



**GREATER  
CAMBRIDGE  
PARTNERSHIP**

# **Cambourne to Cambridge**

**Better Public Transport  
and Active Travel**

## **Appendix E Written Responses**



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## **Appendix E1 Organisational Responses**



CC/GCP

**Greater Cambridge Partnership  
Cambourne to Cambridge  
Consultation**

10 July 2022



Dear Sir,

**Consultation response to 'Cambourne to Cambridge Better Public Transport and Active Travel Environmental Impact Assessment- Public Consultation' on behalf of Cambridge Biomedical Campus**

I write on behalf of the Cambridge Biomedical Campus (CBC) to first and foremost express our support for the proposals associated with the Greater Cambridge Partnerships scheme to improve the public transport network between Cambourne and Cambridge, freeing up road space for better walking, cycling and improving air quality.

We are encouraged that consultation is taking place and are really keen to be able to contribute to the thinking which will mitigate the impacts on the landscape, environment. We are encouraged to see that there are proposals to minimise the carbon footprint and that there is a strong biodiversity statement.

**About the Cambridge Biomedical Campus**

The Cambridge Biomedical Campus (CBC) is located at the heart of the UK's and Europe's leading life sciences cluster, located in the city of Cambridge. The CBC is a vibrant, international healthcare community and a global leader in medical science, research, education and patient care.

The site has grown considerably in recent years and the organisations on the site reflect the strength of healthcare and life sciences in Cambridge:

- Healthcare and the NHS: Cambridge University Hospital NHS Foundation Trust, Royal Papworth Hospital NHS Foundation Trust and Cambridgeshire and Peterborough NHS Foundation Trust
- Education: The Deakin Centre and Cambridge Academy for Science and Technology
- University & Research Institutes: University of Cambridge School of Clinical Medicine – housed in multiple buildings across the CBC and comprising twelve Academic Departments, four Research Institutes and five Medical Research Council (MRC) units, The Medical Research Council Laboratory of Molecular Biology (MRC LMB), Cancer Research UK Cambridge Institute, Heart and Lung Research Institute and Addenbrooke's Centre for Clinical Investigation
- Industry & Expansion: AstraZeneca Strategic R&D Centre, GlaxoSmithKline's (GSK) Experimental Medicine and Clinical Pharmacology Unit, Abcam PLC Headquarters, The Milner Institute which facilitate collaboration across more than 12 pharma companies and ideaSpace – a co-working community of start-ups

As the largest employment site in Cambridge – the CBC is focused on ensuring patients benefit from the campus’ world-leading research. The international nature of the collaborations cut across traditional boundaries to allow us to work together on care, research and training. Our success is based on everyone’s willingness to unite to exert a powerful global influence as the campus attracts world class companies, investment and talent to Cambridge with the aim of improving healthcare and knowledge.

### **Why this consultation is important to the Cambridge Biomedical Campus**

With world-leading academic and industry scientists on the same site as the teaching hospitals of the University of Cambridge, the campus is the optimum environment for the rapid and effective translation of research into routine clinical practice.

With the cost of healthcare set to increase as the demand from an aging population soars, we are set to develop the treatments of the future also creating the next generation of UK life sciences companies. We have the foundations in place to generate the ideas, products and revenue to deliver the future success of the UK’s flourishing life sciences industry.

The campus will therefore continue to grow, creating jobs and bringing investment to Cambridge but we do this in collaboration with the city and its residents. Our achievements and success reflect the endeavour, persistence and brilliance of the people who live and work here. The delivery of the new Cambourne to Cambridge route will only deliver benefits directly to the campus if the connections between route and to the campus are also efficient. The campus team therefore look forward to seeing the improved bus network, with onward and seamless travel to the CBC, which will help to facilitate as well as support decongestion in city.

As of today, there are 21,000 researchers, industry and clinicians all working on the site. In 2021, it was estimated there would be 26,000 people working on the Campus (prior to Covid-19) and up to 30,000 beyond 2031. Investment in the Campus over the past three years totals more than £750m. The CBC is the biggest employment site in Cambridge, with further space to grow.

Sustainable access to CBC is a key factor alongside affordable housing to ensure the Campus can attract and retain the best staff. With the further predicted growth in and around Cambridge as well as the predicted growth on the Campus itself, improved public transport, walking and cycling proposed will become even more pressing. The proposal, we understand is a key enabler to improving connectivity and is vitally important for the campus as the cost of living continues to increase, and as we attract staff from further afield. In addition, as we continue to grow, the pressures on car parking will continue to increase because of both staff numbers and patient numbers. More sustainable transport have many benefits including health benefits and carbon reduction.

CBC is pleased that the Cambourne to Cambridge scheme has reached this stage of consultation and recognises the ambitious programme put forward the need to raise revenue to deliver the ambitious public transport schemes, and make a step-change in environmental sustainability, ill-health effects associated with air pollution and the need for effective transport mechanisms to support staff, patients and visitors attending the Campus.

### **The proposal:**

The CBC is delighted to see the Cambourne to Cambridge scheme continue to be developed and the detail of thinking which has been applied to the promotion of use of public transport, and active travel, which the scheme will deliver. For the campus, the seamless design for onward travel to the CBC will be of vital importance, with this scheme forming an integral part of a wider, cross county network of improved travel.

The CBC is pleased to note the strong statement which has been laid out in the consultation documents in relation to minimizing the impact on biodiversity, minimizing carbon footprint and the added benefits of the 'natural capital' interventions which will be delivered via the scheme.

**With regard to bio-diversity and minimizing impact on habitats:**

The CBC is pleased to see that the biodiversity commitment being made as part of the scheme is to deliver a minimum of 10% gain, with a goal of 20% overall. The CBC would urge the Greater Cambridge Partnership (GCP) to do all it can to meet the goal target, rather than settle for less. The importance of promoting bio-diversity and creating environmental habitats cannot be underestimated in the mitigation of climate change and overall well-being.

The CBC welcomes the consideration which has been taken, for example, in the realignment around the waterworks site, to minimize impact on trees and habitats, and at the Scotland Farm Travel hub, where existing trees and hedgerows are to be retained. Maintaining established areas, such as this, where at all possible, is really important.

The CBC is also pleased to see that where there are changes required, thought is being given to planting schemes which will not only attract wildlife, but reduce sound and noise levels from the adjacent A428. It is good to see the partnership approach with the Highways Authority in this regard.

The CBC notes the specificity of detail which has been laid out in the consultation document in relation to specific mitigation for different locations along the route, and not just a standard approach across the board. The use of balancing ponds, landscaping and planting schemes is welcomed.

**With regard to minimizing carbon footprint via travel options:**

The campus welcomes the planning which is being undertaken in relation to promotion of active travel, the proposal that the route is served by modern, electric public transport vehicles, supports sustainable travel – all serving to decrease congestion and pollution.

The CBC is pleased to see that the Scotland Farm travel hub is of a size which will support the volumes of traffic anticipated now, but also has space for growth in the future.

It is essential that the bus services are compliant with low emission standards and that there are electric bus charging points installed at the travel hubs, to promote use of the technology and assurance of reliability of service, which we know, from speaking to our staff, is key to making the change from private to public transport.

The CBC also welcomes the plan to use solar panels wherever possible and urges the GCP to look further to using technology such as this to provide power for electric vehicle charging points and the plans to promote e-mobility.

**Other observations:**

The CBC notes the intention to ensure that during construction, public footpaths and rights of way will be maintained, but with added traffic control to ensure safety.

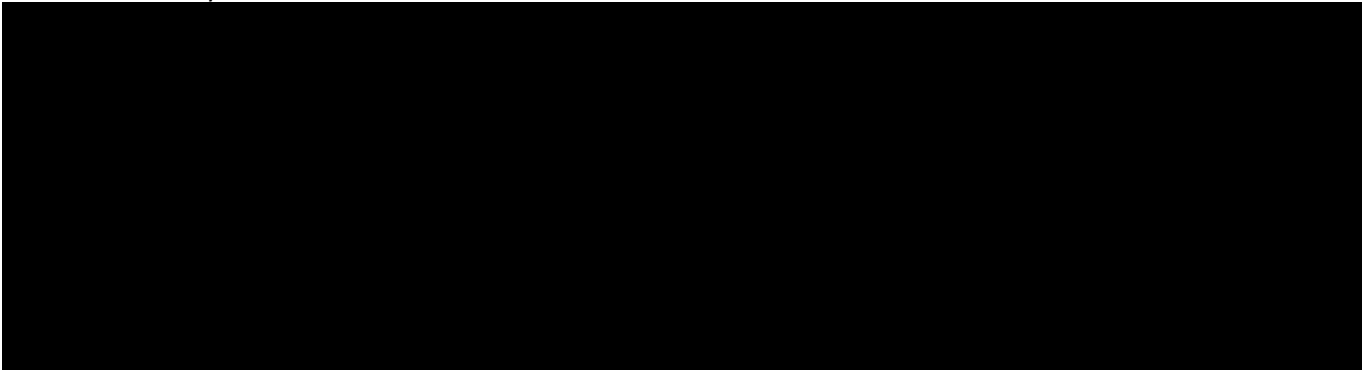
The improved connectivity with active travel options and cycle routes (both along the route and to travel hubs) is welcomed, although there are concerns that inadequate lighting, and safety concerns will diminish their utilization during the darker months of autumn and winter.

**Summary:**

The CBC is pleased to see the consultation coming forward in relation to biodiversity and environmental impact for the Cambourne to Cambridge scheme, and note the progress made in design and development. The campus welcomes the overall ambition of reduction in carbon, improvement in bio diversity, and championing well-being for communities.

The CBC continues to regard the GCP as an important partner in terms of the holistic, system approach to achieving sustainable travel and is pleased to support the options laid out in the proposal documentation.

Yours faithfully





## **Cambourne – Grange Road Busway proposals EIA Cambridge Connect response to EIA consultation**

Cambridge Connect has made detailed submissions to the GCP on these proposals over a number of years and there is no need to repeat these representations here. However, it is important to place on record our brief comments on the EIA for the proposed GCP busway scheme.

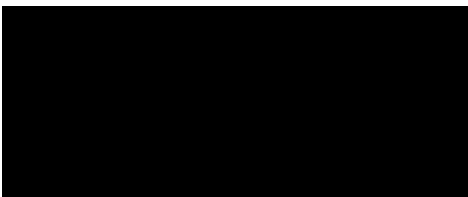
### **Summary of comments:**

1. The very high and distinctive landscape values of the Green Belt surrounding Cambridge City in particular in the area surrounding Coton and the American Cemetery, including of the associated historic values, are insufficiently taken into account.
2. An alternative route to align the proposed busway with the A428 via the Girton Interchange and Eddington has been insufficiently considered. This route has been wrongly screened out of consideration, and a high level professional assessment commissioned from i-Transport identified the route as a potentially viable option that would mitigate many of the concerns about impacts on landscape. The independent review of the busway scheme commissioned by the GCP also identified this route as potentially viable and possessing merit.
3. The increasing erosion of Green Belt surrounding Cambridge makes it especially important that alternatives are fully considered that would help avoid and / or mitigate impacts of transport interventions. This importance has not been given sufficient weight in the EIA.
4. The proposed new busway will unnecessarily damage untouched Green Belt when other viable alignments lying on existing transport corridors lie close by. These alternatives have not been sufficiently considered in the EIA.
5. New data from the 2021 Census have emerged that show the population growth within Cambridge City over the decade from 2011 has been almost 18%. The busway plans were based on earlier population predictions made by the County Council that saw that population being reached in 2031. That is, the predictions are around a decade out in the consideration of the scale and pace of growth. This raises serious questions about the suitability of the busway to meet capacity needs in the future on this route, and the EIA does not take this aspect sufficiently into consideration.
6. Moreover, population growth has also been experienced at an unprecedented rate in South Cambridgeshire, and there is a need for a major re-appraisal of transport interventions in light of the new data in order that a coherent transport strategy fit for the 2030s and beyond can be



developed.

7. These changes, including those precipitated by the pandemic, and by new data on the scale and pace of the Climate Emergency, suggest that the scheme being brought forward is flawed and inadequate to meet future transport needs in the Cambridge subregion.
8. Fundamentally, we consider the route selected for the scheme is flawed, and for this reason the EIA is itself assessing a flawed scheme. The proposed mitigations will not avoid the permanent severance impacts on the landscape and the scheme will only further serve to carve up precious and diminishing Green Belt to transport roads unnecessarily. A priority should be placed on avoidance, and this can be done by fully utilizing existing transport arteries, both on the existing roads themselves and/or alongside.
9. We also consider the mode selected for the scheme (buses) inappropriate to meet future needs in terms of attractiveness and capacity in the context of pressures from growth on surrounding Green Belt, biodiversity values, historic and environmental values, including related to air quality. Light rail is demonstrably superior in most respects for mass transit delivery on the scale required, and in particular with the capacity to drive modal shift at the levels needed. Light Rail can work with interlinked bus services, which can extend reach and flexibility. We consider Light Rail better suited to meet mass transit needs in the Cambridge subregion.
10. Cambridge Connect urges the GCP to reconsider the busway scheme, which was conceived over a decade ago, and fully take into consideration alternative routes and modes that would avoid and mitigate the impacts of transport interventions to the maximum extent practicable. We acknowledge this may necessitate additional resources to be achieved, although we consider the investment would result in more enduring positive outcomes for the communities, economy and environment of the region.





08/07/2022

Dear Jo

**Response to Cambourne to Cambridge Busway Environmental Impact Assessment - Public Consultation.**

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

In respect to the proposals for the Cambourne to Cambridge Busway, Cambridge Past, Present & Future is also a landowner and the charity's land would be required for this scheme. The land also has legal covenants to protect it, including those held by the National Trust. We have made clear to you that the charity objects to your scheme and does not wish to allow its land to be used for the construction of the route. The trustees of the charity will respond separately to you from a landowner perspective, after they have been able to meet to discuss this matter in early August.

Our response is provided on an entirely **without prejudice basis**.

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**Introduction & Overview**

As you are aware from previous correspondence, Cambridge Past, Present & Future supports the improvement of public transport and active travel between Cambourne and Cambridge, however we believe that a route alignment within the corridor of the A1303 can meet the needs for a high quality public transport system with much less harm to ecology, landscape and green belt than the route through open countryside that is being proposed. As a result we strongly object to the route chosen for your scheme. We have previously put forward this case to you in public meetings and in our responses to previous consultations,

including our ideas for an alternative public transport and active travel scheme, which can be found by [clicking here](#).

Your latest consultation asks us how the impacts of your proposed scheme could be avoided or mitigated. You will be aware that the recommended mitigation hierarchy is to:

1. Avoid impact
2. Minimise impact
3. Restore after impact
4. Offset impact

Many of the worst impacts of your proposed scheme will occur from Hardwick to Cambridge and these can be **avoided** by providing a high quality public transport scheme within the A1303 corridor and an active travel route by extending the Comberton Greenway; this approach would be compliant with the mitigation hierarchy and we repeat our request that the Greater Cambridge Partnership carry out work to properly assess the alternatives and compare them to the scheme you are proposing, so that we can all judge whether the damage that will be caused by your preferred route can be justified.

In our response to this consultation we have not set out the evidence for an alternative, nor some of the evidence against your preferred route, such as the Benefit Cost Ratio. We are responding directly to your consultation in good faith, and this is intended to provide you with information that you will find helpful in planning to mitigate the impacts of your proposed scheme, however this information is being provided on a without prejudice basis to our overall objection to constructing a new road and associated infrastructure through open countryside in the Coton Corridor. Where we have responded positively this should not, in any way, be considered as indicating support for your preferred route.

Below we respond to the impacts on the various sections of the route from Cambourne to Cambridge:

### **Section B - Bourn Airfield**

CambridgePPF has previously raised concerns about the route through Bourn Airfield, as part of our responses to proposals for the busway and the planning application for the redevelopment of the Airfield:

- The route is aligned too far to the north of the development meaning that it will not well serve the new residents of Bourn Airfield, who will have to travel to reach it (some residents will be 1km away). It would be preferable to route the busway through the middle of the development. If East-West Rail is provided, then the busway could have the potential to connect residents to a new station, but the current alignment largely precludes this due to being located too far north (it would be nearly as quick for people to travel direct to the new station as to reach the busway).
- The significant bend in the route does not future-proof the infrastructure for other uses such as light rail. It also slows vehicles, reducing journey times.

### **Section C - Childerley Gate**

The route through this section would destroy landscaping/habitat that was created to offset the impact of the construction of the A428. There would be a loss in biodiversity.

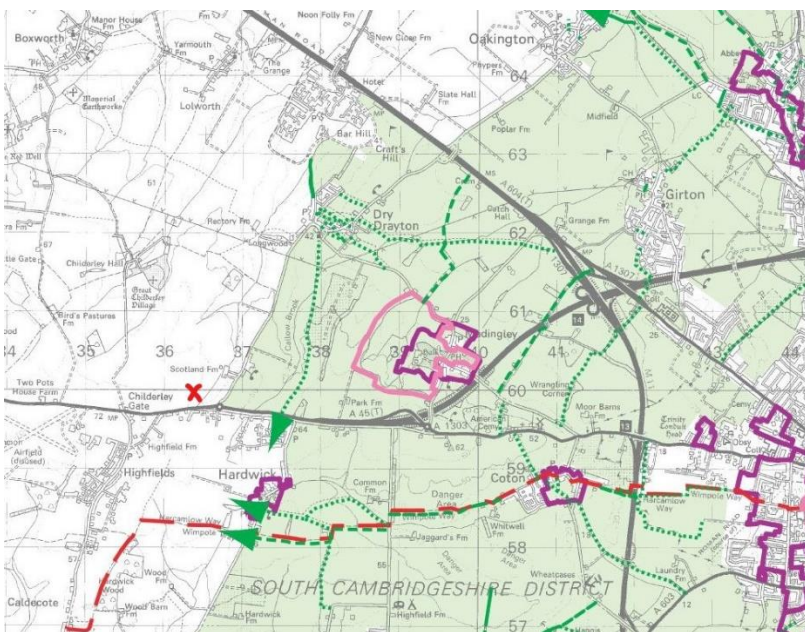
We wish to raise concerns about the proposal to create an island of new habitats surrounded by busy roads at the eastern section, between the A428, St Neots Road and existing balancing pond. Any wildlife taking up residence here would face the risk of being killed on surrounding major roads and the ecological benefits are likely to be reduced by the physical barriers and ecological severance created by the roads. We are particularly concerned about plans to locate a SUDS pond here, which will attract wildlife and could lead to the deaths of a large number of amphibians attempting to cross busy roads to breed. In our view, this proposal represents poor ecological planning, and we would encourage you to instead consider creating new

habitat in a location which is better connected to other natural habitats and where the wildlife that moves in is not at high risk of being killed. We are aware that there is already a SUDS pond in this location that was created as part of the A428 but we advise you against repeating that mistake.

However, it may be appropriate in this location to plant trees in order to have a mitigating impact on traffic noise and transport infrastructure – as well as some wildlife benefits.

### Section D - Scotland Road Park & Ride

We note that the proposed location for a giant car park in the countryside is within the Green Belt, in a visible location towards the top of the hill and adjacent to a stream and a public right of way (enjoyed for walking in the countryside). We note that the land on the opposite side of Scotland Road is not in the Green Belt, would be screened by the farm buildings, is not near a watercourse and would not impact the amenity of users of a public right of way. In planning and landscape terms, the harm caused by the Park & Ride could be best mitigated by siting it on the land on the opposite side of Scotland Road. Indicated by an X on the image below.



We list here some of the reasons against building a large car park:

1. For buses to serve the P&R, they must divert across the A428, adding to the journey time from Cambourne and Bourn Airfield rather than reducing that journey time (the aim of the scheme).
2. If there are more frequent services from the P&R than from Cambourne/Bourn then it will undermine the bus service from Cambourne/Bourn, as people who have a car will drive to the P&R to pick up a cheaper, more frequent service into Cambridge.
3. It adds significantly to the embodied carbon cost of the project.
4. It adds to the cost for little, if any, net benefit.
5. A bus station at Cambourne, served by express buses to/from St Neots and by feeder (including demand-responsive) services from surrounding villages, would be a much more appropriate investment.

If a car park is necessary, we question whether it is necessary to construct a car park of this scale, given that the main aim of the scheme is to transport people from Cambourne and Bourn (where they will alight). Some of the harm caused by the Park & Ride could be mitigated by a phased construction, in which the area for the Park & Ride is expanded to meet any future demand. In the interim, the unused land could be planted with

wildflowers to provide temporary habitat (which could become permanent if the full extent of the Park & Ride is not required).

We support the proposed habitat creation adjacent to Callow Brook, where there is habitat connectivity into the wider countryside. We agree that there is a risk of impact on the Callow Brook in terms of water run-off pollution and also flooding. The Brook is already over-incised due to field drainage, and it is important that run-off rates are not increased by the proposed car park.

We note that your plans indicate creating nature rich grassland. The GCP's Landscape, Ecology & Heritage group has previously raised concerns with you about creating small, isolated areas of grassland habitat because it is often very difficult and expensive to maintain these to achieve ecological benefits (for example through annual cutting and collecting or grazing), as a result they do not achieve the ecological value hoped for. As an example, Cambridgeshire County Council has neglected the management of species rich verges at Babraham Park & Ride, which have been encroached upon by scrub. The recommendation of the GCP's Landscape, Ecology & Heritage group was to create larger areas of grassland habitat (ideally adjacent to existing grassland) or failing that, to prioritise other habitat that can more easily be maintained, such as woodland or scrub. We note that the priority habitat for this area in the [Cambridge Nature Network](#) is woodland.

We note that solar panels for car ports are inappropriate development in the green belt and that they would contribute to adverse impacts. Whilst permission has been granted for solar car ports at Babraham Road P&R in Cambridge, this site is fully screened by trees and therefore there is no visual impact.

#### **Section E - Hardwick**

CambridgePPF strongly supports an on-road route via St Neots Road because this would minimise the loss of trees. We note that you are suggesting that this could only be an option if St Neots Road is closed to through traffic, to which we make the following points:

- There is not sufficient evidence that traffic volumes along this stretch of road are, or will be, so high that buses running along the road would be delayed significantly compared to buses running on a segregated route. Therefore, it would be possible to both avoid harm to woodland and keep the road open to traffic. Certainly, outside of the morning rush-hour no case can be made, and therefore consideration should also be given to a time-limited restriction on through traffic, which may be more acceptable to local residents (eg through camera control rather than a bus gate).
- We note that the GCP is proposing to provide a separate active travel route from Hardwick to Cambridge (part of the Comberton Greenway) which will be accessed to the south of the village. We also note that this would avoid the steep incline of Maddingley Hill and be away from vehicles and therefore is likely to better meet the needs of users.
- We agree that the views of Hardwick Residents should inform your plans.

We strongly support the modification to the route running south of the Waterworks site, as we proposed it to you. This modification meets the requirements of the mitigation hierarchy because it would avoid harm to mature woodland and meadow habitat and has the advantages of moving infrastructure further from the busy Maddingley Mulch roundabout and also helping to slow speeding traffic on Long Road.

We note that you are proposing to create areas of grassland habitat on the land that would be between the new busway and St Neots Road/Long Road and the Waterworks site. We understand that this is subject to landowner agreement. We understand the logic for the choice of habitat type because it would match that found on the Waterwork's site, and we have no objection to this in principle. However, we note that there are likely to be difficulties managing these small grassland areas in perpetuity (ie grazing them or cutting and collecting hay) and that the priority habitat for this area in the [Cambridge Nature Network](#) is woodland – and the nearest designated habitat is Maddingley Wood SSSI, which at its closest point to the habitats at the

Waterworks is only 600m away. CambridgePPF recently took the decision to convert 2 acres of grassland into woodland because of these reasons (on a site located 650m from Madingley Wood SSSI).

It is unclear whether new habitats would be open to the public or remain as private land. The implications of this are that fencing may be required, which could have an impact on visibility in the landscape; or that there would be disturbance to wildlife and habitats which would reduce any Biodiversity Net Gain calculations.

You have indicated that the crossing of Long Road could be an “Area where wayfinding features, lighting, seating points and cycle parking may be proposed”. We note that this location is in the greenbelt and currently has a very rural impression. Accordingly, any ancillary infrastructure or features in this location should be kept to a minimum to avoid/minimise urbanisation impacts. Any infrastructure that is required should be designed to fit into a rural landscape (eg use of wooden and natural materials, etc).

## **Section F - North of Coton**

### **Ecological Impact**

The greatest area of ecological impact caused by this scheme will be between Cambridge Road (Coton) and Ada Lovelace Road. This will result in the destruction of 1km of habitat, to a width of at least 20metres, in other words at least 20,000m<sup>2</sup> of habitat loss (5 acres). This includes bisecting a City Wildlife Site. The habitat lost will include priority biodiversity habitats such as scrub and traditional orchard, as well as mature trees and a meadow. These are identified on the Phase 1 Habitat Survey carried out in 2017/18. The habitat currently has no public access and so also acts as a refuge for wildlife on the edge of the village. It is likely that your scheme would also have additional indirect impacts on biodiversity in these locations during construction (noise, dust, disturbance, severance, pollution) and during operation (severance, pollution, disturbance – including from active travel users).

We note that most of this area was not surveyed as part of the ecological surveys carried out in 2017/18 due to access not being granted by the owner (eg invertebrate, reptile, breeding bird, bat surveys). This means that we are not yet able to comment on the impact on particular species.

The information provided in the consultation document fails to adequately describe the likely impact and could be considered as misleading, “These include a host of ecological surveys across multiple sites, including for bats; and in the Coton Orchard, where there will be some loss of trees.” Given that this area of land is private and therefore the public would be unaware of it, it would have been expected that you would have explained the likely ecological impact when consulting people about the environmental impact of the scheme.

It will not be possible for you to avoid, minimise or restore and in order to achieve a biodiversity net gain you will need to create new habitat offsite from where the damage will occur.

It would be possible to avoid this ecological destruction by delivering an alternative scheme in the A1303 corridor, as we have previously proposed and submitted to you ([click here](#)). This would follow the recommended mitigation hierarchy, which is to:

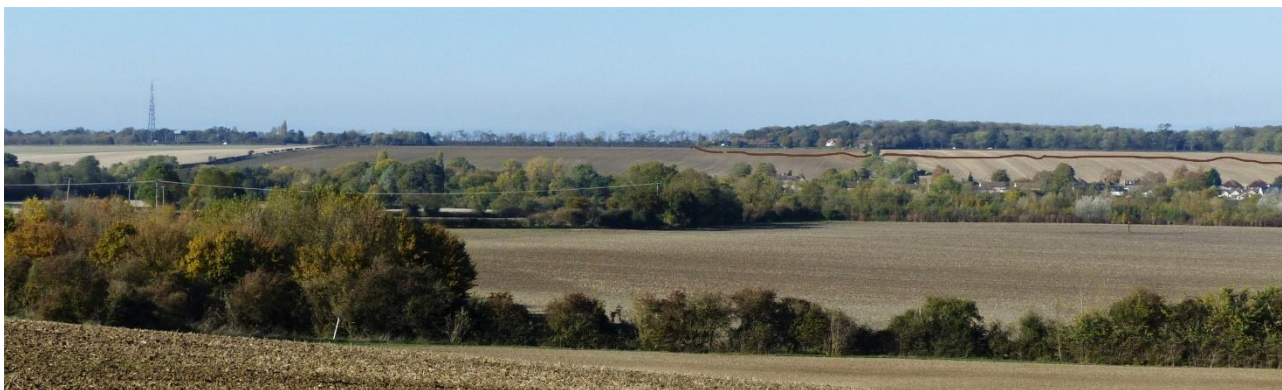
1. Avoid impact
2. Minimise impact
3. Restore after impact
4. Offset impact

We note that you propose to plant the meadow at Rectory Farm with woodland. We have no objection to this but note that this is unlikely to achieve a significant gain in biodiversity due to the existing value of the meadow and the low score given to new woodland in the biodiversity scoring matrix. We have concerns about the location of the pond in your plans in relation to amphibians and the fact that the pond would be

adjacent to the M11 and the bus road – with the risk of significant animal deaths – it would be preferable to locate this further away from roads or use landscaping to discourage animals from reaching the roads.

### **Cross section profile**

The consultation material is unclear as to whether the new road would be visible from Red Meadow Hill. Although the caption under the artist's impression states that it would not be, the diagram beneath, which shows sightlines, does not include a sightline from Red Meadow Hill. Given that Red Meadow Hill is higher we would like the Environmental Statement to show the sightline from the hill. Below is our indication of a section of the route from the hill:



We support the proposal for mounding, but do not support proposals for the use of screening vegetation along open sections of the route (ie between Madingley Mulch and Coton village). Hedges or rows of trees in an east-west direction would introduce new boundary features into the landscape in an unusual way (ie not related to field patterns), and would draw attention to the fact that a new road has been constructed in the countryside. Tall vegetation would also have the effect of blocking views, which are important in this location and would be enjoyed by users of an active travel path.

However, the undulating landscape means that the route will be more visible in some locations than others, for example along some sections of Whitwell Way. Although people won't see the road they will see the buses using it, which will have a detrimental impact on their enjoyment of the landscape. In these more visible locations consideration could be given to the planting of trees, which would help to screen the buses. Small "copses" of trees would be less out of place in the landscape than rows of trees/hedges and in our view the benefit of these copses helping to screen buses in highly visible locations may outweigh the impacts of small changes to the landscape.

The priority wildlife corridor between Madingley Mulch and Coton village runs north-south from Madingley Wood SSSI towards Barton Rifle Range, not east-west. This is shown in research carried out by the Wildlife Trust BCN for the [Cambridge Nature Network](#).

### **Impact on views along the route**

There is no consideration in the consultation material regarding the visual impact of the scheme when looking along the route. There will be views/impacts looking along the road from Cambridge Road (Coton), from the public footpath between Coton and the American Cemetery and also from Long Road. There will also be impacts for users of the active travel route. Your scheme has been designed to be very straight, this will result in very long views of the road and a high degree of detrimental impact (eg see our mock up below). This impact can easily be mitigated by creating gentle curves in the route. Through the GCP Landscape, Ecology & Heritage group we have previously raised this issue and the group considered that this would be appropriate. However this advice has not been acted upon, we assume at the request of engineers who have a preference for straight lines. Given that the route would be crossing a popular footpath (uncontrolled crossing) and

Cambridge Road (also a footpath) we would expect vehicle speeds to be restricted on this section anyway, and so gentle curves would also help to reinforce speeds and improve safety.

Further, the active travel route is up the biggest hill in the area and towards the prevailing wind. Active travel users struggling up the hill are unlikely to be motivated by a long straight road with buses speeding along it. A more sinuous route would be much more preferable.

In short, we see no evidence of attempting to mitigate the impact on views along the route despite the fact this has been recommended, could easily be achieved and would have other benefits such as improved safety and better for active travel users.



Mock up of view from Cambridge Road (Coton) looking west.

### **Habitat mitigation/creation**

We note that you are proposing to create areas of grassland habitat adjacent to the bus road. We understand that this is subject to landowner agreement. The GCP's Landscape, Ecology & Heritage group has previously raised concerns with you about creating small, isolated areas of grassland habitat because it is often very difficult and expensive to maintain these to achieve ecological benefits (for example through annual cutting and collecting of hay or livestock grazing), as a result they do not achieve the ecological value hoped for. The group did not want to see previous failures on other schemes, eg St Ives guided busway, repeated for GCP schemes. The recommendation of the Landscape, Ecology & Heritage group was to create larger areas of grassland habitat (ideally adjacent to existing grassland) or failing that, to prioritise other habitat that can more easily be maintained, such as woodland or scrub.

We note that the priority habitat for this area in the [Cambridge Nature Network](#) is woodland. The priority wildlife corridor between Madingley Mulch and Coton village runs north-south from Madingley Wood SSSI towards Barton Rifle Range, not east-west. This is shown in research carried out by the Wildlife Trust for the [Cambridge Nature Network](#).

We also note that creating strips of woodland or hedgerow along the exposed and open section of the route (Madingley Mulch to the Coton-Madingley footpath) is unlikely to be acceptable in landscape terms.

The section of the route between Long Road and Madingley Mulch is backed by trees and therefore planting trees in this location would be appropriate in landscape terms, including a high hedge or row of trees on the southern boundary to screen buses in this exposed location – it would also connect to existing woodland. You have proposed grass in this location.

### **Drainage & Suds**

We have previously drawn your attention to work that we commissioned to identify opportunities for natural flood management in the Bin Brook valley. This highlights that water draining from farmland crossed by your route is a factor in poor water quality and flooding in the Bin Brook. Flooding in the Bin Brook has included

damage to property and resolving this is an ongoing priority for the Environment Agency and County Council Flood Team. Your scheme creates a risk of exacerbating these problems (during construction and operation) but also provides an opportunity to go beyond “not making things worse” and to help alleviate an ongoing problem for the community. We encourage you to discuss with the two agencies how you could do this by working together.

Your proposed SUDS pond is in close proximity to one of the ditches draining to the Bin Brook and we hope that it is intended that you would also use this pond to intercept water in the ditch, thereby helping to hold back water during heavy rainfall events. The ditch also provides some degree of connectivity between your SUDS and the Bin Brook (not withstanding the poor ecological quality of the ditch and the fact that it is culverted through parts of the village).

Your consultation material only shows two SUDS ponds. Given the slopes, history of flooding in Coton and water quality issues in the Bin Brook we are concerned that no SUDS are indicated in-between the two shown.

### **Other impacts**

You have indicated that the crossing of Cambridge Road could be an “Area where wayfinding features, lighting, seating points and cycle parking may be proposed”. We note that this location is in the greenbelt and acts as one of the gateways to the village. Accordingly, any ancillary infrastructure or features in this location should be kept to a minimum to avoid/minimise urbanisation impacts. Any infrastructure that is required should be of high quality and designed to enhance the village setting (eg use of sympathetic materials, etc and not standard highways infrastructure).

### **Section G - M11 Bridge and West Cambridge site**

You are aware that National Highways is reviewing the slip road exit from the M11 very close to the location of the proposed bridge, with the possibility of road widening as a consequence, which would create a need to increase the span of the bridge. It is unclear whether this could have other consequences such as increased land take or ecological loss.

### **Section H - West Cambridge to Grange Road**

#### **Ecological Impact**

As it leaves the West Cambridge Campus the route will cross a stream and destroy part of a County Wildlife Site (Hedgerows East of M11). This will not only directly destroy habitat but also have a severance impact on the remaining habitat. This is not described in the consultation material.

The route shown in the consultation material seems to indicate that where the route joins the Rifle Range track that it would cut across an area of thick hedgerow that runs north-south adjacent to “Top Pitch”. This habitat destruction seems unnecessary and could be avoided by a slight realignment of the route so that it joins the Rifle Range track before the north-south hedge (following the mitigation hierarchy of firstly avoiding harm).

The consultation plans indicate the creation of grassland habitat adjacent to the Bin Brook, however there is already habitat in this location, including riparian trees and shrubs and grassland. Repeating our points above about the difficulties of achieving good and sustainable ecological outcomes for small isolated areas of grassland, it is unclear to what extent your proposals in this area might actually achieve a benefit.

Repeating our points above, about the difficulties of achieving good and sustainable ecological outcomes for small isolated areas of grassland, we would highlight that this is what is proposed for the land between the route and the University Sports Ground.



We support the creation of ponds in this area, which will complement existing ponds in this wildlife corridor and could help to increase the local population of Great Crested Newts. It is hoped that the ponds would have permanent water rather than being swales.

### **Impact on landscape, heritage and amenity**

The section of Rifle Range track beyond the Ruby Club Training Ground is attractive, particularly when facing west. It has the feel of what it is, a farm track in the green belt. This track is well used and enjoyed by the local community for walking even though it is not a public right of way. The amenity to the community would be damaged by turning the farm track into a bus road and consigning walkers to a surfaced path next to it, which they will share with cyclists. This impact will be further worsened by the intrusion of significant bridge infrastructure. The cumulative effect will be to extend urbanisation 500 metres further into the green belt.

There is no information in the consultation material regarding pedestrian access along the Rifle Range track during construction and therefore the extent to which there could be a temporary loss of public amenity. We would urge you to consider the track as if it were a public footpath.

We note that the proposals show new tree/hedge planting to the south of the Rifle Range track but for walkers using the track this would have the effect of removing the view across the field and hemming them in. A better approach could be to plant a small number of specimen trees so that there are still views under/between trees and also some screening for properties to the south.

Regarding the strips of hedging between the route and University Sport Ground. We understand what you are trying to achieve but we would like to point out this is likely to be undesirable for users of the active travel path, especially at night because the hedging will create hidden corners where people could be assaulted. Therefore, from a personal security and “designing out crime” perspective, we recommend that the strips of hedge are only considered for the west of the route.

At the junction with Grange Road the loss of trees will have a negative impact on the West Cambridge Conservation Area and adjacent listed buildings. It is unclear from the information what is proposed to mitigate this impact.

We also note that as the bus road leaves the Campus it will cut across the walking and cycling routes to Coton village, meaning that active users will have their journeys delayed by having to stop and give way to buses.

### **Proposed Active Travel route**

We have previously submitted requests/evidence to you that your proposed active travel route is not the best available active travel route between Cambourne and Cambridge, this is because your route traverses a big hill (with a height gain of 40 metres), it will be adjacent to vehicles (either buses or highway traffic) and it will be distant from some residents in Bourn Airfield and Cambourne. The alternative is to extend the Comberton Greenway from Hardwick, via the public bridleway to Highfields Caldecote. From there a short section of new route is required to reach the Bourn Airfield development ([click here for more information and scroll to p35](#)). This active travel route has already been identified by Cambridgeshire County Council as a priority. This route has the advantages that it avoids the big hill (it is undulating), is away from vehicles (thus safer and also more attractive) and can be more easily accessed from the centres of Bourn Airfield and Cambourne. It is therefore likely to be better used and generate greater modal shift. Due the hill we believe there may be equality issues in not pursuing this option (see below).

Given that there is a viable (better) alternative, the harm to ecology, landscape, heritage and green belt of constructing a very wide new active travel route through open countryside is not justified.

The consultation material states that a service road would be required for the guided busway, and so this can also function as an active travel route (eg same as the St Ives busway), however our understanding is that a

service road is only a requirement for a physically guided bus system and is not required for an optically guided bus system (an optical system is essentially a road). The EIA is considering both options. If a physical guidance system is required then it would make sense that this also provides an active travel route, however if an optical guidance system is preferred then the case for providing a full-width, segregated active travel route is weak.

Any active travel/service road provision alongside the busway, should be kept to a minimum in order to avoid and minimise harm to ecology, landscape, heritage and green belt. This could be simply a 2–3m wide shared-use path, separated from the road by a narrow verge. Such a design would be compatible with LTN1/20: “4.4.4 ... Although there may be fewer cyclists and pedestrians in rural areas, the same requirement for separation from fast moving motor vehicles applies. A well-constructed shared use facility designed to meet the needs of cycle traffic – including its width, alignment and treatment at side roads and other junctions – may be adequate where pedestrian numbers are very low.” and “6.5.6 Shared use may be appropriate in some situations, if well-designed and implemented. Some are listed below: Alongside interurban and arterial roads where there are few pedestrians;”

For the section between Cambridge Road (Coton) and the West Cambridge Campus the active travel route would duplicate and run parallel to the Comberton Greenway (these routes would only be 250 metres apart). Given that the route will cause significant ecological impact on this section it can be argued that there is already a viable alternative in place and therefore the harm can be avoided (as required by the mitigation hierarchy). We have previously requested that Greenway and busway active travel routes be combined when they both reach Cambridge Road/High Street. Even if both routes are retained because of the need for a service road, it would still be desirable to connect the two routes along Cambridge Road (Coton) in order to give active travel users the option of switching between them and improve cycle provision along the road to Madingley (which itself urgently needs improved active travel provision).

We also wish to raise safety concerns in relation to the proposed design. The active travel route from Cambridge Road (Coton) to Madingley Mulch involves a height change of 40 metres and has been designed to be very straight. This will result in cyclists travelling downhill at fast speeds, typically 25-30mph. This creates a safety risk for other users of the route as well as pedestrians who will cross it (eg the public footpath between Coton and American Cemetery). Design solutions will be needed to prevent high speed cycling, our preference would be to introduce gentle curves into the route as this would also have other benefits such as reducing the visual impact on views and making the route more interesting for active travel users.

### **Construction approach including proposed locations for construction compounds**

A local construction compound is proposed on land owned by CambridePPF in close proximity to Coton village. We have concerns about the impact of this on adjacent houses, visual impact on the setting of the village and potential run-off (it is on a slope).

A local construction compound is proposed for the area in the vicinity of the Coton-Madingley footpath/water tank. This area is on the side of the hill above the village of Coton and could be very visible either from the footpath or the village (it is hard to tell from the information provided). We question whether this impact is acceptable, which may be determined by the period of use intended for it.

A local construction compound is proposed on the West Fields adjacent to the sports centre. This compound is next to the Coton Footpath, which looks out across fields. This compound would have a detrimental impact on the amenity of users of the footpath.

### **Equality**

Your preference to pursue an active travel route adjacent to the bus road, rather than pursuing an extension to the Comberton Greenway from Hardwick to Bourn Airfield/Cambourne could have equality implications.

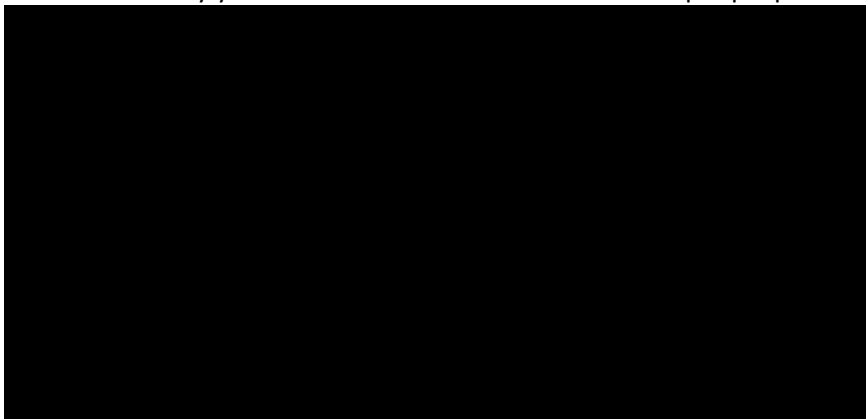
Your proposed active travel route involves a significant hill (height rise of 40 metres) which will prevent its use by some people with limited mobility or fitness. The alternative avoids the hill and is undulating and therefore would not represent such a significant barrier to people with limited mobility, ie would be more accessible. Therefore, you are pursuing an option which is less accessible than an alternative. See our response above regarding the active travel route.

**Comments on this consultation**

We note that you have asked the public to comment on the impacts of your proposals without providing any details on the likely width of the scheme, this will make it difficult for them to understand the likely scale of impacts. We had to ask you directly to provide this information to us.

We also note that you have not included any information about the guidance systems that might be used and how these could differ in terms of their impact.

As noted above, your consultation has not adequately described some of the ecological impacts that would be caused by your scheme. This could influence how people perceive your scheme and how they respond.



Date: 08/07/2022

## **Greater Cambridge Partnership**

### **Cambourne to Cambridge Better Public Transport and Active Travel Environmental Impact Assessment - Public Consultation**

Dear Sir,

#### **Consultation response to 'Cambourne to Cambridge Better Public Transport and Active Travel Environmental Impact Assessment- Public Consultation' on behalf of Cambridge University Hospitals**

I write on behalf of the Cambridge University Hospitals (CUH) to first and foremost express our support for the proposals associated with the Greater Cambridge Partnerships scheme to improve the public transport network between Cambourne and Cambridge, freeing up road space for better walking and cycling and contribute to improved air quality.

Reliable, safe, convenient, and affordable public transport services are fundamental in our success in delivering health and care to the community at our hospitals.

We are encouraged that consultation is taking place and are keen to be able to contribute to the thinking which will mitigate the impacts on the landscape and environment. We are encouraged to see that there are proposals to minimise the carbon footprint and that there is a strong biodiversity statement.

#### **About the Cambridge Biomedical Campus and Cambridge University Hospitals**

Cambridge University Hospitals NHS Foundation Trust (CUH) is situated at the heart of the Cambridge Biomedical Campus and has over 1,000 beds, 11,000 members of staff and is one of the largest and best known acute hospital Trusts in the country. The 'local' hospital for our community, delivering care through Addenbrooke's hospital and the Rosie maternity hospital, CUH is also a leading regional and national centre for specialist treatment; a government designated comprehensive biomedical research centre; a partner in one of six academic health science centres in the UK – Cambridge University Health Partners (CUHP); and a university teaching hospital with a worldwide reputation. CUH with its health system partners have secured funding from Government to develop the Cambridge Children's Hospital, a dedicated hospital which seeks to treat the whole child integrating physical health, mental health and research. In addition, our plans for the Cambridge Cancer Research Hospital are well advanced and in cohort two of the Government's new hospitals programme. Our further hospital development programme is clearly defined for the next decade through our Addenbrooke's 3 programme business case.

The Cambridge Biomedical Campus (CBC) is located at the heart of the UK's and Europe's leading life sciences cluster, located in the city of Cambridge. The CBC is a vibrant, international healthcare community and a global leader in medical science, research, education and patient care.

Whilst CUH occupies a significant portion of the Campus, other CBC partners include The Royal Papworth Hospital, one of the largest specialist cardiothoracic hospitals in Europe and the UK's main heart and lung transplant centre which treats 24,000 in-patients and day-case patients, and 73,600 outpatients per year supported by 1,800 members of staff.

Within the last three years, University of Cambridge have opened two buildings dedicated to healthcare research on the Campus and Abcam, a commercial business supplying clinical sources for research work, have occupied their building. The three developments bring an additional 1200 members of staff to site. AstraZeneca will fully occupy their new building later this year, bringing with them a further 3000 members of staff. Work has recently commenced on site with construction of a new facility which will operate as an 'incubator hub' for development of new healthcare science projects. This will further add to the numbers of staff and visitors attending site.

### **Why this consultation is important to the Cambridge Biomedical Campus and Cambridge University Hospitals**

Currently, it is estimated that approximately 4000 members of staff come to the Campus from the catchment area for the Cambourne to Cambridge route. This is an important housing corridor for staff working at our hospitals. Reliable, convenient, safe and timely public transport play a fundamental role in our efforts to attract and retain staff working in our hospitals. Our staff tell us that the high cost of living in and around Cambridge is a material factor in choosing to work at our hospitals or remain working with us.

Low cost, sustainable access to the CBC and our hospitals is a key factor, alongside affordable housing, to ensure the hospitals can attract and retain the best staff. With the further predicted growth in and around Cambridge as well as the predicted growth on the Campus, improved public transport, walking and cycling will become even more pressing.

CUH consider the Cambourne to Cambridge transport project a key enabler to improving connectivity and is vitally important as the cost of living continues to increase, and staff having to seek more affordable housing outside of Cambridge. In addition, as we continue to grow as a hospital, the pressures on car parking will continue to increase both because of patient and staff numbers. The NHS and our Trust's commitment to reducing our carbon footprint to net zero by 2045 require comprehensive sustainable public transport links that are compatible with the shift patterns required to provide healthcare services to the region's largest hospital. Sustainable transport has many benefits including health benefits and carbon reduction and improving air quality.

CUH is pleased that the Cambourne to Cambridge scheme has reached this stage of consultation and recognises the ambitious programme put forward will make a step-change in environmental sustainability, ill-health effects associated with air pollution and support delivery of the need for effective transport mechanisms for staff and patients attending the hospital, and wider Campus.

With world-leading academic and industry scientists on the same site as the teaching hospitals of the University of Cambridge, the Campus is the optimum environment for the rapid and effective translation of research into routine clinical practice.

With the cost of healthcare set to increase as the demand from an aging population soars, we are set to develop the treatments of the future and also facilitating creation of the next generation of UK life sciences companies. We have the foundations in place to generate the ideas, products and revenue to deliver the future success of the UK's flourishing life sciences industry.

The Campus will continue to grow, creating jobs and bringing investment to Cambridge but we do this in collaboration with the city and its residents. Our achievements and success reflect the endeavour, persistence and brilliance of the people who live and work here.

The Campus has 21,000 researchers, industry and clinicians all working on one site. In 2021, it was estimated there would be 26,000 people working on the Campus (prior to Covid-19) and up to 30,000 beyond 2031. Investment in the Campus over the past three years totals more than £750m. The CBC is the biggest employment site in Cambridge and seeking to develop an expanded Campus.

### **The proposal:**

CUH is delighted to see the Cambourne to Cambridge scheme continue to be developed and the detail of thinking which has been applied to the promotion of use of public transport and active travel, which the scheme will deliver.

The Trust is also pleased to note the strong statement which has been laid out in the consultation documents in relation to achieving net gain in biodiversity, minimizing carbon footprint and the added benefits of the 'natural capital' interventions which will be delivered via the scheme.

### **With regard to bio-diversity and minimizing impact on habitats:**

CUH is pleased to see that the biodiversity commitment being made as part of the scheme is to deliver a minimum of 10% gain, with a goal of 20% overall. The Trust would urge the Greater Cambridge Partnership to do all it can to meet the goal target, rather than settle for less. The importance of promoting biodiversity and creating environmental habitats cannot be underestimated in the mitigation of climate change and overall well-being.

The Trust welcomes the consideration of the realignment around the waterworks site, to minimize impact on trees and habitats, and at the Scotland Farm Travel hub, where existing trees and hedgerows are to be retained. Maintaining established areas, such as this, where at all possible, is important.

The Trust is also pleased to see that where there are changes required, the thought applied to planting schemes which will not only attract wildlife, but reduce sound and noise levels from the adjacent A428. It is good to see the partnership approach with the Highways Authority.

CUH notes the specificity of detail which has been laid out in the consultation document in relation to specific mitigation for different areas along the route, and not just a standard approach across the board. The use of balancing ponds, landscaping and planting schemes is welcomed.

### **With regard to minimizing carbon footprint via travel options:**

CUH welcomes the planning which is being undertaken in relation to promotion of active travel, the proposal that the route is served by modern, electric public transport vehicles, supports sustainable travel – all serving to decrease congestion and pollution.

The Trust is pleased to see that the Scotland Farm travel hub is of a size which will support the volumes of traffic anticipated now, but also has space for growth in the future.

It is essential that the bus services are compliant with low emission standards and that there are electric bus charging points installed at the travel hubs, to promote use of the technology and assurance of reliability of service, which we know, from speaking to our staff, is key to making the change from private to public transport.

CUH also welcomes the plan to use solar panels wherever possible and urges the GCP to go further to using technology such as this to provide power for electric vehicle charging points and the plans to promote e-mobility.

**Other observations:**

CUH notes the intention to ensure that during construction, public footpaths and rights of way will be maintained, but with added traffic control measures to ensure safety.

The improved connectivity with active travel options and cycle routes (both along the route and to travel hubs) is welcomed, although there are concerns that inadequate lighting, and safety concerns will diminish their utilization during the darker months of autumn and winter.

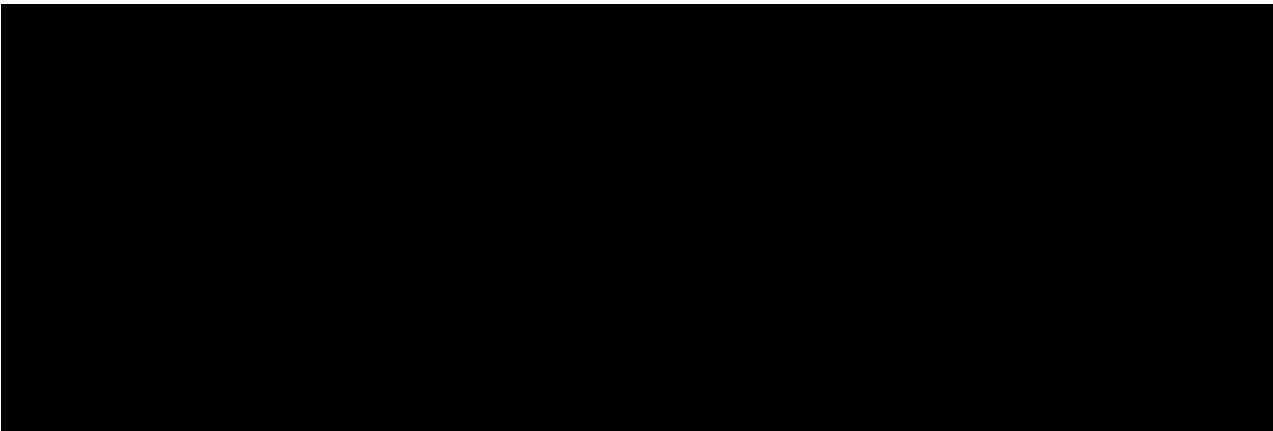
**Summary:**

Reliable, safe, convenient, and affordable sustainable public transport is a basic hygiene factor in our success as a hospital in delivering care to our community which along with affordable housing is the two major components in our ability to attract and then to retain the best talent to provide health and care.

CUH is pleased to see the consultation coming forward in relation to biodiversity and environmental impact for the Cambourne to Cambridge scheme, and note the progress made in design and development.

The Trust welcomes the overall ambition of reduction in carbon, improvement in biodiversity, and championing well-being for communities, and similar themes are set out in the recently published CUH Green Plan, which echo the approach.

CUH continues to regard the GCP as an important partner in terms of the holistic, system approach to achieving sustainable travel and is pleased to support the options laid out in the proposal documentation.



**CAMCYCLE**



11 July 2022

## **Cambourne to Cambridge Better Public Transport and Active Travel Environmental Impact Assessment - Public Consultation**

Dear Sir or Madam,

Camcycle is a volunteer-led charity with over 1,600 members working for more, better and safer cycling for all ages and abilities in the Cambridge region, together with partners throughout the county. Our focus is on cycling as a mode of sustainable transport for everyday purposes, including but not limited to: shopping, going to work or school, attending a doctor's appointment, visiting friends or family, and leisure. Many of our members and their families cycle for these purposes on a regular basis and therefore have great interest in cycle infrastructure and route networks that will improve journeys to their everyday destinations.

Our points here focus on the active travel details of the scheme should it proceed in light of the proposals presented. We make no comments on the scheme in principle.



## Question 2: Do you have any comments on the proposed Active Travel route for cyclists, pedestrians and equestrians?

- We will require more detail than has been provided so far in order to fully evaluate the scheme. In particular, the detailed design of crossings and junctions, and the general geometry of the active travel route, are important areas that are not currently specified. Local Transport Note (LTN) 1/20 must be used to guide those detailed designs on any infrastructure in the vicinity of routes where people will be cycling.

### The Active Travel Path alongside the new Busway

- Not much information is provided about the configuration of the active travel path other than that it will be 'separated by a verge where space allows'.
- This does not engender much confidence that there will be separation from fast-moving bus traffic. We remind the GCP of the several deaths and serious injuries that have occurred in places where there is no separation between path and busway, and urge the GCP to meet LTN 1/20 specifications for separation between high-speed motor traffic and active travel.
- The width and surfacing of the parts of the active travel path used for cycling must also meet LTN 1/20 specifications.
- There should be verges as part of the active travel route, including at least one that is suitable for equestrian use, and also providing good visibility where the path joins with other paths and roads, as well as a spacious, more inviting, open and better-feeling environment for people.
- A separate and dedicated footway should be provided where pedestrian flows are expected to be strong. We believe this is most likely to be the case in the following areas: within Cambourne, within Bourn Airfield, within Hardwick and in the vicinity of the West Cambridge site.
- Our experience with the existing Busway informs us that the lack of lighting is a problem for many people, especially those who are concerned about personal security at night. We also note that unlit shared-use pathways are more dangerous at night because pedestrians tend not to carry lights and even bright cycle headlights do not necessarily provide enough illumination to see unlit pedestrians with sufficient warning, not to mention any dogs being walked. Therefore, stronger lighting options should be provided along the active travel path, especially where it is reasonable to expect significant pedestrian flows. Within the built-up area there should be street lighting. Outside the built-up area you should consider options such as motion-sensitive lighting that comes on when there is activity in the area. We agree

with the need for permanent street lighting at all junctions, crossings and bus stops, for safety reasons.

- The active travel path should not be fenced off from the surroundings and in general you should seek to enable as much natural surveillance as possible of the active travel path from surrounding buildings, for personal security reasons. If a sound wall is provided to attenuate the noise generated by the busway then that sound wall should be placed between the busway and the active travel path such that the lines-of-sight between neighbouring buildings and the active travel path are obstructed as little as possible. Again, the purpose is to maximise feelings of personal security along the active travel path at night by making it feel more connected to the surrounding neighbourhood. The more it is used, the safer it will feel.
- Connections between the active travel path and other nearby paths should be made as easily and as frequently as reasonably possible, provided they are designed with the geometry, visibility splay and access control specifications found in LTN 1/20. The more opportunities there are for access to and from the active travel path, the safer and more usable it will feel.

### **Madingley Road cycling and walking route**

- The document states that the Madingley Road cycling and walking route will be a minimum of 3m wide but that it will not segregate cyclists from pedestrians except in and around the West Cambridge campus.
- The document shows a blue line for this route that runs as far west as Eddington and as far east as Queen's Road.
- The above description of the Madingley Road cycling and walking route is inconsistent with plans previously consulted on about this project and the specific wording is potentially inappropriate for an urban route because it hardwires certain design specifications that could and possibly should be done differently (it may be desirable to have one-way cycle tracks in certain sections, for instance, and shared-use pavements are unlikely to be appropriate at all). Therefore, we object to this above characterisation of the Madingley Road project
- The description of the Madingley Road cycling and walking route should read: '[it] will meet LTN 1/20 specifications for cycling regarding design, geometry and surfacing, and it will segregate cyclists from pedestrians at least along the length of the route that lies within the city of Cambridge' in order to keep the relevant design options open (such as the provision of one-way cycle tracks in certain sections).

### **Question 8 (Cambourne): Do you have any comments and suggestions about the proposals for the route from Broadway to Sterling Way?**

- The active travel route should have frequent connections to surrounding paths, meeting LTN 1/20 specifications for visibility splays and junction designs, and it should be designed to maximise natural surveillance and overlooking from neighbouring properties so that the route feels safe for people to use at night.
- The route is currently shown as terminating at Sterling Way. However, the active travel portion should continue straight across Sterling Way and through to Eastgate, via the unhighlighted route on the map also known as 'Lamppost Alley'. This path does not currently meet LTN 1/20 specifications because it has dangerous and exclusionary barriers, as well as lamp posts mounted within the surface of the path, and no dedicated footway. These are problems that can be easily corrected by the C2C project as part of creating the direct and cohesive active travel route connecting Cambourne, Cambridge and the villages in between.
- Within Cambourne, at least, the active travel route should have a dedicated and separate footway alongside the already-proposed path for cycling, with design guided by LTN 1/20 specifications. This is due to the expected high levels of usage of the active travel route by pedestrians.

### **Question 9: Do you have any comments and suggestions about the proposals for the route through Bourn Airfield?**

- At least where it runs adjacent to built-up areas, the active travel route should have frequent connections to surrounding paths, meeting LTN 1/20 specifications for visibility splays and junction designs, and it should be designed to maximise natural surveillance and overlooking from neighbouring properties so that the route feels safe for people to use at night.
- Similarly, because of the expected high levels of usage by pedestrians, there should be dedicated and separate footways at least in the built-up areas surrounding each of the potential bus stops, in accordance with LTN 1/20.

## Question 10: Do you have any comments and suggestions about the proposals for the route through the Childerley Lodge area?

- This section is very isolated, with the active travel path up on a retaining structure alongside the busway and the A428. It is also a longer and less direct route than the existing St Neots Road.
- Instead of putting the active travel route on the retaining structure it would be more direct and coherent and would feel safer to provide an LTN 1/20-compliant active travel route alongside the existing St Neots Road.
- The active travel route would diverge from the busway at the eastern edge of the Bourn Airfield, and would continue further east within the development (where it could continue to connect with local active travel routes).
- A crossing can be provided at Highfields Road south of the roundabout.
- The active travel route could continue behind (south of) the BP station, in order to avoid conflicts at the petrol station driveways. This is a common safety feature found in similar situations in the Netherlands (and a few UK locations), where active travel routes often pass behind petrol stations to reduce the risk of driver/cyclist collisions. Should this suggestion be taken up, we note that path visibility should not be obstructed by fencing, and there must be access for those who want to walk or cycle to the petrol station shop, for instance.
- The existing shared-use pathway alongside St Neots Road could be improved into a fully-fledged active travel route (and meeting LTN 1/20 standards) between Bourn Airfield and Hardwick.
- The active travel route would then connect with the quiet section of St Neots Road entering Hardwick where there is very little motor traffic and the road qualifies as a Quiet Lane (Chapter 7 LTN 1/20). A cleanly designed transition can be provided into the segregated active travel route adjacent to the busier section of St Neots Road, Hardwick.

### **Question 14: Do you have any comments and suggestions about the proposals for an active travel path between the [Scotland Road] Travel Hub and Dry Drayton?**

- We support the provision of an active travel route between Dry Drayton and Hardwick (whether as part of this project or provided separately).
- The proposed design shows crossings of A428 slip roads at both of the roundabouts near the travel hub. These crossings would need to be signalised in accordance with the Design Manual for Roads and Bridges part CD 143 and LTN 1/20, in order to make them safe for all users.
- The travel hub diagram shows the existing circuitous approaches to the bridge over the A428. More direct approaches should be considered; for example, by creating a more gentle ramp from the travel hub up to the existing bridge deck, and a similar approach for the other side.

### **Question 19: Do you have any comments and suggestions about the proposals for the route through Hardwick?**

- The active travel route should be designed to LTN 1/20 specifications with particular attention paid to visibility at the edge of the highway where there are numerous driveways crossing the proposed route, as well as to bus stop design where there will be bus passengers needing to cross the active travel route in large numbers. Care should be taken to ensure there is full intervisibility between active travel path users and bus passengers at bus stops, and that the bus stop crossing area is fully accessible in all directions: to both bus passengers and disabled cyclists using the active travel route.
- A dedicated and separate footway should be provided as part of the active travel route within Hardwick. Such a footway should be located adjacent to the highway boundary. This will ensure that it helps with providing visibility splays at the many driveways and accesses along St Neots Road.
- There should be a connection to the existing shared-use pathway alongside St Neots Road east of Long Road. In addition, the longstanding safety and visibility problems between path users and drivers at the junction of Long Road and St Neots Road could be addressed as part of making this connection.

### **Question 23: Do you have any comments on North of Coton proposals?**

- This section is somewhat more isolated than the existing A1303 shared-use pathway; however, it is also significantly more direct. Therefore we are inclined to prefer this proposed alignment of the active travel route.
- Opportunities for connections between the active travel route and the village should be pursued as much as possible in order to make the route more usable. In particular, there should be a connection to the primary school, and another connection point on the east side of Coton is also highly desirable for residents in that area to access the route.

### **Question 24: Do you have any comments and suggestions about the route over the M11 and through West Cambridge?**

- There should be a connection between the street known as The Footpath and the proposed active travel route to enable easier use of the proposed M11 bridge from the east side of Coton.
- The Charles Babbage Road cross-section shows minimal separation between carriageway and cycleway. While this is a low-speed section of route, we note that there will be a very busy and important bus stop on this road. That will require much more space than is currently shown in the cross-section. The bus stop itself will require a substantial platform and shelter on each side of the road. The cycleway will need to pass behind the bus shelter while maintaining visibility between bus passengers and cyclists, as well as full accessibility for both bus passengers crossing the cycleway and disabled cyclists using the cycleway. It will be important to carefully follow LTN 1/20 guidance in the design of these bus stops.
- The busway turns south at what is currently a service road junction with Charles Babbage Road. That junction will need to be very carefully designed in order to make sure that it is both safe and convenient for people cycling along Charles Babbage Road.
- The busway will cross what is currently called the Southern Ecological corridor but which is also currently a major cycle route within the West Cambridge site as well as being part of the future Comberton Greenway. This cycle route is currently continuous and uninterrupted at the point where the service road meets it. We are concerned that the C2C proposals would see this cycle route severed by a dangerous and difficult junction. The residential building at this junction creates a blind corner that is not compatible with heavy vehicular usage. Given that this is an existing important cycle route on the West Cambridge site, as well as the wider region, this junction should be designed to maintain walking and cycling priority with buses stopping, giving way, and bus drivers checking both directions before proceeding.

- The Coton Path is an existing heavily-used cycle route between West Cambridge and Adams Road, although it is starting to show its age. The C2C project proposes to overlay its active travel route on a section of the Coton Path. At the very least, this section must be improved up to LTN 1/20 standards. The separate and dedicated footway must be maintained. The cycling section of the Coton Path should be widened to at least 3.5m given its level of usage. The high kerb in between should be replaced with a safer 'forgiving-style' kerb as described in LTN 1/20 section 6.2. There is an overabundance of sign posts (due to older and deprecated guidance); these should be removed or at least placed in safer locations 0.5m away from the cycle route. The existing Coton Path switches between segregated shared-use and fully shared-use at path junctions because it is following older and deprecated guidance from LTN 1/12. These sections should be corrected so that they remain fully segregated throughout, in accordance with LTN 1/20, and the extraneous tactile paving removed. The path junction designs should be provided in a fully segregated manner so that no shared-use areas are needed.
- Where the C2C active travel route diverges from the Coton Path / Comberton Greenway, sufficient space must be provided for good visibility between all path users, and a proper LTN 1/20 compliant junction of active travel routes designed.

### **Question 26: Do you have any comments about the junction with Grange Road?**

- The active travel path section shown next to the rugby club has no separation from the busway. We understand there are space constraints here. Therefore, the speed limit for the busway where there is no separation from the active travel path must be 30mph or less, in accordance with Table 6-1 of LTN 1/20.
- The indicative design for the junction at Grange Road shows absolutely no recognition of the presence of cycling traffic. It appears to be a junction with some pedestrian crossings of the usual style. If this junction is meant to be the beginning of a route that includes significant cycle traffic, the C2C active travel route, then it should have smooth, coherent and accessible transitions designed for cycling to and from Grange Road, fully integrated with the traffic signals.

## Comments relating to The Equality Act 2010

- The project has the potential to provide a strongly positive impact for disabled cyclists and mobility scooter users if it provides a fully accessible active travel route and connections throughout the project scope, in accordance with LTN 1/20.
- The project has the potential to negatively impact disabled bus passengers if the design of the bus stops and access to them is poor. Therefore, it is vital that the bus stops and associated crossings of cycle routes be designed to LTN 1/20 specifications as well as any other relevant standards for accessibility.

Your sincerely,  
On behalf of Camcycle,





Greater Cambridge Partnership – C2C Consultation  
PO Box 1493  
Mandela House  
4 Regent Street  
Cambridge  
CB1 0YR

Dear Sir or Madam,

**CAMBOURNE TO CAMBRIDGE (C2C) CONSULTATION RESPONSE ON BEHALF OF CHIVERS FARMS LTD**

By way of introduction, Bidwells is the appointed agent to represent Chivers Farms Ltd regarding the C2C Consultation, with reference to the updated alignment of the Hardwick section.

Chivers Farms Ltd strongly opposes the updated alignment of the bus route for this section as presented in the Environmental Impact Assessment: Public Consultation brochure (2022).

**Negative impacts to the farming business**

Chivers Farms Ltd is a long-standing family farming business, having had its origins in Chivers and Sons operating in the locality from the 1850s until its takeover by Schweppes in 1959. The family continues to own, rent and farm over 1,000 hectares to the north and west of Cambridge.

The land owned, rented and farmed by Chivers Farms at Hardwick and Comberton is shown shaded pink and hatched red on the enclosed plan. The land extends to c. 450 hectares. The farming operations are centralised at Northfield Farm off Long Road, Comberton (within the blue circle on the plan); this is where the main grain store and the farm machinery are located. The farm office sits within the green circle on the plan, at Victoria Farm, Hardwick. Due to the topography and natural features of the land including ditches, hedges and trees, there are no internal farm tracks which cross the dashed blue line on the plan. Therefore, less than a third of the land can be accessed from Northfield Farm, without using the highways network. To access the large blocks of land to the east and west of Hardwick, farm vehicles travel from the farmyard (in the blue circle) north up Long Road, west along St Neots Road, and then south along Cambridge Road/Main Street; this route is reversed on return trips. This is the most direct route along the roads and is suitable for vehicles of this size. Out of harvest time, this route accommodates around 20 round trips per day by the farming team, and at harvest this can reach up to 50 round trips per day. St Neots Road is also currently used to access the land farmed by Chivers Farms Ltd at Impington via the A428.

The directors of Chivers Farms Ltd are very concerned about the installation of a bus gate on St Neots Road, to the east of Cambridge Road, which would restrict the passage of cars and agricultural vehicles. The current journey from the farmyard at Comberton to the farm office at Hardwick by road takes approximately five minutes by car (longer by tractor) and is 2.1 miles. If access is restricted along St Neots Road, the alternative route via Toft would take twice as long (10 minutes by car) and is more than

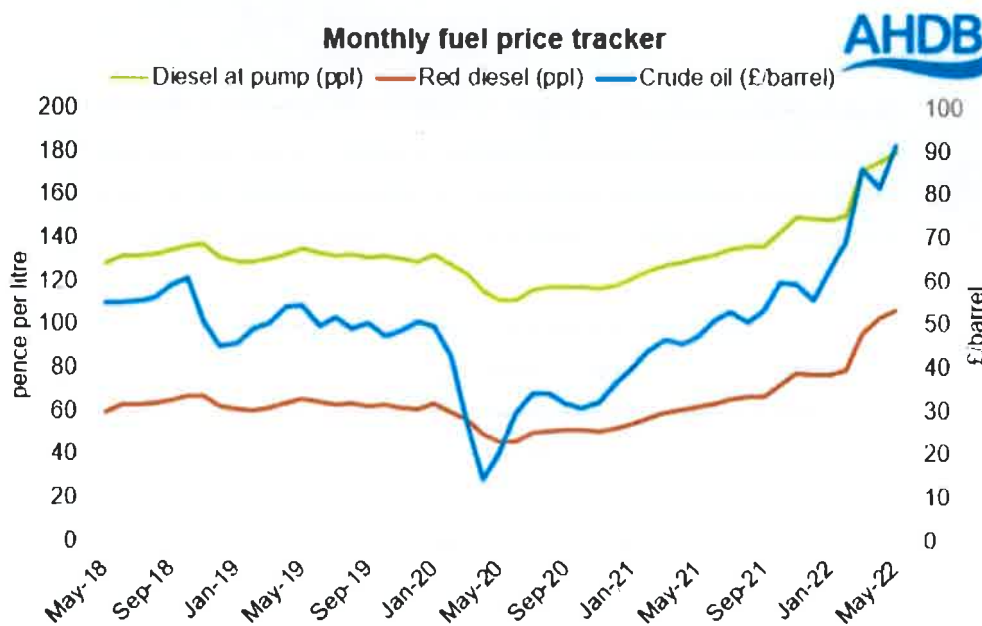
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double the distance (4.9 miles). Using the alternative route will lead to increased numbers of large farm vehicles travelling through the residential areas, past Comberton Village College, Comberton nursery and Comberton primary school. The journey time is also expected to be further increased due to commuter and local traffic also being diverted via the same roads.

Time is valuable within a farming business, and the increased journey time will reduce efficiencies within the business.

In terms of direct costs, the Agriculture and Horticulture Development Board (AHDB) has reported the below increases in fuel prices for the agriculture sector since May 2018. With prices increasing at these rates, the increased journey distance between farmyard and farm office, and between the land parcels, will have a considerable negative impact on the farm's operating costs.

Heavy vehicles travelling longer distances will also have a negative environmental impact, which contradicts the sustainability drivers of the overall project.



Source: HMRC, Defra, DECC, OPEC

To mitigate any disturbance to the commerciality of the farming operations, Chivers Farms Ltd would prefer busses to travel along the road as it is, or for the previously proposed route along the green corridor between St Neots Road and the A1428 to be reinstated; neither of these options will result in any travel restrictions along St Neots Road. If the current preferred option does proceed, to mitigate the negative impacts to the farm, agricultural vehicles **must** be permitted to pass through the bus gate.

**Lack of engagement regarding the proposed locations of the proposed drainage ponds, woodland and grassland planting**



**KEY**

The proposals presented are indicative only and are subject to change.

- |   |  |   |   |
|---|--|---|---|
|  | Proposed new route   |  | Stretches of hedgerows and tree planting aimed at creating strategic screening or helping the scheme fit into the landscape |
|  | Previous route alignment   |  | Indicative new planted hedgerows to provide wildlife corridors between existing habitats                                    |
|  | Proposed active travel path  |  | Planted drainage ponds. Opportunities to include limited permanently wet areas for wildlife                                 |
|  | Proposed links to Dry Drayton subject to agreement with landowners |  | Area where wayfinding features, lighting, seating points and cycle parking may be proposed                                  |
|  | Proposed bus stop location   |  | Indicative extents of new rich grassland planting   |
|  | Indicative extents of new rich grassland planting                  |  | Indicative extents of new native woodland planting  |
|  | Indicative extents of new native woodland planting                 |  | Low earth mounds helping the scheme fit into the landscape  |

The plan and key above (taken from the online consultation brochure) show a considerable amount of Chivers Farms Ltd land being dedicated for drainage ponds, grassland, and woodland planting. Chivers Farms Ltd has not been consulted on these areas. Whilst Chivers Farms Ltd is supportive of biodiversity net gain and improved habitat areas, the location of such areas should be considered in conjunction with landowners. One of the areas currently proposed directly impacts a future development site (hatched red on the plan). We would also like to request sight of the methodology and reasoning behind the proposed locations of these areas, and to better understand the flexibility to adjust the shape and siting of these. Chivers Farms Ltd **must** be consulted regarding these areas before they are finalised.

### **Negative impacts to the local villages**

The directors of Chivers Farms Ltd live in Hardwick and Comberton. Should the current updated alignment be pushed forward, we believe it will cause considerable issues for those travelling in and out of these villages, causing congestion and queues within Hardwick, as commuters are forced to take alternative routes to avoid the bus gate. The bus gate will also increase traffic levels within the neighbouring villages of Toft and Comberton.

The increased levels of traffic in all three villages will cause negative road safety implications to the services along this route including Hardwick shop, Hardwick School, Comberton Village College, Comberton Nursery and Comberton Primary School. We do not believe that the road facilities along the diversion route have the capacity to support such an increase in vehicle numbers; areas of note are the Limes Road junction, the crossroads at the duck pond in Comberton, and the mini roundabout at the end of Long Road. Issues are already occurring at these areas, which will only be made worse by the introduction of the bus gate. It is also anticipated that there will be an increase in traffic at the roundabouts west of Hardwick, which provide access on to the A428.

### **Justification for the alignment options**

In our opinion, we do not believe there is a justified amount of traffic currently travelling along St Neots Road to justify a bus only lane. This is supported by the evidence prepared for the GCP to develop options for C2C, which found that an on-site road C2C option along this section of St Neots Road, shared with existing vehicular traffic, would have no significant impact on traffic as it is not a congested road (Mott MacDonald Options Appraisal Report (Part 1), November 2018 – Annex B). Closing this section of St Neots Road to private vehicles would therefore not generate any journey time savings for C2C public transport services, which raises questions as to why the closure is needed?

We do not believe that future developments at Bourn Airfield and Cambourne will change this position. We would request that the GCP demonstrates, in full, why a bus only route is required at this location? Could other measures, such as intelligent traffic controls including traffic lights which prioritise busses be used instead?

### **Increased traffic on the A428**

Should traffic be re-routed to the A428, which is part of the strategic road network, this will increase local journey traffic on this network, which should be used for sub-regional and regional travel journeys. Loading the A428 with increased traffic will also lead to additional merging and diverging manoeuvres between private vehicles and heavy good vehicles; this will have a negative impact on road safety on the A428. We do not believe that there have been any studies to show the effects of the increased traffic loading from the re-routing of St Neots Road on to the A428 and how this will affect the A428. We anticipate that the re-routing of St Neots Road is highly likely to severely negatively impact the strategic road network. We again highlight, that restricting traffic on St Neots Road is unnecessary and will jeopardise the safe and efficient operation of the A428.

### **Integration with other travel proposals**

We would ask that further information is provided to show how this updated alignment ties in with other sustainable travel incentives in the area. We understand that a Greenway is set to cross/travel along Main Street in Hardwick – how will increased traffic on this road affect this proposal? How will the GCP ensure that this quiet village road will still be safe to travel along via bicycle?

We also understand that the Comberton Greenway is aiming to convert the B1046 through Comberton to a 'quiet road' with on-road cycle lanes. The same Greenway is set to cross Long Road with traffic calming measures in place. Re-routing traffic from St Neots Road will increase traffic along these roads, contradicting the aims of the Comberton Greenway to provide safe and sustainable travel routes.

Furthermore, if East West Rail is to cross Main Street, had this been factored in, will it cause any further traffic restrictions?

What are the benefits to Hardwick, Comberton and Toft, including the number of busses per day and where these will travel to?

### **Resilience of the Network**

Should there be a serious accident or roadworks which close the A428 between Madingley Mulch and Scotland Road, the only private vehicular access to Hardwick would be via Main Street and through Toft. While such occurrences would hopefully be rare and short-lived, it would have a significant impact on the capacity and road safety of these routes through the south of Hardwick and Toft, and thereafter Comberton and the Comberton Greenway.

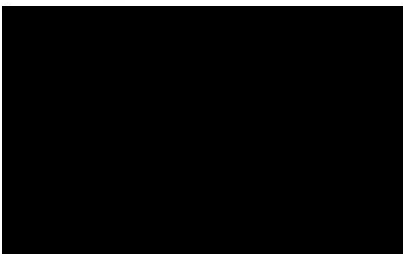
### **Conclusions**

Chivers Farms Ltd strongly opposes the updated route alignment at Hardwick, to run along St Neots Road with a bus gate to restrict traffic. Chivers Farms Ltd believes it is unnecessary to restrict the use of St Neots Road; it will not decrease bus journey times but instead will create a number of negative impacts to Chivers Farms Ltd.'s business, the safety and efficiency of the local roads through Hardwick Toft and Comberton, the loading of the A428, and it will jeopardise the aims of the Comberton Greenway.

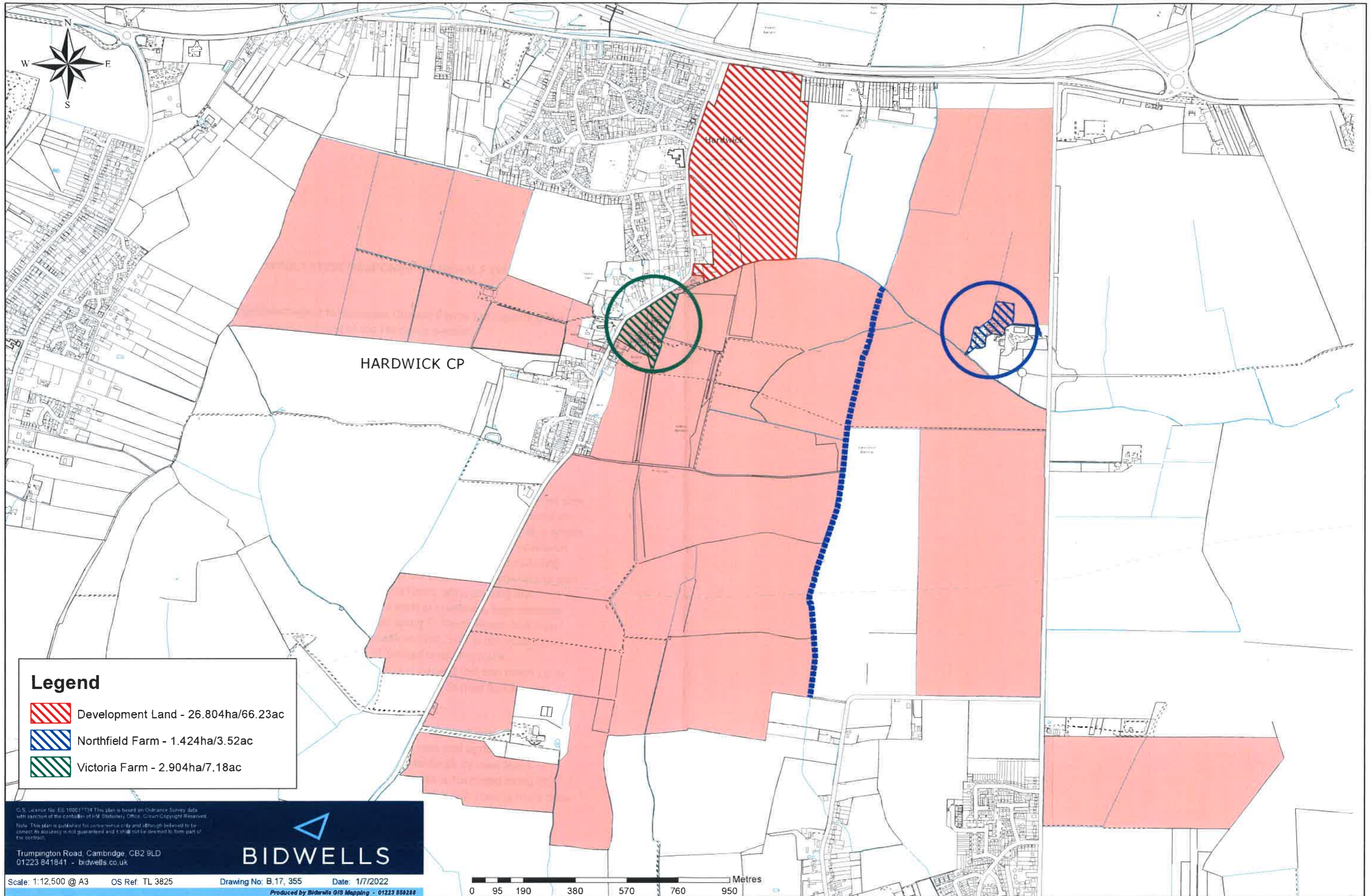
Chivers Farms Ltd. would propose that busses should travel along the existing St Neots Road, or the GCP should revert to the previous proposal, to run off-road between the A428 and St Neots Road.

In terms of the environmental areas, we would ask that landowners are consulted early in the process, to discuss the best location for these to mitigate negative impacts on land use and value.

Kind regards



# Land at Hardwick & Comberton - C2C Bus Route



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**Client:**  
**Clare Hall College**

**Project:**  
**C2C Busway Route  
Option Review**

**Executive Summary Report**

**July 2022**

## REPORT CONTROL

**Document:** Executive Summary Report

**Project:** C2C Busway Route Appraisal

**Client:** Clare Hall

**Job Number:** 21086

**File Reference:** R02-KH-C2C Busway Route Appraisal - Executive Summary.docx

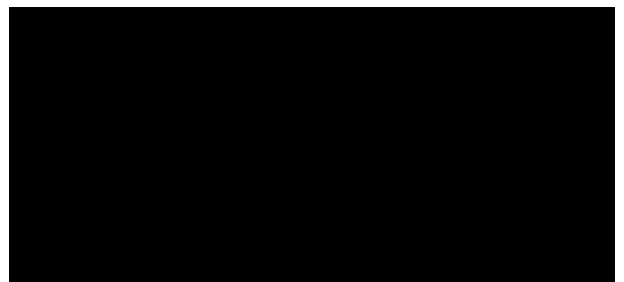
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# CONTENTS

<b>1</b>	<b>SUMMARY &amp; CONCLUSIONS .....</b>	<b>1</b>
	INTRODUCTION.....	1
	BACKGROUND .....	1
	ROUTE OPTION SUMMARY APPRAISAL.....	2

# 1 SUMMARY & CONCLUSIONS

## Introduction

- 1.1 Clare Hall has commissioned Pulsar to prepare a Transport Appraisal Report on the Cambridge to Cambourne (C2C) Busway proposals.
- 1.2 The current proposals involve a busway route immediately adjacent to the college site. Clare Hall is concerned that the busway proposals will have a detrimental environmental impact and will also prejudice future development plans to enhance the College.
- 1.3 A Report has been commissioned by Clare Hall in order to review the current C2C busway proposals and provide transport advice on the relative merits of the various different route options. This document represents the executive summary of the Report.

## Background

- 1.4 Clare Hall is a college within the University of Cambridge which admits postgraduate students, postdoctoral researchers, distinguished visiting academics and Fellows, senior members of the University of Cambridge. Founded in 1966, it enjoys a world class reputation and has hosted several Nobel Prize winning Visiting Fellows.
- 1.5 The Cambridge to Cambourne (C2C) project is one of four corridor schemes proposed within Greater Cambridge Partnership's (GCP) transport programme. From Cambourne, the busway project would pass through West Cambridge and the Maddingley Mulch Roundabout. The eastern section would then proceed to Cambridge City Centre.
- 1.6 The scheme is currently passing through its 4<sup>th</sup> public consultation stage and will be subject to an Environmental Impact Assessment. The GCP is anticipating the submission of a Transport and Works Act Order later this year (2022).
- 1.7 Various route options have been reviewed including three main alternatives. These involved two "on-road" options running predominantly alongside Maddingley Road (A1303), and a third "off-road" option. The third option was subsequently split into four sub-options.
- 1.8 The GCP concluded that the preferred option should involve an off-road option primarily as it was consistent with high-level objectives to create segregated routes and would provide the route with the highest journey time reliability. It should be noted that a consultation exercise resulted in one of the on-road options as the most favoured. The on-road options are also considered to be the most cost-effective.

1.9 Of the four sub-options (within the off-road option), two were discounted at an early stage. The remaining sub-options involved a route via Rifle Range Access (RRA) immediately south of Clare Hall or via Adams Road.

### Route Option Summary Appraisal

1.10 **Table 1.1** below sets out the main differences between these two routes and incorporates a “traffic signal” coding approach to represent the relative merits of individual aspects of each option. Green represents a “positive” aspect, orange/amber represents a “neutral” aspect and red represents a “negative” aspect. These are subjective judgements and are for discussion purposes only.

**Table 1.1 – Summary of Key Issues: Adams Road and Rifle Range Access**

Issues	Rifle Range Access Option	Adams Road Option
Type of Busway Route	Fully segregated up to Grange Road	Fully segregated up to Adams Road and then along quietly trafficked / wide road
Land Requirements	Requires land purchase / CPO of RRA including parts of rugby club and / or Clare Hall site. Will require demolition of existing buildings	No (or minimal) land take required
Grange Road junction	Will require major alterations at the junction with RRA including land purchase	No significant alterations required at the junction with Adams Road
Construction Requirements	Will require new roadway constructed, potential demolition (and replacement) of buildings, as well as a flyover across Bin Brook	Requires widening of existing Coton cycleway route
Utilities Impact	May require the diversion/relocation, lowering or protection of fibre-optic network	Unlikely to have a significant impact on Utilities
Impact on Cycling	Current scheme would provide a segregated route on RRA but would result in unaffected cycling conditions along Adams Road.	Removal of on-street parking on Adams Road and associated traffic movements is likely to improve cycling conditions on Adams Road (even with busway). There would still be the potential for a segregated “greenway” cycle / pedestrian route on the RRA.
Impact on Neighbouring Sites	Will require purchase of part of rugby club grounds or Clare Hall site, including potential demolition of buildings. May also prejudice future development plans on Clare Hall site.	Unlikely to have any significant impact on neighbouring sites

Noise / AQ Impacts	Will introduce vehicular traffic on RRA, i.e. along southern edge of Clare Hall site.	Busway will involve removal of on-street parking and associated traffic movements. Therefore, noise and air quality effects likely to be minimal (or potentially positive)
Green Belt	The RRA is wholly within the Green Belt. New road and flyover considered to be resulting in detrimental impact on Green Belt.	Would result in minor impact on the Green Belt.
Other environmental considerations	Would result in loss of trees and hedges along RRA. There would also be potential impacts on canopies / roots of other trees along the route including two trees within the Clare Hall site that benefit from TPOs	No impact on trees along the Adams Road section. Likely to be some trees affected adjoining Coton cycleway.
Cost Implications	Given the above there are likely to be significant cost implications associated with land purchase and construction costs. No regard to cost benefit analysis (purchase of land, construction costs, utilities, legal costs, etc) compared with using existing infrastructure....	Some construction costs associated with widening the Coton cycleway but relatively low costs associated with alterations on Adams Road

- 1.11 The above demonstrates that whilst it would be preferable in principle to incorporate a slightly greater level of segregation for the busway route, there are numerous implications associated with a busway route along RRA compared with Adams Road. Furthermore, the journey time benefits are likely to be minimal given the relatively short length of Adams Road, and particularly once on-street parking is removed from Adams Road.
- 1.12 It is concluded that the RRA route would result in significantly greater environmental and cost impacts as well as potentially precluding development opportunities for Clare Hall. The introduction of a busway along the Adams Road route appear to be result in significantly fewer and less severe impacts, and with regard to certain aspects, may improve the environment along Adams Road.
- 1.13 The College seeks further dialogue with GCP on the route options and further assessment on alternative routes.



[www.pulsartransport.co.uk](http://www.pulsartransport.co.uk)

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PO Box 1493, Mandela House  
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By e-mail and  
post: consultations@greatercambridge.org.uk

8 July 2022

Dear Sirs

### **Camborne to Cambridge Environmental Impact Assessment - Public Consultation - Response**

We act on behalf of Clare Hall College (the **College**), part of the University of Cambridge and write to provide a consultation response on behalf of the College. In summary, our client is extremely concerned of the adverse environmental impacts and wider impacts the proposed West Cambridge to Grange Road section of the C2C route (**section route**) will have on the surrounding area.

Whilst we understand the principle purpose of the consultation is to obtain feedback on elements to be assessed as part of the environmental impact assessment, Question 28 of the pro-forma consultation questionnaire does ask for any other comments on the proposals. On this basis, this letter should also be treated as an in-principle objection to the proposed section route, as alternatives for this section of the proposed bus route have not been thoroughly explored and should be re-visited.

Given the failure of the Council to properly interrogate less environmentally intrusive and sustainable alternatives, the College has commissioned its own transport consultant, Pulsar, to carry out an assessment of the West Cambridge to Grange Road section of the bus route and review other viable alternatives. An executive summary of the conclusions reached by the College's transport consultant is provided as part of this consultation response.

Key concerns of the College can be summarised as follows:

#### **1 Requirements to consider alternatives**

Regulation 11<sup>1</sup> of the Transport and Works (Applications and Objection Procedure) (England and Wales) 2006 (the **Regulations**) sets out the requirements to be considered as part of an Environmental Statement when submitting an application for a Transport Works Act Order.

An Environmental Statement should include details of the main alternatives to the proposed works which have been studied by the applicant and "*an indication of the main reason for his choice, taking into account the environmental effects*" (emphasis added).

GCP is therefore legally obliged to consider the environmental effects of the main alternatives explored in order to inform the selection of its preferred option. There is no suggestion to date that GCP has complied with that legal requirement.

The consultation brochure confirms at Section H, that a previously proposed alignment using Adam's Road had been "discounted in response to feedback". It is notable that this feedback was principally limited to responses from residents on Adams Road and did not take into account any supporting environmental information or wider planning and highway considerations for discounting that option as a main alternative.

As set out in the Pulsar Executive Summary, there are various scenarios which should have been and should continue to be considered by GCP in comparison to the proposed section route. If Rifle Range Access (being a private access road) remains the preferred option then we require detailed information and environmental analysis to demonstrate why the alternatives have been discounted.

Table 1.1 of the Pulsar Executive Summary, uses a traffic light methodology comparing the Adams Road and Rifle Range Access as options. This table starkly highlights that the Adams Road option provides a far more favourable solution than the proposed section route. Notably, the issues it raises are not specific to the impact the section route has on the College, but wider planning, amenity, environmental and highway concerns.

It is our view that the GCP cannot continue to ignore or fail to properly interrogate other viable options, particularly ones which rely on existing infrastructure thereby having a reduced carbon footprint, are more sustainable and which will have lesser biodiversity and environmental impacts.

## 2 Cultural Heritage

Clare Hall College and its grounds is bounded by Herschel Road to the north, Grange Road to the east and Rifle Range Access to the south; it sits within the West Cambridge Conservation Area. It was founded in 1966 and is one of only two wholly graduate colleges in Cambridge. The Scholar's Garden immediately to the east of the site is Protected Open Space, as is the University Rugby Club Ground to the South, adjoining Rifle Range Access.

It provides on-site accommodation for postgraduate masters, distinguished visiting academics, some resident College Fellows and has hosted several Nobel Prize winning visiting fellows.

The Michael Stoker Building and Clare Hall are listed as Grade II\*, being important works by Ralph Erskine and Elmside is Grade II listed. This listing was recently granted by Historic England following concerns the potential threat the proposed busway would have on the setting of the College. The College seeks to provide a "*place to think, a place to meet, a place to talk and a place to share*" in peaceful surroundings. Despite being located in Cambridge City Centre, the serene and reflective ambience experienced within the College's grounds is notable and extraordinary; this is attributable to the fact that the south side of the College bounding Rifle Range Access experiences no vehicular traffic, it being a private road which is not publicly accessible to vehicles. It is this very unique "quietness" which contributes to the College being an inspiring location and is a strong draw from international visiting academics, fellows and postgraduate students.

The construction and operation of the section route, creating a busy through route with buses passing every 10 minutes, together with public use of the active recreation route, will dramatically alter the historical

character and setting of the area, causing more than substantial harm. Such an alteration to the character and setting of the College will have long term reputational and economic damage to the College, affecting its ability to attract international visiting fellows, academics and students.

### **3 Ecological Impact**

The proposed section route will impact on Bin Brook and the surrounding greenspace. This area is identified in the Cambridge Local Plan 2018 as a City Wildlife Site comprising an area of biodiversity or geodiversity importance. The loss of any habitat by development is required, by policy to be replaced. The consultation brochure provides no indication that replacement land will be made available. Any replacement land will need to be in close proximity to Bin Brook in order to be able to genuinely compensate for the specific wildlife and biodiversity habitat particular to this locality.

The construction of the busway along this part of the section route has the potential to have significant implications for the character, hydrology and biodiversity of the area. The illustrative view of the Bin Brook crossing provided in the consultation brochure is misleading. It is clear that a combined bus way for the passing of 2 buses, together with an active recreation route and bridge will be a significant and engineered piece of infrastructure which is not comparable to a normal highway, and need to be capable of accommodating water run off to ensure it does not risk polluting the watercourse and local area. The consequence will be substantial disturbance to the wildlife site creating irreparable damage to a long established habitat which cannot be properly mitigated, even with the provision of compensatory land.

### **4 Flooding and Drainage**

Part of the section route within the Bin Brook area is identified as being at medium to high risk of flooding. The bridge proposed and related infrastructure will require significant earth works in order to be raised sufficiently above existing ground levels and engineered to a such a degree to ensure that it not be susceptible to flood risk. Any environmental impact assessment should properly identify the level of engineering intrusion which will be needed to facilitate the construction of the section route in this area. The consultation brochure acknowledges that additional flood storage measures will need to be provided as part of the scheme but it is not clear at this stage the extent and intrusiveness of such measures, nor whether such flood mitigation measures will be limited to the extent of the section route identified.

Part of the College's grounds also sit within the flood plain and the College buildings have a unique drainage mechanism which runs alongside Rifle Range Access. The consultation brochure fails to recognise the impact any required engineering solutions for this section route could have on the existing drainage provision enjoyed by the College and surrounding properties, nor the detrimental impact any works within the flood plain could have on the College grounds.

### **5 Prejudicial to the existing and future Operation of Clare Hall College**

Rifle Range Access is a key access route for the College, it is used for maintenance and operational reasons and provides an emergency egress route. Rifle Range Access will also provide a route for construction vehicles in realising the College's development proposals for further student accommodation and its aspirations for a concert hall.

Use of Rifle Range Access as a 2 way bus route with active recreation path sterilises the use of this road by the College, constraining the day to day management of the College and prejudicing its future development proposals. It is important for the future economic and world class reputation of the College that it has the ability to evolve and grow, providing qualitative facilities to its students and eminent visitors. The suggestion in the consultation brochure that the College can continue to enjoy its rights to use Rifle Range Access for its



day to day operations are not evidenced and it is difficult to envisage how this can be done safely with 2 way bus movements occurring every 10 minutes in each direction (or 5 minutes per bus).

## 6 Utilities

Rifle Range Access accommodates the Granta Backbone Network which is a fibre-optic communications network owned and maintained by the University of Cambridge Information Services division. It is more than an internet cable, it carries traffic for the LAN, Wi-Fi, High Performance Computing, LORA net, Building Management Systems, Data Centre Hosting and CCTV to the university and colleges. It is also rented out to the Medical Research Council, Anglia Ruskin University, Cancer Research UK, City Council and British Antarctic Survey.

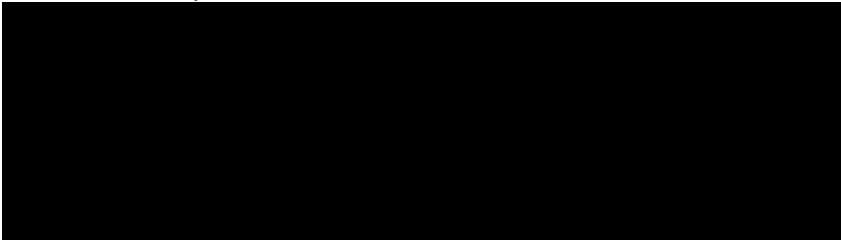
Any construction within the vicinity of this cable should be avoided; the costs of protection works, relocation and impacts of development on the cable should be thoroughly assessed as part of any application.

## Conclusion

If the GCP continues to progress preparing an environmental impact assessment based on the section route scheme, any application submitted in reliance of that assessment will be legally flawed, this is notwithstanding the adverse impacts the section route will have both on the College and surrounding area identified above.

Our client requests GCP meet to discuss, with its consultants, alternative options to be explored before committing further resource to this section route. Pulsar has prepared a comprehensive report which may be shared with GCP to assist the discussion on alternatives.

Yours faithfully



Dear Sirs

## **Cambourne to Cambridge Project – Environmental Impact Assessment Consultation**

This is the official consultation response from Comberton Parish Council to your consultation on the Cambourne to Cambridge Busway.

### Introductory points

- We are very concerned to learn that your plan is to close St Neots Road to traffic in both directions at the point where Long Road meets St Neots Road. This will have a very real and undesirable impact on both the residents of Comberton and Hardwick. It will mean all of the traffic that normally turns left at that junction to access services and facilities in Hardwick and other villages in the direction of Cambourne, will now have to drive all the way through the centre of Comberton and Hardwick, which at busy times both roads are already very busy and difficult to navigate.
- In Comberton we have a junior school just off the main road through the village and of course the very busy Comberton Village College (CVC) at the Toft end of Comberton.
- In Hardwick you have a junior school and a village shop and post office that regularly is very difficult to pass due to cars parked on the road. Also Hardwick has a narrow and very long 30 mile residential zone that cars will need to drive through instead of the currently available main roads of Long Road and St Neots Road.
- Comberton has recently found to its dismay that a Coop shop is to open in Comberton opposite the CVC against the residents wishes and against the planners wishes (they got the approval at appeal). This now threatens the viability of our main shop in the centre of the village which also hoists our post office. We are now likely to lose that central village shop and the post office. That means more traffic will now have to travel to Hardwick to get to their post office which will be the closest to Comberton.
- Page 25 of the consultation brochure refers to a Cambridgeshire County Council consultation in 2021 on active travel proposals to close St Neots Road to the west of Long Road to through traffic. Is there any evidence that Comberton residents and the Parish Council were consulted on these proposals? It would appear that this public consultation is the first time people in Comberton have been made aware of proposals to install a bus gate. What was the outcome of the 2021 consultation and where is this documented?

### Effect of the proposed works to St Neots Road

- The above route to Hardwick would be severed. Traffic would have two likely alternative routes. One would be to join the A428 westbound at Madingley Mulch and come off almost immediately at the Hardwick junction. However, the A428 is a trunk road intended to carry long-distance traffic, not local journeys. By way of comparison, the recent upgrade of the A14 sought to remove local traffic between Cambridge and Huntingdon by providing a separate road (the A1307). Has any assessment taken place on the effect of increased traffic on the A428 and has National Highways been consulted? In addition, this route would add around a mile to journeys from Comberton compared to St Neots Road.





# Coton Busway Action Group Response to the GCP EIA consultation

Date: 07.07.22

## Introduction

Coton Busway action Group (CBAG) is a non-political organisation which represents the views of the vast majority of residents in Coton village who strongly believe that the village will be adversely affected by the GCP's preferred off-road route for the C2C busway. Residents have repeatedly attempted to make their views heard through consultations, at GCP, CPCA, SCDC meetings, the LLF and through the media.

CBAG was formed in 2015 and has closely followed the GCP's promotion of its preferred route. CBAG members support improvement in travel links from the West of Cambridge to commuter and leisure destinations around the city but believe that a viable on-road solution down Madingley Hill using existing infrastructure has never been openly and transparently explored. In responding to this EIA consultation CBAG is not endorsing the off-road route. We do not feel that the GCP's EIA is valid without a comparator with an optimised on-road solution.

We believe that this is a poor scheme, and that Grange Road is an inappropriate destination given that the two major commuter destinations are the Biomedical Campus and Science Park. These destinations are not served well from Grange Road without travel through the city centre. We also believe that in the context of a climate emergency the construction of a new concrete-based tarmac road with a poor benefit/cost ratio is completely unjustifiable. Our comments will be largely confined to section F in the consultation document.

## Greenbelt Concerns and the Viewscape of Madingley Hill

Coton is one of Cambridge's few unspoilt rural necklace villages in the greenbelt. The village contains many listed buildings and the Grade 1 listed Church, St Peters. It has a central conservation area. Important to the setting of the village are the surrounding CPPF owned and National Trust covenanted arable fields which form the northern border of the village. Some of this land surrounding the village was purchased by the founders of CPPF to prevent it being damaged by urban sprawl and to protect the views of Cambridge from Madingley Hill, which is one of the few high points in the Cambridge greenbelt.

Section 5A of the most recent LDA Cambridge Greenbelt Study report commissioned in 2002 by South Cambs District Council states:

*"From the west Cambridge is approached along the historic route, Madingley Road. The first view of the city is an elevated panoramic view just before the turn off to Coton. Development has occurred up to the M11 but the distance from the open countryside to distinctive Cambridge is still short emphasising the quality of Cambridge as a compact city".*

*"To the West of Cambridge is the Western Claylands landscape character area. This area is characterised by a combination of open arable fields and mature vegetation. This vegetation includes deciduous woodland on ridgetops and hedgerows along routes and field boundaries. The overall impression is of a mature peaceful rural landscape which enhances the topography of east-west ridges. There are some distant views of Cambridge from*

*highpoints, but the majority of these views are screened by vegetation in the summer months. An important approach into Cambridge from Bedford passes through the western Claylands. Adjacent to the road is the American cemetery, a memorable feature within the setting of the city. Just beyond the American cemetery is a key elevated view of Cambridge.”*

It is precisely this viewscape that the C2C busway will bisect that was eloquently described by the superintendent of the Cambridge American Military Cemetery to the GCP Executive Board in the summer of 2021.

*“The Madingley Hill landscape is a place of beauty that has been valued by many generations and is worthy of preservation. Its stunning viewshed extends north towards Ely Cathedral, east towards King’s College Chapel, south over Red Meadow Hill, and beyond; with the picturesque villages of Coton and Madingley nestled either side.*

*“In 1945, Major-General Lee of the US Army requested Madingley Hill to become the site of a permanent commemorative cemetery and memorial to honour fallen US service personnel of the Second World War specifically because of its natural beauty and unparalleled viewshed. The US Government asked for this specific terrain – no other terrain would do – because the viewshed was the key “selling point” then, as it is now.*

*“Today, the Cambridge American Military Cemetery is a world-renowned monument and a Grade 1 listed landscape by Historic England. Extending south, the unspoilt open countryside, located in the Green Belt, is extensively protected by National Trust covenants.*

*“We are concerned that GCP’s proposal to build a tarmac bus road across the south side of the hill would irreparably damage this unique and precious landscape, compromising the setting of the American Military Cemetery, severing historic community access routes, and paving the way for further urban encroachment in its vicinity.”*

The GCP executive dismissed his concerns.

In one of its concluding paragraphs the 2002 LDA report states:

*“There are a variety of landscapes within the Cambridge greenbelt. The diversity of landscapes within the setting of Cambridge is one of the city’s defining characteristics”.*

Just as we can see Cambridge city when standing on Madingley Hill, features of Madingley Hill can be seen from the city and its surroundings, and the busway will become an unattractive scar across the hillside. The GCP specifically mentions the view of Madingley Hill from Red Meadow Hill in the consultation document; however, the fields of Coton on Madingley Hill can be viewed from many areas on the approach to Cambridge. The GCP may have examined the sight lines from Red Meadow Hill and ascertained that the tarmac of the busway would not be visible. We understand that the width of the construction cut into the side of Madingley Hill for the entire length from Madingley Mulch to Cambridge Road will be a minimum of 19.5 metres, but possibly as wide as 30 metres to allow for a cutting or embankment slope. It is inconceivable that the escarpment created by the road will not be visible from miles around. The buses travelling along it will be clearly visible from many vantage points.

In the GCP C2C Outline Business Case Options Appraisal Report January 2020 greenbelt scored only one point higher for an on-road option than the off-road option even though the off-road option introduced a tarmac roadway across arable fields and the on-road route would use existing infrastructure. We were told that one of the reasons for this was because

the on-road route still passed through the greenbelt even though it used the existing A1303. We do not believe that this scheme reaches the 'exceptional circumstances' National Planning Policy Framework (NPPF) threshold for breaching the greenbelt. It has never been compared to an optimized on-road scheme.

## Coton Orchard

The village's 100-year-old orchard forms the eastern border to the village. The orchard would be bisected, and land obtained through compulsory purchase by the GCP for its preferred route. The orchard was planted in 1922 and contains hundreds of veteran fruit trees, including rare varieties of apples, pears, greengages, and cherries that are unique to Cambridgeshire. It offers wildlife a virtually undisturbed habitat. The destruction of this natural habitat would be an unmitigated disaster. CBAG endorses the submission by Coton Loves Pollinators to this EIA consultation which goes into considerable detail regarding environmental issues affecting Coton Orchard.

## Active Travel

The GCP is promoting better walking, cycling and horse riding along the service road for their proposed off-road busway through Coton. We are asking why the GCP is planning three parallel cycle routes all within a few hundred yards of each other (1 - the off-road busway, 2 - along Madingley Road, and 3 - the Greenway along Whitwell Way). For safety reasons, following two fatalities, new speed limits of 20 mph or 30 mph have just been imposed on the existing St. Ives busway in urban areas, to protect cyclists and pedestrians. These speed restrictions may well apply to the on-road sections through developed areas in Cambourne, the new Bourn airfield site, the proposed on-road route through Hardwick, in the West Cambridge site and on the route to final destinations within Cambridge after Grange Road. How will these new speed restrictions affect journey times? In our view these potential speed restrictions will make the proposed busway slower than some current on-road routes, for example, the Citi4.

## Section F, entitled 'North of Coton'

To head this section 'North of Coton' is a gross misrepresentation of fact. The C2C off-road route bisects the village of Coton. The village extends to the houses on the A1303 and includes the 100-year-old orchard. Coton is a village with a very cohesive sense of community and residents feel that their rural way of life could be fractured by this tarmac busway going through the village.



Map showing the boundary of Coton



GCP preferred route through Coton

## **Biodiversity net gain**

It is difficult to see how any landscaping or biodiversity measures can be taken to mitigate the potential damage caused by this route. The proposed measures appear cosmetic rather than to represent true biodiversity net gain.

The only way to mitigate the damage caused by the off-road route would be not to build it.

Any new trees planted to replace those removed will take years to mature. Although areas of new tree planting are shown on the indicative map in the consultation document, when the representative of the GCP came to present in the village recently he admitted that the GCP would be reliant on local farmers and landowners giving up land for woodland planting and that realistically any land planted for mitigation would be very dependent on how it added to the cost of the project. In view of the escalating costs of this project, we are not confident that the mitigation measures in the consultation brochure will materialise. Much of what is shown seems to be indicative.

In the options appraisal report of the C2C outline business case published in January 2020 biodiversity scored lower for an on-road route than an off-road route even though the off-road route introduces a tarmac roadway across arable fields. We do not recognize the methodology used in this assessment.

The GCP claims to have refined the C2C route through the north of Coton. It passes close by the back of Coton Primary School, continues down close to Coton Village Hall and the houses along the High Street, and crosses Cambridge Road within 40 metres of the nearest houses. CBAG considers this to represent unacceptable urbanization of a rural environment.

## **Environment**

### **Flooding**

The GCP environmental impact assessment states that, "Drainage will also be an important consideration", and proposes a drainage pond to be put in place slightly to the west of the section that is proposed to pass through agricultural fields north of Whitwell Way and Coton High Street (see map p. 28 and text p. 30 public consultation document).

This so-called "drainage strategy" does not consider the existing drainage systems that run through these fields, nor a past history of flooding. There are two open drainage ditches running down the rise from north to south. One lies to the west, running open past Gray's sporting goods site before continuing underground into a drain on Whitwell Way. The other runs further west, as an open ditch through the back gardens of properties on the High Street to the west of the village hall. It too then runs underground to join the main drain on the High Street. It has always been the responsibility of homeowners and the farmers in the relevant fields to ensure these ditches are kept clear. In the last decade there has been at least one flood across the gardens of these houses due to a ditch becoming blocked at a position further up the field.

The environmental assessment makes no mention at all of these existing drainage ditches, nor their past history of flooding. The proposed drainage pond is positioned too far west to be connected with them. It is of great concern that the environmental assessment does not even recognise, much less propose, measures to mitigate the specific risk of flooding to fields, gardens and houses along the north side of Whitwell Way and Coton High Street. This is one further piece of evidence of the many ways in which the scheme is poorly thought out.

## Cleaner Transport

Whilst the intention is to reduce emissions with this scheme, we are aware that initially the GCP may use diesel buses running on rubber tyres on this tarmac pathway. GCP representatives have stated to us at meetings that it is unlikely that car usage will reduce significantly through the introduction of this busway. Building a new tarmac busway through the fields of Madingley Hill will free up more space on the A1303 for cars. If modal shift is not significant, motor vehicle usage is likely to increase. We have concerns about the increase in particulates from vehicles using rubber tyres travelling at speed near the village and Coton Primary School.

### **Bus stop**

On page 30 of the GCP document there is a diagram showing a proposed bus stop to the west of Cambridge Road opposite Coton Orchard; however, on the drawing on page 28 the bus stop is clearly shown on the east side of Cambridge Road occupying space which is currently part of Coton Orchard. Quite why the consultation which is part of the EIA process has been used to introduce the possibility of siting a bus stop on Cambridge Road is puzzling. The bus stop would not serve the village well. The houses in some of the less affluent areas of Coton are approximately 1100 metres away from the proposed bus stop.

On his recent visit to the village, at public meetings, and on consultation webinars the GCP project lead for C2C has repeatedly said that residents in Coton have asked about having a stop in the village and that he believes a stop would be an asset to residents. During all the previous well-attended, standing-room-only, public meetings held in Coton Village Hall where GCP representatives have attended, only one individual out of hundreds has ever asked about having a bus stop in Coton. We are disappointed by the misrepresentation of this issue. At the more recent meeting regarding the EIA consultation only one other resident made the point that if the busway does eventually go through the village a stop might then be seen as compensation.

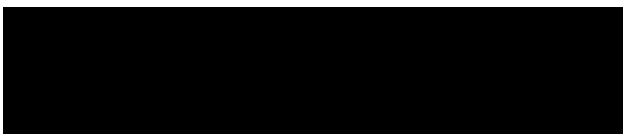
There were, however, many contrary views expressed regarding the potential damage to the village which may come to be seen as a convenient park-and-ride spot at the last stop to the west of the M11.

Would commuters travelling north on the M11 drive to a park-and-ride at Scotland farm when they could drive off the motorway straight into Coton and park?

It is therefore clear that the proposal for a bus stop on Cambridge Road is ill thought out, and likely to inflict enormous damage on the village as part of this badly designed scheme.

### **Conclusion**

In conclusion we do not think that there are any mitigation measures that would compensate for the destruction caused by ploughing a concrete track covered in tarmac through the arable fields of Madingley Hill close to homes, school and the undisturbed wildlife haven of Coton Orchard. We do not believe that the claims made regarding biodiversity net gain are robust. There has been no demand for a bus stop in Coton and it will have an unacceptable impact on the village.





**From:**  
**Sent:**  
**To:**  
**Subject:**  
**Attachments:**

I am writing to you on behalf of the Coton Loves Pollinators community action group in Coton. Coton Loves Pollinators group was set up in 2019 and has been actively working with Coton village residents, the congregation of St Peter's church and the whole of Coton CofE Primary School and parents in order to improve biodiversity and support for pollinators in and around Coton.

We, and the residents we have been working with, are deeply concerned about the impacts that the proposed Coton section of the busway will have on the biodiversity of Coton and our cherished Coton Orchard and the green corridor between ourselves and Cambridge. In addition to this, we strongly oppose the Coton busway route due to the unacceptable and irreversible damage it will cause to the entire character and physical integrity of Coton as a village.

Please find the reasons for our concerns set out in our formal letter of response to your EIA below.

We look forward to hearing from you.

Yours sincerely,

Coton Loves Pollinators  
Coton



Jo Baker  
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11 July 2022

## CAMBOURNE TO CAMBRIDGE BETTER PUBLIC TRANSPORT AND ACTIVE TRAVEL PROJECT ENVIRONMENTAL IMPACT ASSESSMENT: PUBLIC CONSULTATION – GROUP RESPONSE

***Coton Loves Pollinators is a grassroots project based in the village community. Our focus on pollinators has enabled us to engage a wide range of people and organisations in various successful initiatives; our motivation and concern is for biodiversity and the landscape in and around the local area. This letter is our formal group response to the Consultation Questionnaire.***

### 1. INTRODUCTION

We fully accept the need for improved transport solutions, including a better bus connection, on the western side of Cambridge. We see no justification, however, for the proposed off-road scheme, which would result in unjustifiable damage to the landscape and ecology of this area.

This scheme is not the best solution for a number of practical and economic reasons, and that case will be made by others. Our comments focus on its environmental and ecological impact.

### 2. COTON VILLAGE

Coton is currently a quiet, unspoilt village with a central conservation area status, various listed buildings and the Coton Countryside Reserve around its edges. Although relatively close to the city, it has a real sense of rural seclusion and community, and so is regarded by all who live here as a rather special place. All this would be seriously damaged by the incursion of the busway, which would impose unacceptable urbanisation on this rural environment.

Walks from the village, both up Red Meadow Hill and up the rise towards Madingley, offer what have to be some of the loveliest, most unspoiled views anywhere around Cambridge – with gently rolling fields and hedges and woods, currently uninterrupted by roadway. These are valued enormously, not only by villagers but by the many visitors who make the short trip from the city to get the benefits of walking in nature. From Red Meadow Hill, the busway infrastructure may be concealed (although this is not entirely clear from the EIA Consultation document) but the buses would be visible and would significantly alter the peaceful character of the landscape. The path up to Madingley would be crossed by the busway and the view towards Coton completely despoiled. On this path particularly, the walk would be interrupted not only by the sight but also by the noise of the buses.



**View from the walk up Red Meadow Hill, looking toward Coton and Madingley Rise**



**View from the walk from Coton to Madingley, looking towards Coton**

### 3 THE COTON ORCHARD

On the northern edge of Coton village, the proposed busway would run through a 100-year old orchard of more than 140 acres. Orchards were once numerous in the area and part of the village’s character, but The Coton Orchard is all that remains of that heritage.

#### **Traditional orchards and crop diversity**

The Coton Orchard meets all the criteria for *Traditional orchards* (Defra 2016) which, with their low-intensity management are recognised “hotspots for biodiversity”, make a “significant contribution to biodiversity and local distinctiveness” and frequently contain Nationally Rare or Nationally Scarce Species (Defra 2016, p. 1). Traditional orchards are classed as a *Priority Habitat* (Natural Environment and Rural

Communities Act 2006) and as “rare” in comparison with other types of priority habitats (p.4). Being inaccessible to the public has made the The Coton Orchard an even more attractive refuge for wildlife.

Traditional orchards are also recognised for the contribution they make to *crop diversity*, and to government targets for its conservation (Defra 2016). This is certainly true of The Coton Orchard, which contains a wide range of cultivars, some local and some rare.

The total width of the proposed busway, including ditches and active travel route, is 20 metres. It was explained to us at the GCP Drop-in event on 30<sup>th</sup> June that, as it cuts through the orchard, there will be an additional zone of newly planted grassland between the ditch and active travel route, and this zone would be between 5 and 10 metres. This means that the total loss of habitat in the orchard will be a minimum of approximately 12,800 m<sup>2</sup> and potentially as much as 18,200 m<sup>2</sup>: (c. 3–4.5 acres).

### **Bats**

A bat survey conducted for the GCP in 2019 describes the hedgerow running along the eastern border of the Orchard (Hedgerow 10) as “notable for bat activity”. Several species were detected using the hedgerow for foraging and commuting, including the highest numbers of Noctule and the rare Narthusius pipistrelle in the area to the west of Cambridge, as well as the extremely rare Barbastelle bat. This is an IUCN red list species, a UK Biodiversity Action Plan species, and conservation priority on both a local and national scale.

Busway infrastructure cutting across and removing a significant section of this hedgerow, as well as the considerable noise and upheaval during the construction phase, will certainly constitute disturbance for these endangered bats whose foraging habitat (in addition to their roosts) is protected by legislation.

We await the findings of a bat survey within Coton Orchard itself, but since traditional orchards are a favoured site for bat roosts, it is very possible that findings could raise the status of Coton Orchard as an important site for bat conservation.

### **Mitigation measures**

The section between the proposed bus stop in Coton and Ada Lovelace Road, just the other side of the M11, is the area that will suffer the greatest ecological impact from the off-road busway. Yet, in the EIA consultation document, this is the area where there appears to be least certainty and the least detail about how this can be mitigated. The EIA document states that: the environmental surveys needed to understand the risks of passing through this area have not yet been completed, that locations where habitat improvements will be possible have not yet been identified, and that ideas are yet to be developed. Given the complexity of making a valid *Biodiversity Net Gain* (BNG) calculation, it is not clear to us how a claim for a BNG of 10–20% can be made with such confidence at this stage. In fact, in presenting the off-road route as an opportunity for a net gain in biodiversity, the EIA document fails to convey the true extent of the impact on wildlife and glosses over the uncertain reality of the situation.

Mitigation in the orchard appears to rely, first, on newly planted areas of grassland. As pointed out by Cambridge Past, Present and Future (CPPF), these small, isolated areas do not achieve real biodiversity and are often difficult and expensive to maintain. Second, there is the proposal to plant new woodland near the school, in Coton Orchard by the new bus stop, and on Rectory Farm land. Again, as noted by CPPF, this is unlikely to achieve a significant BNG because of the low score given to *new* woodland in the biodiversity scoring matrix. In the case of Rectory Farm, the BNG is also reduced by value of the existing meadow. The proposed mitigation measures therefore appear to be “replacing with features of lower value or replacing locally important features with features further away” – a pitfall that environmental management guidelines warn against (CIEEM Guidelines, p.8).

The conclusion reached by CPPF is that under the proposed scheme, *restoration or minimisation will not be possible*, underlining the fact that Coton Orchard is an irreplaceable priority habitat. We note that, critically, “any project that damages irreplaceable habitats ... cannot make a claim for that whole project of BNG” (CIEEM Guidelines, 2019). What this means is that any Biodiversity Net Gain calculation for Coton Orchard, would, in any case, be invalid.

Overriding all these concerns, however, is the principle of Mitigation Hierarchy. This is the “cornerstone of achieving BNG” (CIEEM, 2019, p.5), which requires that the *first* obligation is seeking means of *Avoidance* – e.g. by moving the site or changing the design. Only after all other possibilities have been exhausted should measures such as *Minimisation* and *Compensation*, including *Offsets*, be deployed. Offsets – such as the proposed Woodland planting behind Coton Primary School – are “relatively expensive and the risk is high” and so should be viewed as a last resort (CIEEM, p157).

The off-road busway is *not* the scheme of last resort, and so does not adhere to these guidelines.

In summary, this traditional orchard with its rare fruit trees is an established, priority habitat that provides a valuable refuge for endangered bats as well as numerous other species – as is likely to be confirmed by the full ecological survey in due course. It would be tragic if, having just reached its 100<sup>th</sup> anniversary, this priceless piece of Coton’s heritage were to disappear under concrete and tarmac.

#### 4. THE WIDER ENVIRONS

The off-road route between Madingley and the M11 would go through greenbelt land with restrictive covenants in favour of The National Trust. It includes scrub, meadows and mature trees that previous surveys across the locality have revealed as habitat for a variety of important species, including:

*61 birds species* (winter), of which 31 are on at least one conservation priority list – 14 being on the ‘red list’ (UK and Local BAP Priority Species and the Birds of Conservation Concern). These include such species as Grey Partridge, Golden Plover, Woodcock, Barn Owl, Marsh Tit, Skylark and Kingfisher. The commissioned survey (Cambridge Ecology, 2018–19) underlines the fact that without mitigation, the presence of these species “could constitute a constraint to the scheme and therefore are of material consideration during the planning decision process”. Whilst it notes that mitigation is possible, there is no guarantee, as noted above, that the proposed measures would protect these species from damaging effects.

*A population of brown hares* in the arable fields to the west of Coton (Cambridge Ecology, 2018–19). This is a Species of Principal Importance under the Natural Environment and Rural Communities (NERC) Act 2006; a UK BAP Priority Species and included in the Local BAPs for Cambridgeshire. Mitigation measures would be required to ensure legal compliance, but, again, there is no guarantee that the population would not suffer.

#### **Green corridors and networks**

In addition to the damage caused to several areas of ecological importance, including The Coton Orchard, the off-road scheme would result in *bisecting ecological networks and corridors*, which are a vital component in any plan for wildlife recovery.

This stands in direct conflict with the UK Government’s National Planning Policy Framework (2021), adopted by Greater Cambridge, which states, “Planning policies and decisions should contribute to and enhance the natural and local environment by ... minimising impacts on and providing net gains for biodiversity, *including by establishing coherent ecological networks that are more resilient to current and future pressures*” (p.50, italics ours) and that plans should “safeguard ... wildlife corridors and stepping stones that connect them” (p.51).

In line with this, at the heart of the Cambridge Nature Network project is the aim of “enlarging and linking ... high value habitats” via a network “based around the remaining fragments of high quality wildlife habitats”. This much-needed initiative for a county that is one of the most nature-depleted in the country will be undermined by the off-road busway. It makes no sense to invest in developing these interlinked networks on the one hand while erecting a (completely avoidable) concrete and tarmac barrier on the other.

We highlight the importance of wildlife corridors because they are not included by Defra’s biodiversity metric, which would presumably be used to calculate the scheme’s projected BNG. This type of calculation would therefore be inappropriate because it would indicate a BNG while whilst sustaining critical losses in ecological connectivity (CIEEM, 2019).

We note, too, that the Active Travel route through Coton duplicates the proposed Comberton Greenway, at the expense of an additional swathe of habitat, and therefore ecological network loss.

## 5. CONCLUSION

The 'North of Coton' Section of the C2C busway contains some of the most ecologically sensitive areas along the route. Some of these are inaccessible to the public, and this has increased their environmental value but has at the same time reduced their 'visibility' – and so perhaps the level of awareness of the extent of potential loss. We believe that the points made here – about the devastating impact of this scheme on local wildlife and ecology, on the unique character of Coton village, and on what the countryside and walks offer both villagers and visitors – are a more-than sufficient case against the off-road busway.

Moreover, according to the GCP's own Outline Business Case (GCP, 2020), the on-road schemes are likely to produce comparable journey times between Madingley and Cambridge and allow more efficient onward journeys to actual destinations such as the Science Park, the City Centre and the Biomedical Campus (GCP C2C Outline Business Case, 2020). The £200M off-road scheme, meanwhile, has a benefit–cost ratio of 0.43 ("poor value for money") which is significantly less than an on-road scheme.

Therefore, because it is simply not the case that there is no practical or economic alternative to the off-road route, we believe there can be absolutely no justification for this scheme which would be in conflict with UK Government and local policy aimed at preserving and enhancing our natural capital and biodiversity, and which has already been strongly rejected by the general public.

Not only would this off-road scheme cause unjustified ecological damage, but the incursion of the roadway, bus stop and buses into would irrevocably spoil the feel and fabric of this much-loved village.



## REFERENCES

Cambridge Ecology (2018-19), *Cambourne to Cambridge Better Public Transport: Brown Hare Survey*

Cambridge Ecology (2019), *Cambourne to Cambridge Better Public Transport: Stage 2 Bat Survey*

Cambridge Ecology (2018–19), *Cambourne to Cambridge Better Public Transport: Winter Bird Survey*

Cambridge Nature Network website: <http://cambridgenaturenetwork.org>

CIEEM (Chartered Institute of Ecology and Environmental Management) (2019) *Biodiversity Net Gain: Good Practice Principles for Development*

Defra (2016) *UK Biodiversity Action Plan Priority Habitat Descriptions: Traditional Orchards*

GCP C2C Outline Business Case (January 2020), Options Appraisal Report Part 2, Annexe B

Ministry of Housing and Local Government (2021) *National Planning Policy Framework*



# Coton Loves Pollinators

is a grassroots project set up by a group of Coton residents to enhance the village of Coton and the surrounding area for pollinators.

## Our Aims:

1. To work with the community and local landowners to create a more biodiverse environment that will attract pollinators and enhance the landscape for both people and wildlife.
2. To raise village awareness about the needs of pollinators and what can be done to support them.
3. To create a network of pollinator habitats made up of hedges, trees, wildflower meadows, gardens and No-Mow verges and to contribute to Buglife's B-Lines project.

## Why do we need pollinators?

Insect pollinators such as honeybees, solitary bees, hoverflies, wasps, flies, beetles, butterflies and moths all play a vital role in providing free pollination of many of our plants, wildflowers, trees and crops.

**"1 in 3 mouthfuls of food that we eat is dependent on pollinators"**

Unlike many rural areas, semi-urban areas can offer a wide range of favourable habitats for pollinators. They are mostly free from pesticides and offer a diverse range of shelter and forage. Gardens, churchyards, allotments and roadside verges are all particularly beneficial.



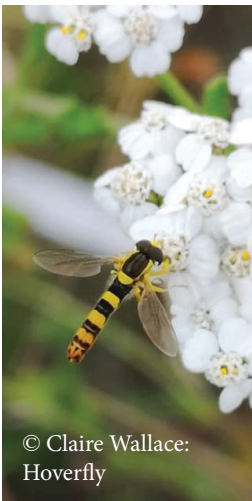
© Claire Wallace:  
*Bombus terrestris*

In order to achieve our goals we are working with a wide range of partners including Coton Orchard Garden Centre, local landowners, farmers, Barton Rifle Range (MOD), Coton Primary School, Coton Garden and Allotment Societies, St Peter's Church and our local conservation charity Cambridge Past, Present and Future (CPPF). We hope that our project will be an inspiring example of how a whole community can come together to enhance biodiversity in our midst and to demonstrate the simple steps we can ALL take to help pollinators.



© Claire Wallace: Burnet on birds-foot trefoil

## Who is leading the project?



© Claire Wallace: Hoverfly

A steering committee has been formed made up of Sharon Cairns (Founder, Stockholm Loves Pollinators), David Coomes (University of Cambridge Conservation Research Institute), Mel Forbes, Amanda Fuller (landscape designer), Sara Godward (Parish Councillor), James Littlewood (CEO Cambridge Past Present and Future), Richard Miller (Manor Farm), Carolyn Postgate (Parish Councillor), Cathy Shaw, Allan Treacy and Claire Wallace (conservationist). Youth liaison Viv Bradbury.



"We support this joined-up approach to pollinator conservation in the community. We are keen to develop best practice on the land we manage (Coton Countryside reserve) and to encourage other landowners to see what they can do. Pollinators need our help."

James Littlewood, CEO, Cambridge Past Present and Future (CPPF)



"Coton Orchard Garden Centre is pleased to support this important community project. Pollinators need a supply of pollen and nectar-rich food from early Spring through until the end of Autumn. We are happy to help raise awareness about the different kinds of trees, plants and spring bulbs which can be planted to support them and to work with the children at Coton Primary School."

Jamie Rolling, Senior Plant Manager, Coton Orchard Garden Centre



"There are many ways a churchyard can serve a community. I am delighted that we will be helping pollinators by planting spring bulbs and herb beds and most importantly by allowing areas of grass to grow long for wildflowers. We hope that everyone in the local community will feel inspired to join us, to get involved and even try this at home."

Revd Rebecca Gilbert, St Peter's Church, Coton



# How YOU can help Pollinators

1. Leave your garden a little wilder.

Never use pesticides. Leave ivy to grow on your trees and walls for bees in late autumn. Maybe designate a small 'No Mow' area in your garden for dandelions and clover which are so important for pollinators.



2. Plant pollinator-friendly plants all year round which can provide essential leaf forage for pollinator larvae and pollen and nectar for adults.

Look for the RHS list of 'Plants for Pollinators' and their 'Plants for Pollinators' logo when buying plants and avoid double-flowered hybrids.

3. Pollinators also need special habitats and shelter. Consider making a solitary bee bank by leaving a south facing area of bare earth for bees to burrow, leaving dead wood to rot in a corner of the garden or creating log piles to offer shelter to a host of insects.

4. Want to make a bigger impact? Lobby Cambridge County and City Council to introduce a Pollinator Action Plan. Go to Friends of the Earth and click on their link.

**For more tips on how to help, how to get involved,  
web links and project updates go to  
[cotonvillage.co.uk](http://cotonvillage.co.uk) | Coton Loves Pollinators**

Contact Sharon Cairns: [cotonlovespollinators@gmail.com](mailto:cotonlovespollinators@gmail.com)



Coton Village Community Noticeboard

Wednesday, June 8, 2022



FAO Peter Drake – Transport Director  
Greater Cambridge Partnership  
PO Box 1493  
Mandela House  
4 Regent Street  
Cambridge CB1 0YR

Dear Mr. Blake,

**CAMBRIDGE TO CAMBRIDGE – EIA CONSULTATION**

Further to your letters dated 11/05/2022 ‘seeking views ... from property/land/business in proximity of the proposed route’ I am replying on behalf of **Houston Crest Properties UK** (land owner) in my capacity [redacted], **Coton Orchard Ltd** (tenant) [redacted], [redacted], whose home, [redacted], is adjacent to the proposed route, and as a [redacted] resident of [redacted] myself, all combined, rather than separately in response to the 5 duplicate letters and 6 e-mails received. Though we will labour through the questionnaire individually to be counted, I felt the need to also compose a written response as I don’t think the consultation questionnaire allows us to truly voice our views.

**PUBLIC CONSULTATION OR A COSTLY APPEASMENT EXERCISE?**

The questionnaire attached to the 23MB hard to load 48-page public consultation brochure is in my opinion leading, obfuscating and does not facilitate transparency nor represent a genuine consultation. I posit that it is in fact a means to sculpt evidence in support of the application to build under the Transport Works Act Order (TWAO) to be submitted to the Department of Transport (Dft). The repetitive nature of the multiple-choice questions psychologically, and the brochure in fact literally, encourages participants to skip to the area that affects them directly, leaving the potential to statistically skew the results – e.g., it could be represented that ‘only x (small) % of people who completed the questionnaire objected...’. Further, questions like “where should we site the bus stop?” leaves no room to say that we think there shouldn’t be a bus stop at all because we don’t think a road should be built in the first place, that the harm to the environment is not outweighed by the limited (if any) public gain of going off-road. Questions like that shown below offer limited scope and is open to distortion of results.

**Q22. Would you like to see a bus stop where the route crosses Cambridge Road in Coton?**

<input type="checkbox"/> Yes	<input type="checkbox"/> Maybe
<input type="checkbox"/> No	<input type="checkbox"/> No opinion

And the questions allowing unrestricted comment such as Q27 below in my opinion have no relevance to EIA at all!

## Your Thoughts

**Q27.** Under the Equality Act 2010 we will be looking at the proposed scheme to ensure that it does not impact adversely on people or groups with protected characteristics. These are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. We have a duty to ensure that our work promotes equality and does not discriminate.

Please comment if you feel any of the proposals would either positively or negatively affect or impact on any such person/s or group/s.



## ATTRITION

It's been 5+ Years of being inundated with e-mails, calls, texts, letters, questionnaires, requests for; meetings, access, surveys, opinions. I am one person trying to keep my business solvent, receiving no payment to acknowledge, read, reply or action any of the deluge, unlike yourselves and the consultants engaged for whom this is paid work.

## GASLIGHTING

Madingley Rise, Coton Orchard Fruit Farm & Garden Centre, even my home *all* labour under a restrictive covenant in favour of the National Trust (replacing Cambridge Preservation Society). Permissions had to be sought to multiple agencies to cut down a *single* tree, planted in 1996 that was becoming a danger in 2016, yet Jo Baker (*Project Manager – Greater Cambridge Partnership*) in her e-mail 22/02/2021 writes “...our records suggest that the Orchard is not covered by that” and under these proposals, tens, if not hundreds of mature trees, traced back as far as when the original orchard was planted in 1922, will be obliterated. Trees we were told to protect for their ecological value now deemed “impermanent” “unproductive” and less useful to the environment than “new planting” next to a tarmac road?

Back in 2016 we were told that the C2C busway through Coton was needed to ‘*tackle congestion on Madingley Road*’. In a letter 05/06/2020 I pointed out that Covid will change the way people travel and thus work traffic flow, that the **1-minute off peak** saving Mott MacDonald (2020) forecast as the improvement for 2036, does not represent value to the public for the **base cost of £146m** (p54) (Q4 2018 prices, I expect it to be much more now) not to mention annual maintenance cost **£0.35m** (p55 2019 prices, calculated at 1/60 whole life operational and maintenance costs Table 25, likely much higher due to inflation) [Adjusted BCR 0.48 i.e. between 0 and 1 is defined by DfT in the **VfM** as “**Poor**”]. (To which I receive the reply (22/02/2021) that “*works are not anticipated for at least 2-3 more years... the current COVID-19 crisis will have abated.*” When I returned to this point, given present changes due to WFH, I get told C2C busway through Coton is necessary as “*Local Plans propose significant new housing to the west of the city by 2031*” so it is no longer about Madingley road but setting up infrastructure at public expense for private development? Is this part of the **£458m** (p17) (2019 prices) predicted “*Land Value Uplift*”?

## THREATS

Bear in mind that the first “walk-over survey” and on-site meeting was requested by [REDACTED] – *Major Infrastructure Deliver Project Manager of the then captioned A428 Cambourne Cambridge Better Bus Journeys project* – on 07/09/2016, some 5+ years ago, we have largely cooperated with the project’s demands for access to survey. I did however call a stop this month 10/05/2022 following [REDACTED] [REDACTED] at Coton Orchard leaving me shorthanded until [REDACTED] and also because I felt that requests were unreasonable, being made in an increasingly haphazard, disparate and poorly coordinated manner, directed to unrelated persons (including our tenants) when not immediately responded to. To which Ms. Baker replied “*if we cannot resolve the issue by 22/05/22 amicably then we will need to recourse to section 172 of the Housing and Planning Act 2016 and, if need be, seek Court approval to enforce our right of access. I am pleased that to date we have managed to avoid that eventuality.*” which I read as a threat. I have replied directly. I am putting this here because I don’t want my refusal to be bullied and threatened used as an excuse for an incomplete EIA. I want to point out that 172 surveys have already been carried out. If an untrained amateur such as myself, on just a few evenings, with no equipment other than eyes and a camera, can note the variety and array of flora and fauna as shown in my illustration attached. Then surely WSP, whom GCP engaged to carry out this latest survey, should be able to produce a comprehensive list already from the 6 months they’ve been coming and going?

## ENVIRONMENTAL IMPACT

“*There is a commitment to deliver a minimum of 10% biodiversity net gain for the scheme overall, with the goal of achieving 20%*” (2022 consultation brochure). Biodiversity net gain being defined as an approach which “*aims to leave the natural environment in a measurably better state than beforehand*”. ‘Better’ is subjective, you can plant 10 types of common flora beside the tarmac but it does not, in my opinion, represent a ‘net gain’ of losing say 2 local varieties of apple tree and 3 habitats even if statistically you’ve doubled the numbers.

## CONCLUSION

I believe that the **Environmental Impact** of implementing the off-road option through Coton of “**The Cambourne to Cambridge (C2C) Better Public Transport Project**”, i.e., tarmacking swathes of countryside, will cause ecological damage that will *not* be mitigated sufficiently by proposed new planting. The *predicted* improvements for travel times and air quality (as a result of estimated cars taken off the road) do not take into account the changes in travel patterns created by Covid and makes assumptions not backed by evidence. By contrast, the construction of a road, where there is presently only flora and fauna, will unquestionably have a negative impact in the form of light and air pollution. All this at an extortionate (and likely under estimated) cost to local Government (i.e., local tax payers) representing poor VfM as defined by commissioned reports and the DfT themselves.

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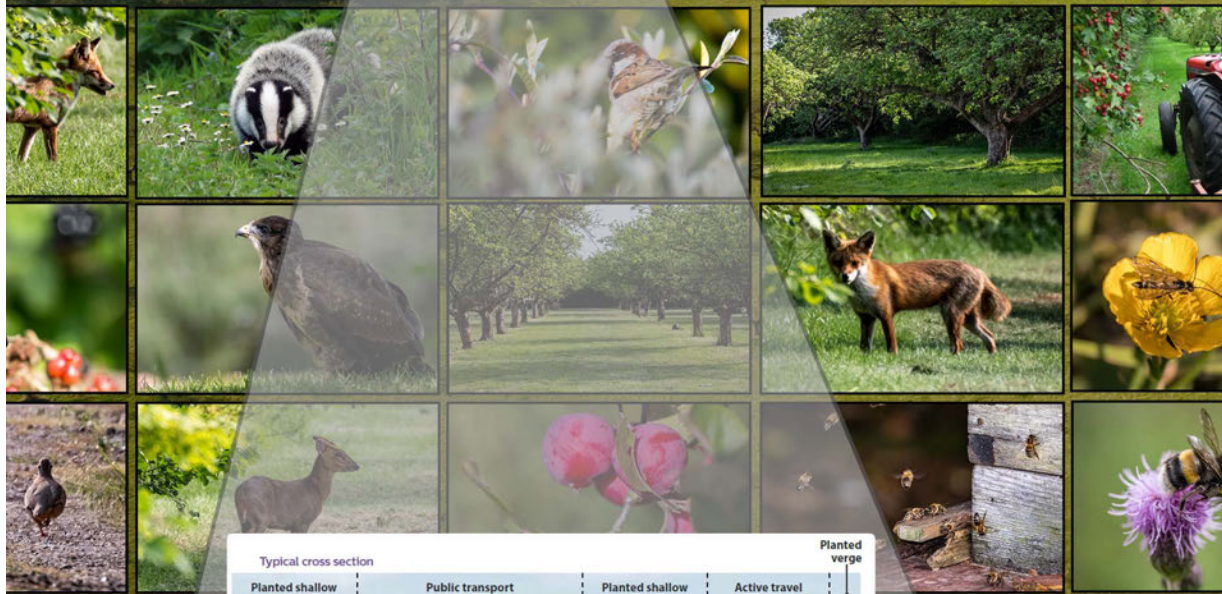
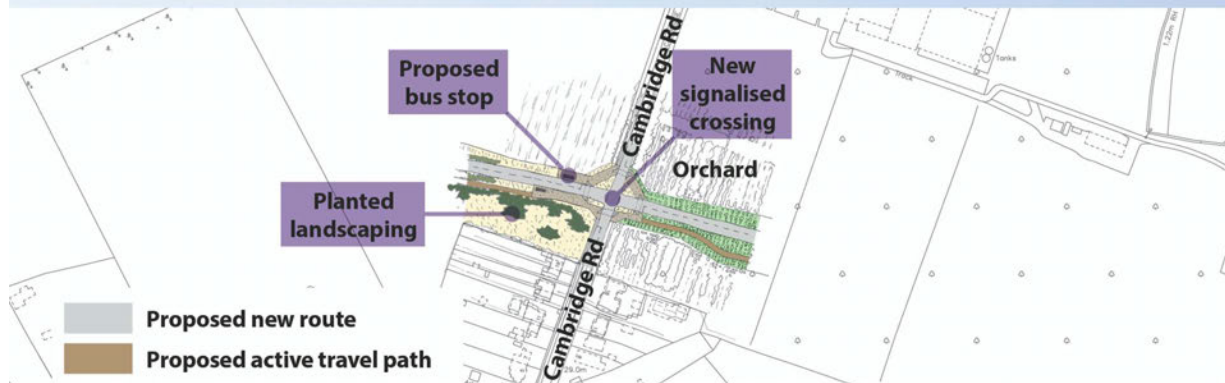
*Benefit Cost Ratio (BCR): Benefit Cost Ratio, is an indicator of the overall value for money of a project or proposal.*

*Cambridge Autonomous Metro (CAM): CAM is the proposed metro style system for Greater Cambridge.*

*Value for Money (VfM): Using public resources in a way that creates and maximise public value.*

*Wider Economic Impacts (WEI): improvements in economic benefits that are acknowledged, but which are not typically captured in traditional cost-benefit analysis.*

# ENVIRONMENTAL IMPACT OF C2C AT COTON ORCHARD?



FOR ILLUSTRATION. NOT TO SCALE

# COTON PARISH COUNCIL

**Chairman:** Mark Abbott



11 July 2022

Greater Cambridge Partnership  
Mandela House  
4 Regent Street  
Cambridge CB1 0YR

By email to:  
consultations@greatercambridge.org.uk  
JoM.Baker@cambridgeshire.gov.uk

Consultation Questionnaire. Cambourne to Cambridge Better Public Transport and Active Travel Project. Environmental Impact Assessment: Public Consultation. Response from Coton Parish Council.

Thank you for the above consultation. Thank you also for the efforts you have made to engage with local communities. This is a formal response on behalf of Coton Parish Council.

## **Introduction**

As you are aware from previous correspondence, Coton Parish Council supports the improvement of bus connections between Cambourne and Cambridge, and thus supports the “need” for a C2C project as set out in the GCP’s Outline Business Case (OBC), approved in January 2021.

However, as the OBC says (p.21):

“The off-road route lies mainly in Green Belt land. An assessment of the key planning policy considerations ... needs to be weighed against the impact in environmental terms, particularly accounting for the location of large parts of the proposed route being situated within the Cambridge Green Belt. The impacts on the Green Belt will continue to be assessed as the project proceeds.”

And, again in the OBC section on Impact on Environment and Heritage:

“Between Madingley and Coton there are parcels of land on either side of Madingley Road that are subject to covenants held by the National Trust to protect the landscape in the area but the landscape is not designated in any other manner. As the route crosses the open landscape from the Waterworks site at Madingley down to Coton it would have an impact on the pattern and tranquillity of this rural landscape. ... The setting of the Coton listed buildings and conservation

area is likely to be impacted by the introduction of the new infrastructure through the rural edge of the village.”

## **C2C Consultations 2014–2022**

As set out in the OBC (p.22 onwards), there have been several consultations on the proposed C2C route:

**2015 public consultation.** The majority of respondents agreed that better bus services are needed, and most preferred an on-road bus lane in-bound from Madingley Mulch roundabout into the city centre.

**July–August 2017 busway user research.** Speed, reliability of journey and frequency of service are key service elements which motivate people to use the service; this has assisted in informing the specification of the proposed scheme.

**December 2017 – January 2018 public consultation and focus groups (Phase 1 options).** 40% of respondents preferred Option B, an on-road tidal public transport lane. 18% of respondents preferred Option A, an on-road tidal eastbound public transport lane.

**2019 Workshops with local liaison forum “technical group”.** Publication of technical notes “explore ‘quick win’ options along Madingley Hill”. Viable projects avoid land take and significant environmental impact, and minimise input from, or impact on, third parties, restricting options to a short section of public transport lane, extension of cycling improvements and review of signal timings.

## **What is the most appropriate C2C Route between Madingley Mulch Roundabout and Cambridge?**

The GCP’s own data shows that:

- Congestion along the Cambourne to Cambridge route causes significant traffic delays only in the city-bound morning “rush hour” (7–9 am). Real-time bus journey data generated pre-Covid, by transport specialists Vix, indicated that there were no material traffic delays along the A1303/Madingley Road outside the morning peak in the in-bound direction, or at any time out-bound. GCP modelling conducted before the Covid pandemic indicated that that would still be the case beyond 2031, even with projected new home building. This has been confirmed repeatedly in GCP technical documentation.

The post-pandemic transformation of work patterns and the resulting changes in commuting patterns lend further support to the GCP’s pre-pandemic projections and to the case for in-bound interventions only. The Office for National Statistics study, *Is Hybrid Working here to stay?* (ONS 23/05/22) found that “most people who took up homeworking because of the coronavirus (COVID-19) pandemic plan to both work from home and in the workplace (‘hybrid work’) in the future, according to data from the Opinions and Lifestyle Survey (OPN).”

Workers were asked about their future plans in February 2022, after government guidance to work from home when possible was lifted in England and Scotland. More than 8 in 10 who had to work from home during the coronavirus pandemic said they planned to hybrid work. Since then, the proportion of workers hybrid working has risen from 13% in early February 2022 to 24% in May 2022.

This, of course, may only be the start of the flexible working revolution, as both employers and employees identify significant advantages in terms of cost, productivity and quality of life. Moreover, in a knowledge-based economy such that in Cambridge, hybrid practices are even more likely to become quickly and widely adopted.



Coton Parish Council also notes that Cambridge City Council has advertised its own hybrid working policy: “we have adopted a flexible office base arrangement where flexible working arrangements are encouraged and should be informed by business need”, and that South Cambs District Council voted on 13<sup>th</sup> June this year for a new hybrid work policy where flexibility is “accepted as the norm rather than the exception”. Leader of South Cambs District Council Bridget Smith said after the vote, “It is important that we do not just go back to our way of working pre-covid, because I think we have identified many advantages from a different way of working and certainly by working in a hybrid fashion.”

The GCP found that there was no case for an outbound bus lane before the pandemic, and Coton Parish Council believes that, in the light of changing working practices, there can certainly be no case for it post-pandemic.

- An in-bound bus lane for all or most of the section from Madingley Mulch roundabout to the West Cambridge campus turnings would deliver essentially the same Cambourne-to-Cambridge journey times as an off-road scheme between Madingley Mulch roundabout and Grange Road.

According to the GCP’s own documentation (e.g., C2C consultation brochure, November 2017) the journey time between Cambourne and Cambridge city centre would be 21.5–33.5 minutes for the proposed off-road scheme, as compared to 25–35 minutes for a generic (non-optimised on-road scheme). Pre-Covid Vix data and the recently conducted GCP assessment of on-road options (C2C Outline Business Case, Options Assessment Report Part 1, Section 8.9) clearly show that elimination of any delays on Madingley hill by means of a free-running in-bound bus lane would deliver journey times between Madingley Mulch Roundabout and Lady Margaret Road of less than 9 minutes, consistent with an overall Cambourne to Cambridge journey time comfortably in the 20–25 minute range.

For some routes, an on-road option would in fact be a few minutes faster than the proposed off-road scheme, most notably to and from the Cambridge Biomedical Campus via the M11 (avoiding three left turns within the West Cambridge site); to and from the Cambridge Science Park via Eddington (avoiding traversing the West Cambridge site); and returning from the City Centre (avoiding the elongated return route via Lensfield Road).

- An in-bound bus lane on the A1303 would fit within the current highway boundary for the entire stretch from Madingley Mulch roundabout to the West Cambridge site. Other arterial routes into Cambridge – Huntingdon Road, Trumpington Road and Milton Road, for example – have a bus lane alongside two lanes of general traffic and a cycle lane within a road width as little as 12 metres, which is as narrow as the A1303 gets.

The detailed analysis of on-road options in Section 8 of the C2C Outline Business Case Options Assessment Report confirms that construction would be feasible.

- An in-bound bus lane along the A1303 could be implemented at minimal cost compared with the estimated £150–200 million cost of an off-road scheme.

Coton Parish Council therefore concludes that, given the GCP’s recognition of the environmental damage an off-road bus lane would cause, and the lack of business case benefits behind the off-road option, there is no rationale for preferring an off-road busway over an on-road solution between Madingley Mulch and Cambridge. The preferred route will result in the destruction of many acres of greenbelt, including priority bio-diversity habitats, a 100-year-old orchard and cherished viewsapes protected by National Trust covenants.

Given the lack of requirement for an outbound intervention, the duplication of active travel routes and the acknowledged ability of an in-bound on-road bus lane to provide at least equivalent transport

benefits, Coton Parish Council believes that the proposed scheme does not meet the “exceptional circumstances” criteria for breaching the greenbelt as required by the National Planning Policy Framework (NPPF).

### **Specific Questions in the Environmental Impact Assessment**

#### *Active Travel*

The GCP proposals for the C2C busway contain provision for a cycle lane, or “active travel route”. This is additional to their proposals for a “greenway” or cycle route, from Cambridge, running through Coton and along the Wimpole Way, to Hardwick and Comberton. It is also additional to the GCP’s planned investment in the existing cycle lane along Madingley Road. In short, within a 500m north–south corridor between Cambridge and Hardwick, the Cambridge authorities are planning to spend money on three separate cycle lanes.

GCP officials are proud of this approach, claiming in meetings that it will make Cambridge “more like Belgium”, or other European countries with good cycle provision, and that the off-road cycle path would be the most “direct route into town”. However, whilst measures to encourage commuters out of cars and onto bicycles are to be welcomed, Coton Parish Council believes that building three separate cycle tracks within a 500m corridor is an extravagant duplication of infrastructure, an unnecessary greenbelt incursion and a waste of taxpayers’ money. Moreover, the active travel route goes over a significant hill (with a height gain of 40 metres), will be adjacent to vehicles (either buses or highway traffic) and will be distant from some residents in Bourn Airfield and Cambourne. It is therefore not an ideal route to encourage commuters out of cars and onto bicycles and is arguably not the “inclusive” option.

The council strongly recommends that the off-road busway, and its cycle route, are not taken forward.

#### *Construction*

Coton Parish Council does not agree that CPPF land at the northern edge of the village is a suitable site for a local area compound. It is a prominent location with poor access.

#### *Bus Stop*

Coton Parish Council would like the bus services, which should in any case be delivered along the Madingley Road, to stop at the American Cemetery and at the existing bus stop at the Coton turn.

The planned bus stop at the junction with Cambridge Road is at least a kilometre from the majority of social housing in the village and would not serve Coton well.

Coton Parish Council believes that there is a strong likelihood that commuters using the bus stop would use the village as a park-and-ride site, which would lead to parking congestion. It would also potentially materially compromise the Comberton Greenway since much of the commuter parking would most likely take place on the Greenway route (Coton High Street and The Footpath).

Coton Parish Council is concerned that the bus stop and crossing point at the Cambridge Road is “an area where wayfinding features, lighting, seating points and cycle parking may be proposed”. This would represent undesirable urbanisation on the edge of the village and a further incursion on the greenbelt.

#### *Impact on the village, conservation zone, views, sight lines and bio-diversity loss*

There has been a settlement at Coton for over 1000 years. The village is surrounded by fields and trees, has the 11<sup>th</sup>-century, Grade I listed St Peter’s Church at its heart, and a further 13 listed buildings, most of which sit within the historic centre of the village and the designated conservation zone. There

are also two moated sites and the remains of ancient ridge-and-furrow field patterns, which are designated Historical Monuments (*An Inventory of the Historical Monuments in the County of Cambridgeshire, Volume 1*, West Cambridgeshire. HMSO London 1968). Coton Parish Council believes that the route of the proposed Busway through the fields immediately to the north of the village centre and then directly through the village as it crosses Cambridge Road and goes through Coton Orchard would irreparably damage the village setting and compromise its rural integrity.

The fields to the north of the village centre leading up to Madingley Road and Madingley Rise are protected by National Trust covenants because of their importance to the setting of Cambridge. The significance of these fields and the views of Cambridge from the hill are highlighted in the most recent LDA Cambridge Greenbelt Study, commissioned by South Cambs District Council in 2002.

The views from the village, and in particular from Whitwell Way across the fields and up towards Madingley Rise, are fundamental to Coton's rural setting. The proposed engineer-led 'straight line' approach to the busway route through these fields is particularly brutal and indicative of a lack of appreciation and respect for the landscape value of this area.



The Grade I listed Cambridge American Military Cemetery at the top of Madingley Hill is the only military cemetery in the United Kingdom that commemorates American service men and women and civilian volunteers who died in World War II. More than 3,800 are buried there, and the Walls of the Missing list over 5,000 names in the sacred memory of those who were lost missing in action. Dedicated in 1956 on land donated by the University, the site was chosen because of its situation at the top of Madingley Hill and the views afforded across surrounding countryside. This was articulated by Matthew Brown, Superintendent of the Cemetery, in representations made to the GCP Executive Board in 2021. Mr Brown stated that the site was chosen, "Specifically for its natural beauty and unparalleled viewshed. The US Government asked for this specific terrain – no other terrain would do – because the viewshed was the key". He went on to say, "We are concerned that GCP's proposal to build a tarmac bus road across the south side of the hill would irreparably damage this unique and precious landscape, compromising the setting of the American Military Cemetery, severing historic community access routes and paving the way for further urban encroachment in its vicinity." The EIA consultation document does not address these concerns.

At the east of the village lie the community allotments and The Coton Orchard, which was first planted in 1922 and celebrates its centenary this year. The orchard contains venerable specimens of rare local

fruit tree varieties, including apple, pear, greengage and cherry. Both Coton Orchard and the allotments are protected by National Trust Covenants. Coton Parish Council believes that the consultation fails to describe adequately the impact of the proposed scheme on this traditional orchard and its significant bio-diverse habitat. In this, it could be deemed to be misleading. Under the Natural Environment and Communities Act 2006, traditional Orchards are classified as Priority Habitats. Based on a proposed scheme width of between 20–30 metres, the destruction of priority habitat in the orchard will amount to between 3–4.5 acres. Furthermore, the most recent bat survey conducted in 2019 identified the eastern part of the orchard as being “notable for bat activity” and identified several rare species, including the extremely rare Barbastelle bat, which are national conservation priorities.

Coton Parish Council believes that the current proposed mitigation and offsetting improvement measures do not robustly evidence Bio-diversity Net Gain (BNG) as required. The EIA document does not properly account for habitat loss – not least because the Orchard surveys are incomplete. The offsetting schemes do not appear to provide real ecological benefits. In particular, the proposed small and isolated grassland habitats are (as highlighted by Cambridge Past Present and Future on other schemes and in their response to this consultation) of dubious long-term ecological benefit. Coton Parish Council is also concerned that the planned offsets are subject to landowner consent, which, as GCP officers have confirmed is considered unlikely in a number of areas. Coton Parish Council therefore believes that there is considerable uncertainty as to whether a BNG is achievable along the section of the route that runs from Madingley Mulch to Ada Lovelace Road, and this is not properly acknowledged in the consultation document. Again, this could be deemed to be misleading.

Red Meadow hill to the south of Coton is the highest point locally and provides important views to both Cambridge and Madingley Hill. Coton Parish Council is concerned that the new road would be visible from Red Meadow Hill. The consultation documents state that this would not be the case but there is no evidence to support this. Coton Parish Council requests that the GCP provide evidential sightlines to support this statement.

#### *“North of Coton”*

Coton Parish Council rejects this terminology. The proposed off-road bus lane would not go “north” of Coton village, but through arable fields at the back of the houses on the High Street, through Coton Orchard, and through a largely undisturbed rich wildlife habitat beyond the Orchard and within the village boundaries. It also cuts across the fields around the village, which have been protected for 100 years and have National Trust covenants on them. Coton Parish Council believes that the bus route should be delivered using Madingley Road.

#### *M11 Bridge*

Coton Parish Council believes that a new M11 bridge to carry an off-road busway is unnecessary and should not be built, given that the bus services between Cambourne and Cambridge could be delivered no less effectively along Madingley Road. The “Rectory Farm Bridge Options Report”, produced by Atkins for GCP in June 2016, provided multiple options, including a dedicated in-bound bus lane on the existing M11 overbridge, alongside two lanes of general traffic and a lane for non-motorised users – all at minimal cost compared to that of an entirely new bridge.

#### *“Quick wins”*

The GCP Executive Board has repeatedly been urged by stakeholders to consider “quick wins” on the A1303 that could improve C2C bus journeys prior to or in the absence of implementing an off-road busway. At the Executive Board briefing meeting in December 2018, the Board agreed to explore such “quick wins”. In response, in May 2019, Mott MacDonald produced a technical note titled “Madingley Road ‘Quick-Win’ Options Outline”. This provided some suggestions, but with an extremely restrictive

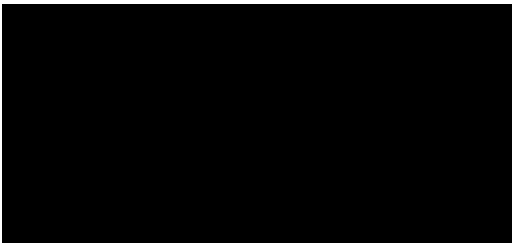
set of criteria, including no land take, no significant vegetation loss and no impact on or input from any third parties. Considering the impact of the off-road option on land take, vegetation and third parties, Coton Parish Council argues that it was unreasonable to have placed such extreme restrictions on alternative on-road approaches.

In 2021, the independent audit of the C2C project noted: “the range of measures that would improve conditions along Madingley Road for bus users as well as general traffic are worth re- considering given the recent changes in the government’s transport strategy and policy towards buses accompanied with additional funding. It is possible that the GCP shied away from considering any substantial improvements along the A1303 because of the cost implications and fearing that it would divert resources away from the preferred option. The two options are not mutually exclusive and could be considered compatible.”

Coton Parish Council notes that the auditor’s recommendation has still not been followed through by the GCP and that consideration has still not been adequately given to less destructive, less costly on-road opportunities. At parish consultations in 2022, GCP officials defended the lack of activity by claiming, falsely, that previous “quick win” explorations were only to consider cycle routes, rather than bus routes. Coton Parish Council would note that the GCP has therefore not undertaken the necessary due diligence on on-road alternatives to its preferred off-road busway scheme.

### **Other responses**

Coton Parish Council supports the responses to this consultation made by Coton Loves Pollinators, Cambridge Past Present and Future and the Coton Busway Action Group.



11 July 2022

Delivered by email

Greater Cambridge Partnership  
PO Box 1493  
Mandela House  
4 Regent Street  
Cambridge  
CB1 0YR

Ref: COUS3003

Dear Sir / Madam

## **CAMBOURNE TO CAMBRIDGE BETTER PUBLIC TRANSPORT AND ACTIVE TRAVEL ENVIRONMENTAL IMPACT ASSESSMENT CONSULTATION**

We write on behalf of Countryside in respect of the current consultation on the Cambourne to Cambridge (C2C) project. Countryside have important land interests along the C2C corridor, most significantly at Bourn Airfield. We welcome the opportunity to comment on the current Environmental Impact Assessment (EIA) consultation process as part of the continuing dialogue on the proposals.

### **Background**

Bourn Airfield is allocated as a new village in the South Cambridgeshire District Local Plan 2018 Policy SS/7<sup>1</sup> and is subject to an adopted SPD (2019) for the site<sup>2</sup>. A planning application for the development of the majority of the new village by Countryside Properties (UK) Ltd and the Taylor Family received a resolution to grant permission in February 2021 for the following description of development:

*“Outline planning permission for a new mixed use village comprising residential development of approximately 3,500 dwellings; mixed uses comprising employment, retail, hotel, leisure, residential institutions; education, community facilities, open space including parks, ecological areas and woodlands, landscaping; engineering for foul and sustainable urban drainage systems; footpaths, cycle ways, public transport infrastructure, highways including a principal eastern access from the roundabout in St Neots Road and western access with Broadway including first section of strategic public transport route; associated infrastructure, groundworks and demolition; with all matters reserved except for the principal highway junctions from the St Neots Road roundabout and onto Broadway with some matters reserved except for access.”*

---

<sup>1</sup> <https://www.scambs.gov.uk/media/17793/south-cambridgeshire-adopted-local-plan-2018.pdf>

<sup>2</sup> <https://www.scambs.gov.uk/planning/local-plan-and-neighbourhood-planning/bourn-airfield-spd/>

Discussions on the Section 106 Agreement are well advanced and it is expected that this will be signed and the formal decision issued in July 2022.

The planning application will deliver a section of the C2C route through the site to link the A428 corridor to Cambridge and St Neots. The strategy for the HQPT route through the site is to:

- Provide dedicated bus lanes and cycle path running parallel;
- Access from the north east and north west. The north west access will be from the existing access. The north east access route is safeguarded to allow for the GCP to bring forwards its preferred alternative in the future;
- Run along the northern corridor of the site for most of its length, without any crossing to allow for buses to reach their optimal speed;
- Locate the two C2C halts to conveniently serve the whole development, one by the village centre and another by the north-eastern gateway and existing employment site; and
- Have only two crossings, in proximity to the C2C halt to limit the impact on the speed of travel.

Countryside are supportive of the C2C project and have worked closely with the GCP to date through the development of the proposals for both the Bourn Airfield and the C2C scheme. This has involved regular meetings between Countryside's appointed transport consultants, Mayer Brown, and the GCP and sharing of Countryside's evidence base. Countryside are committed to continuing this dialogue and seeking to support the development, and ultimately the delivery of the C2C scheme. The final alignment of the C2C should not affect the developable area of the Bourn Airfield planning permission. The current discussions regarding the Preferred Route are focused around the following matters:

- Adjustment to the Western Access within the highway boundary, to align with the Busway within Cambourne
- The Western and Eastern Interchanges – for which the C2C Team have asked Countryside to provide a provisional design
- The Cycleway within Bourn Airfield – for which it is accepted that there is a doubling up (a C2C Cycleway and a Countryside Cycleway) which will require later resolution
- The Busway at the NE section of the site – around the specific alignment proposed.

## **Response to Consultation**

The current consultation is focused around a single document titled Cambourne to Cambridge; Better Public Transport and Active Travel Project; Environmental Impact Assessment: Public Consultation. The consultation documents seeks views on more detailed scheme proposals (albeit not at a technical detailed level) and possible impacts, as well as the ways to manage and mitigate those impacts.

At this stage the consultation continues to be high level. Whilst more detailed plans are included and potential impacts identified, alongside potential mitigation, this is not a full suite of documentation for consideration. As such, this response does not comprise a detailed technical appraisal. We reserve the right to comment on more detailed matters as further information is published.

Section 3 of the consultation document provides general information for the scheme, with the emerging designs and environmental issues presented across eight area sections. Section B relates to Bourn Airfield. Given

Countryside's interests the focus of the representations is on Section B however the wider proposals are also considered.

We note the proposals for the Scotland Farm Travel Hub. The consultation document advises that facilities at the hub will include *"2000 car parking spaces, with 5% for disabled parking and potential provision of electric charging points."* It is considered that imperative that provision is made for electric charging points as part of the Hub. We note that the Greater Cambridge Sustainable Design and Construction SPD (2020) clearly encourages the provision of EV charging points.

With regards to Section B: Bourn Airfield we would highlight the following points:

- The consultation report notes that the route will potentially pass by newly developed houses and a generally increasing urban environment. We would note that the route would also run alongside the new education facilities and it is important this is recognised, as has been done through the development of the Bourn Airfield proposals by Countryside.
- We note the suggestion of a construction compound on the Bourn Airfield site. Whilst Countryside have no objection to this in principle, it will be important that there is ongoing dialogue on the siting of this compound. It should also be noted that whilst the Countryside proposals will be under construction, there are existing employment facilities on site which fall outside of the Countryside site which are operational. Further construction is also ongoing in respect of the development of additional employment land on the site.

## **Recommendations on EIA process**

Countryside are supportive of early consultation on the EIA Scoping process. Given the early juncture of this consultation, we provide the following items to be mindful of during the next stages:

- Any EIA process must consider the Project as whole, regardless of application method or consenting regime. It is important that, where works are proposed, survey efforts are full and up to date in order to inform a robust EIA process and assessment of the Project as a whole. Any gaps in baseline survey data may lead to uncertainty in defining effects and mitigation and thus result in avenues for procedural risk/challenge. It is recommended that the maximum extent of works is defined at an early juncture (now) and that suitable spatial tolerances are allowed for any areas of uncertainty (e.g. infrastructure, construction compounds and any other items 'outside' the main project area).
- One of the key areas which needs to be considered in any EIA is the approach to cumulative assessment. This is particularly the case here when thinking about the C2C project alongside the Countryside proposals at Bourn Airfield. For in-combination effects it is recommended early engagement with consultees and decision makers is established and that an agreed list of projects is established for assessment within the EIA. In order to inform potential 'Approved Projects', it is recommended that a review is undertaken of planning applications submitted to SCDC and other national registers<sup>3</sup> to identify potential projects that could give rise to in-combination interactions with the Proposed Scheme. Appropriate temporal and spatial considerations should be applied to your search and selection of schemes for in-combination assessment, along with what is considered to be 'existing and approved'<sup>4</sup> in line with the EIA Regulations and PPG.

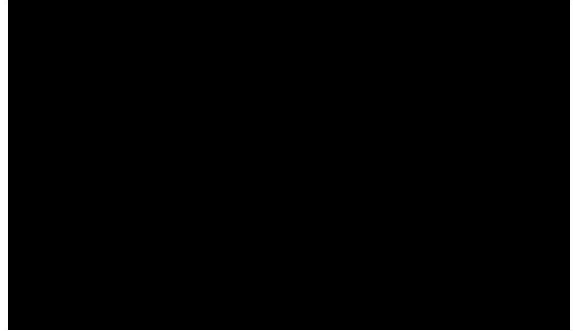


We hope that the above observations are of assistance in the continued development and assessment of the proposals for C2C. Countryside are committed to continue engaging with the GCP and other relevant parties regarding the proposals and would be happy to arrange a meeting to discuss the above further if this would be of assistance.

Yours sincerely



**Cambridge University Rugby Union and  
Association Football Trust Limited  
(THE)**



Greater Cambridge Partnership  
PO Box 1493  
Mandela House  
4 Regent Street  
Cambridge  
CB1 0YR

11 July 2022

Dear Mr Blake

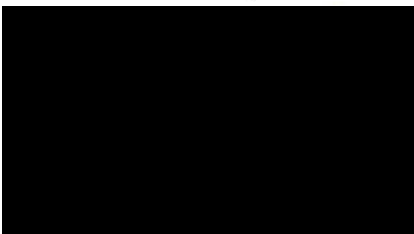
**Cambourne to Cambridge – Environmental Impact Assessment Public Consultation**

Following your request for consultation on the Cambourne to Cambridge Busway, the directors of Cambridge University Rugby Union and Association Football Trust Limited, would like the following points to be considered as part of the consultation.

- The arrangements for continuing daily access to the current grounds and the associated training facility on the paddocks;
- The arrangements for the parking of vehicles during the set up of events such as Steel Bidders where lorries are unloaded on the hardstanding of the track;
- Access for emergency vehicles (ambulances especially) to the training ground;
- The arrangements for access during the construction of the busway – will it be a route for all construction traffic;
- The close proximity of the proposed busway to the grounds boundary line;
- Build over rights for the ground;
- Loss of trees to Grange Road;
- The proposals over potential impact to current drainage arrangements for the grounds;
- Any proposals for enhanced security arrangements for the ground and training ground including safety fencing/netting and boundary treatment;
- Intentions regarding the retention or enhancement to bus stop facilities in close proximity of the grounds on Grange Road

The board of directors would welcome further discussion with the Greater Cambridge Partnership surrounding the Cambourne to Cambridge (C2C) Better Public Transport Project and impact on the Company.

Yours sincerely



Section D NMU access along Scotland Road, northern end.

## NMU Comments

The route proposed in the EIA consultation has three main issues:

- 1) The existing footpath is narrow. The typical width between road and street furniture is 1.40m, the narrowest point (Southernwood House) drops to about 1.10m but could be increased to 1.40m if a streetlight were relocated.
- 2) The proposed crossing point at the entrance to the village is regarded as being exposed to high-speed traffic and contention around the chicane.
- 3) Access from the Park Lane/Oakington Road side of the village will require users to cross twice.

Proposed alternative route:

- 1) Crosses the hedgerow most obviously past the end of the drainage ditch, opposite Southernwood House, further along between the trees opposite Blackgate House, or close to the roundabout if the levels can be adjusted to avoid a steep slope.
- 2) Joins the road opposite Oak Crescent. This might be a suitable point for a controlled crossing (with this scheme or in the future) and is probably the safest place to cross.
- 3) Permits cyclists from High Street to join after using the roundabout.
- 4) Provides a crossing point for pedestrian access from the green at the end of High Street
- 5) Provides a crossing point for pedestrian access at the Rectory Farm end (since there is an existing break in the hedgerow here).

There is an approved LHI submission to improve parking adjacent to Oak Crescent. There may be an opportunity to allow for future integration as part of this work.

There may be some loss of mature hedgerow, but it may be possible to mitigate this by providing additional screening of the route from the new Church Farm Buildings development. This would avoid introducing an obvious break into the hedge line.

A suggestion has been made that the path could follow the border of the Church Farm development and join the road network on Madingley road close to Park Street.

There is a bank on the bend alongside the roundabout, this may require some form of retaining wall to achieve a suitable path width.

Online map (extract below):

<https://shared.xmap.cloud?map=127c54e7-39fa-4186-bb8a-29a225b06da5>

## Travel Hub Comments

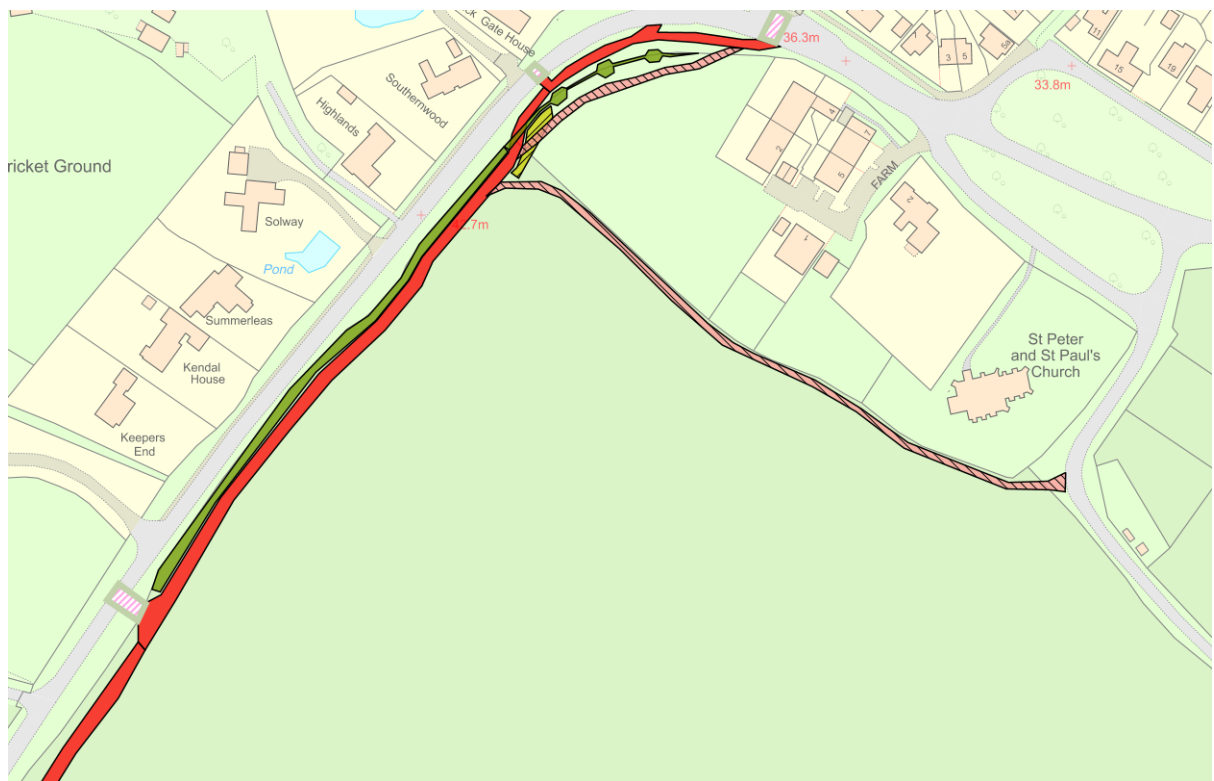
Many people do not have the ability to cycle and may not have a car, and so a regular shuttle bus service would be an essential component for Dry Drayton and other villages in the vicinity. This would be a way to ensure the Travel Hub is fully inclusive and could also tempt car owners from their vehicles.

DDPC intends to survey residents of the village regarding potential traffic calming and speed reduction measures as a response to the existing conditions. However, we anticipate that additional measures may be necessary to mitigate the changing traffic flows resulting from the Travel Hub.

The consultation mentions a balancing pond and filtration system to protect Callow Brook. Whilst this is necessary protection, it is unlikely that it would be successful in the case of a fuel spillage from cars or buses. What protection will be in place during and after the construction phases to protect the environment and nearby watercourses should there be leakages from a fuel bowser or vehicle?

Strict movement protocols should be enforceable for materials' suppliers, subcontractors, and site staff to ensure they only use routes that approach from the A428 roundabout at Scotland Road and not via the C-road through Dry Drayton that comes from the A1307. This must be strictly enforced by the main contractor as the site for the Travel Hub will also be a main depot for the project, not just for the construction phase.

Designing out light and noise pollution from the Travel Hub must be a priority to mitigate its impact not only on the nearby residential and industrial areas, but also further afield on the Church Farm Buildings in the village itself.



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**BY EMAIL ONLY**

5<sup>th</sup> August 2022

Dear Sir/Madam

**East West Rail Company Representation on the Cambourne to Cambridge Better Public Transport and Active Travel Environmental Impact Assessment - Public Consultation**

This response is submitted by Adams Hendry Consulting Ltd on the Cambourne to Cambridge (C2C) Better Public Transport and Active Travel Environmental Impact Assessment public consultation document on behalf of our client, East West Rail Company (EWR Co).

*Background*

EWR Co is the organisation responsible for delivering East West Rail (EWR), a major rail project aiming to deliver both new and enhanced rail infrastructure to provide frequent, fast, and reliable rail links for communities between Oxford, Milton Keynes, Bedford, and Cambridge to support and facilitate economic growth across the Oxford – Cambridge corridor.

It aims to deliver a net zero-carbon railway, in line with existing and developing net zero carbon policy, legislation and commitments at a global, national, and local level. To accelerate the modal shift to public and active transport, EWR Co has taken a proactive approach to environmental considerations and put them at the core of the project to ensure environmental and social benefits are delivered to the local community. EWR's low carbon transport solution will compliment and help to deliver the overall transport aims of the Greater Cambridgeshire Partnership, and those throughout the Ox-Cam sub-region to support sustainable economic growth and facilitate accessibility and movement by sustainable modes of transport.

The latest EWR proposals were subject to non-statutory public consultation between 31<sup>st</sup> March and 9<sup>th</sup> June 2021. The main consultation document 'Making Meaningful Connections' can be viewed [here](#), whilst the wider EWR documentation library can be found on [eastwestrail.co.uk](http://eastwestrail.co.uk).

Significant rail service enhancements are proposed within the Greater Cambridge area, with a new EWR station proposed at Cambourne and enhancements to Cambridge station, alongside service improvements across the sub-region to help improve connections between people's homes and their jobs.



**RTPI**  
Chartered Town Planners



**INVESTORS  
IN PEOPLE**



### *C2C Environmental Assessment*

At this stage of the Project, the consultation document provides a high-level of reporting on the potential environmental impacts of the proposed C2C scheme which are noted. EWR wishes to continue to liaise closely with Greater Cambridgeshire Partnership (GCP) as the full details of the scheme are refined and the further work is undertaken to prepare the Environmental Statement be submitted with the Transport and Works Act Order (TWAO) application, envisaged at the end of this year.

### *Proposed Active Travel Links to EWR*

In the meantime, EWR Co can confirm its support in principle for the C2C public transport route and the opportunities this presents for the delivery of a direct active travel link to and from the new EWR Cambourne Station connecting to the C2C network into Cambridge. The commitment to provide an active travel link as part of the C2C proposals will allow residents of Cambourne to use non-vehicular methods for first/last mile travel to and from Cambourne Station, aligning with EWR's targets for sustainable transport. EWR Co also support C2C bus links to key destinations in Cambridge including to EWR services at Cambridge Station and to key employment hubs.

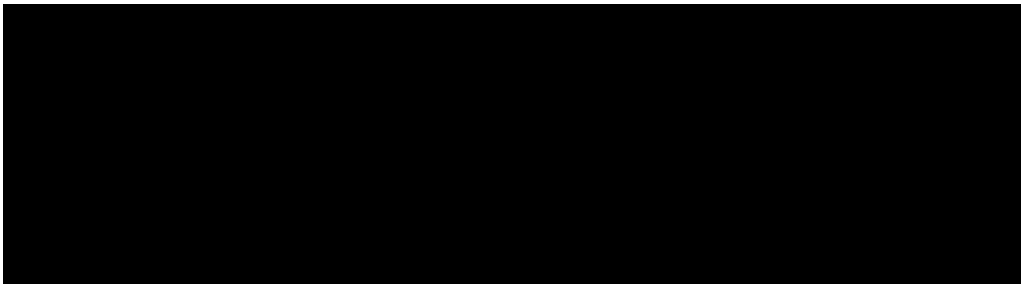
### *C2C Potential Interface with EWR and Support for Co-ordinated working*

There is likely to be a potential interface between EWR and the C2C Section B proposals at Bourn Airfield, and at the western end of Section C Childerley Gate and further a potential interface with proposed active travel routes in the area. As EWR Co's proposals are yet to be confirmed, EWR Co wish continue to work closely with the Greater Cambridge Partnership as the C2C proposals are refined further and prior to the submission of C2C's TWAO later this year.

### **Summary**

East West Rail is likely to play an important role in helping the Greater Cambridgeshire Partnership to achieve a net zero transport network through public transport corridor links such as the C2C project and in principle the project is supported. EWR Co supports close working and ongoing communication with Greater Cambridgeshire Partnership, to ensure that the proposals for East West Rail are fully integrated with C2C and any development conflicts are avoided.

EWR Co will wish to submit a further representation once the Transport and Works Act Order (TWAO) application is submitted to the Secretary of State at the end of the year, accompanied by an Environmental Statement.



**Cambourne to Cambridge Better Public Transport and Active Travel Project:  
Environmental Impact Assessment Public Consultation**

I am writing on behalf of Hallam Land Management Limited (HLM) in response to your invitation to submit representations on the Cambourne to Cambridge Better Public Transport and Active Travel Project Environmental Impact Assessment.

Their interest relates to the proposed Travel Hub facility at Scotland Farm. They are working with the landowner, James Peck, who owns the land on which the new Travel Hub facility and active travel path to Dry Drayton is proposed as well as a much wider tract of land to the north of the A428 towards the village of Dry Drayton.

Section 3 of your Environmental Impact Assessment sets out the reasoning for Scotland Farm's selection as the preferred site for a Travel Hub, noting its ease of access to and from the A428 and low environmental sensitivity. We support that conclusion and its continued selection as a 'travel hub' site.

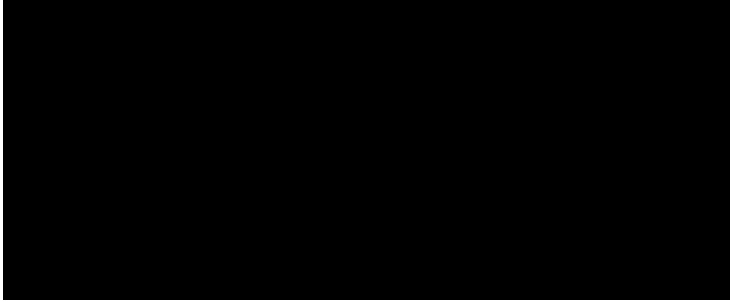
We note the inclusion of an indicative design on page 23 of the document. We have also prepared an illustrative masterplan for the travel hub which I've attached to this submission for your consideration. We are very keen to ensure this is an attractive and well-designed facility that is an asset to the area, and look forward to seeing how the designs evolves for this site.

James Peck as landowner and HLM as both his appointed agent and land promoter therefore fully endorse and support the proposed Travel Hub facility and active travel link as part of the Cambourne to Cambridge Better Public Transport and Active Travel Project.

We look forward to being able to consider the responses made to your consultation, with particular reference to those in relation to the facilities sought at Scotland Farm Travel Hub and the active travel link to Dry Drayton, and having an input into the design process for these elements as the project progresses.

Thank you for your time in reading this letter, and I look forward to hearing from you.

Yours sincerely





 Park and Ride



Rev	Description	Date
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Client:



Scotland Farm  
**Park and Ride Area (Illustrative)**

Scale@A3: Drawn: Designed: Approved:  
**1:12,500 CE MG OR**  
0 500 m 

Drawing Number: Revision: Date:  
**HLM059-031 - 01/12/2021**

50 North Thirteenth Street, Central Milton Keynes, MK9 3BP  
01908 666276 mail@davidlock.com davidlock.com



**Jesus College, Cambridge**

**Land at Grange Road, Cambridge (The Old Rifle Range)**

**Cambourne to Cambridge – Better Public Transport and Active Travel Project –  
July 2022**

***Response to the consultation on the above project following the release of the Environmental Impact Assessment Paper***

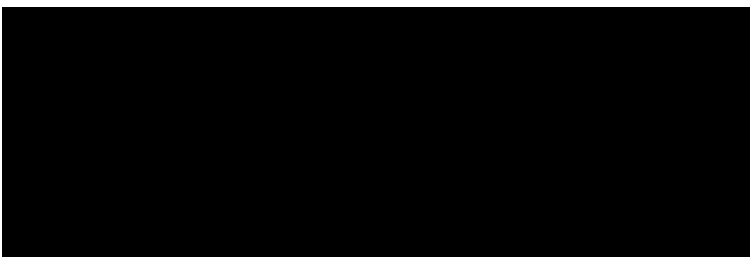
The College have reviewed the paper in so far as it effects their land holding at Grange Road, Cambridge. In general, the College is in support of any scheme which helps to resolve transport and congestion issues within the city. It supports the initiative of a new transport corridor to Cambourne.

The College is encouraged that the Greater Cambridge Partnership have taken into account some of the comments and observations which the College has made in earlier consultations. From the College's perspective, specifically in relation to their land holding, we would reiterate that an un-fettered access to their land is maintained at all times and for all types of vehicular and pedestrian uses. This is the principal access for farm and arboriculture machinery to access their land and this will need to be accommodated into any travel path/access designs. The new road junction with Grange Road will need to be designed to accommodate this type of traffic.

The College has also been concerned about land take, to ensure that this is minimal and really required, particularly where it adjoins the rugby ground and training grounds. For example, we noted in the masterplan for Section H, that there is a proposal for new rich grassland planting along the Bin Brook. We suggest this does not need to be part of the land take/change and perhaps something the College may look at as part of some other initiative.

We have stated before the issues of other third parties who have access rights along the roadway off Grange Road and the various underground services which benefit the West Cambridge site and others. We assume some reserved, services corridor will be retained for the College to retain these rights and to offer them to other third parties in the future.

The College seek to be fully briefed with any consultations going forward, given their land holdings will be affected by the scheme and to ensure the interests of the College are taken into account.





## Martin Grant Homes – North Cambourne

Greater Cambridge Partnership – Cambourne to Cambridge – Better Public Transport and Active Travel Project - Environmental Impact Assessment: Public Consultation

Martin Grant Homes - Representations

i-Transport Ref: SAW/VP/ITL17310-01

Date: 08 July 2022

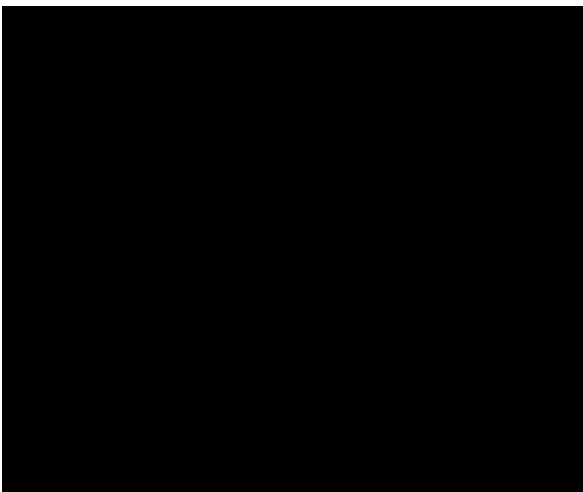
Martin Grant Homes – North Cambourne

Greater Cambridge Partnership – Cambourne to  
Cambridge – Better Public Transport and Active  
Travel Project - Environmental Impact Assessment:  
Public Consultation

Martin Grant Homes - Representations



Date: 08 July 2022



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## Quality Management

Report No.	Comments	Date	Author	Authorised
ITL17310-01	Issue	08.07.22		

File Ref: SAW/VP/ITL17310-01

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## Contents

### Executive Summary

<b>SECTION 1</b>	<b>Introduction</b>	<b>1</b>
<b>SECTION 2</b>	<b>Representations</b>	<b>2</b>
<b>SECTION 3</b>	<b>Conclusions</b>	<b>6</b>

## Appendices

<b>APPENDIX A.</b>	<b>WSP C2C Better Bus Journeys Consultation Response 2017/18</b>
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## Executive Summary

Martin Grant Homes (MGH) supports the principle of the Cambourne to Cambridge (C2C) public transport system. It is important to improve the sustainability and travel characteristics of the existing settlement of Cambourne.

Further, MGH welcomes the principle of a Travel Hub at the proposed future East–West Rail (EWR) station, should it proceed. However, MGH continues to believe that, as evidenced by GCP’s own work, GCP has not adopted the optimum solution and the authority should therefore reconsider the location of the park and ride facility. The independent audit of C2C recommended that further analyses and sensitivity tests be undertaken, and this work should be done before any further advancement of the proposal.

GCP’s current proposal may have an increased environmental impact over other options. The 2017 Regulations, paragraph 2 of Schedule 4 requires the applicant to include in their Environmental Statement a description of the reasonable alternatives studied (for example in terms of development design, technology, location, size and scale) and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. In consequence, the environmental impact assessment of the Greater Cambridge Partnership’s (GCP) scheme must consider the alternative solutions not preferred by GCP including a park and ride (P&R) facility at North Cambourne.

## SECTION 1 Introduction

- 1.1 These representations are made on behalf of Martin Grant Homes. MGH is promoting a residentially led, mixed use development on land to the north of Cambourne. The proposal was set out in Savills' North Cambourne – Vision Document which was submitted to GCP in early December 2021.
- 1.2 The Vision Document took account of EWR and a North Cambourne station and also proposed a park and ride site, and travel hub. It is important to note however that any future development at North Cambourne can proceed in a sustainable manner both without or with a railway station and without or with the proposed C2C scheme.
- 1.3 MGH supports the principle of C2C. Further, it welcomes a travel hub at North Cambourne should a North Cambourne EWR station be provided but as made clear in previous representations, it continues to believe that GCP's preferred option of a park and ride facility at Scotland Farm is not the optimum solution. It considers that the sustainability of the existing Cambourne settlement and future development of Cambourne is best served by a comprehensive travel hub and park and ride facility which, should it proceed, can be fully integrated with a North Cambourne railway station.
- 1.4 The remainder of the document sets out the background to MGH's representations.



## SECTION 2 Representations

- 2.1 MGH's position has been consistent over time that a P&R facility at Scotland Farm is not the optimum solution. Representations were made to the Better Bus Journeys Consultation in 2017/18 and these are reproduced at Appendix 1. GCP's decision making process to justify the selection of Scotland Farm for a park and ride site has been 'opaque' with no clear reasoning set out or even responses to the earlier representations submitted on behalf of MGH.
- 2.2 At that time, GCP used a two stage decision making process, the decision making part of which was significantly flawed. The seven alternative park and ride sites considered at that time were arbitrarily divided into two groups and assessed by GCP using a multi criteria assessment. The assessment ranked North Cambourne in equal top position with Bourn Airfield. Bourn Airfield was the location preferred by GCP in the Stage 1 assessment due to its potential interaction with future development. This was irrespective of the fact it was remote from the A428 junction via which it needed to successfully 'capture' car borne trips into Cambridge.
- 2.3 The second stage assessment proceeded with four sites which were then reduced to two sites – Bourn Airfield and Scotland Farm. The executive summary of the park and ride study report considered that Bourn Airfield was '*.....less desirable' than Scotland Farm given the likely pressure which would be put on the St Neots Road and the roundabouts connecting to the A428 by the proposed residential development. It is also further away from a junction with the strategic road network*'. Both of the reasons that Bourn Airfield was found unfavourable compared to Scotland Farm in the second stage assessment applied equally at the time of the Stage 1 assessment. The reason for GCP concluding in Stage 1 that Bourn Airfield was the best location was due to its interaction with future development, At Stage 2, this no longer seemed to be a key criteria in the selection of Scotland Farm, as Scotland Farm is in the Green Belt and has no adjacent development proposed. Why, then, was North Cambourne (previously identified as the most sustainable site for park and ride), not considered again at this stage, particularly as park and ride could be delivered in close proximity to the A428 junction?
- 2.4 The consequence of GCP's flawed two stage assessment is that a site with a multi-assessment criteria score of 0.49 was preferred to a site at North Cambourne with a score of 0.58. Using GCP's own rankings, the North Cambourne site was 18% better than GCP's chosen option. All of GCP's thinking and actions since that time have been to seek to justify a P&R facility at Scotland Farm in a closed and post hoc manner.

- 2.5 It was clear at the time of GCP's original assessment that North Cambourne was demonstrably, based on its own evidence, the preferred location for a park and ride facility. The outcome of this flawed decision making is that the GCP's preferred scheme promotes a Park and Ride facility at Scotland Farm which is located in the Green Belt and remote from Cambourne, Bourn Airfield, West Cambourne and possible future development at North Cambourne. The facility would involve a detour north of the A428 of at least 1.7km for all buses and passengers on every journey. This 'dead' length will increase operating costs and reduce ridership levels due to increased journey times.
- 2.6 Cambridge City Council and South Cambridgeshire District Council (referred to as 'the Councils') published at the end of 2021, their 'First Proposals' which showed that the local planning authorities have agreed to support an uplift in both employment and new homes. Their proposals identified the Cambourne area for growth with the preferred option being to the north of the settlement. The scale of the proposal, to the end of the plan period, is some 1,800 houses although there is no specific site identified at this stage.
- 2.7 The general travel characteristics of the existing Cambourne settlement are unsustainable. It is heavily car based with a high proportion of out commuting to nearby settlements including Cambridge. Some 95% of daily trips are undertaken by vehicle and Cambourne experiences less than 15% internalisation of trips. It is paramount therefore that decisions on both spatial strategy and transport infrastructure serve not only future development but, most importantly, also provide a step change to existing travel patterns. The principle of C2C and an accompanying park and ride facility offer benefits to the existing settlement of Cambourne and delivered appropriately, can help to raise the proportion of trips undertaken by sustainable modes quite significantly.
- 2.8 GCP has adduced no clear decision-making process or rationale as to why it ignored the findings of its own earlier assessment and instead adopted a sub-optimum location for the major travel hub at Scotland Farm.
- 2.9 The impact of the uncertainty regarding future spatial development patterns and the provision of strategic transport infrastructure was acknowledged explicitly in Amey Consulting's 'Independent Audit of Key Assumptions and Constraints' review of the C2C project. The report predated the Councils' 'First Proposals' which seek to allocate up to a further 1,800 homes at Cambourne. At that time the audit stated:

*'It is recommended that the assumptions and constraints in the following areas need updating in the Business Case to incorporate the latest developments in transport policies and strategies that influence the C2C scheme: ...*

- The GCP should continue to consult with stakeholders as the preferred option progresses and implement any recommendations that may arise from the Environmental Impact Assessment.*
- EWR: the issues around the potential impact on demand should be subjected to further analysis. This could be done through more detailed modelling of passenger demands or through sensitivity analysis of projected demands for the C2C under different scenarios..... More testing of travel demands would be helpful in understanding the long-term impacts of the scheme and general traffic in the area as well as on bus ridership.*

2.10 At a recent meeting with MGH and its representatives, GCP confirmed that it would not revisit the location of the park and ride under any circumstances. This position is despite the GCP's own scoring of the options identifying North Cambourne as the demonstrably preferred location.

2.11 Having made a flawed decision some years ago, it is disappointing that there has not subsequently been a more open-minded attitude in the authority to take account of changed circumstances and thereby ensure that the comprehensive travel hub is located in the best location both for future development and to deliver a step change in the travel characteristics of the existing settlement which is predominantly car based. MGH therefore continues to urge GCP to reconsider its approach to the location of the Cambourne park and ride facility.

2.12 Finally, page 2 of the C2C current consultation document makes clear that GCP is seeking views on how to mitigate and manage the impacts of the proposal. MGH believes that a sub-optimal solution has been chosen where the impact of two travel hubs is likely to be greater than if GCP had adopted North Cambourne as the preferred location for a combined park and ride facility and travel hub. Should GCP continue to pursue the Scotland Farm site, it will be imperative that the Environmental Impact Assessment considers fully the impacts of the rejected options as referred to earlier in relation to the EIA Regulations.

2.13 There is a real opportunity to deliver park and ride combined with the proposed C2C scheme and this significant investment, delivered in an appropriate location, will help to provide positive modal shift for internal trips within the existing settlement of Cambourne that would not otherwise happen. A park and ride located at Scotland Farm offers very little benefit to either existing residents in the area or future residents of an expanded Cambourne.



## SECTION 3      Conclusions

- 3.1      MGH is grateful for the opportunity to respond to the C2C consultation and wishes to engage constructively. MGH is supportive of the principle of C2C and welcomes a travel hub at North Cambourne, which would have the additional benefit of a transport interchange should EWR deliver a station at North Cambourne.
- 3.2      MGH continues to believe that, as evidenced by GCP's own work, GCP has not adopted the optimum solution and the authority should therefore reconsider the location of the park and ride facility. The independent audit of C2C recommended that further analyses and sensitivity tests be undertaken, and this work should be done before any further advancement of the proposal. If GCP chooses to pursue the current option, then it is both imperative and a legal requirement that the environmental impact assessment considers the options that were previously considered including a park and ride site at North Cambourne. GCP will need to demonstrate that Scotland Farm is superior to all other alternatives which is demonstrably not the case based on the existing evidence which shows that a park and ride at Cambourne is preferred.

**APPENDIX A.** WSP C2C Better Bus Journeys  
Consultation Response 2017/18



# Cambourne to Cambridge Better Bus journeys Consultation 2017/18 TECHNICAL NOTE

DATE	30 January 2018	CONFIDENTIALITY	Public
SUBJECT	Response to consultation on behalf of Martin Grant Homes and Harcourt Developments		
Project no.	Prepared by	Checked by	Authorised by
11501632	DAB	DAB	DAB

## 1. INTRODUCTION & BACKGROUND

This note has been prepared on behalf of Martin Grant Homes (MGH) and Harcourt Developments (HD) in response to the Greater Cambridge Partnership's consultation titled Cambourne to Cambridge: Better Bus Journeys during late 2017 and January 2018. A submission was also prepared on behalf of MGH and HD to an earlier consultation with regard to the Cambourne to Cambridge scheme in November 2015 which proposed the land north of Cambourne as a park & ride site location to serve the A428 corridor as part of a settlement expansion proposed north of Cambourne.

It is noted that the consultation is seeking views on two elements of the Cambourne to Cambridge scheme, firstly the choice of site for a park & ride to serve the corridor and secondly options for phase 1 of the bus route alignment from the Madingley Mulch roundabout to Cambridge.

## 2. PARK & RIDE SITE LOCATION

It is noted that the consultation is putting forward two alternative sites for the park and rides as follows:-

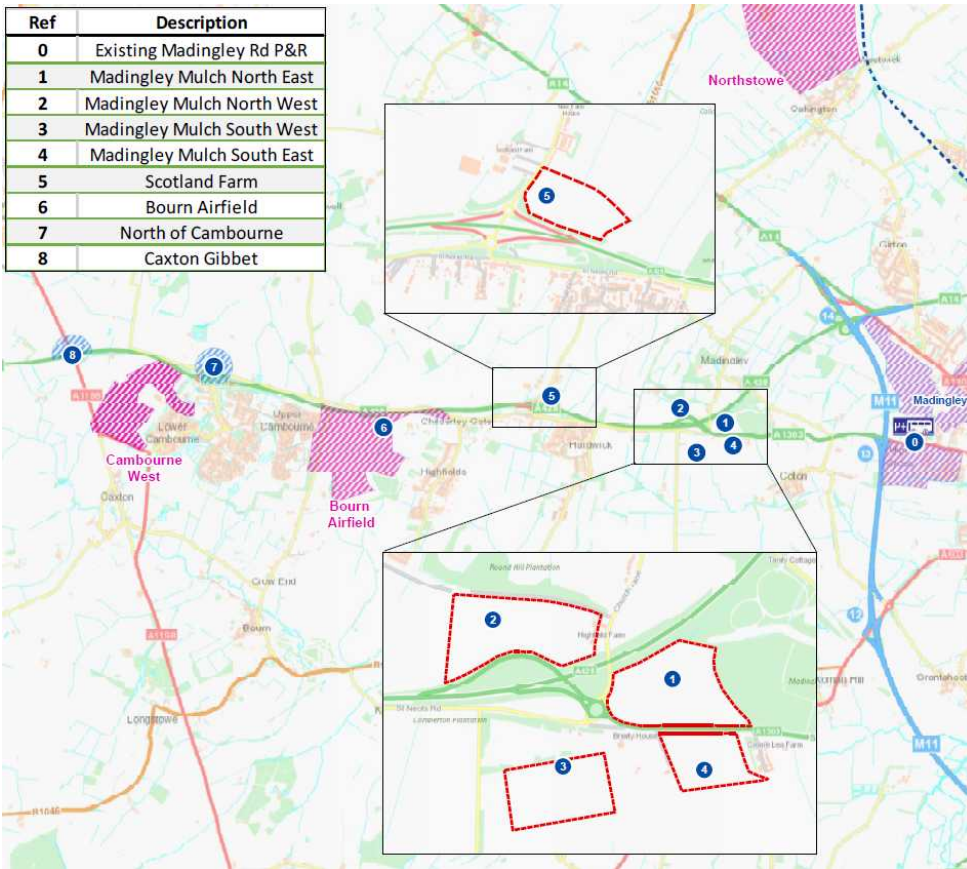
- Water works site (south of the Madingley Mulch roundabout); and,
- Scotland Farm (north east of the junction on the A428).

The consultation documents available for review, notably the Park & Ride Study (September 2017) sets out how the above two sites were selected from an initial list of 7 park & ride sites. It is evident from a close review of the Park & Ride Study that the justification for selection of the above two sites was flawed which has resulted in a wrong site selection for this consultation.

The Park & Ride Study identifies that the site selection was a two stage process. Stage 1 compared the 7 alternative park & ride sites on a detailed multi-criteria assessment grouped together in headings of policy, benefits and deliverability. Following Stage 1 four sites proceeded to Stage 2 which resulted in the selection of the two sites being put forward as part of the consultation.

### Stage 1 (July 2017)

The 7 alternative sites assessed in Stage 1 (July 2017) are shown on the location plan below.



**Figure 2.1 Park & Ride Assessment – Stage 1 Sites**

The site previously proposed by MGH and HD is listed as site 7, North of Cambourne.

The detailed multi criteria assessment is set out in the Park & Ride Study with the results summarised in the following table.

2B. MULTI-CRITERIA ANALYSIS - SUMMARY IN ORDER					
No.	Name	1A. HIGH LEVEL THEME - POLICY ALIGNMENT	1B. INTERMEDIATE LEVEL THEME - BENEFITS	1C. OPERATIONAL THEME - DELIVERABILITY	WEIGHTED AVERAGE
		Final weighted score (-3 to 3 scale):	Final weighted score (-3 to 3 scale):	Final weighted score (-3 to 3 scale):	
6	Bourn airfield	1.09	1.16	-0.50	0.58
7	North of Cambourne	1.21	1.15	-0.60	0.58
5	Scotland Farm	1.02	1.06	-0.60	0.49
3	Madingley Mulch South West (Often referred to as water works site)	1.09	1.06	-0.73	0.48
4	Madingley Mulch South East (often referred to as Chrome Lea)	1.09	0.92	-0.73	0.43
2	Madingley Mulch North West (often referred to as Park Farm)	1.09	0.95	-0.98	0.36
1	Madingley Mulch North East (site adjacent to SSSI north of A1303)	1.09	0.90	-0.98	0.34
8	Caxton Gibbet	1.14	1.08	-1.23	0.33
0	Existing Madingley Road Park and Ride	0.76	0.27	-0.20	0.27

**Figure 2.2 Stage 1 Site Ranking**

It is clear from the above table that site 7, North of Cambourne, is ranked in equal top position alongside site 6, Bourne Airfield. However, when looking at specific transport benefits, the North of Cambourne site is ranked highest and the Bourne Airfield site is ranked the lowest given that it is not located at an A428 junction.

The report identifies that sites 6 and 7 perform best but are similar and so only one of the two will be put forward to Stage 2. Of the two sites site 6 is then selected based on the potential interaction with future adjacent development at



Bourne Airfield, ignoring that the Bourne Airfield site has the lowest ranking for transport benefits which should be a prime consideration given the function of a park & ride site.

Furthermore, it has been publically known since submission of the Local Plan further proposed modifications in November 2016 that the emerging policy for the Bourne Airfield site no longer includes an allocation for a park and ride. This decision arises for two reasons; firstly the site is not large enough to accommodate the range of land uses proposed even without a park and ride and secondly the site is not located near a junction with the A428 and so has poor access from the strategic road network. This change to the emerging Local plan was made some 6 months before the park and ride study commenced and so have been in the public domain for that period and yet apparently ignored in Stage 1 of this study.

It is therefore clear that site 7 (North of Cambourne) is preferable to site 6 (Bourne Airfield) and should have been put forward to Stage 2 of the park & ride study.

### Stage 2 (August 2017)

The stage 2 option assessment proceeded with 4 alternative park and ride site locations (sites 3, 4, 5 and 6) which would be whittled down to two, either site 3 or 4 as one option and either site 5 (Scotland Farm) and 6 (Bourne Airfield) as the other option to go forward to the consultation. The justification for the selection between sites 5 and 6 is set out in the Executive Summary of the park and ride study report and is repeated below:-

*“Bourn Airfield is considered less desirable than Scotland Farm given the likely pressure which would be put on the St Neots Road and the roundabouts connecting to the A428 by the proposed residential development. It is also further from a junction with the strategic road network. Modest parking provision for cyclists and disabled drivers adjacent to bus stops within the development itself, and potentially additional parking to meet local needs, would be desirable to maximise the use of the busway by residents, and to reduce external trip-making, but the additional pressure of traffic arriving from elsewhere generated by the Park and Ride would not be helpful when considered cumulatively against the impact of the development itself.*

*With regard to Bourn Airfield it is also noted that the requirement in the emerging Local Plan to potentially include a Park and Ride facility as part of the Bourn Airfield new settlement may be removed from the proposed allocation if the Council's further proposed modifications reflecting the position of the busway scheme at the time are confirmed by the Examination Inspector.*

*Having regard to the transport disbenefits of Bourn Airfield compared with Scotland Farm, it is proposed that land at Bourn Airfield is excluded from further assessment.”*

It is clear from the extract above that the site 6 (Bourne Airfield) was considered less favourable than site 5 (Scotland Farm) on the basis of the transport disbenefits and that a park & ride was being omitted from the Bourne Airfield Local Plan allocation. The above two reasons for why Site 6 (Bourne Airfield) was considered inferior to Scotland Farm equally applied at Stage 1 when comparing sites 6 and 7. If these considerations were applied, as they should have been at Stage 1, then site 7 (North of Cambourne) would have been selected for Stage 2 over site 6 (Bourne Airfield).

Furthermore, given that site 7 (North of Cambourne) was ranked higher than site 5 (Scotland farm) at Stage 1 (see figure 2.2 above) it would logically follow that site 7 would have been selected over site 5 to proceed to the current consultation. On this basis the process of site selection is fundamentally flawed and the preferred location for the park and ride (Site 7) should be reinstated to proceed to further stages of analysis and consultation.

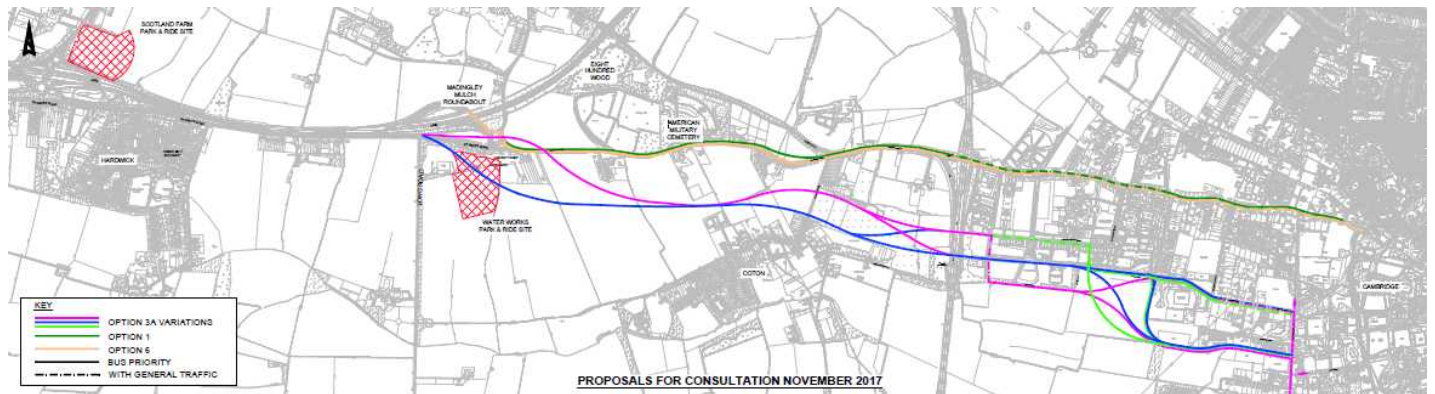
### 3. BUS ROUTE ALIGNMENT OPTIONS

The consultation has identified 3 options for a bus priority route between the Madingley Mulch roundabout and central Cambridge as follows:-

- Option 1 (Route A): an on-road option which includes the introduction of a bus lane on Madingley Road between Madingley Mulch roundabout and Lady Margret Road;

- Option 6 (Route B) : an on-road tidal bus lane on Maddingley Road running between Maddingley Mulch Roundabout and the new entrance to Eddington (High Cross); and
- Option 3A (Route 3 variants): an off-road busway running between Maddingley Mulch roundabout and Grange Road, Cambridge.

The above options for Phase 1 of the bus priority route are shown on figure 3.1 below.



**Figure 3.1 Phase 1 Consultation Bus Route Alignments**

The bus route studies have identified that route option 3A would offer the shortest bus journey time and could attract 64% more bus passengers than Options 1 or 6.

On the basis of the shortest journey time, highest potential bus patronage and reliability offered by an off road route then a preference is expressed for the Option 3A route for phase 1 of the bus route.

#### 4. CONCLUSIONS

With regard to the park and ride site selection, from an examination of the park and ride study it is clear that the process of site selection is fundamentally flawed and the preferred location for the park and ride (Site 7) should be reinstated to proceed to further stages of analysis and consultation.

With regard to the Phase 1 bus route options, on the basis of the shortest journey time, highest potential bus patronage and reliability offered by an off road route then a preference is expressed for the Option 3A route for phase 1 of the bus route from Cambourne to Cambridge.





Defence  
Infrastructure  
Organisation

Greater Cambridge Partnership  
PO Box 1493  
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**By E-Mail only**

06/07/22

Dear Sir or Madam,

**Cambourne to Cambridge EIA**

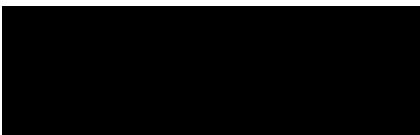
Thank you for consulting the Ministry of Defence on the Cambourne to Cambridge (C2C) Better Public Transport Project.

There are two MOD establishments within proximity of the proposed transport route these being Madingley Cemetery and Barton Road Rifle Range.

The current proposed route lies to the north of Barton Road Rifle Range. At this location, the MOD have no objections.

However, please re-consult with our team if there are any changes to the route, specifically if brought further south within Coton.

Yours faithfully,





**National  
Trust**

**BY EMAIL**

Transport Director, Greater Cambridge Partnership  
SH1317  
Shire Hall  
Cambridge  
CB3 0AP

11<sup>th</sup> July 2022

To Whom it may concern,

**Cambourne to Cambridge Park and Ride Project – EIA Public Consultation**

I write with reference to the proposed Cambourne to Cambridge Better Public Transport project, of which the fourth public consultation is currently live for comments on proposals to best manage and mitigate the scheme's impacts as part of an Environmental Impact Assessment (EIA). The National Trust welcomes the opportunity to comment on the Greater Cambridgeshire Partnership's proposals for this phase.

The National Trust has an interest in the scheme as the Trust has the benefit of a Section 8 covenants over land in the parish of Coton. It is section 8 in the National Trust Act 1937 that enables the Trust to take the benefits of such covenants to protect specific features of the land such as an historic building, view or landscape, even when there is no Trust land immediately adjoining the covenanted land.

The National Trust's covenants at Coton were established in 1958 in order to give greater protection to this area of countryside lying to the south of the A1303 from urban development. The covenanted land extends for a distance of approximately 1km from Madingley Road, the western approach to the city, through Coton Orchard to the M11 and West Cambridge, and includes Madingley (Whitwell) Hill, which at 62 metres AOD is the highest point west of Cambridge.

The founders of the Cambridge Preservation Society, now Cambridge Present and Future (CPPF) purchased land in this area to protect the rural character of the area and associated views of the city from the western approaches to Cambridge at a time when the area was at

risk from proposals for a ring road to the south of the city. The land was subsequently included within the Cambridgeshire Green Belt, and for the past 50 years Green Belt policy has effectively prevented the encroachment of Cambridge into Coton and the surrounding countryside.

### **The National Trust's Current Position**

The National Trust continues to object to the proposal for an off-road busway between Madingley Mulch and Cambridge city centre because of its impact on a valued landscape which has intrinsic visual, historic and cultural significance, and which is fundamental to preserving the setting and special character of the historic city of Cambridge in accordance with its Green Belt purpose. It will create a linear, engineered feature across this landscape which would have an urbanising effect on the western approach to the city, and the Cambridgeshire Green Belt. The Trust understands and supports the need for new high quality public transport infrastructure that improves journey times, and reduces congestion, and is generally supportive of the aims of the project however feel that this proposed location would have an adverse impact on the features detailed above.

### **Environmental Impact Assessment- Public Consultation**

The National Trust welcomes proposals to implement a decision-making process which seeks to 'design out' potential environmental impacts. It should be noted that when making alignment decision based on high level information, local detail can be ignored, leading to more data collection needs and need to mitigate complex issues. The developer should not start out assuming they can mitigate everything effectively or easily.

The following should be considered carefully:

- Any loss of physical connectivity that degrades ecological integrity of habitats and species across the wider landscape.
- Any impact on mobile species including birds, mammals (notably bats) and invertebrates which are known to cover significant distances.
- Impact of noise and vibration, and loss of tranquillity during construction and operation on species, particularly for bats
- For any mitigation, this development must use evidenced solutions supported by thorough survey.
- In combination/cumulative effects of numerous development (inc EWR Routes) must be considered
- This development presents significant scope for new housing development associated with enhanced transport infrastructure. Any such development could place additional recreation pressures on Wimpole Estate and have potential impacts on our nature conservation assets (notably SSSI/SAC but also priority habitat and species, and County Wildlife Sites (CWS)), infrastructure and visitor management of the site. This

should be considered and addressed strategically (ie through strategic development plans) and suitable green space must be attached to any such development (SANGs), plus enhanced access network through rights of way, etc, and potentially onsite measures to mitigate any impact at Wimpole Estate, to avoid and/or mitigate any impacts. Visitor survey and impact reporting, ecological sensitivity mapping and a menu of mitigation measures should be developed for Wimpole to help actively inform and mitigate development pressures, as has been done for National Trust Hatfield Forest.

The Trust welcomes the opportunity to comment on the proposed mitigation measures. However, I should stress that any comments on these mitigation measures are wholly on a without prejudice basis to our current objection. We also reserve the right to comment on the impact on nature until results of the environmental surveys have been released.

We have limited our comments to those sections that would affect the covenanted land:

### **Section E- Hardwick**

- The Trust welcomes that the route now drops below the waterworks site, avoiding the harm to the mature woodland and meadow habitat.
- We would like to raise concerns regarding the difficulties in managing the small areas of land for grassland. Converting to woodland may be an a more appropriate use but should however consider any potential impacts on archaeological features before any planting takes place.
- Any ancillary infrastructure or features in this location should be kept to a minimum to avoid/minimise urbanisation impacts and designed to be sympathetic to the Landscape Character.

### **Section F- North Coton**

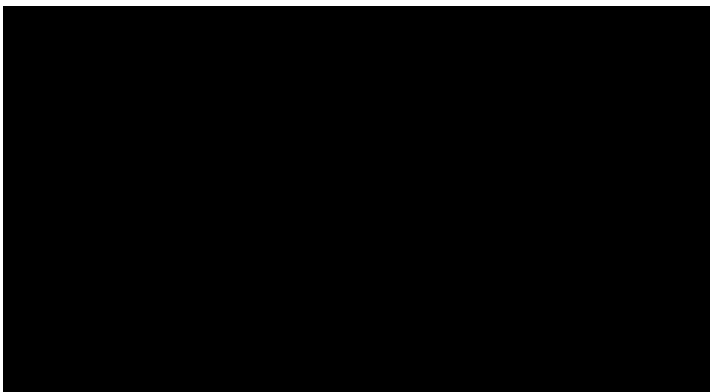
- Loss of priority habitat at Coton Orchard, trees with bat roosting potential. If there are Bats present, then mitigation needs to be mentioned/determined.
- Is the route to be 5G enabled? If so EMF impacts on wildlife, fauna, flora and insects and humans should be considered.
- Access to agricultural land holdings – The document states that agricultural access to both north-south and east-west will continue. Crossing points or bridges are not shown on the plans and more clarity is required.
- Visual effects from vertical elements, movement of vehicles and night lighting visible on skyline from receptors to south should be considered. We would advocate for a nighttime study of the LVIA. Items that should be considered are; how tall are the vertical elements? Is lighting bat friendly can it be low level. Can the road level be reduced so that visual impacts/lighting are less.
- The proposal will create a new linear straight edge to the settlement which has historically being indented and organic in character. We would advocate for a more curved route to eliminate direct views along the route from key access points.

- The Trust would support the proposal for low mounding, but stresses that this has to be designed in context to Landscape Character, correct species of Trees/Shrubs etc. Groups of planting rather than straight lines.
- The aim to try and move away from a new horizontal linear feature across the covenanted fields by introducing north-south planting schemes along the lines of old field boundaries is welcomed. Although there should be careful consideration of maintaining views.
- Who will manage the new proposed green infrastructure? This should be covered in the LEMP that should describe the proposed ecological and landscape mitigation, habitat creation, habitat management and ecological monitoring during the preconstruction phase, construction phase and aftercare period of the scheme. Plus, any receptor sites required for differing species during and after construction.
- The naming of the matrix areas within the consultation document is misleading; one is entitled Cambridge Green Belt, but the areas 'west Cambridge' and 'arable land and orchards' is also within the designated greenbelt area. This is likely to have distracted members of the public to the fact that it is in fact all greenbelt area.
- We would like to raise concerns regarding the difficulties in managing the small areas of land for grassland. Converting to woodland may be an a more appropriate use but should however consider any potential impacts on archaeological features before any planting takes place.
- Any ancillary infrastructure or features in this location should be kept to a minimum to avoid/minimise urbanisation impacts and designed to be sympathetic to the Landscape Character.

The National Trust would welcome opportunities for ecological and biodiversity enhancement through this project including bigger, better and more joined up habitat and would wish to see exemplar ecological practice and delivery of significant Biodiversity Net Gain (BNG).

We trust these comments will be given careful consideration.

Yours sincerely,







P

**BY EMAIL ONLY**

[C2c@greatercambridge.org.uk](mailto:C2c@greatercambridge.org.uk)

Dear Mr Blake

**Cambourne to Cambridge Better Public Transport and Active Travel Project – Environmental Impact Assessment Public Consultation**

Thank you for seeking Natural England's views on the Environmental Impact Assessment (EIA) for the above proposed scheme in your letter dated 12 May 2022.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

We note that the Cambourne to Cambridge (C2C) project is a new public transport route from the Greater Cambridge Partnership (GCP), proposed to link Cambourne to Cambridge via the new Bourn Airfield development, a new Travel Hub at Scotland Farm, Hardwick and West Cambridge campus. The project is one of four corridor schemes, promoted by the GCP, which, together with measures to free up the congested city centre and a network of cycling and walking Greenways, along with other infrastructure improvements, aim to create more sustainable, accessible and reliable ways to travel into and around Cambridge.

GCP is seeking views are sought on how best to manage and mitigate the Scheme's impacts on the landscape and environment. Natural England has already provided detailed comments in response to the EIA Scoping consultation (11 March 2022 ref. 383612). Our advice is that the ES should provide a robust assessment of the potential effects of the Proposed Scheme on statutory and locally designated sites, protected species, priority habitats and species, landscape and visual impacts, soils, air and water quality, cumulatively and in-combination with other development. We therefore welcome that a range of ecological surveys are being undertaken to inform EIA, including surveys for bats and in the Coton Orchard, where there will be some loss of trees.

The site and surrounding landscape are particularly important for bats, providing important roosting, foraging and commuting habitat. Eversden and Wimpole Woods Site of Special Scientific Interest (SSSI) is also designated as a Special Area of Conservation (SAC) on account of its maternity colony of barbastelle bats. Madingley Wood SSSI, a few hundred metres to the north of the Proposed Scheme, also supports Barbastelles and other bat species. We are aware that GCP is undertaking extensive survey work to ensure that the effects of the Proposed Scheme on bats and their inter-connected supporting habitat is minimised. This is welcomed by Natural England.

Natural England supports the following aspects of the Proposed Scheme as set out in the consultation brochure:

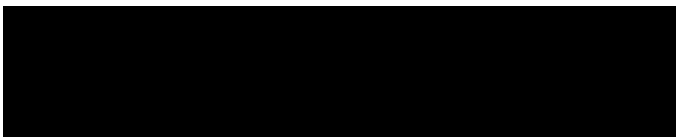
- objectives for cleaner, greener transport and connecting communities;
- the aim to deliver 20% biodiversity net gain;

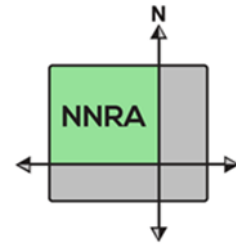
- re-alignment of the route to protect trees and other vegetation and habitats wherever possible and consideration of how the scheme can contribute towards natural capital including aesthetic values, recreation or flood regulation;
- proposals to limit impact on a woodland Local Nature Reserve at West Cambridge and to restore and extend planting alongside the M11 motorway;
- proposed habitat creation, to benefit wildlife and landscape, including species-rich grassland creation, hedgerows and native woodland planting, planted drainage ponds and permanently wet areas, enhanced orchard planting;
- proposal for the incorporation of an active travel path alongside the C2C for pedestrians, cyclists and horse riders, connecting new and existing routes, such as the planned Comberton Greenway, to complement the growing rural walking and cycling network;
- embedding habitat creation and ecologically beneficial drainage infrastructure within the travel hub and lighting designed to minimise impacts on wildlife.

Natural England advises that environmental enhancements, including BNG, should aim to contribute towards the delivery of the [Nature Recovery Network](#) and the [Cambridge Nature Network](#). National Habitats Network mapping is available to view at [www.magic.defra.gov.uk](http://www.magic.defra.gov.uk). Reference should also be made to guidance set out in the Greater Cambridge Biodiversity Supplementary Planning Document (SPD) and the objectives and targets of the [Cambridgeshire Green Infrastructure Strategy](#). Buffering, enhancement and connectivity of existing woodlands and hedgerows, incorporating species-rich grassland and wetland features, is a particular priority in this area to provide a range of environmental benefits including habitat enhancement for bats and other wildlife.

I hope you will find our comments helpful. Please send any new consultations or further information on this consultation to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely





Greater Cambridge Partnership

1 July 2022

Jo Baker, Greater Cambridge Partnership

Dear Jo,

**Re: Cambourne to Cambridge (C2C) Environmental Impact Assessment (EIA):  
Public Consultation**

I am writing on behalf of the North Newnham Residents' Association (NNRA) and in response to the EIA. First may I thank you for meeting members of the Committee yesterday afternoon?

NNRA supports the urgent need to improve public transport links into central Cambridge as a major centre of employment. Its support is also based on reducing congestion and pollution and helping address the climate emergency. Failure to develop adequate public transport will likely lead to development of protected open spaces within and adjacent to Cambridge. The Cambourne to Cambridge project will make a major contribution to achieving these objectives.

NNRA is wholly supportive of the proposed environment impact considerations and mitigations mentioned on pages 35 and 36. The "Active travel path" illustrated on page 35 should consider pedestrians as well as cycles. We anticipate that the path will be used primarily by cyclists but there should be adequate, ideally segregated, space for pedestrians to walk safely as well. You acknowledge that there will be some loss of trees and hedgerows in our part of the route. We trust that you will ensure that GCP's commitment to make good environmental damage by replacing trees and hedges and providing well-designed screening to minimize the visual impact on properties is honoured.

In addition, we have three further points although tangential to the EIA consultation:

1. NNRA support segregating public transport from ordinary traffic to promote reliability and encourage public transport usage from villages to the West of Cambridge. The guided bus experience has shown that segregating public transport from general road traffic gives the journey time reliability that is necessary to persuade people to use public transport.
2. We recognize that Adams Road and its junctions are now the responsibility of the Comberton Greenway project but NNRA are keen that lessons learned about traffic segregation from earlier discussions of the C2C scheme are applied as much as possible to Adams Road and its difficult junction with Wilberforce Road and the Coton Footpath. Good cooperation between the Greenway project team and your own could help to ensure this. This would enable cycle safety to be improved, and motorized traffic to be minimized. Cycle traffic between central

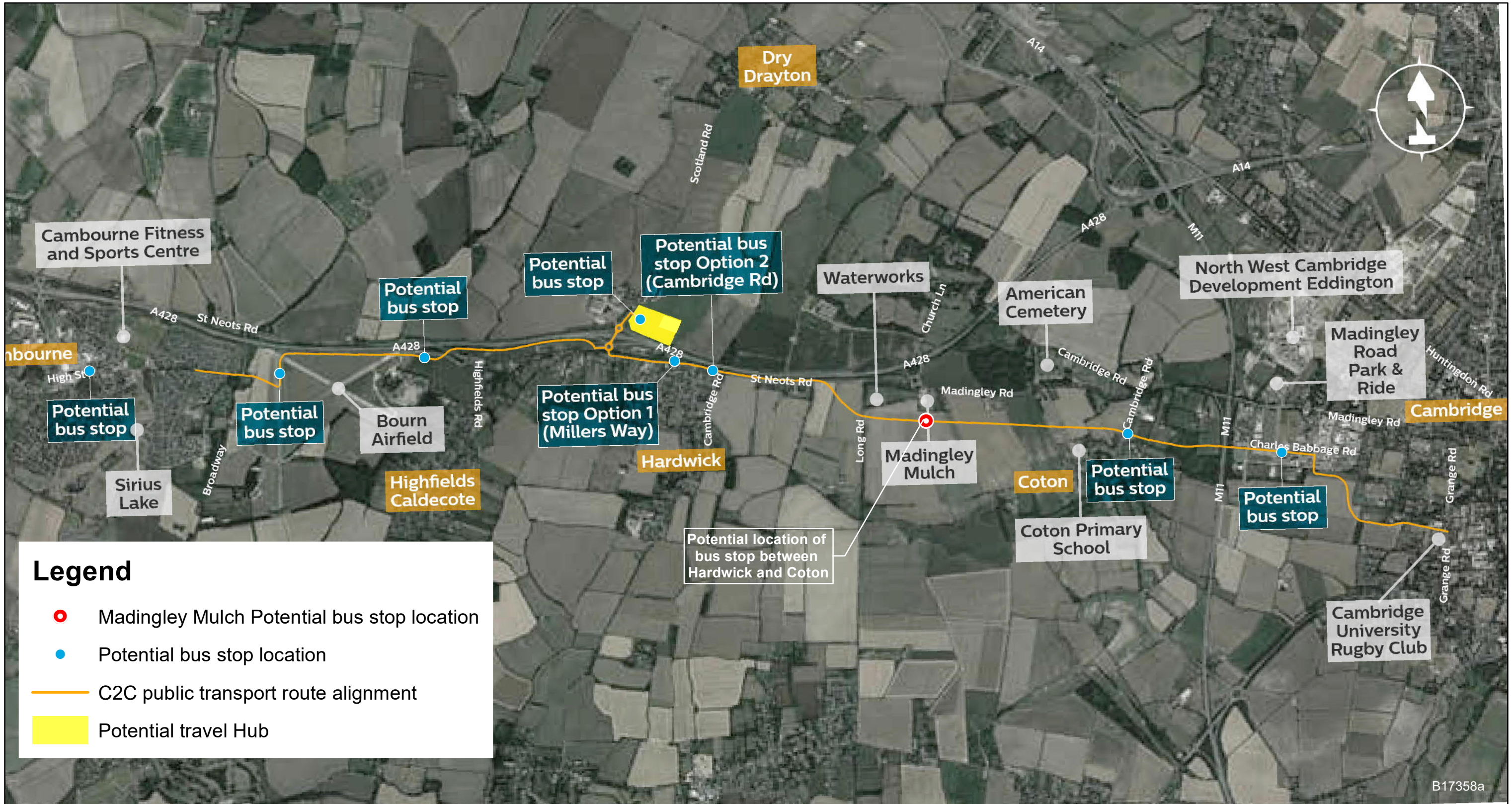
Cambridge and the West Cambridge site is projected to increase dramatically and the current configuration of Adams Road is unsuitable for this growth in cycle traffic. Minimising motorized traffic should consider speed calming measures, reduced parking space, significant charges for daily commuters (vs. no charges today). We believe that traffic calming measures can be implemented in such a way as to enhance the environment of this historic Cambridge street.

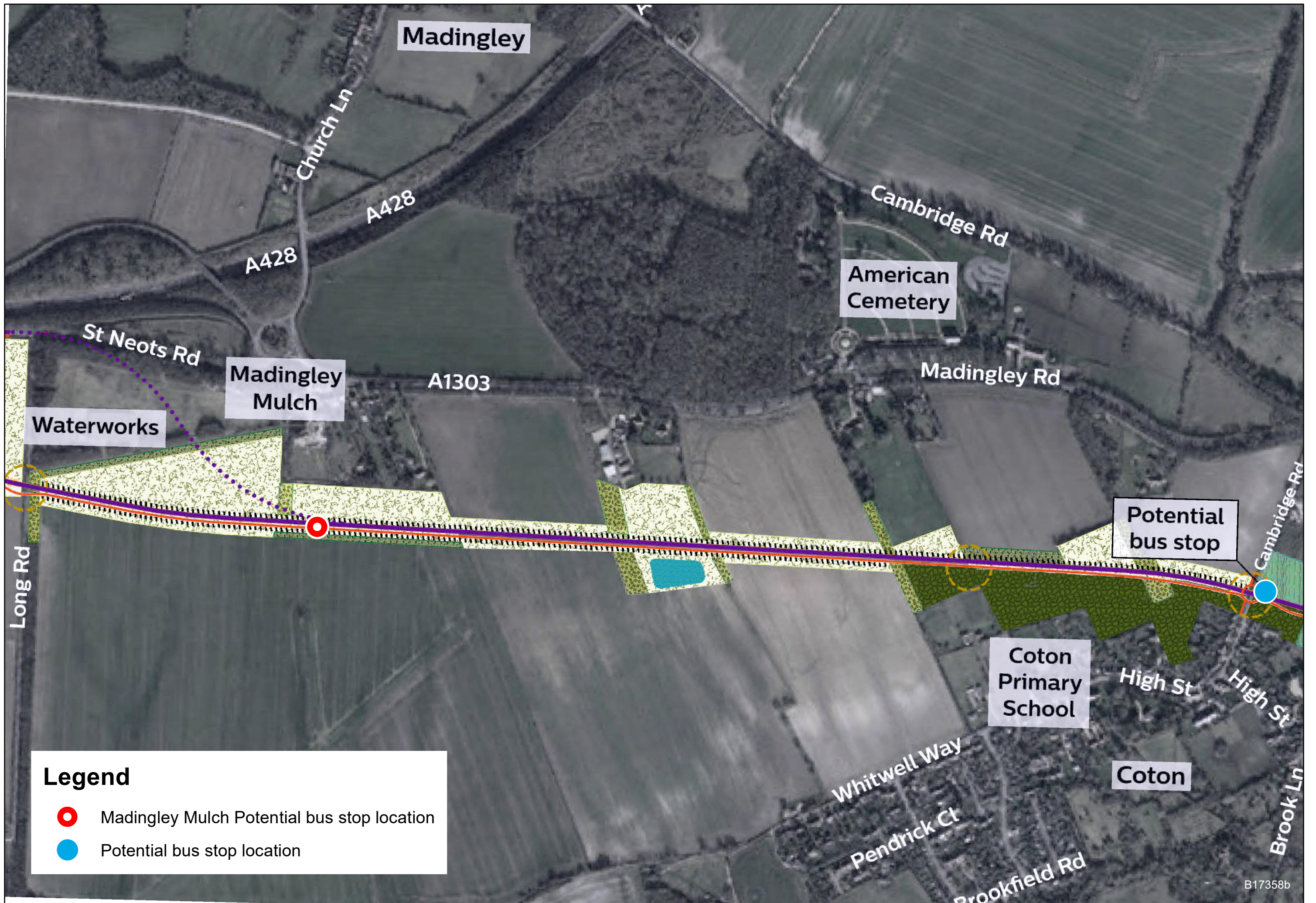
3. Regarding the operation of Grange Road junction, it should be noted that traffic volumes on Grange Road spike with school (St John's College School and King's College School) drop off and pick up times. It is important that this daily term time traffic doesn't negatively impact bus reliability and that the buses don't create worsened congestion for motorized vehicles. Now may be the moment in time to discuss alternative drop off and pick up measures with these schools e.g., move drop off and pick up points to Barton Road layby and Madingley Park & Ride.

Thank you in anticipation of considering our points.

Yours sincerely,







[REDACTED]

---

**From:** [REDACTED]

**Attachments:** [REDACTED]

Dear Greater Cambridge Consultation officers (and FAO C2C Project Managers),

I have submitted a response on behalf of RO Property Management Ltd to your consultation questionnaire on 7 July within which provides a proposal for a new bus stop location immediately to the south of the Madingley Mulch commercial site which occupies a position halfway between the significant gap between the potential bus stop locations at Hardwick and Coton. Our proposed bus stop location immediately south of Madingley Mulch would represent an excellent opportunity to serve the existing commercial site and adjoining residential area through planned redevelopment. My client RO Property Management Ltd would be happy to discuss the proposal with the C2C project managers and how this proposal would benefit the C2C project, site, surrounding area and local residents. Please find attached photo-plans using extracts from pages 13 and 28 from the CTC consultation brochure which show where the proposed bus stop (in red) could be located and accessed and serviced from the Madingley Mulch site. The site could enable maintenance access to the busway as well as assist in planting and new linked habitat creation. My client is currently considering the viability of an element of cycle parking and car parking with EV charging facilities on part of the existing commercial Madingley Mulch site.

We would very much like to discuss the proposals with you. Please do not hesitate to get in touch with me.

Regards,

[REDACTED]

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Bidwells LLP, a limited liability partnership trading as Bidwells, is registered in England & Wales (registered number OC344553). The registered head office is Bidwell House, Trumpington Road, Cambridge, CB2 9LD, where a list of members is available for inspection. **To read our full disclaimer please click [here](#) To read our Privacy Notice please click [here](#)**

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BY EMAIL



**Bedfordshire  
Cambridgeshire  
Northamptonshire**

To: Greater Cambridge Partnership  
PO Box 1493, Mandela House, 4 Regent Street,  
Cambridge, CB1 0YR  
Email: [consultations@greatercambridge.org.uk](mailto:consultations@greatercambridge.org.uk)

Date: 6<sup>th</sup> July 2022

Dear Sir / Madam,

### **Cambourne to Cambridge Busway Environmental Impact Assessment - Public Consultation**

This response is submitted on behalf of the Wildlife Trust BCN. We have not had the time to assess the scheme in full, so our comments only relate to specific and limited ecological / biodiversity aspects and are not a full commentary on all the ecological impacts of such a significant transport infrastructure project. Our lack of comment on other aspects should not be read as implying support for this scheme.

The Wildlife Trust welcomes moves to encourage less carbon intensive travel patterns, however, we are concerned that many of the transport schemes currently being developed fail to properly apply the mitigation hierarchy, and in particular the need to design schemes that avoid impacts on the natural environment in the first place, or minimise those impacts. This scheme unfortunately falls into this category.

#### **Ecological Impacts**

The Wildlife Trust maintains our objection to the route bisecting and destroying a significant area of the City Wildlife Site East of the M11. We also object to the loss of hedgerow that forms part of the County Wildlife Site (Hedgerows East of M11). On the other side of the motorway, an area of traditional orchard priority habitat and other associated habitats will also be lost. The impacts will not be limited to direct habitat loss, but will also include disturbance from air, noise and light pollution and fragmentation of habitats.

We are aware that other consultees have submitted detailed and extensive critiques of the scheme, including highlighting some of the other local ecological impacts. These should be fully considered.

The Wildlife Trust does however welcome the proposed change in route to avoid the Waterworks site on Madingley Hill. This modification meets the requirements of the mitigation hierarchy by avoiding harm to mature woodland and meadow habitat, with significant invertebrate interest as shown by the ecological surveys.

It is disappointing to see the consultation documents once again failing to clearly set out the full scale of ecological impacts, which could be construed as misleading the public. This is a recurring concern the Wildlife Trust has raised with previous GCP consultations.



## **Ecological Mitigation & Biodiversity Net Gain**

While the Wildlife Trust welcomes the GCP ambition to deliver 20% Biodiversity Net Gain (BNG) through their infrastructure programme, the current scheme will not do so without significant off-site habitat creation.

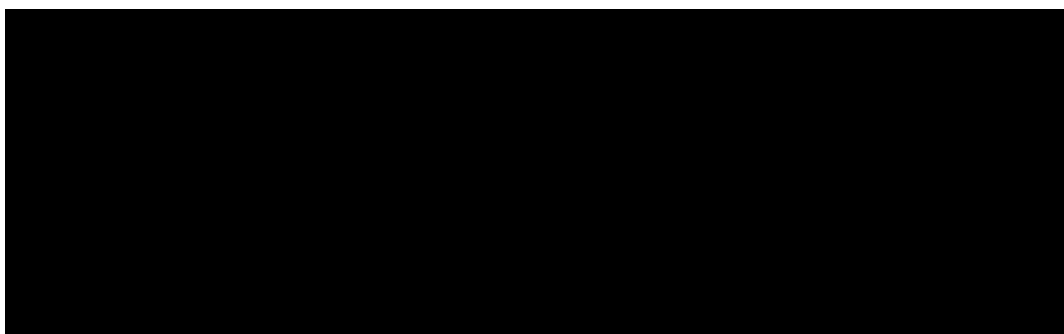
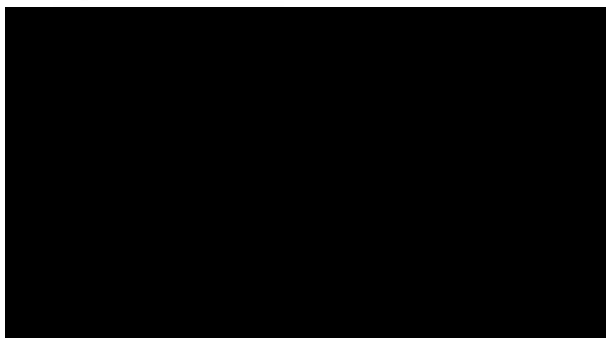
Many of the mitigation areas associated with the route (whether for landscape or habitat) are small and will be difficult and relatively costly to manage. The GCP's Landscape, Ecology & Heritage group has previously raised concerns about creating small, isolated areas of grassland habitat because it is often very difficult and expensive to maintain these to achieve ecological benefits (for example through annual cutting and collecting of hay or livestock grazing), as a result they do not achieve the ecological value hoped for. This is born out on many new transport developments, not least as evidenced by the Cambridge-St Ives guided busway landscape and ecological mitigation areas. This will in turn affect the BNG calculations, possibly increasing the need for off-site habitat compensation.

The recommendation of the Landscape, Ecology & Heritage group was to create larger areas of grassland habitat (ideally adjacent to existing grassland) or failing that, to prioritise other habitat that can more easily be maintained, such as woodland or scrub.

A further consideration for this scheme is that it passes through the Cambridge Nature Network Boulder Clay Woodlands Priority Area. The Cambridge Nature Network study identified a priority wildlife corridor between Madingley Mulch and Coton village running north-south from Madingley Wood SSSI towards Barton Rifle Range, not east-west. The design of this scheme should therefore be revised to support and reflect the habitat types and corridor linkages identified through the Cambridge Nature Network.

We hope these comments can be taken into account and the scheme revised accordingly.

Yours faithfully,





**GREATER  
CAMBRIDGE  
PARTNERSHIP**

# **Cambourne to Cambridge**

**Better Public Transport  
and Active Travel**

## **Appendix E2 Individual Responses**

1. Hello – The map showing on the website is too small to see clearly which roads/paths are being used on the approach to Cambridge. Could this be amended, please?  
Thank you [redacted]

2. Hello,

You really should provide a proper map of the route. The one that you display has terrible resolution making any detail illegible.

Best regards

[redacted]

3. Hello,

Can you please send me a clear map of the proposed route of the new Cambourne to Cambridge link? The one on the website is rather unclear and not readable, especially the sections to the East of Coton.

Thanks, [redacted]

4. I first attended a consultation event in relation to the Cambourne to Cambridge transport link under the then City Deal on Tuesday 15th September 2015, and here we are in May 2022 still/again involved in consultation activities.

Over this time I have lost track of and mostly lost interest in the number of "Consultations" there have been on the same subject: and in almost 7 years not a single inch of route or track has materialised. I have absolutely no idea what it is that the GCP actually spends its time doing apart from talking and spending enormous amounts of tax-payers money on staffing and yet more consultations.

It would be of real interest to me to know just how much money the City Deal and the GCP has to date spent on itself and on making no progress with the Cambourne to Cambridge transport link.

[redacted]

5. I would like to give my views on the proposed Cambridge to Cambourne link. Your website ([www.greatercambridge.org.uk/c2c-eia](http://www.greatercambridge.org.uk/c2c-eia)), unfortunately, does not seem to offer any means of doing so. The phone number you provide yields a recorded message which tells me to email you.

How do I provide my views? If it is not possible to do this online (in 2022!), please send two printed copies to:

[redacted]

6. Hi,

I just received your note through the post about the consultation. I went to your website to

view the preferred route, but can only find low resolution images that are impossible to consider. I also checked your ecology report and notices that both ponds [redacted] were indicated as no access. [redacted]the pond has been tested many times over the last few years, with multiple surveyors reporting it is the highest density of great crested newts they had ever seen – which raises significant doubt on quality of your report.

Can you please provide a link to a high resolution image of the proposed route, and respond as to why your ecological report appears incomplete?

Regards  
[redacted]

7. (email includes attached map) May I ask a question for clarification please

In the Consultation Brochure you describe two different scenarios for different ends of the St Neots Road?

Top of Page 25 “the current preferred route is proposed to run off-road through a green corridor separating St Neots Road from the A428”. This doesn’t touch the tree line west of Cambridge Road until you need to keep a distance from the A428. Then the available space disappears hence the need to either take out the trees or take out the traffic east of Cambridge Road. This seems still to be the case as the follow on comments state they relate to the east of Cambridge Road.

Page 27 second paragraph clearly relates only to the East of Cambridge Road, it states (thanks to the Active Travel BusGate proposal....) “East of Cambridge Road we are now proposing to take the route along St Neots Road. The reduction in through traffic would yield road safety, noise and air quality benefits for residents, at the cost of a loss of car access to the east” .. You don’t mention the traffic that would be pushed onto the narrower village roads with increased pollution, noise and jeopardy for other road users.

In the Questionnaire Question 17 you ask only about the whole route through Hardwick – choice is on or off road. No distinction about east or west of Cambridge Road.

What are you asking us to comment on, please? Not sure a single yes/no answer can be given to the routes as described in your brochure?

In relation to the lay-bys is the situation you announce in Question 17 is also not clear. Are you talking about both ends of St Neots Road? We received the following response from the County Active Travel Senior Project Officer, Clare Rankin ...”Our Active Travel scheme (also attached) won’t affect the lay-bys”. The drawing accompanying this statement (attached) shows the Active travel down St Neots Road east and west of Cambridge Road. Another contradiction?

Please explain

[redacted]

8. Dear Sirs

I have looked at the proposed route for this and I am rather concerned about how this will affect the residents of Hardwick. Will this new route affect the Citi 4 that serves the village and Cambourne at the moment? The proposed site at Scotland Farm may be all well and good for those coming by car but what of those that rely on the Citi 4 and may not be able to get to Scotland Farm.

I look forward to your response.

Yours faithfully

[redacted]

9. I have looked carefully through the EIA consultation document. It goes into detail (e.g. where bus stops are etc) which I find at odds with the overall purpose of this consultation which is supposed to be on the EIA itself. My comments refer to the EIA.

#### 1. Review of the past 7 years

2015: City Deal launched C2C project with a range of off-road and on-road options proposed for consultation

Public strongly opposed the "southern" off-road proposal through Coton and West Fields

2016: City Deal "carefully assesses" 5 options in more detail, concluding that Option 3, an off-road busway through Coton, is best

2017: Residents propose optimised on-road "Option 6". This was endorsed by the LLF (although it was repeatedly misrepresented by GCP in scheme reports)

2017-18: GCP consults on off-road "Option 3" vs two sub-optimal on-road variants

Public still prefers on-road by 2:1 margin

2019: Feasibility study supports development of £4bn Cambridge Autonomous Metro (CAM) system

2019: East-West Rail consults on major heavy rail link between Bedford and Cambridge & possible duplication of other schemes connecting Cambourne and Cambridge noted

2021: CAM abandoned

2020-22: Pandemic dramatically changes working practices and commuting patterns; traffic surveys shows Madingley Rd runs freely even during morning peak hours; effect of housing growth & East-West Rail as yet unknown

2022: Environmental Impact Assessment on off-road scheme

#### 2. Conclusions

The above history shows that the outcome of many consultations have been ignored by GCP; when forensically examined it makes one think that public consultations are a charade and that there is a drive within the GCP to do what it wants notwithstanding overwhelming public views: to achieve this they employ successive consultants to write reports to support their prejudiced view, ignore the strong public view and they have manipulated data to their ends.

#### 3. Facts relevant to the EIA specifically

The GCP C2C Outline Business Case, Options Appraisal Report Part 2, Annexe B, January 2020

GCP produced highly controversial scoring of off-road and on-road options:

- Landscape impacts: scored the same (2 points) for on-road and off-road schemes, even though the off-road route introduces a new tarmac roadway across currently unpaved fields
- Noise: scored the same (3 pts) for on-road and off-road, even though the off-road route runs through a village and close to a primary school
- Air quality: scored the same (5 pts) for on-road and off-road, even though the off-road route introduces air-borne particulates through a village and close to a primary school
- Biodiversity: scored lower for an on-road route (1 pt) than an off-road route (2 points), even though the off-road route introduces a tarmac roadway across currently unpaved fields
- Heritage: scored the same (2 pts) for on-road and off-road, even though the off-road route introduces a new tarmac roadway through a village and close to a Grade 1 listed church

- Green Belt: scored only 1 point higher for on-road (3 pts) than off-road (2 pts), even though the off-road route introduces a tarmac roadway across currently unpaved Green Belt land
- Public Acceptability: on-road and off-road schemes allocated the same scores (5-6 pts), despite on-road schemes always receiving far greater support in the GCP's public consultations

[redacted]

10. Firstly, I do not understand the need for a dedicated busway on St Neots road, the traffic is not heavy on this road. The busway could, if necessary, be started after the Comberton Long Rd junction.

Secondly. More consideration needs to be given to the traffic that is going to be 'forced into Cambridge Rd, Hardwick. At present the shop causes hold ups- some extensive especially in the morning and evening. If St Neots road is closed then traffic will use Cambridge Road as a Rat Run to Cambridge and I do not think this has been taken into consideration in any of the reviews.

Thirdly. If a busway is forced upon us, then I believe the whole of St Neots Road should become one way westward. from the Madingle turn to the end of St Neots Rd to reducing the traffic of non Hardwick residents using Cambridge Rd as a short cut.

Whatever is adopted i believe more consideration needs to be given to the concern of Hardwick residents.

[redacted]

11. What is the carbon footprint for this development and how are you mitigating this in the short, medium and long term?  
Some numbers and methodology here would be appreciated.

There is perceived locally to be no traffic issues along St Neots road Hardwick, so why are you not running buses along the existing carriage way? A full explanation, criteria and data would be appreciated.

Thank you  
[redacted]

12. I listened to the Zoom last night about the environmental issues wrt the Camborne Cambridge busway.

Having been out of the loop for a little while I was bitterly disappointed to see that the planned route still goes over a new bridge, through West Fields to Grange Road and Silver Street. When cycling I have frequently been involved in a traffic jam in Silver Street because it's not wide enough to take buses. Surely one of the proposed alternatives using Madingley Road has to be a more viable alternative for many reasons.

[redacted]

PS. Couldn't make your survey work so sent this instead.

13. (Email includes embedded map) This is a query about the Cambourne to Cambridge (C2C) project. My wife and I are the owners of and living in the property at address [redacted] which I have shown with red rectangle in the image below on the map of the project I took from greatercambridge website:

As I noticed from the project details from the greatercambridge website and as indicated in the above picture, it appears that there is a proposal for an active travel path, going in front of our house shown with the dark blue line. While we don't have any objections on that, we have the following questions:

1. Does this project affect our property and our right of access in any shape or form?
2. On the project map from your website there is a black line moving over some properties, including ours. As we understand, the project map indicates that this is "Enhanced Footways New Public Right of Way"? Can you please advise what does the area covered by that line mean and what implications this does have for us?

I appreciate your reply to the above and look forward to hearing from you.

[redacted]

14. (Two emails in close succession) Further to my last below, I think going through Bourn would be a great idea! Particularly of how close parts of CAMBOURNE (particularly upper CAMBOURNE where I live) are joined up to Bourn.

Kind regards

[redacted]

Sent from my iPhone

> Good afternoon

> Could you advise on how long the proposed new route would take from upper CAMBOURNE to CAMBRIDGE?

> The current route I take takes an average of over 45mins as it stands ([redacted], upper CAMBOURNE to Emmanuel street, CAMBRIDGE) which I feel is an incredibly long journey which essentially only takes 20 mins or less to drive.

> I don't think that any changes to the route which would involve a longer bus journey would be used.

> Kind regards

>

[redacted]

15. Good morning,

Firstly I'm not really against the proposed transport link but I'm keen to know what is happening near the Childerley Gate/St Neots Rd area [redacted] at that junction and the map is not entirely clear. If you could confirm if or not the link passes along the St Neots Rd or the Dual carriageway at that area, I can then just be concerned about the rail link, BP Service station expansion, St Neots road roundabout alterations and the Bourn airfield East site !

Kind regards

[redacted]

16. The plan for this bus route would ruin the area of West Cambridge. The majority of votes on the plan by the public have resulted in a preferred route north of Cambridge, not this option.

This option was imposed on us by the GCP, in spite of several meetings on the subject, where we made our views known.

The cost at £160m is far too much to spend on a road plan. The additional bridge over the M11 is an unnecessary expense, apart from causing further damage to the West Cambridge environment, both visual and natural. The proper answer to traffic problems would be to run the bus on the Madingley road and A428.

Increased working from home has considerably reduced the traffic in and out of Cambridge, suggesting a smaller scale operation is called for.

Particular damaging aspects are:

The damage to the historic Cotton orchard and the village.

The proposed Bin Brook crossing would be a desecration of a rural stream. We value the existing bridge.

The destruction of long stretches of the Cotton footpath, used as a quiet walk from Cambridge to surrounding fields.

The damage to the fields in Green Belt land to the west of Wilberforce road, through which the proposed route would travel.

Perhaps worst of all, is the prospect of building development along the bus route in the West Fields. Colleges are already planning to build on Green Belt land along the route. Having allowed a bus road across open fields, it is certain residential building will follow.

The proposed rail link from Cambridge to the west will make the busway redundant.

Much of the land over which the proposed bus route would pass is owned by Cambridge Past Present and Future. Please honour this and withdraw proposals for compulsory purchase.

This is Cambridge, please come and see the site and respect the valuable open fields to the west of the city.

Regards

[redacted]

17. (jpg of alternative suggestion attached to email) DESIGNERS GREATER CAMBRIDGE PARTNERSHIP SCOTLAND FARM PARK & RIDE

Dear Sir/Madam

We have just come from a Parish council meeting where the new Scotland Farm Park & Ride was discussed.

Simply we were shocked at the proposal to locate the new connective pathway from Dry Drayton village on the western side of Scotland road as it runs down into the village as currently the existing footpath & verge is not suitable due to restrictive width & this will mean compulsory purchase of the fronts of properties adjacent will need to happen or an already over burdened road will need narrowing, also the drainage specifically running from Keepers end down to Solway is wholly inadequate due to the fact that there is a long standing flooding issue to the verges & the road as a result of the western fields of Scotland farm water run off into the irrigation ditches running down into the village of dry Drayton & the blocked culverts beyond causing thousands of gallon of water to bubble up through the ground flooding the road & verges every time there is a substantial rain falls. Simply if these



verges are tarmacked then the water will simply bubble up further back within the boundaries of the properties herein mentioned causing substantial flooding & structural damage to those properties.

The highways & environmental officers know all about this & to place the new pathway adjacent & outside the fronting properties would be a disaster.

Also in addition to the aforementioned the simple fact is that the danger to users of the pathways & the traffic jams that would ensue due to residents trying to enter their properties over the pathways would be substantial as vehicles would have to wait for pedestrians, cycles, horses to pass before proceeding to enter their property causing traffic chaos.

A far better solution would be for the pathway to continue its course into the centre of the village on the eastern side behind the hedgerow & then curl back over the land that does not have the irrigation ditch as it stops someway before the roundabout. This would mean that drainage wouldn't be a problem as water run off would go into the ditch, the pathway would not have to cross the ditch & I would propose that a larger roundabout would be constructed to enable better manoeuvring room for HGV's that currently have to mount the verge if coming from Park St & going toward Scotland Farm. It would also be far better to have a pedestrian/cycle crossing between the church & the bus shelter as traffic will already be slowing to approach & exit the roundabout, as against putting it on the higher speed area of the Rectory Farm entrance as is currently proposed.

So for every reason the western side location is wrong & I would implore the decision makers to think again.

I WOULD ASK ALL VESTED PARTIES TO LOBBY AGAINST THE PROPOSAL TO LOCATE THE PATHWAY ON THE WESTERN APPROACH.

I take the liberty of attaching the far better proposal & most sensible.

The key is the pathway being yellow (Continuing its course from the line of the P&R, the red dot marking the end of the irrigation ditch & the further 2 red dots indicating a crossing location beyond an enlarged roundabout.

Yours Sincerely

[redacted]

#### 18. To Whom it may concern

It has come to my attention that the new connective pathway from Dry Drayton village has been proposed to go on the western side of Scotland Rd. I was extremely surprised that this was the preferred place and not the eastern side. My worries are completely based on safety. The footpath on the western side is very narrow as it is, walking two abreast is impossible and when walking single file you feel you might get hit by a car's wing mirror, and if a lorry goes past that is just frightening. There is no obstruction to the alternative footpath on the eastern side, so that would not be any issue for pedestrians. Also there is considerable flooding on the western side, the road is constantly breaking up and needing fixing, many cars are badly damaged and this will just get worse if the new route is just tarmacked, making cycling, or walking impossible. The other factor that concerns me is the fact there are 9 houses on the western side, plus the cricket pitch behind them, all who would have to cross the new pathway to get into their houses, coming from Hardwick end or the A14 end. This will cause the owners to have to stop causing traffic build up and possibility of crashes.

The other issue is that Dry Drayton has an abundance of lorries driving through and this

would also cause the possibility of accidents for anyone using the pathway. The village surely should have a 7.5 ton weight limit. Also cars that come into the village from Hardwick, if we are lucky slow down to go the correct way round the speed reducing area, but a lot don't even bother to do that, they just go on the wrong side of it and don't slow up, then they all speed up again until the mini roundabout at High St. There are children that walk along the narrow footpath as it is and it just doesn't seem safe, it will be worse if the cars still speed, plus cyclists using it, plus possibly horses. If the pathway was placed on the Eastern side of Scotland Rd most of the safety issues I raised would not arise. If the footpath was placed on the eastern side it would also be far safer for the crossing to be between the church and the bus shelter as traffic tends not to speed there

[redacted]

19. Dear Greater Cambridge

I am writing with regard to the following consultation 'Cambourne to Cambridge Better Public Transport and Active Travel Environmental Impact Assessment - Public Consultation' which extends until 11th July 2022.

The extract below is from the attached brochure regarding the Childerley Gate Alignment.

I am trying to ascertain what is proposed in the area circled green, and in particular details of how cyclists/walkers are proposed to cross St Neots Road. Is someone able to provide me with this information? (or even better arrange a call to talk this through)

Regards

[redacted]

20. Dear Madam, Sir,

Thank you for the opportunity to comment on the proposed masterplan for the C2C project.

Improvements to the route into Cambridge along the west is a really good idea. Quick and easy access with high frequency buses and good cycle connection will make such a difference. However a few questions remain:

- Will the P&R at Scotland Farm is now definitely going ahead? An active travel route without a P&R is also an option.

Who is expected to use the P&R in Dry Drayton? Residents of Cambourne and the villages along the new C2C travel path won't need a P&R as they can hop on directly and don't need to park a car?

Cars coming from the M11 will not want to drive back to Scotland Farm so where will they park if the Eddington site is being closed?

Wouldn't cars coming from St Neots be better off joining the C2C at its beginning in Cambourne?

The most likely users will be cars coming from the A14 who will access the new P&R through Dry Drayton village. (The traffic has already increased greatly and cars travel at high speed.

Further traffic calming measures will be necessary and measures to discourage 'the rat run') Local users from the surrounding villages have a problem:

- Will the adjacent villages definitely be connected to the C2C travel path? Will Caldecote, Bourn, Madingley and Dry Drayton get a cycle path to make it safe to join the C2C route? I can only see a proposed cycle path to Dry Drayton 'with permission of the landowner' which is more than vague. The villages of Caldecote, Bourn and Madingley are completely left out of consideration. How can all this be addressed?
- Where there are road crossings along the route, will there be traffic lights?
- As there are safety concerns with the guided bus ways in Cambridge already, has there been an assessment for the proposed scheme?
- Is the active travel path to Dry Drayton really supposed to cross the road in front of the entry to Rectory farm where lorries and large farm machinery from the agribusiness is joining the road frequently? Would it not be much safer to keep the travel path behind the hedge all the way into the village? (Why has the village not been connected to the cycle paths to Cambridge and the Bar Hill to the North?)
- I understand that environmental and traffic assessments are outstanding. Surely these are of major concern and need to be completed before further decisions can be made.

Thank you for taking this into consideration.

Best wishes

[redacted]

21. Dear [redacted]

We write further to the consultation meeting held at Coton last week. While you know our views on the busway running through the green belt to save a mere few minutes, we would like to speak to you about mitigation if this busway is to go ahead.

You said at the meeting that you would consider mitigating the affect of the busway if residents didn't want to see the busway. When we met council officers in 2014 they suggested that an easy solution would be for the busway to be located in a cutting (surrounded by trees) so that we do not see buses going by. We note that you have not made provision for this, can we discuss this please? In the scheme of things we would suggest the cost of this would be negligible.

Further at the meeting you were challenged about the route running through the ancient orchard and you said that you genuinely wanted to hear views about the route and where it potentially could be changed. You pointed out that it couldn't move north near the Cemetery as this had already been looked at but that you would look at the current route as it stands. We would ask that you reroute away from our back garden. This is not a big ask as this could be done by going further south upon entry at the waterworks rather than running diagonally across as it currently runs.

We would be happy to meet you to discuss the above options.

Kind regards

[redacted]

22. Dear [redacted]

The zoom meeting June 9th was very useful. Prior to it, I responded to the on line questionnaire and expressed a concern which has not been replied to. Therefore please assist me with one.

The proposal plan map refers in area H to a temporary Balk road for the construction undertakings.

Very close to the route in area H is one anciently uncultivated field, I believe owned by Jesus College. It is very precious in its biodiversity and unique ecology and therefore needs specific protection from any disturbance. It incorporates grid references TL 43645 58199 TL 43623 58134 TL43581 58130 TL43530 58073 TL 43597 58237

Please will you direct me to the ecological survey pertinent and specific to this field and assure us that this is being recognised and safeguarded?

Yours sincerely

[redacted]

23. Dear Sir / Madam,

Improvement in public transport to serve existing communities and those developments already agreed is obviously to be welcomed but the following should be borne in mind:

1. This catch up measure should not be leveraged by others to undertake widespread development of the western approach to Cambridge, fundamentally altering the character of the area. A particular concern would be further development between the proposed travel hub and Dry Drayton creating a "sprawl"
2. Many elderly and vulnerable people and others will continue to need to access Cambridge by car and no measures should be taken to make this more difficult or expensive, citing the availability of an improved bus service.
3. The potential of the travel hub will not be fully realised unless there are suitable cycle and footpaths connecting the hub to the wider travel network. Unfortunately the recent improvements to the A14 including the development of cycle and footpaths into Cambridge, have not benefited Dry Drayton. Residents can only access the new footpaths and cycle paths via very busy roads. This would be a good opportunity to address this anomaly.
4. The proposed travel link shown on P23 of the public consultation document appears to join the existing road just before Dry Drayton's traffic calming measures. There is also a busy farm entrance at this site with increasing traffic volumes including heavy farm machinery and lorries. The Highways Agency has also approved an additional access just within the traffic calming for my house. Obviously there are enormous risks in combining different vehicle types - as you know there have been fatalities on the Guided Bus route. The road is also very narrow at this site and there is a ditch on the western side. The active travel path therefore needs to continue on the other side of the hedge and ideally join the new A14 active travel routes.

I would be very grateful if you could let me know your views on the above.

Yours faithfully,

[redacted]

24. Dear [redacted]

Thank you very much for your reply.

Is the proposed C2C scheme to disturb land "at the north of the field" as you say, or hopefully, north of the field?

It is indeed the potential construction of a temporary Haul, not Bauk Road, that I refer to, as cited in the last paragraph of page 36.

The existing biodiversity of Jesus College's historically undisturbed meadow, is in an outstanding and unique league. Reduction and loss of its specific entities, could not be

compensated for by expansion of habitat composition in the separate area at the brook level.

Could the ecology researchers responsible for this specific area review and response?

Good wishes

{redacted}

25. To whom it may concern,

I write in relation to the proposed travel hub at Scotland Farm and active travel path to be delivered in connection with the C2C Better Public Transport Project from Dry Drayton's point of interest.

These developments are to be welcomed in so far as they genuinely complement and improve the existing infrastructure and transport links for the current residents as much as the future residents of the area. However, the following considerations should be noted:

1. The active travel path in its current form does not genuinely promote the vision of the Scotland Road travel hub. According to the current plans, the travel hub is only connected to a road and one of the least populated villages in South Cambridgeshire. It is therefore difficult to picture the "travel hub" as anything more than a park and ride, the likes of which in Madingley has better transport connections in fact to what is proposed at Scotland Road. In order to genuinely fulfil the vision of the "travel hub", the active travel route should therefore be expanded to offer more meaningful connections. This could very reasonably and cost effectively be achieved by extending the proposed active travel route through the remaining half of the village to connect it to the existing pedestrian and cycle routes running from Bar Hill to Cambridge. Neighbouring villages such as Caldecote and Madingley could also benefit from similar connections and these active travel paths would be welcomed whether or not the travel hub proceeds.

2. While I strongly welcome the development of the active travel route, the planned route will require some improvements in order to ensure the safety of its users and road traffic. As currently planned, the route crosses over a country lane with speed limits of 60 mph before the traffic calming measures and next to a farm entrance in constant use by heavy agricultural machinery. It is then planned to run along a pavement which is currently so narrow that it is impossible for 2 pedestrians to walk alongside each other. It is therefore difficult to imagine that this will be able to facilitate two way traffic for both pedestrians and cyclists etc. These issues could easily be resolved by removing the crossing and continuing the travel path across the fields on the other side of the road.

3. The proposed and future developments should not come at the cost of any of the existing transport infrastructure. Improved public transport connections are required and welcomed to attract more private users away from the roads. However, private transport connections for the elderly/ vulnerable, commercial usage and general use should be protected.

I look forward to receiving your feedback.

Kind regards,

[redacted]

26. Hi

I have tried my best to let everyone who lives in Hardwick know about the planned busway, so many people say they didn't receive the original flier, you were just relying on that one piece of communication to ask the opinion of so many residents.

Many aren't on Facebook or do not regularly check it.

Having hundreds of cars turning left at the junction of St Neots Rd/ Cambridge Road is crazy. It really is not that busy west bound along St Neots Rd to need a bus gate.

Please do consider the problems by the shop with people trying to drive past parked cars, particularly at busy times.

Thanks

[redacted]

27. Morning

Please confirm if there will be a bus route put in place from West Cambourne to Cambridge and if so when?

Thank you

Yours sincerely [redacted]

28. Dear Sirs

No right turn – busgate proposal (buses and cyclists only) at Cambridge Road – St Neots Rd Hardwick Junction

Re the above I have already completed and returned a questionnaire to you but felt there was insufficient room in the form to set out my full concerns.

This proposal is not in the public interest on the ground of Driver Cost, Environment and Safety

Cost

The present distance between the Cambridge Road junction and Madingley Mulch roundabout is 0.9 miles. A return journey to Coton/Eddington/Cambridge will therefore be 1.8 miles. Using the A428 diversion the equivalent mileage is 4.8 miles. That is an excess of 3 miles per journey. Taking a typical calendar month of 22 days plus say one journey each weekend, that equals 26 return journeys extra per calendar month. 26 journeys at 3 miles excess = 78 miles = approx. 2 gallons of petrol / diesel, at say £8.50 per gallon equals an additional cost to the commuting motorist of £17 each month. To put £17 in your pocket you have to earn £25 before tax (20%) and National Insurance (12%) or in annual terms £300 p.a.

This diversion is therefore going to cost the commuting motorist £300 pa at gross salary level. That is a cost that is totally unacceptable and just on its own is a reason not to proceed with this.

Environment

As above the average commuter doing 5 return journeys to Coton / Eddington / Cambridge per week plus one weekend journey is going to burn about 2 gallons of petrol / diesel extra, using the diversionary route, per month. Over a year that's 24 gallons (110 litres). I do not know how many vehicles make that journey but per hundred cars, that 2,400 gallons of petrol / diesel burnt into and polluting the atmosphere. We should be conserving our resources, not creating schemes that use more which at the same time increases pollution. Again, just on its own this is a further reason why the scheme should be abandoned.

Safety – there are several safety aspects.

Diverting incoming traffic from Madingley Mulch onto the A428 is going to cause merging issues onto that road. Given enough cars at rush hour not only could this cause a merge

accident but if queues develop there is a serious risk of rear end collisions. Similarly when leaving the A428 at Dry Drayton the additional queue on the slip road caused by additional volume of traffic could cause a rear end collision as cars leave the A428 at speed. Secondly, the amount of traffic using St Neots Road between Dry Drayton and the Cambridge Road junction will double in both directions. This is unacceptable from a safety aspect, and will also result in a loss of environment to nearby residents. This will double the fuel pollution in that area and double also the noise pollution. Taking all the above into account I believe there is no justification for this change. It is costly to the motorist, is environmentally damaging and there are significant safety issues. Quite simply, if the road can be kept open for buses, then it can be kept open also for motorists too.

29. Dear Sir,

I apologise for the late submission of my comments on the proposed travel route from Cambourne to Cambridge.

I wish to register my objection to the proposed 'Travel Hub' at Scotland Farm, Dry Drayton (NOT Hardwick as stated in the consultation document). A park and ride scheme in this area will fundamentally alter the nature of Dry Drayton and Hardwick and will continue the urbanisation of these once rural villages, and I oppose it. However, it seems to me that the decision has already been made regarding location of this scheme. If that is the case there are three issues that particularly concern me -

1. Traffic in Dry Drayton must be properly and effectively controlled to improve safety and prevent rat-running. It is not uncommon for international HGVs to come through the village, and there would be a huge increase in rush hour traffic if the P&R is moved. The road should be designated as unsuitable for HGVs except for deliveries, and traffic "calming" measures should be paid for by Greater Cambridge Partnership funds, not Parish or District Councils.
2. There is already a need for safe, protected off road routes allowing bicycles, walkers and horses to travel from Oakington through Dry Drayton to Hardwick and on to Madingley Mulch. Neither Parish nor SCDC should be required to pay for this.
3. I am extremely concerned that the phrase 'Travel Hub' implies more than just a meeting point for buses, cars and cyclists/pedestrians. If the proposal for the Park and Ride scheme goes ahead, it must not provide a green light for East-West rail link to follow the northern route. The two developments have been consulted on separately, and it would be a travesty if decisions about one became a fait accompli for the other.

I hope that my views will be taken into account alongside those of other responders