

**Formal Response to the public consultation on the Cambourne to
Cambridge busway scheme, November 2017-January 2018**
A428 Local Liaison Forum

The A428 Local Liaison Forum met on 5th December 2017 and agreed the basis for a formal response to the consultation.

LLF members present:

Helen Bradbury (Chair)
Bridget Smith (Vice-Chair, SCDC Gamlingay)
Tim Scott (SCDC Comberton)
Mark Howell (SCDC Cambourne)
Tumi Hawkins (SCDC Caldecote)
Des O'Brien (SCDC Bourn)
Ruth Betson (SCDC Cambourne)
Lina Joseph (CCC Hardwick)
Gabriel Fox (Coton PC)
Stuart Hawkins (Madingley PC)
Markus Gehring (City Cllr, Newnham)
Rod Cantrill (City Cllr, Newnham)
Chris D'Oyly (North Newnham RA)
Rita Langan (Cranmer Road RA)
Ellen Khmelnitski (Gough Way RA)
Wendy Blythe (South Newnham RA)
Robin Pellew (CPPF)
Stephen Coates (Save West Fields)

Apologies:

Steve Jones (Convenor of 23 Parish Councils)
Bev Edwards (Barton PC)
Grenville Chamberlain (SCDC Hardwick)
Harriet Gillett (Storey's Way RA)

Structure of this document:

This document begins with a summary of the LLF's position on the proposals and the consultation, and the additional information/work it now asks GCP to provide. It then highlights the following six areas of concern:

- Deficiencies in the consultation material
- The treatment of Route B
- The comparison of the Park and Ride sites
- The environmental impacts of Route C
- Connectivity and journey times to key employment sites
- The potential impact of an onward route via The Backs and Silver Street

It concludes with the LLF's vision of an alternative approach, as discussed in its meeting on 11th September 2017.

Summary of the LLF's position on the proposals and the consultation:

- Any reasoned assessment of the Cambourne to Cambridge proposals is difficult until GCP clearly articulates its long-term strategic goals and, more specifically, how this scheme fits within a wider strategic vision.
- The LLF has consistently opposed Route C on the basis that its benefits do not justify its financial and environment cost. It is unclear how it connects to key employment sites; how it connects to the City Centre (and the impacts of so doing), and how it fits with wider strategic transport goals.
- The LLF believes that its own Route B could offer almost identical journey time and reliability benefits as Route C, at least for the next 10 years, but at a fraction of the financial and environmental cost. This scheme is not correctly described in the consultation document.
- The LLF has consistently opposed the siting of a Park and Ride on Madingley Hill, and prefers it to be located at Scotland Farm. This is a less environmentally sensitive location; is situated before congestion begins; is better connected and is more accessible.
- The LLF believes the consultation document contains misleading information on Route B, on the cost of Route C and in the comparison of the Park and Ride sites. It also omits vital information on the environmental impact of Route C and connectivity both to key employment sites and to the city centre. These deficiencies require immediate rectification (see requests below).

The LLF requests the following from GCP:

- That GCP clearly articulates its long-term strategic goals and, more specifically, how the Cambourne to Cambridge scheme fits within a wider strategic vision.
- That the consultation be paused until the deficiencies in the consultation material, as highlighted in this document, are rectified.
- That members of its Technical Group meet with Officers and their consultants to draw up an optimal version of Route B (formerly Option 6).
- That GCP give consideration to the positive vision proposed by the LLF (see final page).

1. Deficiencies with the consultation material

Resolution carried (5th December 2017; 17F 1A):

The consultation should be paused until the deficiencies, omissions and misleading statements identified by the LLF are rectified.

The LLF considers the current public consultation does not stand up to scrutiny.

1.1 The consultation document contains misleading information:

- The description of the LLF's Route B differs from what was intended in five substantive ways, and the comparison of the three schemes unfairly favours Route C (see section 2).
- The cost comparison omits the substantial land acquisition and maintenance/renewals costs associated with Route C (see section 2);
- The high environmental impact, poor accessibility and poor connectivity of the Waterworks site on Madingley Hill are not reflected in the Park and Ride comparison data (see section 3).

1.2 The consultation document omits key information necessary in order for respondents to make a reasoned response:

- The substantial Green Belt impact of Route C is missing from the information given. This is despite the independent consultancy LDA concluding Route C is 'inappropriate development' (see section 4).
- Connectivity and journey times to 'real' destinations such as the City Centre, Addenbrooke's and the Science Park (see section 5) are not included.
- The environmental impact of accessing the City via The Backs and Silver Street (see section 6) is also not included.

1.3 The corrective measures undertaken by the GCP following the printing error in the consultation brochure have been inadequate. Leaflets incorrectly describing Route A were delivered to 1,900 homes and were still being given out at roadshow meetings as late as last week. An unknown number of responses will therefore be based on incorrect information.

1.4 In a letter sent to all households that had received the consultation leaflet on 28th November, the Transport Director provided major new information that had been 'unintentionally left out of the original material'. Responses sent prior to this letter are therefore based on incomplete information.

The consultation should therefore be paused until these deficiencies are rectified.

2. The treatment of Route B

Resolution carried (5th December 2017; 18F 0A):

The LLF welcomes the offer from Chris Tunstall to re-engage with officers on the development of an optimal, community-supported scheme for better bus journeys between Cambourne and Cambridge.

The LLF considers the consultation materials to be manifestly unfair in that they do not fairly represent and compare the on-road scheme Option 6 (now Route B), which was proposed and supported by this LLF.

The following points should have been made clear to respondents:

2.1 Cost. The cost comparison presented for Routes A, B and C may have been done on a “like for like” basis (construction costs only) but is not fair, because the elements omitted - land acquisition, renewals and maintenance - vary enormously between the three routes. Route C would have tens of millions of pounds of extra costs above the pure construction costs, whereas Routes A and B would not. Furthermore, no information is provided on the value for money of the three options, which is a key factor for public consideration.

2.2 Option 6/Route B. Despite the claim on page 4 of the brochure, Route B as presented in the consultation materials is materially different from Option 6 as proposed and supported by the LLF in five substantive ways. First, it does not include an express service on the A428 dual carriageway. Second, the overall design has been misrepresented as tidal only, whereas the LLF specified a scheme that could be inbound or tidal, subject to further technical work. Alternative engineering approaches which could obviate the need for gantries in a tidal scheme, such as physical segregation of the bus lane, have not been properly investigated. Third, the LLF’s scheme provided a link through the West Cambridge site, and fourth, despite promises to the contrary, GCP Officers have failed to engage with the LLF to develop Smart Traffic Measures along Madingley Road. It was never the LLF’s intention that buses merely join general traffic east of the M11 bridge. Finally, the consultation materials claim that the M11 bridge at junction 13 must be widened to accommodate Option 6. This is clearly contradicted by the “Rectory Farm Bridge Options Report” published by the GCP in June 2016. No separate evidence of the need to widen the bridge has been provided.

The LLF’s original document providing a description and maps for Option 6 (Route B) are attached.

In the consultation document, Route B as described has a longer journey time; is more environmentally damaging and is more costly than it should be. This needs immediate rectification.

3. The comparison of the Park and Ride sites

Resolution carried (5th December 2017; 15F 0A):

The LLF does not support a Park and Ride at the Waterworks site for the same reasons as it opposed the Crome Lea site.

The comparative descriptions and accompanying photo montages of the two Park and Ride sites on page 10 & 11 of the consultation leaflet are misleading, and underestimate the problems associated with the Waterworks site.

The LLF opposes the Waterworks site for the same reasons that it opposed Crome Lea:

3.1 Situated on high ground, the waterworks site can not only be seen from a distance of 12 miles and from three counties, but will also have a significant visual impact on the closest villages of Hardwick, Coton and Madingley.

3.2 The site is located on highly-sensitive Green Belt land surrounded by National Trust covenants.

3.3 Situated after congestion begins, a Park and Ride here will worsen traffic around Madingley Mulch Roundabout, not alleviate it, and will encourage more rat-running through nearby villages. Given Madingley Mulch Roundabout is already congested, the cost of re-engineering the layout there could be substantial. Ignoring these costs means that the sites are not being compared on an equal basis, and should be clarified.

3.4 It is less well connected than the Scotland Farm site to the Science Park as there is no exit eastbound at the Madingley Mulch roundabout.

3.5 It is less sustainable than Scotland Farm as commuters will spend longer in congested traffic in their cars in order to reach the site.

LLF requests that the comparative descriptions of the Park and Ride sites are revised with immediate effect.

The LLF does not consider Madingley Hill to be a suitable location for a Park and Ride site:

Resolution carried (11th September 2017; 19F 0A)

Madingley Hill is not a suitable location for a Park and Ride site because of poor accessibility; poor connectivity; the unacceptably high environmental damage caused by a site there; and the fact that it is located after congestion begins so it will worsen, not alleviate, local traffic problems. We therefore recommend that all options for a Park & Ride on Madingley Hill in the vicinity of the Madingley Mulch Roundabout should be dropped.

The LLF has consistently expressed support for a Park and Ride at Scotland Farm, and remains unchanged in this view.

4. The environmental impacts of Route C

Resolution carried (11th September 2017; 16F 0A 2Ab):

The LLF considers that the environmental impacts of ... the off-line 3a busway are being significantly underplayed in the documentation. We ask that these assessments are re-analysed, with possible future impacts of future proofing considered.

4.1 The independent GCP-appointed consultants LDA Design concluded in their report titled *A428 Cambourne to Cambridge Segregated Bus Route Consideration of Green Belt Issues*, dated August 2017 that they considered Route C north of Coton and through the West Fields to fail the NPPF paragraph 90 test and constitute inappropriate development within the Green Belt, and that 'very special circumstances' would be required to permit it.

The LLF considers this independent advice on the Green Belt to be important information that should have been made available to the public in the consultation leaflet.

4.2 The conclusions reached in the LDA report do not consider the potential impacts of a Rapid Mass Transit system along the Route C alignment, although this is being openly discussed and currently investigated by GCP and the Combined Authority, and would potentially have far greater impact on the Green Belt.

Resolution carried (17th July 2017; 20F 0A 2Ab):

The LLF does not consider Option 3a a suitable alignment for Rapid Mass Transit given its proximity to rural communities; the amount of infrastructure required to keep our communities safe, and its impact on sensitive green belt areas. We ask that consideration is given instead to developing a more suitable alignment.

Given the Route C s being openly discussed as a potential alignment for a future RMT system, the potential impacts of this should be made clear.

The LLF has consistently opposed Route C on the basis that it does not offer sufficient benefits to justify the environmental impact, and does not consider it to be a suitable route for an RMT system.

The LLF requests that the consultation material be amended to include (i) expert advice on the Green Belt impact of Route C; (ii) expert advice on the Green Belt impact of the RMT solutions being openly discussed for this alignment, and (iii) information on the associated infrastructure requirements for a RMT system given its likely proximity to our rural communities.

5. Connectivity and journey times to key employment sites

Resolution carried (Western Orbital LLF 30th October 2017; 19F 0A)

The WO LLF believes that connectivity of a Western Orbital service to Cambourne to Cambridge bus services is of key importance. End-to-end journey times and journey quality from West of Cambridge settlements to key employment sites such as the Cambridge Biomedical Campus are a critical factor in judging the benefit of these schemes, to allow proper evaluation of benefit-cost ratio. Therefore, the LLF requests that robust end-to-end journey metrics are included in all documentation (reports, consultation literature, etc) on this and related schemes moving forward.

The LLF has consistently requested information on journey times and connectivity to the key employment sites: the BioMed campus, The Science Park and the City Centre. This has not been forthcoming. We consider this to be a huge omission that should be rectified immediately.

6. The potential impact of onward route via The Backs and Silver Street

Resolution carried (5th December 2017; 15F 0A):

Despite repeated efforts by the LLF to seek clarification, the consultation fails to set out what will happen to buses as they travel from Grange Rd to Silver St. Given the huge sensitivity of the Backs, residents are entitled to full disclosure of all likely bus lanes and engineering schemes that might be necessary and might impact The Backs (as a Grade I registered park and garden) and associated roads, and a full quantification of travel time impacts of taking a Silver St route. The LLF considers this refusal to comment on the travel impacts post Grange Road to be a gross failure of transport design.

The LLF considers this a crucial omission. If further investigation shows that The Backs and the Silver Street bridge are not suitable for buses, or if negative public opinion results in such a proposal being dropped, and buses have to revert to Madingley Road, then the marginal improvement in Cambourne-Cambridge journey time currently claimed in the consultation brochure would disappear and could not then be used to try to justify the high cost and environmental damage of Route C.

The LLF asks for the impact on The Backs and Silver Street to be immediately assessed.

The LLF's positive vision

Resolution carried (5th December 2017; 20F 0A):

Our concern is that the Executive Board is setting up projects in a sequence that is not cumulative and could be contradictory. For example, the outcome of the review of the feasibility of mass public transport options could have a significant impact on the consideration of bus-based transport plans, yet no allowance for this is being made in the GCP programme.

The LLF therefore proposes that the Executive Board should differentiate at the time of their approval between short-term and long-term measures. We recognise that the urgency of the situation requires immediate measures but equally we are concerned that excessive sums of money should not be allocated to schemes that may have a short operative duration.

The sort of project that the LLF considers to be short-term (that is up to 10 years) includes the implementation of an on-road bus proposal – such as option 6 - whereas longer term interventions include an upgrade of the Girton interchange and the introduction of a light rail system – with a central route starting from the Girton interchange. A link from St Neots could sensibly run alongside the A428 and link into this.

The LLF asks that the GCP investigate this proposal, as it could be realised alongside the likely East/West improvements and upgrade of the Girton Interchange - so be more cost effective, and would be far less environmentally damaging, as any route from the west, regardless of mode of transport, could be placed in the cutting of the A428.

Helen Bradbury, Chair A428 LLF, 10th December 2017