

Transport and Works Act 1992: The Proposed Cambridge County Council and Greater Cambridge Partnership Cambourne to Cambridge (“CtoC”) Order (“**the CtoC busway**”)

DfT REF: TWA/24/APP/03 (“**the Draft Order**”)

STATEMENT OF CASE

*On Behalf of Cambridge Past Present and Future (“**CPPF**”)
and Coton Parish Council (“**CPC**”)*

Introduction and Summary

1. CPPF is a registered charity whose objectives include working to protect the beauty of Cambridge and its environment. CPPF owns land as part of its charitable purposes, including land which is proposed to be purchased compulsorily as part of the Draft Order (“**CPPF land**”).¹ CPPF has held this land since the early 1930s to protect the setting of the historic village of Coton and the countryside setting of the historic city of Cambridge. CPPF objects to the Draft Order in its capacity as landowner of the CPPF Land and, more generally, by reference to its charitable purposes.
2. CPC is the parish council for the area where the off-road section of the CtoC busway would be developed and where the CPPF land is situated.
3. CPPF and CPC acknowledge the need, in principle, to improve accessibility in the Greater Cambridge region to deliver a reliable public transport service between Cambourne and Cambridge. However, they object to the Draft Order on the basis that the reliance on an off-road guided busway through Coton as part of the CtoC Busway is fundamentally flawed and the assessment of travel benefits and modal switch are based on flawed transport modelling which uses pre-Covid data. Their case is not only that the CtoC Busway in its current form has not been properly justified but that in any event the benefits of the CtoC

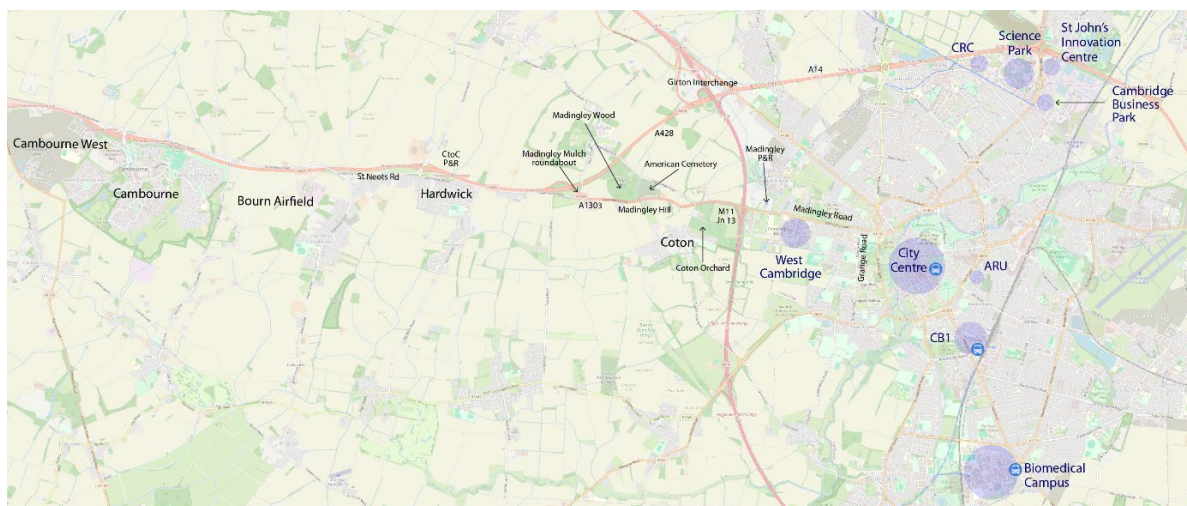
¹ CPPF is the freehold owner of 8 land areas subject to CPOs with the following plan number references: 10-109, 10-114, 12-126, 12-127, 13-128, 13-129, 13-137 & 13-141.

busway can be delivered by way of an in-highway bus priority scheme along Madingley Hill (“the CPPF alternative”). The CPPF alternative would be less costly, less environmentally harmful, and quicker to deliver than the CtoC busway and also would avoid the need for any compulsory land acquisition.

4. This Statement of Case is provided further to CPPF and CPC’s initial objections as set out in their letter dated 8 January 2025.

Description of the Proposal

5. The CtoC Busway will consist of sections of dedicated guided busway and sections of on-road bus route running for approximately 13.6 km along the A428/A1303 transport corridor with a Travel Hub at Scotland Farm. An emergency and maintenance track will be provided alongside the dedicated sections of busway which would be accessible to pedestrians and cyclist and will also function as a bridleway. It is proposed that buses will use an optical guidance system on the dedicated sections and these sections are designed to this specification.
6. Throughout the inquiry there will be reference to Madingley Mulch roundabout which refers to the junction between the A1303, A428 and St Neots Rd by Madingley Mulch, the garden building supplier. Madingley Hill refers to the A1303 between Madingley Mulch roundabout and the M11 Junction 13. Madingley Rd refers to the A1303 between the M11 Junction 13 and Queen’s Rd.



Key locations along the proposed CtoC Busway route

The Scope of the TWAO

7. CPPF and CPC will ask the Secretary of State to consider whether the emergency and maintenance access track which is included within the Draft Order falls within the scope of the matters in respect of which the Secretary of State may make an Order. In particular, CPPF and CPC will ask the Secretary of State to consider whether the track can be considered to be “ancillary” to the operation of the busway. CPPF and CPC do not consider that the track can reasonably be considered to be ancillary to the operation of the busway, given that it is not necessary in light of the fact that the busway is no longer proposed to be kerb guided. There is no reason why maintenance, recovery and emergency vehicles cannot use the busway itself.

Scheme Objectives and Claimed Benefits

8. CPPF and CPC will present its evidence by reference to the Scheme objectives, which are to:
 - a. achieve improved accessibility to support the economic growth of Greater Cambridge region;
 - b. deliver a sustainable transport network/system that connects areas between Cambourne and Cambridge along the A428/A1303 transport corridor; and
 - c. contribute to enhanced quality of life by relieving congestion and improving air quality within the surrounding areas along the A428 /A1303 and within Cambridge City.
9. CPPF and CPC will also refer to what are claimed to be the benefits of the CtoC busway, which can be summarised as follows:
 - a. The delivery of a sustainable transport improvements by way of a new transport link providing faster and more reliable bus services, an active travel route and a new travel hub.
 - b. Reduction in congestion along the A428/A1303 corridor and within Cambridge City.
 - c. To support economic growth in the form of new housing development in the vicinity of the scheme.
 - d. Improvements in air quality and biodiversity net gain.

Transport Assessment

Traffic Modelling

10. CPPF and CPC will demonstrate that the transport modelling that has been undertaken in support of the application does not reflect up to date baseline conditions and so the justification for the CtoC Busway has not been proven.

11. In particular, CPPF and CPC will demonstrate that:

- a. The traffic modelling is based on the 2015 CSRM2 model which includes data last updated in 2019 in the F-Series version (i.e. prior to the Covid-19 pandemic) which is out of date and does not provide a reliable basis for assessing the impacts and benefits of the Scheme.
- b. Commuter travel patterns post-Covid are demonstrably different to those pre-Covid. CPPF and CPC will, in particular, make references to a number of other schemes which demonstrate that the post-Covid commuter levels are significantly lower than pre-Covid, including Land at Melton Road, Edwalton Sharphill Wood, Nottingham, Fairham (Clifton South SUE), Nottingham and Cottage Farm, Oadby, as well as evidence in respect of bus travel times between Cambourne and Cambridge.

12. CPPF and CPC will argue that unless or until a Transport Assessment is carried out based upon post-Covid travel patterns, the impacts and benefits of the Scheme cannot properly be assessed and the Draft Order should not be made, not least because it has not been demonstrated that there is a compelling case in the public interest to justify the compulsory acquisition of the CPPF land.

13. In addition, CPPF and CPC will demonstrate that the traffic modelling does not adequately take into account the interacting impacts of multiple, large-scale local transport interventions, recently delivered or under construction, including:

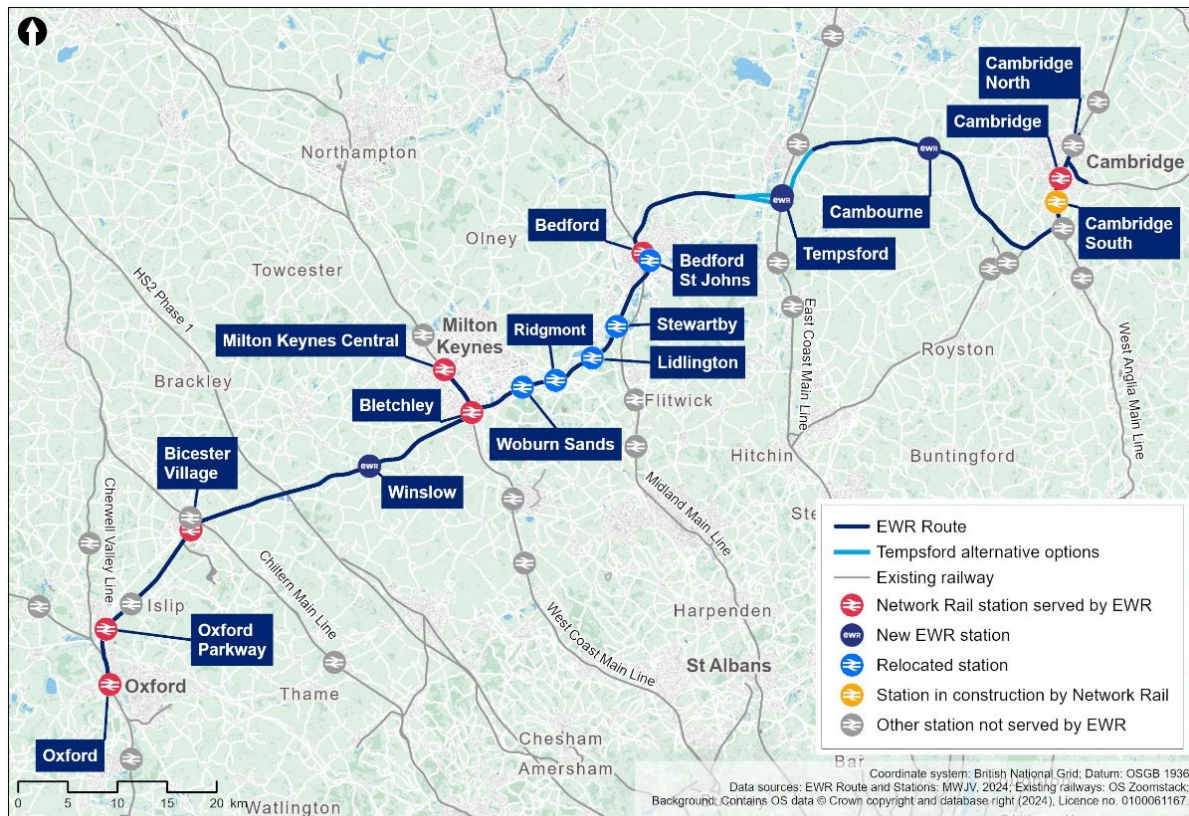
- a. May 2020: the A14 has been upgraded to provide three lanes between the Girton (M11) and Milton interchanges, with two-lane eastbound exit ramps at the Histon and Milton interchanges with the consequence that journey times from Cambourne

to the Histon, Milton and Horningsea interchanges are more reliable for private and public transport accessing north and east Cambridge.

- b. May 2017: Cambridge North station has opened giving Cambourne and future Bourn Airfield residents faster and more convenient access via the A428 and A14 to rail services than travelling to Cambridge Central station.
- c. 2026: Cambridge South Station will open which will materially affect travel patterns and which has not been included within any of the scheme assessments.
- d. From 2027: the A428 will be dualled all the way west to the A1, creating a fast route from Cambourne and Bourn Airfield to employment sites in St Neots, Bedford and beyond.

East-West Rail

14. The Government reconfirmed in the Autumn Budget 2024 its support for East West Rail (“EWR”) to run to Cambridge. The current preferred alignment between Bedford and Cambridge includes a station at Cambourne, which will link the expanding settlement directly to major employment sites at the Biomedical Campus (via the new Cambridge South station, which is due to open in 2026), CB1 (via Cambridge Central station), Bedford and Bletchley (for Milton Keynes).



EWR Route Overview October 2024

15. CPPF and CPC will demonstrate that, contrary to the position taken in the GCP Outline Business Case Addendum, the delivery of EWR will significantly reduce the benefits of the CtoC busway because many of its intended passengers are likely to use the rail services between Cambourne and the three stations in Cambridge, rather than the CtoC busway as EWR will offer faster and more reliable journey times.

16. CPPF and CPC will demonstrate that no modelling has been carried out to understand the likely effects of EWR on CtoC usage (including by reference to TAG Unit M4 Forecasting and Uncertainty) such that the Transport Assessment is inadequate for this reason also.

Scheme Objectives and Benefits

17. CPPF and CPC will demonstrate that the Scheme does not meet all of its objectives and that the benefits are overstated.

18. In particular, CPPF and CPC will refer to the fact that one of the aims of the Scheme is to reduce congestion and the reduction in congestion is claimed as a benefit of the Scheme.

However, the Transport Assessment demonstrates that the Scheme will have no material impact on the local highway network. The Scheme is not, therefore, meeting one of its key objectives.

19. CPPF and CPC will demonstrate that there is no issue with congestion for traffic flowing away from Cambridge such that the Scheme does not bring about any meaningful benefit for 'outbound' movements.
20. CPPF and CPC will demonstrate that such benefits as are claimed in support of the Scheme by way of modal shift can be achieved by way of the CPPF alternative, as set out in greater detail below.
21. CPPF and CPC will demonstrate that the delivery of housing at Cambourne West and Bourn Airfield is not 'dependent' upon the Scheme, not least because planning permission has been granted for a significant amount of housing and employment development on these sites already and development at Cambourne West is being built out and occupied.
22. CPPF and CPC will demonstrate that the assertion in the Economic Case that "44% of the jobs supported by the CtoC project can be considered net additional at a UK level" is wrong and is based on a flawed understanding of the evidence base which is claimed to support it.
23. CPPF and CPC will demonstrate that the do minimum scenario GCP has used as a baseline comparator does not consider the option of routing buses to Cambridge City Centre via the A428, A14 and either Histon or Milton Road, both of which GCP upgraded with new bus lanes at a combined cost of £43.7m to provide faster and more reliable bus journey times.

CPPF Alternative

24. Given the very low BCR of the proposed Scheme, the harms to which the Scheme will give rise and the need for the compulsory acquisition of land, CPPF and CPC has explored alternative options for an equivalent scheme. CPPF and CPC will demonstrate that its alternative scheme (in the form of an in-highway inbound bus lane down Madingley Hill) will deliver very similar benefits as the equivalent section of the CtoC (the remainder of the Scheme remaining as is proposed). We attach to this SoC a detailed description to the CPPF alternative which includes consideration of:

- (i) A detailed route breakdown and descriptions of interventions proposed in eight sections A-H along the route including the in-highway inbound bus lane
- (ii) Quick win interventions
- (iii) Supplementary and alternative interventions including cycle ways, modifications at Girton Interchange, bus station at Cambourne and bus routing through Bourn Airfield development
- (iv) Assumptions of infrastructure delivery of a new Park & Ride at Scotland Road
- (v) Phased delivery in 6 stages
- (vi) Inbound Flow control
- (vii) Performance Comparison to GCP scheme
- (viii) Discussion of previous objections to an in-highway bus lane

25. CPPF and CPC will demonstrate that the CPPF alternative would achieve almost identical benefits as the equivalent section of the CtoC scheme in terms of journey time savings for buses. In addition, the in-road bus lane would provide journey time savings to all bus, coach and emergency services using Madingley Road to enter Cambridge or join the M11, whereas GCP's busway would provide journey time savings only to vehicles permitted to use the busway, fitted with the appropriate guidance technology and driven by a driver trained in its use.

26. The CPPF alternative would be entirely consistent with the Local Plan requirement² 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.”*

27. The CPPF alternative more cost-efficiently meets the CtoC scheme objectives by solving the actual problems encountered by buses. The lack of congestion outbound beyond the M11 junction obviates the need to build entirely segregated infrastructure for buses travelling out of Cambridge.

28. The CPPF alternative would deliver policy-compliant bus priority to increase the mode-share of travel by bus between Cambourne and Cambridge as effectively as the CtoC busway scheme for the new housing allocated, consented and being built pursuant to Policy

² Policy SS/7: New Village at Bourn Airfield, South Cambridgeshire Adopted Local Plan 2018

SS/7: New Village at Bourn Airfield of the South Cambridgeshire Adopted Local Plan 2018 and Policy SS/8: Cambourne West. With EWR now expected to play the principal role in providing high quality passenger transport between Cambourne and Cambridge, the CPPF alternative is a proportionate intervention both in the interim before EWR opens and as a long-term complement to EWR in providing a reliable public transport connection to west Cambridge.

29. The CPPF alternative fits better with changed circumstances since 2014: GCP's budgetary constraints, owing in part to high inflation of construction costs; the likelihood of EWR being built, which would provide faster transport connections between Cambourne and Cambridge, including the Biomedical Campus and CB1 which together draw a quarter of all commuters from Cambourne; and significantly altered travel patterns post-COVID.
30. The CPPF alternative fits better with the local authorities' and national strategic objectives on decarbonisation of transport, traffic reduction and modal shift, including a target central to the City Deal of reducing peak-time traffic in Cambridge by 10–15% on 2011 levels; whereas the GCP's proposal makes sense only if traffic levels follow a business-as-usual growth trajectory over the long term.
31. The CPPF alternative provides very much better value for public money. There would be large savings on land acquisition and construction costs, including not having to build a new bridge over the M11.
32. The CPPF alternative would avoid the need for the environmental harm associated with the equivalent off-road section of the Scheme and avoid the need for any compulsory acquisition of land.
33. It avoids the direct and indirect ecological harm that would be caused by the off-route scheme to designated and undesignated ecological assets including Coton Orchard.
34. It avoids the landscape and visual impact harm identified by the National Trust to its covenanted land identified in their objection letter dated 8 January 2025.
35. It avoids the adverse landscape and visual impacts on the land between Cambourne and Grange Road, in particular to the setting of the City of Cambridge which is presently

contained by an abrupt urban edge. It avoids the loss of openness of the landscape to the area west of Cambridge which has maintained its rural character.

36. The applicant's LVIA does not sufficiently recognise the value of the openness of the countryside with its long and open views. It is additionally unconvincing in its appreciation of the sensitivities of the landscape character to the west of Cambridge.

37. In short, the CPPF alternative would deliver similar social benefits at lower cost and significantly lower environmental harm than the scheme proposed by the GCP.

Claimed Carbon Benefits

38. CPPF and CPC will demonstrate that the assessment in the Environmental Statement (ES) showing that the Scheme is CO₂ beneficial and, therefore, in conformity with the DFT transport decarbonisation plan is flawed. The calculations underlying the assessment in the ES are based on outdated forecasts. Up-to-date forecasts demonstrate that the Scheme is a net CO₂ emitter. CPPF and CPC will refer, in particular, to the objection made by Dr Louise Hirst (representation lodged 8 January 2025).³

39. Technical report 6 states that CO₂ emission calculations within the ES were made using TAG data.⁴ The Tag forecast has changed dramatically in recent years, with the forecast for proportion of electric vehicles in 2050 increasing from 44% (used in ES) to 81% in the May 2025 update. Petrol vehicles are forecast to emit >90 times the CO₂ than their electric counterparts by 2050.⁵

40. Furthermore, a key limitation of the Tag data is that values post 2050 are assumed constant. Given that the assessment period for the C2C busway extends to 2085, the CO₂ emissions calculation presented in the ES is dominated by an inaccurate forecast of electric vehicle percentage. This can be seen in figure 10.2 of the ES, which shows a near linear carbon recovery post 2050 for the duration of the assessment period. Using updated Tag forecast

³ Objector ref TWA/24/APP/03/OBJ/279

⁴ Department for Transport, (2022). Guidance: Tag Data book. [online] Available at: <https://www.gov.uk/government/publications/tag-data-book> (Accessed: 03/11/2022 – corresponds to Nov 2021 v1.17

⁵ Tag book version Nov 2024 v1.17 2050 forecast assuming 50 km/h

data, carbon recovery post 2050 is negligible, making this scheme net polluting and in conflict with the stated net zero goal.

Ecological and Biodiversity Impacts

41. The off-road segment of the CtoC busway is routed through numerous locally designated wildlife sites and 28 valuable hedgerows including: Coton Orchard County Wildlife Site, Scrubland east of the M11 Wildlife Site, Coton Path Hedgerow County Wildlife Site and Bin Brook City Wildlife Site.
42. The impact on Coton Orchard is the most significant as the Orchard contains a significant number of veteran trees, a mix of hedgerows, scrub, 'Traditional Orchard' (a 'Priority' habitat of Principal Importance under the NERC Act 2006) and a large expanse of formerly intensive orchard. Six of the veteran trees are within the scheme boundary and this serves to demonstrate how the CtoC busway would bisect the Orchard, destroying 2.2 ha of wildlife habitat including Traditional Orchard and veteran trees. In keeping with the biodiversity duty under s.41 Natural Environment and Rural Communities Act 2006 (as amended) these are relevant and important material considerations in this case.
43. CPPF and CPC will seek to demonstrate how the CPPF 'in-highway' alternative provides a means to avoid impacts to Coton Orchard and other designated sites, and to lessen the impact on biodiversity generally, and that taken along with the other advantages of the CPPF alternative, it should be preferred having regard to matters such as the mitigation hierarchy, national and local planning policy and the biodiversity duty. In making this case, CPPF and CPC will refer to evidence produced by other objectors to the Scheme where appropriate, including the Woodland Trust and the owners of the Coton Orchard.

Summary and Conclusion

44. Accordingly, CPPF and CPC will argue that the Scheme has not been adequately justified and that its benefits can be delivered by way of a cheaper, less harmful alternative. CPPF and CPC will invited the Secretary of State to refuse to make the Draft Order.

Richard Buxton Solicitors

11 April 2025

List of additional documents to be relied on not referenced in SoC

The following documents may be referenced:

1. CPIER: [Cambridge & Peterborough Independent Economic Review](#), Cambridgeshire and Peterborough
2. Independent Economic Commission, September 2018
3. EC: [Outline Business Case: Economic Case](#), Mott MacDonald, 17 January 202
4. HGV: Heavy Goods Vehicle ([legally](#), any goods vehicle over 3.5 tonnes when fully laden
5. IA: [Independent Audit of Key Assumptions and Constraints](#), 25 May 2021
6. NPPF: [National Planning Policy Framework](#)
7. NR: C2C Technical Note: [Northern Route](#), Mott MacDonald, 22 May 2019
8. NTSR: Cambourne to Cambridge Better Public Transport Project [Non-technical Summary of Outline Business Case](#), Mott MacDonald, December 201
9. OAR: [Outline Business Case](#) Appendix B: [Options Appraisal Report Part 2 & Part 3](#), Mott MacDonald December 2018
10. OBC: [Outline Business Case](#), Mott MacDonald, 17 January 202
11. OBCA: Outline Business Case Addendum (TWA0 doc ref CtoC-21-00 rev 00
12. QW: C2C Technical Note: [Madingley Road 'Quick-Win' Options Outline](#) Mott MacDonald, 14 May 201
13. RFB: A428 Cambourne to Cambridge Option Study: [Rectory Farm Bridge Options Report](#) Atkins, 10 June 2016
14. SEN: [Outline Business Case](#) Appendix J: [Strategic Economic Narrative & Economic Impacts Report](#), Mott MacDonald, 17 January 2020
15. SoA: TWA0 Statement of Aims (TWA0 doc ref CtoC-4-00 rev 00)
16. SOBC: [Strategic Outline Business Case](#), Atkins, 23 September 2016
17. TA: Transport Assessment (TWA0 doc ref CtoC-25-00)
18. TSCSC: [Transport Strategy and High Level Programme](#) of the [Transport Strategy for Cambridge and South Cambridgeshire](#), Cambridgeshire County Council, April 201
19. TSM: [C2C Topographical Survey Maps](#), Cambridgeshire County Council, 24 November 2016
20. TWAOA: [Cambourne to Cambridge: Transport & Works Act Order application](#) (March 2023)
21. Light Rail & Tram Statistics England: Year Ending March 2024 (revised) (updated 25th February 2025)" - Department for Transport
22. Land at Melton Road Edwalton: Monitoring Report (8) (2024)" - Lawrence Walker Limited (October 2024)
23. Fairham (Clifton South SUE) Nottingham Technical Note 27: A453 Crusader Roundabout Variation of Planning Condition 24 (Commercial Floor-Space Limit) - Lawrence Walker Limited (April 2025)
24. Red House Farm WLWA Model Flow Comparisons- SLR Consulting Limited (March 2025)