal of Induced Investment Impacts May 2025](#)

A.2.2 This is a key step in the process. If development is not dependent on a transport scheme, then the need for a transport scheme should be considered solely on transport grounds, as one would for a standard appraisal.

33. Further guidance is provided in Table 3³¹ which provides some illustrations of how dependency should be assessed. The most relevant illustration is for “A large geographically concentrated housing scheme which is accompanied by public investment to improve the capacity of local roads and public transport.” In that case, the answer given to the question, “Is there dependent development?” is (underlining added), “Potentially yes (subject to a dependency test) – this is an example whereby a portion of the new development could come forward without the need to improve the transport capacity, but government investment in transport is required to enable the full housing development to go ahead. Without it the existing transport system would be overwhelmed.”
34. The Applicant has not provided any evidence that it has carried out the recommended dependency test, as described in Appendix A of TAG Unit 2.2.
35. Furthermore, there is nothing in the evidence before the inquiry to justify any assertion that the delivery of dwellings at Cambourne West or Bourn Airfield absent the Scheme would breach a reasonable level of service on the transport network. On that basis, the Applicant simply cannot make good its claim that the housing development is ‘dependent’ on the Scheme.
36. Even taking the Applicant’s evidence at face value, however, there is no explanation in the evidence before the inquiry as to why 850 dwellings at Cambourne West are claimed to be dependent on the Scheme at all. No explanation is provided in the proof of evidence of Mr Whitehouse. So far as the underlying documents are concerned, the Economic Case Addendum provides an analysis of the claimed land value uplift but refers the reader to the Strategic Case Addendum for an explanation as to why the developments at Cambourne West and Bourne Airfield are dependent.³² The Strategic

³¹ [CD9-50 Transport Analysis Guidance Unit A2.2: Appraisal of Induced Investment Impacts May 2025](#)
PDF20

³² [CD1-21.02 Appendix B – Economic Case Addendum 2024](#) at 4.4.19

Case Addendum, however, contains no such explanation.³³ At the Outline Business Case, it had been assumed that 2350 dwellings at Cambourne West would be dependent on the Scheme.³⁴ That assumption obviously no longer holds good because the Cambourne West development has begun to be built out without the Scheme being in place. However, whatever justification there was at the OBC stage to include delivery of dwellings at Cambourne West as ‘dependent development’ cannot rationally apply to the 850 dwellings now claimed to be dependent by the Applicant. CPPF/CPC contend that in the absence of any evidence that 850 dwellings at Cambourne West are dependent on the Scheme, those dwellings should be discounted from the analysis.

37. So far as the Bourn Airfield development is concerned, Condition 13 of the planning permission restricts occupation to no more than 500 dwellings unless or until the Scheme, or an equivalent Scheme (such as the CPPF Alternative) is delivered. Aside from the condition, however, there is no post-COVID transport analysis which demonstrates that, in transport terms, the Bourn Airfield development will still be dependent on the Scheme. If transport conditions had changed post-COVID (as CPPF/CPC contend, consistent with Government guidance, that they have) and, on analysis, it was clear that delivery of the Scheme was no longer necessary to enable the dwellings at Bourn Airfield to be delivered, the developer could apply to vary that condition imposed on the planning permission. Indeed, even on the Applicant’s own timetable, delivery of the Scheme is likely to delay delivery of the Bourn Airfield development (taking into account the need for two dormant seasons before the transplantation of the Veteran Trees at Coton Orchard can be attempted³⁵). That delay would provide the Bourn Airfield developer with the incentive to seek to vary the condition. While Mr Sensecal and Mr Kelly suggested that the LPA was ‘unlikely’ to permit any variation to the condition, the LPA would of course have to determine the decision in accordance with its statutory duties and by reference to the available evidence.

³³ [CD1-21.01 Appendix A – Strategic Case Addendum 2024](#), see the relevant section at para 7.4.3

³⁴ [CD1-20.16 Strategic Economic Narrative and Economic Impacts Report Outline Business Case – Appendix J](#), Table 8, PDF68

³⁵ [CD1-10.06 Environmental Statement Addendum, June 2025](#) at paragraph 2.3.10

38. As to development referred to within the emerging Local Plan (such as the new allocation for development to the north of Cambourne), that development is premised upon, among other things, the delivery of a new railway station at Cambourne as part of the East West Rail scheme.³⁶
39. The Applicant does not claim that any other development is dependent on the Scheme in economic terms.
40. In terms of the amount of LVU claimed, CPPF/CPC also contend that the Applicant has adopted an overoptimistic approach which has considered potential upside sensitivity testing but has failed to provide any downside sensitivity testing.
41. One of the inputs into the LVU Analysis is the Gross Development Value (“GDV”) of the Land following completion of the development that is claimed to be dependent on the Scheme. In this instance, that is 850 dwellings at Cambourne West and 3,000 at Bourn Airfield. That GDV has been calculated by the Applicant “by multiplying the number of dwellings in the development area by the assumed house price per dwelling.”³⁷ The Applicant’s LVU assessment is based on an average house price of £506,051 at 2024 prices to which an annual 2.2% real (inflation-adjusted) house price increase has been applied in the future to give a GDV estimate of £672.07m for both sites.³⁸
42. As Mr Leigh explained in his written and oral evidence, these two inputs are inherently uncertain and the figures used by the Applicant do not reflect recent history. Whereas the Applicant’s assessment of house prices is based on an estimated average value of residential land³⁹, actual average house prices based on real world data are lower, around £420,000 - £430,000.⁴⁰ In terms of house price growth, the Applicant’s claimed 2.2% historical annual increase in real house prices (used to project forward to the completion of build-out) is based, without clear justification, on nine years’ data to

³⁶ e.g. [CD29-71-2 App A - Greater Cambridge Local Plan - Part 1 - Introduction and Development Strategy](#), Policy S/DS 2(c)(i)(1) and [CD29-71-5 App A - Greater Cambridge Local Plan - Part 4 - Site allocations](#), Policy S/CBN: Cambourne North sub-paragraphs (3), (34), (38) and the supporting information at paragraph 3.3.7 and following

Greater Cambridge Local Plan First Proposals [CD6-04] page 31

³⁷ [CD1-21.02 Appendix B – Economic Case Addendum 2024](#) at 4.4.30

³⁸ [CD1-21.02 Appendix B – Economic Case Addendum 2024](#) at 4.4.32

³⁹ [CD1-21.02 Appendix B – Economic Case Addendum 2024](#) at 4.4.31

⁴⁰ [CD26-10-W3-1 Edward Leigh Proof of Evidence](#) at section 4.4.8.6 on p. 24-25

January 2023. Analysing Land Registry data for South Cambridgeshire over a full decade to July 2025, the annualised growth rate is negative 0.6%.⁴¹ There is therefore little justification for projecting forward at a rate of +2.2% without also testing lower growth rates, including a nil growth rate, which is expressly identified by MHCLG to be within a reasonable range of figures to be tested in its Appraisal Guide.⁴²

43. If one removes the dwellings at Cambourne West on the basis that there is no evidence that they are dependent on the Scheme and assumes a lower average house price and 0% house price growth, the LVU associated with the Scheme would give rise to a benefit cost ratio of just 0.5.⁴³ Even if one assumes 2.2% house price growth (but excludes the Cambourne West dwellings and assumes a lower average house price), the BCR for the Scheme is only 1.1. CPPF/CPC contend that these scenarios are, at the very least, realistic possible outcomes and serve to demonstrate, in accordance with the TAG Guidance, that the economic benefits are highly sensitive to relatively minor changes in the assumptions underlying the inputs. Not only should these alternative scenarios have been considered by the Applicant, but they should now be considered by the Secretary of State in the decision whether to make the Order. The economic benefits which are said to justify the scheme are highly uncertain and the economic case for the Scheme is speculative.

Carbon Benefits

44. Throughout the genesis of the Scheme and at this inquiry, the Applicant has claimed that the Scheme will give rise to carbon savings. It is clear from the evidence of Stephen Kelly on behalf of South Cambridgeshire District and Cambridge City Councils that these claims have had an impact on the decision-making process.⁴⁴ Upon analysis, that claim is obviously wrong. The evidence demonstrates that the Scheme will be a net emitter of carbon.

⁴¹ [CD29-94 LVU Sensitivity Tests and Real House Price Growth 03.11.25](#)

⁴² [CD29-60 Response to Alternative Scenarios for Land Value Uplift Assessment, 9 October 2025](#), Annex C to the MHCLG Appraisal Guide, paragraph C21 at PDF538

⁴³ [CD29-60 Response to Alternative Scenarios for Land Value Uplift Assessment, 9 October 2025](#), Table on PDF3.

⁴⁴ [CD26-12 REP-09 Stephen Kelly Proof of Evidence](#) at paragraph 4.16, 4.21, 6.33, 6.42, 6.47, 6.48

45. With regard to the carbon assessment the Environmental Statement has failed to provide a “reasoned conclusion on the significant effects of the works on the environment, taking into account current knowledge and methods of assessment, as required”⁴⁵ as it used outdated fleet composition data and relied on unreasonable methods of assessment, as follows.
46. The carbon assessment used for the Environmental Statement failed to use the correct TAG data book for the composition of the fleet. Forecasts of the likely proportion of electric vehicles vs petrol/diesel vehicles (i.e. the ‘fleet composition’) are key to the assessment of carbon emissions because the carbon savings claimed for the Scheme derive to a significant extent from the number of kilometres driven by petrol/diesel cars which will be ‘saved’ by virtue of the Scheme. The greater the proportion of electric vehicles within the fleet, therefore, the lower the carbon benefits of the Scheme.
47. The Environmental Statement records that the relevant TAG data was accessed on 3 November 2022⁴⁶ and that the data set used was taken from the May 2022 TAG data book. The difficulty with that position is that at the time the data was accessed an updated TAG data book was already available (dated November 2022, released in May 2022) on the same webpage and the guidance accompanying the release made clear that *“Where your work is due to report after this date, you should work to the updated values or guidelines if it is appropriate to do so, following guidance in the proportionate update process.”*⁴⁷ Given that, at the time the data was first extracted for the purpose of the ES (3 November 2022), the new TAG data book had been released, and the work was due to report after the data book came into force, it is this data that should always have been used as the basis of the assessment. While CPPF/CPC contends that it would have also been proportionate to use updated values in any case, there should never have been any need to ‘update’ the values.

⁴⁵ [CD5-18 Transport and Works \(Applications and Objections Procedure\) \(England and Wales\) Rules 2006](#) at paragraph 11.(2)(b)

⁴⁶ [CD1-11.06 Technical Report 6 Greenhouse Gases](#), footnote 13, PDF9

⁴⁷ [CD29-66 Prof. Hirst response to WSP Carbon Assessment \(CD29-63\) 15 October 2025](#), Appendix B, PDF11

48. The carbon assessment calculated carbon savings for a single future model year (2036) and applied these savings to every subsequent year in the assessment period.⁴⁸ The combination of this method and the use of outdated fleet composition assumptions means that the -5,020 tCO₂e saving given in the Environmental Statement is based on an assumption that electric vehicle uptake would only reach 27% by 2085. It should have been clear that such a result was unreasonable, especially given that even the outdated May 2022 TAG data book assumes electric vehicle uptake of 44% by 2050.
49. Had the Applicant used the correct data or reasonable methodology at the time of the ES, the ES would have demonstrated that the Scheme would give rise to significant carbon emissions, rather than demonstrating a carbon saving, because the updated TAG data book projects a much more rapid take up of EVs than did the May 2022 data book. While this calculation was never performed by the Applicant, Professor Hirst provided a reasonable extrapolation finding net emissions of approximately +10,000 tCO₂e.⁴⁹ It is highly regrettable that, rather than simply accepting that a mistake was made, Mr Saunders sought to defend the approach taken by WSP on behalf of the Applicant. That defensiveness has done little to inspire public confidence, as articulated by Professor Hirst, in the information put forward by the Applicant.
50. The Applicant has since produced further evidence to predict net carbon emissions from the Scheme. In an Appendix to his proof of evidence, Mr Saunders produced an updated carbon assessment, which suggested that, using the most recent TAG data book dated May 2025, applied to the CSRM F-Series Model,⁵⁰ the Scheme would give rise to a reduction in carbon of -7,055 tCO₂e.⁵¹ The Applicant has not provided a sensible explanation for the large increase in calculated carbon recovery when changing from the CSRM E-series to the F-series model, which further calls into question the reliability and validation of the transport modelling that underpins the assessment.⁵² In addition, this calculation used the same flawed methodology as the

⁴⁸ [CD29-63 Carbon responses Technical Note 14 October 2025](#) at point 12.

⁴⁹ [CD29-66 Prof. Hirst response to WSP Carbon Assessment \(CD29-63\) 15 October 2025](#) at Table 1

⁵⁰ As opposed to the E-Series model used as the basis for the ES

⁵¹ [CD26-01-APP-W3-2 Andy Saunders Appendix to Proof of Evidence](#), Table 1, PDF19

⁵² [CD29-66 Prof. Hirst response to WSP Carbon Assessment \(CD29-63\) 15 October 2025](#) at points 8-10.

original Environmental Statement in that it used carbon savings calculated for a single future model year (2041) and applies them to all subsequent years. In October 2025, the Applicant carried out a further assessment using a method allowed in the latest QCG Guidance (August 2025)⁵³ which demonstrated that the reduction in carbon would be just -1,446 tCO₂e with projected payback in 2084.⁵⁴

51. Even that carbon saving of -1,446 tCO₂e assumes that the take up of electric vehicles increases steadily until 2050 and thereafter remains constant (at 82% of the fleet) for the remainder of the assessment period.⁵⁵ Mr Saunders accepted in cross-examination⁵⁶ that this assumption is "unrealistic". The Applicant sought to defend the use of the data in this way notwithstanding that Mr Saunders accepted that the results it produced were "unrealistic" by reference to the CQC Guidance on the basis that, if the trend in EV take up between 2041 and 2050 were extrapolated beyond 2050, this would imply that EV take up would exceed 100%.⁵⁷ The Applicant's approach on this point was, frankly, absurd. The only sensible way to apply the relevant QCG Guidance⁵⁸ is to extrapolate the trend in EV take up between the final two modelled years (i.e. 2041 and 2050) until such time as EV take up reaches 100% (or some figure very close to that, to account for the possibility of a very small number of residual non-EV vehicles in the fleet) and then calculate the carbon savings for the remainder of the assessment period based on a fleet composed entirely, or nearly entirely of EVs.⁵⁹ As Professor Hirst pointed out, a further alternative would be to use alternative data, such as that provided in the Common Analytical Scenarios data book (giving 2050 EV uptake of 99%).⁶⁰ The Common Analytical Scenarios are "central to how DfT intends to approach

⁵³ [CD8-41 Government Guidance - Quantifying Carbon Emissions for Local Transport Planning - August 2025](#)

⁵⁴ [CD29-63 Carbon responses Technical Note 14 October 2025](#), Table 3, PDF13

⁵⁵ [CD29-63 Carbon responses Technical Note 14 October 2025](#), para 61, PDF10

⁵⁶ By Mr Parker

⁵⁷ [CD29-63 Carbon responses Technical Note 14 October 2025](#), para 65, PDF11

⁵⁸ [CD8-41 Government Guidance - Quantifying Carbon Emissions for Local Transport Planning - August 2025](#), para 7.47

⁵⁹ See [CD29-66 Prof. Hirst response to WSP Carbon Assessment \(CD29-63\) 15 October 2025](#), para 12, PDF5

⁶⁰ [CD29-66 Prof. Hirst response to WSP Carbon Assessment \(CD29-63\) 15 October 2025](#), para 11, PDF5.

uncertainty in transport analysis"⁶¹ and could have been applied in this case to identify the sensitivity of the carbon assessment to the "unrealistic" post-2050 fleet compositions used by the Applicant.

52. Either way, as Mr Saunders accepted, if the assessment were carried out in this way (and it is notable that Mr Saunders failed to produce any assessment on this basis), it is clear that the very small carbon saving which the Applicant currently predicts (-1,446 tCO₂e) will be wiped out and would demonstrate that the Scheme will be a net carbon emitter. This is a matter which should be weighed against the Scheme (notwithstanding whether there is a 'strategic fit' of the Scheme with other outcomes), as was accepted by Mr Sensecal⁶² and as the QCG Guidance in any event makes clear: irrespective of any 'strategic fit', "[t]he net-impact of schemes however should not be dismissed; it should be a key consideration in determining carbon management and scheme prioritisation."⁶³

53. It will be regrettable if the Applicant fails to acknowledge what is obvious to anyone who has followed the evidence in relation to carbon emissions, i.e. that the Scheme will be a net emitter of carbon and instead maintains its position that the Scheme will be carbon positive. Either way, CPPF/CPC considers it to be important that the carbon emissions from the Scheme are properly assessed and weighed in the balance in the decision whether to make the Order.

Access and Maintenance Track

54. CPPF/CPC maintains that there is no requirement for the Scheme to be accompanied by an Access and Maintenance Track and that the compulsory purchase of the land required to deliver it cannot be justified.

55. As Mr Littlewood explains in his proof of evidence, there is no reason why maintenance and emergency vehicles cannot use the busway itself. Indeed, in the case of emergency vehicles, there is every likelihood that they will use the busway, rather than the track, which will be separated from the busway by ditches, trees and other landscaping,

⁶¹ [CD8-22 Department for Transport - Transport Analysis Guidance Uncertainty Toolkit 2023](#) at 1.4

⁶² XX by Mr Parker

⁶³ [CD8-41 Government Guidance - Quantifying Carbon Emissions for Local Transport Planning - August 2025](#), para 6.24.

given that it is likely to provide the quickest, safest and most direct means of reaching any emergency. The notion that an emergency vehicle would travel down the maintenance track thereby coming into conflict with pedestrians and cyclists and necessitating the crossing of landscaping to reach the busway is unrealistic.

56. So far as maintenance is concerned, Mr Lonergan accepted that the Britpave Guidance⁶⁴ was not applicable to the Scheme as it is not proposed to be kerb-guided and that it was “possible” that maintenance could be carried out using the busway, subject to disruption to services.⁶⁵ After all, roads up and down the country are maintained without the need for any separate maintenance track. In reality, any disruption to services caused by reason of maintenance activities is likely to be minimal. The number of buses travelling along the busway is very low by comparison with other roads and, in the event of the need for traffic management (e.g. when flows along sections of the busway are reduced to a single direction to enable maintenance to take place in the busway), the likelihood of conflicts between opposing vehicles is low. Even if such a conflict did arise, the delay to a service would be minimal. Such other benefits as were claimed for the maintenance track (such as that it would allow for the laying of utilities beneath it) cannot possibly justify the use of CPO powers.

57. In terms of its function as an active travel path, it is important to bear in mind that an Order may only be made in respect of matters relating to or ancillary to the types of development specified in s.1 of the 1992 Act.⁶⁶ An active travel path is not a matter related to or ancillary to a busway and so that function of the track would not, in isolation, fall within the scope of the powers for which an Order may be made. Further, CPPF/CPC maintains that the benefits of an active travel path alongside the busway are limited. As Mr Littlewood⁶⁷ has explained, there is a far more attractive active travel route, known as the Comberton Greenway, which is currently being constructed as far as Hardwick, which could easily be extended to Bourn Airfield through Highfields Caldecote by way of the upgrading of existing public bridleways, and without the need

⁶⁴ CD9-04

⁶⁵ XX by Mr Parker

⁶⁶ Section 1 of the Transport and Works Act 1992

⁶⁷ [CD26-10-W1-1 James Littlewood Proof of Evidence](#), paragraph 7.28 and following

for any further acquisition of land. This route would be far more attractive to the majority of pedestrians and cyclists, as it would not run alongside a busway, would provide a more direct route between Cambourne, Bourn Airfield and West Cambridge and would avoid a steep incline on Madingley Hill.

58. The construction of an Access and Maintenance track increases the land take required by around 30%, with a commensurate increase in environmental and other harms, because it is essentially a third lane of road. These significant harms can, and should, be avoided by not building an unnecessary Access and Maintenance Track. The only public benefit which could justify the harms caused by the track is its use as an active travel path, and this benefit can be provided by the Applicant in other ways without significant harms.

CPPF Alternative

59. As part of its case that the Order should not be made, CPPF/CPC contend that there is an alternative, in-highway scheme ('the CPPF Alternative') for the section of the Scheme which comprises the off-line busway between St Neots Road, immediately west of the Madingley Mulch Roundabout, and the Madingley Park & Ride junction which would, subject to refinement through detailed design (as would be expected for any scheme of this nature), be significantly less harmful in environmental terms, cheaper and deliverable in a timeframe comparable to that of the Scheme and aligned with the build-out of Bourn Airfield. There is no dispute between parties that, in principle, the availability of a deliverable alternative which would avoid the need for CPO is a material consideration for the Secretary of State. It would be irrational for the Secretary of State to make an Order requiring the compulsory purchase of land if there is an alternative scheme which would achieve the same objective, having taken into account all relevant considerations.⁶⁸ It is also important to take into account any proposals which the landowner has for its own land, and here CPPF has its own plans to use its land as a nature reserve.⁶⁹

⁶⁸ [CD5-40 de Rothschild v Secretary of State for Transport \(1989\) 57 P. + C.R. 330](#) at 341

⁶⁹ [CD26-10-W1-1 James Littlewood Proof of Evidence](#), paragraph 3.1 by reference to the Guidance in [CD8-28 Guidance on the Compulsory purchase process \(Ministry of Housing, Communities and Local Government\) \(CPO Guidance\) 2025](#) at paragraph 110

60. At the outset, it is important to record those issues in respect of which there has been express agreement between CPPF/CPC and the Applicant as well as those issues which have not been the subject of any challenge from the Applicant.

The Scheme Objectives and Transport Benefits

61. First, there has been no challenge by the Applicant to the evidence given by CPPF/CPC that the CPPF Alternative would deliver upon the objectives for the Scheme and would fulfil the relevant planning policy requirements.

62. As both Mr Littlewood⁷⁰ and Mr Leigh⁷¹ explain, while Policy SS/7 of the South Cambridgeshire Local Plan requires improvements in public transport between Cambourne and Cambridge in relation to the Bourn Airfield allocation, for the section of route in question, the policy requirement is for “Provision of high quality bus priority measures or busway on or parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge.” (see SS/7(8)(a)(iii)). The CPPF Alternative would fulfil this requirement (and there has been no suggestion to the contrary from the Applicant, nor challenge to this evidence). Similarly, Policy SS/8, in relation to the Cambourne West allocation requires, at SS/8(12)(b), “High quality segregated bus priority measures on the A1303 between its junction with the A428 and Queens Road, Cambridge.” The CPPF Alternative would fulfil this requirement⁷² (and there has been no suggestion to the contrary from the Applicant, nor was any challenge made to this evidence during cross examination of Mr Littlewood or Mr Leigh).

63. So far as the Bourn Airfield development itself is concerned, the CPPF Alternative would fulfil the requirements of both Condition 13 of the relevant permission and of the Section 106 Agreement which both refer to the Scheme or “an equivalent scheduled rapid mass transit passenger carrier service.”⁷³ Again, there was no challenge to this evidence from the Applicant.

64. As to the emerging Local Plan, references to the Scheme, whether in the introductory parts of the Plan or in the various draft allocations do not impose any particular

⁷⁰ [CD26-10-W1-1 James Littlewood Proof of Evidence](#), paragraph 5.3

⁷¹ [CD26-10-W3-1 Edward Leigh Proof of Evidence](#), Appendix A Report, paragraph 3.5, p. 6.

⁷² [CD26-10-W1-1 James Littlewood Proof of Evidence](#), paragraph 5.5

⁷³ [CD26-10-W3-1 Edward Leigh Proof of Evidence](#), Appendix A Report, paragraph 4.3.1 - 2, p. 15

requirements for the Scheme and a scheme which included the CPPF Alternative would equally fulfil the requirements of the emerging Plan allocations as does the Scheme. Again, there has been no suggestion by the Applicant (or SCDC) that a scheme which included the CPPF Alternative would be in conflict with the emerging Local Plan policies, or that the planning policy requirements or objectives in the emerging Local Plan could not be delivered.

65. In terms of the objectives for the Scheme and the transport benefits, the CPPF Alternative would deliver equivalent transport benefits to those provided by the Scheme, as Mr Leigh has explained in detail in his report at Section 3.5⁷⁴ and would deliver benefits over and above the Scheme, as he explains at Section 3.6.⁷⁵ As to the fact that the CPPF Alternative would include an inbound bus lane but not an outbound bus lane, Mr Leigh has explained in detail⁷⁶ why an outbound bus lane is not required now and will not be required in the future by reason of the constraints on outbound flows. Any assumption that flows will increase significantly is in any event contrary to the aims and objectives of national planning policy and the emerging Local Plan. Again, there was no challenge to any part of this evidence in the cross-examination of Mr Leigh, nor has the Applicant presented any of its own evidence in relation to these matters.

Environmental Harms

66. There can be no sensible dispute that the CPPF Alternative is very substantially less environmentally harmful than the Scheme.

67. It would avoid any impact on the openness of the Green Belt, involving a minor widening of an existing road corridor. It would avoid the impacts on landscape character caused by the Scheme. It would avoid what are acknowledged by the Applicant to be “significant” impacts on Coton Orchard at a County Scale. It would avoid the need for compensation for damage to three other designated local wildlife sites.

⁷⁴ [CD26-10-W3-1 Edward Leigh Proof of Evidence](#), Appendix A Report, Section 3.5, p. 6 – 7

⁷⁵ [CD26-10-W3-1 Edward Leigh Proof of Evidence](#), Appendix A Report, Section 3.6, p. 8 - 9

⁷⁶ [CD26-10-W3-1 Edward Leigh Proof of Evidence](#), paragraphs 4.2.1 – 4.2.14.3, p. 11 – 14.

68. It would avoid any impact on veteran trees, protected species, including bats⁷⁷ and the other species⁷⁸ which would be affected by the Scheme⁷⁹ and would avoid any impact on the Madingley Wood SSSI.⁸⁰ Both Ms Reason (in relation to bats) and Mr Whitby (in relation to the other affected species) accepted that the CPPF Alternative was, by reference to the mitigation hierarchy, preferable in ecological terms to the Scheme because it would avoid any impacts to protected species and habitats, whereas the Scheme will give rise to impacts which are required to be mitigated. So far as bats are concerned, and notwithstanding the position adopted by Natural England, it remains the case that the mitigation proposed to address the impact on bats, in the form of 'bat hop-overs' is scientifically unproven.⁸¹ Ms Reason accepted that there was, at the very least, uncertainty as to its efficacy. Indeed, the latest scientific evidence suggests, in fact, that bat hop-overs may increase the risk to barbastelles, by encouraging them to cross roads at unsafe heights.⁸²

69. So far as the Scheme is concerned, the ES has failed to properly account for the amount of Coton Orchard which comprises 'traditional orchard,' a priority habitat, and there are other failings in the assessments of other sites.⁸³ The effects from the Scheme will therefore be worse than the Applicant has predicted and the CPPF Alternative is commensurately preferable.

70. In respect of Biodiversity Net Gain, the metric calculation upon which the results submitted with the application were based, was defective⁸⁴ in a number of significant ways, not least insofar as it omitted to account for individual tree loss, as was accepted by Mr Whitby to be an error.⁸⁵ It is accepted by the Applicant that to deliver a net gain, off-site habitat units are going to be required to be purchased and due to the need to

⁷⁷ As accepted by Ms Reason in XX by Mr Parker and explained in detail by Mr Woodfield in [CD26-10-W4-1 Dominic Woodfield Proof of Evidence](#) at paragraph 6.1.1 – 6.1.4 on p. 33 and following

⁷⁸ See [CD26-01-APP-W13-1 Ian Ellis Proof](#), paragraphs 1.1.97 – 1.1.141

⁷⁹ As accepted by Mr Whitby in XX by Mr Parker

⁸⁰ See [CD26-10-W4-1 Dominic Woodfield Proof of Evidence](#) at Section 4.3, p. 17. Mr Whitby confirmed in XX by Mr Parker that he did not challenge this evidence

⁸¹ [CD26-10-W4-1 Dominic Woodfield Proof of Evidence](#) at para 6.1.10 – 11

⁸² [CD29-102 CPPF submission regarding collision risk for barbastelle bats](#)

⁸³ [CD26-10-W4-1 Dominic Woodfield Proof of Evidence](#) at Section 5.2 on p. 22 and following.

⁸⁴ See [CD26-10-W4-1 Dominic Woodfield Proof of Evidence](#) at Appendix DW6

⁸⁵ XX by Mr Parker

correct such errors, a greater number of units will now be needed than assumed in the application. Even assuming that sufficient habitat and hedgerow units are available at Lower Valley Farm and that sufficient watercourse units are available elsewhere, the purchase of such units will give rise to a significant additional cost to the project. Mr Whitby accepted that, to account for the habitat units required to mitigate individual tree loss alone, the likely additional cost could be in the order of £1,000,000.⁸⁶ The contingency for the project is some £37.9m.⁸⁷ It is remarkable that such a large amount of that contingency could be taken up to account solely for just one of the errors in the BNG Assessment. So far as the need for watercourse units is concerned, their availability is limited and there is no concrete evidence that there will be such units available to the Scheme. On any view, the delivery of a net gain will be easier and cheaper to deliver by way of the CPPF Alternative.

71. In terms of the heritage impacts from the CPPF Alternative, it would avoid harm to the Coton Conservation Area (as has been accepted by the Applicant) but would cause some harm to the setting of the American Military Cemetery Registered Park and Garden. CPPF/CPC contend that no harm would be caused to the Memorial, whose boundary is some distance away from the road and whose heritage significance is visually separated from the road by a large wall. Mr Wilson's evidence was, in any event, that any harm to the heritage significance of both assets as a result of the loss of some of the verge between the current carriageway and the boundary hedge of the Cemetery (which is all that the CPPF Alternative would require⁸⁸) was in the 'less than substantial' category for the purposes of the NPPF and 'on the low side of less than substantial.' Mr Sensecall accepted that, by reference to paragraph 215 of the NPPF, the public benefits of the Scheme would outweigh that level of harm to the significance of the heritage asset.⁸⁹ The CPPF Alternative would therefore be compliant with national policy in respect of heritage assets and such limited effects as there would be on the setting of the RPG would not be a reason to refuse permission for the

⁸⁶ XX by Mr Parker

⁸⁷ CD1-21.03 Table 3-1

⁸⁸ [CD26-10-W2-1 Steve Johnstone Proof of Evidence](#) See Frame 3 of the Civilistix General Arrangement Drawings provided at Appendix F

⁸⁹ XX by Mr Parker

Scheme, nor a reason as to why the CPPF Alternative would not be deliverable. While a considerable amount of time at the inquiry was spent examining a letter written from the British to the US Governments in relation to the Cemetery, it is clear that the CPPF Alternative would not incur into any of the 'pink' land shown on the plan attached to the letter.⁹⁰ The 'pink' land, as shown on that plan, cannot sensibly include any of the highway maintainable at public expense and the CPPF Alternative would not incur beyond that highway land (at any point along the boundary of the cemetery). There will be no injury to any of the rights or obligations contained within the letter.

72. As noted above, the CPPF Alternative would be preferable in terms of its carbon impacts (irrespective of whether a new bridge over the M11 is required) and there will be no impact on best and most versatile agricultural land.
73. Taking all of these factors into account, there can be no sensible dispute that the CPPF Alternative has substantial advantages. It would comply with the relevant planning policy framework and deliver equivalent transport benefits and would avoid the litany of environmental harms associated with the Scheme.
74. The only real matter of dispute between CPPF/CPC and the Applicant was the extent to which the CPPF Alternative would accommodate a safe and suitable highway arrangement which was feasible to construct within a timescale that would not give rise to any delay in the delivery of the benefits.
75. While the Applicant, through evidence given by Mr Lonergan, has sought at every turn to identify what are the obstacles to the delivery of the CPPF Alternative, very little energy, if any, has been devoted by the Applicant to any analysis as to how the constraints upon the delivery of the CPPF Alternative could be overcome so as to avoid the harms associated with the Scheme. In that context, it is important to bear in mind, as was explained by Mr Leigh, that the purpose of the CPPF Alternative is not to provide a fully worked up scheme but rather to demonstrate that such a scheme is feasible in principle. Clearly, detailed design work would need to be undertaken, and amendments would be made (as would be the case for any scheme).

⁹⁰ [CD1-06.16 Consultation Report Appendix O – Letters of Support](#), PDF11

76. CPPF/CPC accept that the CPPF Alternative will involve the need for some departures from DMRB standards but, as Mr Lonergan accepted, such departures from standards are not, in principle, unusual and are part of the DMRB process. After all, the existing road is not compliant with DMRB standards, and the Scheme itself requires some departures from standards.⁹¹ Mr Lonergan accepted that the question of whether a departure from standards would be justified would need to be taken in the round by reference to a number of factors, including the size of the risk to the travelling public, impact on flows, capacity of the highway, wider impact on the network, cost, environmental effects and other benefits that may accrue.
77. As to the proposed reduction in the speed limit to 40mph, this would accord with the County Council's Speed Policy⁹², as there is "a strong environmental or landscape reason" for the reduction in speed and there is nothing otherwise, so far as the function or nature of the road is concerned, that would make a 40mph speed limit inappropriate. Reducing the speed limit is likely to increase the capacity of the road, and the fact that the route is part of the diversionary route of the SRN does not mean that a lower speed limit is inappropriate. Running buses at 40mph, rather than 50mph, over 1.3km will make a minimal difference to journey times (at most 15 seconds if the bus doesn't stop at the American Cemetery). It may well be that speeds along this section of the road, in particular around peak times, are closer to 40mph in any event but the absence of speed surveys undertaken by the Applicant mean that it is impossible to know.
78. In terms of the departures from standards required, Mr Johnstone explained by reference to the Table appended to Mr Lonergan's Report⁹³ that Departures D001 – D005 all related to the same cross-section and would involve the approval of reduced lane and verge widths. Mr Johnstone was confident that, in conjunction with the reduction in speeds to 40mph, the provision of reduced lane widths (in particular of the main carriageway to 3.25m) was safe and that the reduction in lane widths and speed limits were complementary and self-enforcing. So far as the other departures

⁹¹ [CD26-01-APP-W8-1 John Lonergan Proof](#), paragraph 5.4.4 and EIC by Mr Cameron KC

⁹² [CD26-01-APP-W8-5 John Lonergan Rebuttal Appendices](#), Report at Appendix 1, Section 3.6, p. 16.

⁹³ [CD26-01-APP-W8-5 John Lonergan Rebuttal Appendices](#), Appendix C to the Report at Appendix 1, PDF32

were concerned D06 – D13 related to minor departures in respect of reduced visibility at junctions which was commonplace in respect of private accesses along an existing route. Traffic flows into these accesses were likely to be low and, for the most part, undertaken by those who were familiar with the road characteristics. Departures D14-17 were matters of detailed design. Thus, while Mr Lonergan sought to emphasise the number and significance of departures required to deliver the CPPF Alternative, CPPF/CPC contend that the Alternative would deliver a scheme that is both safe and suitable.

79. In terms of its construction feasibility, while Mr Lonergan had raised a number of issues in his written evidence, he ultimately accepted in cross-examination that it was possible that the Scheme could be delivered as shown on the Civilistix drawings subject to disruption and cost.⁹⁴ In relation to overhanging trees, branches could be pruned. In relation to verges, the verge could either be retained, or ditches culverted or re-provided. In relation to potential issues of superelevation, the existing surface of the carriageway could be lowered, rather than raised. In relation to concerns about drainage, the amount of additional carriageway required was limited and it may well be that the existing ditch network has sufficient capacity to accommodate any increased run-off. Alternatively, there was the possibility of above ground SuDS (possibly on land owned by CPPF). Pipework was a measure of last resort and unlikely to be required but, if it was, would be limited in scope. It was a challenge that could readily be overcome. Utilities would run down the shared footpath-cycleway and would be readily accessible. While there would be some inevitable disruption while the scheme was constructed, it could be built in sections using overnight/weekend working where possible. It would likely be possible to maintain two-way flows of traffic during the construction period. The construction of an entirely new carriageway would reduce maintenance requirements for the new road. The cost of such a scheme would inevitably be less than for the Scheme.

80. In terms of the crossing of the M11, it is acknowledged that the existing arrangements are constrained. However, the Applicant has already explored the feasibility and cost

⁹⁴ XX by Mr Parker

associated with a new pedestrian bridge over the M11⁹⁵ which would require minimal additional land, if any. Mr Leigh also explained that it was possible that adjustments to the M11 off-slip and signals could also be made to avoid the need for any new infrastructure.

81. In terms of delivery, Mr Leigh's estimate was that the CPPF Alternative could be delivered in its entirety within five years of the date of the decision from this inquiry and that parts of the CPPF Alternative could come forward sooner so as to bring forward the benefits associated with them. The Applicant's estimate for the Scheme itself is that it will come into operation two and a half years after any decision by the Secretary of State⁹⁶ although this does not account for the fact that the construction of the section through Coton Orchard could not begin at the earliest until November 2028, given the need for the preparation works for the transplantation of the veteran trees in Coton Orchard, as was explained by Mr Alder.⁹⁷ There would be no undue delay in the delivery of the CPPF Alternative in such a way as to cause any material harm to the delivery of the Scheme's objectives.

82. Taking everything together, CPPF/CPC acknowledge that there are constraints on the delivery of an in-highway scheme, whether the CPPF Alternative or some variant of it. CPPF/CPC, however, urge the Secretary of State to consider whether the additional cost and environmental harm to which the Scheme will give rise, including the compulsory purchase of land, incursion into the Green Belt, loss of priority traditional orchard, deterioration or loss of irreplaceable veteran trees and a suite of other environmental harms can be justified given the availability of an alternative scheme which achieves equivalent benefits at significantly less cost.

Public Open Space

83. In the event that the Secretary of State agrees that the maintenance track is not required, there will be no public access to the proposed replacement open space. If an access were provided solely via the new bridge, then CPPF/CPC contends that the

⁹⁵ [CD9-36 A428 Cambourne to Cambridge Option Study: Rectory Farm Bridge Options Report 10 June 2016](#)

⁹⁶ [CD1-21.04 Appendix D – Management Case Addendum 2024](#) at Table 2-1

⁹⁷ XX by Mr Parker

proposed area of replacement public open space would not be a good location to encourage public access and dwell time because it would be an isolated area with no surveillance and includes a balancing pond.

84. CPPF/CPC contends that land owned by CPPF would be preferable replacement open space, as shown in Mr Littlewood's proof of evidence⁹⁸ for the reasons given by Mr Littlewood at paragraph 8.6 of his proof of evidence.

Conclusion

85. For all the reasons set out above, the Inspectors are respectfully invited to recommend, and the Secretary of State invited to find that the Order should not be made, the request for deemed planning permission be refused and the application for the public open space certificate dismissed, or alternatively that provision in respect of the maintenance and access track should be removed from the scope of the Order and permission for it refused.

⁹⁸ [CD26-10-W1-1 James Littlewood Proof of Evidence](#), paragraph 8.5