

Submission from Coton Parish Council to Independent Auditor for C2C Scheme

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1 Introduction

This document is a submission from Coton Parish Council (CPC) in response to the call for evidence that will determine the assumptions and constraints dealt with by the Independent Audit on the Cambourne to Cambridge (C2C) bus journeys scheme. Further detailed representations will be provided when the assumptions and constraints are determined.

2 Appraised scenarios

For the appraisal process to be robust the scenarios assessed need to represent a realistic picture of the scale, scope and type of planned activities as well as of the “without scheme” conditions.

The Department for Transport (DfT) Transport Appraisal Guidance (TAG)¹ recognises that in order “to undertake appraisal of an intervention it will be necessary for it to be sufficiently well defined and specified” since its level of detail “will have a direct impact on the scope and level of assessment and appraisal that is possible, and the degree of confidence that can be placed in the results of appraisal” (para 2.2.8). [emphasis added]

At Stage 1 the design should, amongst others, enable:

- “the key physical and operational aspects of an intervention to be understood;
- interfaces an intervention might have with its environs to be identified”.

At Stage 2 a greater level of design detail is expected to enable a more in depth appraisal to be undertaken commensurate with the decision being made (para 3.1.5).

TAG (paras 2.4.2 – 2.4.8) also specify that “analysts should identify a range of scenarios for the future against which options and subsequent further appraisal would be undertaken” and that the ‘without scheme’ case should involve both a core scenario and “several sensitivity tests and alternative scenarios” representing “Future Changes to the Transport System and Transport Demand”.

As outlined below there is evidence, previously submitted or presented to the GCP, to demonstrate that the scenarios assessed do not meet the above requirements, thus limiting the “degree of confidence” that can be placed in the outcomes.

2.1 Incomplete ‘last mile’ route definition

The Options Assessment Report (OAR3)² used to inform the Outline Business Case (OBC) indicates that different Cambourne to Cambridge (C2C) bus services for the selected options will run from Cambourne, or the proposed Scotland Farm Park and Ride (P&R), via Grange Road to three end-points: the city centre, Cambridge North and the Cambridge Biomedical Campus. However, as highlighted in various meetings and outlined in a letter from CPC’s legal advisor,³ neither the OAR3 nor the Summary of the OBC include a definition of the routes to and from Grange Road to the city centre, let alone their appraisal, and nor have such proposals been subject to consultation. The only indication of the

¹ [DfT 2018 Transport Analysis Guidance, The Transport Appraisal Process](#)

² [Mott MacDonald, 2019 Cambourne to Cambridge Better Public Transport Project Options Assessment Report Part 3: Outline Business Case Appendix 3](#)

³ Letter from Richard Buxton Environmental and Public Law to GCP, 19 September 2017 (Appendix 1)

nature of such a connection is a brief reference to Silver Street in a schematic in the OBC summary and that such routes “are proposed routes only and have not been agreed with the route operators”.⁴

From the limited information in the OBC and other communications, it is understood that the intention is for inward bus movements to be routed via Silver Street and Downing Street to Drummer Street and outbound movements routed via Fen Causeway. It is assumed therefore that the travel times in the OBC are based on such routes. It is not, however, clear how these travel times have been derived, in particular whether and how these have taken account of the significant congestion on these roads, which could substantially impact such times etc. and hence appraisal scores. Furthermore, at GCP workshops attended by CPC representatives, bus operators stated their reluctance to use such routes owing to the constraints and that in practice they would avoid them in favour of the current route used by buses via Northampton St, Chesterton Road, Victoria Avenue and Emmanuel Street. This would almost certainly add to the travel times assumed in the OBC.

Without clarity on such an important element of the project’s “key physical and operational aspects”, the implications (i.e., “interface with its environs”) of such proposals for travel beyond Grange Road for the OBC and overall scheme viability are also unclear. As these may be significant (e.g. lack of segregation and hence risk to reliable and unimpeded journeys and journey time, impacts on historic townscape, impacts on property owners along the route (e.g. University and Colleges amongst others), amenity for other road users etc. the CPC believes that their omission from the optioneering appraisal is a failure in the process that raises significant doubts regarding the “degree of confidence” that can be placed in elements of the OBC.

It is also not clear what level of appraisal – if any – was given to the proposals for bus routes between Grange Road and both the Biomedical Campus and Cambridge North.

2.2 Incomplete definition of operational parameters

In February 2018 the Cambridgeshire Autonomous Metro (CAM) proposals were accepted by, and formally adopted into the long term plans of the GCP so that the C2C busway would be capable of future conversion to accommodate CAM, which is accepted policy (including that of the GCP) to be a likely long term scenario for this link. The decision on which C2C alignment to take forward will thus also predetermine the alignment of the subsequent CAM. The post-February 2018 definition of “the key physical and operational aspects” of the project should therefore have identified such “aspects” associated with scheme use, both for a GCP C2C busway as well as for longer term CAM operations, so that these parameters could inform the subsequent appraisal of its “interfaces ... with its environs”. Indeed this may have contributed to the recent challenge of the C2C scheme made by CPCA on the basis that is non-CAM-compliant.

For example, the GCP C2C bus scheme anticipates 10 vehicle movements per hour (i.e. one every six minutes in each direction), while CAM could utilise smaller vehicles that are faster and more frequent “at least every 2-3 minutes” in a single direction at peak times.⁵ The details of the CAM scheme are still being considered, with options including autonomous or on-demand vehicles etc. Thus the C2C scheme’s operating parameters, and hence its benefits and impacts, have the potential to alter very

⁴ [GCP, December 2019 Cambourne to Cambridge Better Public Transport Project Non Technical Summary to the Outline Business Case. \(p58\)](#)

⁵ [Steer 2018. Mass Transit Options Appraisal. Report commissioned by the GCP and Combined Authority](#)

significantly after the first few years of its operation, when CAM is introduced. These altered core operating scenarios, and indeed any other changes that can reasonably be anticipated over the scheme lifetime, should therefore be reflected in the project development and appraisal process rather than limiting the scope of appraisal to its original, and perhaps short-term use, as a bus route. It is noted that the CPCA ambition is to deliver operational CAM lines from 2023-29⁶, i.e., around the same time at which the GCP anticipates the C2C scheme coming to fruition.

However, as outlined by CPC's legal advisor,⁷ despite the high score of the preferred option against the 'future proofing' criteria, the OBC provides no evidence of such a future scenario being assessed, and the reliability of the score allocation method must therefore be questioned.

CPC's understanding is rather that:

- Phase 1 OARs 2 and 3 were based on appraisals of the GCP C2C busway design and operations i.e. did not take account of any differences associated with CAM (e.g. increased number of movements or infrastructure requirements such as grade-separated crossings for example to accommodate the service frequency);
- as CAM compliance only became a condition of the scheme after the Stage1 strategic phase, subsequent appraisals (OAR1-3) were limited to the three shortlisted options remaining at that time (i.e. on-road tidal bus, on-road busway and southern off-road route). Long term use of the route for a CAM scheme was not considered during the original longlisting, shortlisting or optioneering exercises, nor was this revisited to determine if this may have altered their outcomes. It is therefore not known whether other options may perform better than the one proposed by GCP in delivering the desired project outcomes as currently defined;
- as public consultation for Phase 1 was undertaken in 2015 and late 2017 /early 2018 (i.e., before adoption of the principle of CAM compliance), there has been no opportunity for the public to comment on the location of a scheme that will run on a CAM operational scenario.

It is appreciated that conversion of C2C to CAM is likely to be subject to its own permitting process during which stakeholder input can be provided, but at that stage it seems likely (because substantial physical infrastructure will have already been built, and for economic reasons) there would be very limited scope for modifications to the C2C alignment. Given the lack of appraisal, there is significant risk that the southern off-road route could in future be deemed unsuitable for CAM operation, or require major modifications, with resultant major increase in costs and / or duplication of services and land take between Cambourne and Cambridge (i.e., associated with C2C, CAM and East-West Rail) should alternative alignments be pursued for CAM at that stage). CPC considers that this situation, should it emerge, would fail to meet sound sustainability criteria, and would be highly inefficient and an unjustified use of public funds.

For these reasons, CPC considers that the decision about the C2C alignment should have taken account of an operational scenario comprising a short term C2C / long term CAM scenario, which has yet to be properly determined, let alone assessed.

⁶ [Ely Standard: Concern for CAM Metro delivery timeline](#)

⁷ Letter from Richard Buxton Environmental and Public Law to GCP dated 19 September 2017 (Appendix 1)

2.3 Uncertain demand scenarios

It is understood that the scheme has been based on travel demand prediction for 2031 based on analysis carried out at the start of the project in 2015.

As raised at several GCP Executive Meetings⁸ and as recognised by the DfT,⁹ a unique set of “unexpected events have occurred that could have a significant impact on transport scheme appraisals. These include the COVID-19 pandemic, a revised fiscal and economic outlook, the Green Book review with its focus on levelling-up and the government’s commitment to net zero and the transport decarbonisation plan”. It also recognised that these bring “uncertainty around future travel behaviour” and “assessing which options provide the best return for the tax payer”.

Uncertainty regarding demand for C2C, and hence its business case, is also compounded by a lack of sensitivity analyses of the implications of EWR as part to the C2C development process. This need to address the implications of the EWR on the OBC has been raised by numerous stakeholders including the National Trust¹⁰, Local Liaison Forum, local MP Anthony Browne (now Chairman of the All Party Parliamentary Group on the Environment) and numerous County, District and City Councillors.¹¹

CPC is therefore of the view that the ‘without scheme’ scenario does not sufficiently consider a realistic situation, nor has it been informed by adequate scenario testing that takes account of current uncertainties in “Future Changes to the Transport System and Transport Demand”, as outlined in TAG para 2.4.8 (DfT, 2018).

CPC consider that the scenarios that have been used as the basis for C2C option development, subsequent appraisals and OBC production, including those presented at consultation, are not the ones that are most likely to occur. This arises from the observations that:

- No definition or appraisal has been undertaken of the routes (either in or out of the city) or operating scenarios (including travel time) between Grange Road and the city centre;
- The appraised operating scenario elsewhere on the route relates only to its short-term use by bus, but not its likely longer term use for the CAM metro, which has different operational parameters, notably frequency and speed of movements;
- The demand scenarios on which the scheme is based do not take account of current “uncertain times” as identified by DfT and how these should be reflected in the appraisal process (DfT, 2020), nor of the implications of other significant development in the area, notably EWR.
- Since the above are likely to be “material to the decision at hand” they may make the process applied to date, and its outcomes including the OBC, vulnerable to challenge. They thus meet the criteria for appraisal update in accordance with the recommendations of the DfT’s Proportionate Update Process (DfT 2014).

⁸ e.g., [Questions 1 and 6 at the GCP Executive Meeting of 10th December 2020](#)

⁹ [DfT July 2020. Appraisal and Modelling Strategy A route map for updating TAG during uncertain times](#)

¹⁰ National Trust, Letter from Paul Forecast to GCP, of 13 February 2020 (Appendix 6)

¹¹ Open Letter to GCP, 13 January 2020 (Appendix 10)

3 Consideration of alternatives

As the EIA requirements outlined in the Environmental Impact Assessment (“EIA”) Directive are likely to continue to apply post-Brexit to TWA Orders, the need to demonstrate consideration of “reasonable alternatives” will apply to the C2C Scheme. CPC are of the view that not all reasonable alternative alignments or phasings of the scheme elements have been adequately considered by GCP, and that there is a high probability that plausible alternatives would be raised by interested parties during the pre-application process.

In order to avoid potentially abortive work on the C2C design development and EIA of the currently preferred scheme, CPC are of the view that these alternatives should be adequately considered prior to progressing to the next steps, not least to enable GCP to demonstrate “the main reasons for [his] choice [of the preferred option], taking into account the environmental effects”.¹²

C2C wish to highlight several areas where concerns regarding the approaches to consideration of alternatives have previously been raised.

3.1 Alternative alignments

3.1.1 Northern off-road alignment

An off-road route running north of the A1303 and the American Cemetery was initially considered as part of SOBC development. Although it received fewer public objections than the southern off-road route (See Section 4.1 below), it was discounted at the end of the strategic phase due to increased cost, compared to the online route, and the congestion / inability to provide two-way bus priority on Madingley Road (which it would have joined west of the M11).

This northern route was rejected prior to adequate analysis, so it is not clear whether constraints might have been satisfactorily addressed. In particular, a route further north, close to the Girton Interchange was not explored and remains of interest to multiple stakeholders, including CPC. It is understood that the Cambridgeshire & Peterborough Combined Authority (CPCA) are currently exploring options for optimisation of a northern route (Jacobs, 2020).¹³

It is also noted that subsequent comparison of the CAM compliance of the off-road northern, off-road southern and the on-road A1303 routes^{14,15} considered the optimised southern and on-road routes against the “principle of an off road northern alignment” (para 4.5 of Arup 2018b) – i.e., a non-optimised northern route. Questions have previously been raised by the LLF regarding the validity of a comparison of alternatives that had not been subject to an equal degree of optimisation process. CPC therefore questions the reliability of subsequent use of such an analysis to support the choice of the southern off-road option as the “optimal solution” for the corridor, and its CAM compliance notably reference to it in briefings to the GCP Executive¹⁶ including those taking place¹⁷ after it had

¹² EIA Directive Article 5

¹³ [Jacobs 2020b, Review of C2C alternative northern alignments](#)

¹⁴ [Arup, 2018a CPCA CAM Expert Advice A428 Report](#)

¹⁵ [Arup, 2018b Position paper on CAM and A428 prepared or the GCP on behalf of the CPCA](#)

¹⁶ [Report to GCP Executive Board dated 6 December 2018, submitted by Peter Blake](#)

¹⁷ Section 6.2, of the Executive Board Papers of 10 December 2020 relating to the C2C Scheme

been superseded by a Jacobs¹⁸ report that showed that the preferred C2C route and CAM were non-compliant.

3.1.2 On-road A1303 alignment

While two on-road A1303 options were put out to consultation in late 2017, ahead of this CPC alerted the GCP to the fact that only one (the GCP's proposal for an in-bound busway) had been put through the SOBC refinement process while the LLF's proposal (for a two-way tidal busway) had not, despite undertakings by the GCP to do so. Hence CPC consider the comparison of options undertaken ahead of, and presented at, consultation in 2017/18 to be biased, since it compared a non-optimised tidal busway option against two other options, which had undergone additional (though still inadequate) assessment work.¹⁹

Although some improvement of both the (in-bound and tidal) busway on-road options was undertaken post-consultation to address congestion on Madingley Road, the amount of attention given to improving their performance was considerably less than that given to the southern off-road option. Notably, no effort appears to have been given to avoiding or reducing the land take or visual intrusion at the American Cemetery and Madingley Wood SSSI, which were identified as key reasons for rejection of this route. This is despite the statement by Historic England²⁰ that "mitigation measures should be further considered" and by Natural England that further levels of detail were required in order to make judgement regarding impacts of any of the three proposed options.²¹

Similarly, the option to reduce land-take on Madingley Road (and hence from the American Cemetery and SSSI) through use of the Greenway cycle route already proposed between Comberton and the West Campus as proposed by Cambridge Past, Present & Future was not considered.

CPC also understands that measures for managing congestion through traffic controls using a combination of signals and bus lanes has also been proposed with supporting evidence of performance against C2C criteria but has not been considered to date by the GCP.

CPC consider that such further optimisation of the on-road options, including do minimum scenarios, should have been undertaken as part of the development and appraisal process to inform selection of the best performing alternative. This has become even more relevant in the context of likely changes in demand (Section 2.3) which may have altered the OBC and the ability of an on-road option to meet such demand at least in the short / medium term.

3.1.3 "Girton Interchange" option (route along A428/M11 with optional integration)

Although the A428 between Madingley Mulch Roundabout (MMR) and the Girton Interchange (GI) and the M11 between the GI and High Cross lies within the "corridor of interest" (as shown in Figure 3-1 of Mott MacDonald 2014²²) they were not included in any of the 21 long-listed elements considered for inclusion in the C2C scheme. An option which runs adjacent to such existing highway

¹⁸ [Jacobs 2020a, Review of C2C against CAM Objectives](#)

¹⁹ Letter from Richard Buxton Environmental and Public Law to GCP dated 26 October 2017 (Appendix 9)

²⁰ Stakeholder response of 28 February 2018 from Historic England to GCP (Appendix 4)

²¹ Post consultation response from Natural England dated 21 January 2018 (Appendix 8)

²² [Mott MacDonald, 2014 Madingley Road/A428 Corridor Study Options Appraisal Report Produced for Cambridge County Council](#)

infrastructure was therefore not subject to detailed consideration in the C2C scheme development and appraisal process.

The A428 / M11 route, however, is free of many of the constraints subsequently identified to be associated with the options that were shortlisted. Its adoption may therefore potentially unlock an opportunity for the GCP and CPCA to deliver a scheme that meets the needs of longer term growth since it:

- can be fully segregated and avoid the congestion issues on Madingley Road;
- avoids impacts on the Madingley Wood SSSI and the American Cemetery;
- follows existing transport corridors and thus avoids fragmentation of the Green Belt, landscapes etc and is unlikely to add significantly to existing noise levels (since it would closely follow existing major highways).

The use of the GI has also for some time had wide support amongst local communities, who have frequently expressed the view that it warrants further consideration, as has the LLF. This is demonstrated by a clear statement of community support for its use made in the 'Letter of Community Consensus' sent by the Coalition of Parish Councils (and signed by eight South Cambridgeshire District Councillors) to the Secretary of State for Transport and Highways England (copied to GCP, CPCA, local MPs and Council leaders).²³ The letter was endorsed by Parish Councils and District Councillors representing over 30,000 residents living in communities to the west of Cambridge. This letter also had support from a wide range of community groups (e.g., Cambridge Ahead, Cambridge Connect, Cambridge Past, Present & Future, the Federation of Cambridge Residents Associations and Smarter Cambridge Transport). This issue has also been raised on multiple occasions through questions to the GCP Executive²⁴ as well as through submissions made by Smarter Cambridge Transport, Cambridge Connect, CambridgePPF, the LLF and many others.²⁵

Following a request from the C2C LLF to the GCP to consider such a northern option, the response²⁶ was that this had not been looked at during optioneering, and reaffirmed their previous view that it did not qualify for consideration due to:

- additional journey length (2.2km);
- lack of relief provided on radial routes due to P&R being closer to the city;
- dependence on Highways England;
- the length of time required for its implementation and such a proposal being at odds with the Cambridge & Peterborough Independent Economic Review which stresses the need for immediate investment in infrastructure;
- not providing a stop at West Cambridge;
- non-compliance with CAM;

²³ Letter to Secretary of State for Transport and Highways, dated 1 May 2019 (Appendix 5)

²⁴ E.g., [Public Questions to GCP of 10 December, 2020 Question 5](#)

²⁵ [Smarter Cambridge Transport A14 Girton Interchange – a critical link](#) and [Cambridge Past, Present and Future](#)

²⁶ [Mott MacDonald, Technical Memo dated 4 May 2018, subject: the Northern Route](#)

- unachievable within the required timelines and high cost due to scale of work required to the GI.

Most of these assumptions are not sound and the rationale for rejecting the route is flawed, as CPC understands that they could readily be overcome through some optimisation of design and phasing. It is unclear why, given the high level of support for such an alignment, such basic principles were not at least explored by GCP in more detail before discarding this option.

For example, CPC are aware of potential for a route co-aligned immediately adjacent to the A428 from MMR to the GI, from where it could proceed under the M11 (where the highway is elevated and underpasses already exist) and then follow the general alignment of the M11 on its eastern side to Eddington and High Cross. It is reasonable to propose that a base option need not involve a link integrating into the GI itself, thus avoiding the need for more complex and costly designs with full integration with the GI. The base scenario (without any alteration of the GI) would ensure that the selected route is placed at the GI for potential connection in the future, an objective that has plausible economic and social benefits given the GI is of high strategic importance on the regional road network, connecting as it does the major highways of the M11, A14 and A428. This approach would allow future connections either as part of CAM or later (as CAM is not contingent on this). Clear advantages of such an option would be:

- Avoidance of fragmentation of Green Belt;
- Provision for full segregation along the length of the alternative route;
- Avoidance of impact on the SSSI and American Cemetery;
- Avoidance of costly mitigation contemplated for other options;
- Avoidance of high cost of bridge over the M11 by routing under the highway, potentially utilising / modifying an existing underpass.
- Fully CAM compliant;
- Provision of direct access to the new town of Eddington and to the West Campus;
- The base scenario could be implemented immediately as this would not be dependent on Highways England input or any alterations to the Girton Interchange;
- Delayed expenditure on GI modification (i.e. enabling all-ways interchange) until a future date, but can still operate as Busway or CAM without these modifications while still leaving this open for the future;
- Likely to perform well both for a short / long term C2C busway and for CAM;
- Potential for a future link and coach park at the GI;
- Potential for significant wider economic benefits (WEB) due to better connectivity.

CPC has calculated that such a route would add approximately 1.5–2 minutes of journey time between Cambourne and the West Campus and City. This possible disbenefit would, however, likely be outweighed by the better environmental performance and travel comfort (increasingly recognised by DfT as a consideration that needs to be balanced against travel time) and potential to link into the Girton Interchange thus opening up options for access to / from Bar Hill, Dry Drayton and Northstowe. This latter option could provide a direct route from these communities into the West Campus / City by high quality public transport and increase its BCR. Furthermore, the case for such an option may have increased since the 2018 review, following the requirement of the C2C to accommodate a future CAM, and the non-compliance of the preferred option with such a requirement (Jacobs, 2020).

The CPC therefore request that GCP consider and optimise a route adjacent to and co-aligned with the existing A428 and M11 as described above to a level of detail comparable to the southern off-road alignment to date, which could for example be undertaken as part of the CPCA ongoing review of northern alignments. CPC would be pleased to participate in such an exercise.

3.2 Alternative phasing

The selection and appraisal of options has been influenced by the ability to deliver them by certain dates (e.g. the original City Deal had in-built time constraints that affected release of funds). The latest in a series of deadlines is 2025. The early imposition of unrealistic time-frames for C2C scheme delivery, which the CPC considers to be a misguided strategy, has resulted in important strategically advantageous options being excluded from consideration, and the most expensive, and most opposed, of the three shortlisted options being taken forward by the GCP.

Several members of the GCP Joint Assembly²⁷ have expressed concern about “the choreography, process and timeframe for taking forward the proposals and it was suggested that an interim solution should be developed, leading to long term optimal alignment. This could cost significantly less and would allow more time for a longer term CAM system to be developed. If an interim solution looked attractive it should be pursued, even if it caused delay. Dealing with the urgent problem would buy time and that would be the best way to future proof any decision taken.”

A similar view to pause the scheme to allow consideration of the EWR has been expressed by the National Trust.²⁸ CPC also understands there remain uncertainties about where in Cambourne the station for EWR will be located.

CPC and many other stakeholders advocate implementation of a lower-cost, interim solution that can deliver substantial, high-quality travel benefits, while longer-term interventions, better coordinated with EWR and/or CAM, can be developed. Such a case for a phased approach has been strengthened by:

- The recent questions raised about the compatibility of the preferred alignment with CAM objectives;²⁹
- the risks relating the robustness of the scenarios assessed (Section 2 above) including prediction of demand;
- concerns regarding lack of optimisation of alternatives to the southern off-road route prior to their rejection resulting in a potentially biased appraisal;
- The opportunities associated with a route via the GI, which may take longer to implement than the currently preferred option, but also could deliver superior long-term benefits (Section 3.1.3);
- The continued opposition to a southern off-road route, and support for those that follow where practicable existing road alignments, notably those that have future potential to link into the Girton Interchange.

²⁷ [Report to GCP Executive Board dated 6 December 2018, submitted by Peter Blake](#)

²⁸ National Trust, Letter from Paul Forecast to GCP, of 13 February 2020 (Appendix 6)

²⁹ [Jacobs 2020a, Review of C2C against CAM Objectives](#)

CPC consider that a scenario should be developed that comprises a short term optimised on-road busway along the short section of the A1303 between MMR and High Cross, followed in the medium term by the route with potential to run close to, or link into, the GI as described above (Section 3.1.3). This should be undertaken in association with planning for CAM, although CPC do not consider the scenario as necessarily dependent on CAM. That is, it is plausible that such an option would stand on its own merits, whether or not CAM is taken forward in the ways envisaged. Such a phased scenario should be developed and subject to detailed appraisal to enable a proper comparison against the currently shortlisted options.

The CPC consider that, given the complexity of the impacts and benefits associated with each of the shortlisted options, and changes in the operational scenario since the shortlist was developed, insufficient attention has been given to optimisation of alternatives that may deliver superior long-term solutions. CPC therefore requests that these options are revisited, including:

- Optimisation of interim on-road option;
- Optimisation of northern off-road option, following existing transport corridors where possible;
- Optimisation of routes that follow existing road alignments between MMR and High Cross, both along the A1303 and adjacent to the A428 east of MMR and M11 from GI to High Cross;
- Adoption of a phased delivery comprising an interim low-cost solution meeting short term needs whilst a longer term one is fully developed;
- An appraisal of a specific scenario wherein the interim solution followed by the long term one is undertaken to enable a complete and transparent comparison against the other existing shortlisted options.

4 Stakeholder views

The scheme has attracted considerable attention and comment from local communities and their representatives as well as from charities and land owners. It is therefore important that their views are appropriately taken into account in decision making.

4.1 The public

Consultation on the Phase 1 proposal³⁰ in 2017 identified that:

- 58% supported an on-road bus lane (40% tidal lane, 18% inbound flow); and
- 33% supported a southern off-road option (a northern off-road option via the A428 alignment was not presented for consideration).

CPC note that:

- The summary of this Phase 1 consultation (documented in the OAR2 Executive Summary,³¹ para 3.2.2) cites Option B “on-road” as being preferred by 40% of respondents but omits to report that there was a second on-road option preferred by 18% of respondents and neglected to point out

³⁰ [CRG, Summary Report of Consultation Findings](#)

³¹ [Mott MacDonald, 2018 Cambourne to Cambridge Better Public Transport, Options Appraisal Report Part 2 \(OAR2\)](#)

that the off-road option was preferred by only 33%. The GCP summary thus fails to convey the level of support for on-road vs off-road;

- the already significant preference for the Phase 1 on-road options may well have increased had equal effort been given to their optimisation, as was given to that of the southern off-road options (see Section 3.1.2 for further details);
- The summary of the status of C2C on the GCP website³² only cites the consultee preferences for Phase 2 i.e. 48% preferring the “off road”. While this summary lists the Phase 1 options consulted upon, it fails to provide a similar clear summary of consultee preference for each. Most readers, including potentially the GCP Executive, may therefore interpret the Phase 2 results as being the latest preference for the entire C2C scheme. The information presented has therefore been misleading with respect to the actual levels of support for the scheme.
- CPC highlighted to the GCP their concerns that CPC responses were not included in the initial consultation report;³³
- the documentation of consultee preferences for Phase 1 in key GCP communications have also misrepresented the strong preference for following an existing road alignment between MMR and High Cross;
- The earlier Phase 1 consultation in 2015 also confirmed the majority (67%) supported the on-road route with strong opposition to the southern off-road route (65.5% against) and high, if slightly less, opposition to the northern off-road route (57%)³⁴ (Note that the northern off road option included in this consultation did not proceed via the GI, but rather followed a route across landscape adjacent to the American Cemetery, and the level of opposition is not indicative of that for the option suggested in Section 3.1.3 above); and
- In view of the support for a route via or close to the Girton Interchange (Section 3.1.3), it is likely that preference for all the other options would have been lower had such an option been included in those that were put out to consultation.

CPC therefore question the decision, despite such strong opposition, in support of the southern off-road alignment and for this to have been taken forward as the preferred option.

4.2 Statutory consultees

Historic England³⁵ considered that all three Phase 1 options that were subject to consultation in late 2017 “are likely to cause harm to heritage significance, either to the American Cemetery or to the significance of the village of Coton”. It therefore strongly recommended that “detailed heritage assessments” should be undertaken to meet the requirements of the National Planning Policy Frameworks paragraphs 128 and 129, which specify, amongst others, that “Applicants should work

³² [GCP Cambourne to Cambridge Update](#)

³³ Letter from Mark Abbott Chair of CPC to GCP date 5 April 2018 (Appendix 2)

³⁴ Cambridgeshire County Council 2016 [Cambourne To Cambridge: Better Bus Journeys Consultation Report](#)

³⁵ Post consultation response from Historic England dated 28 February 2018 (Appendix 4)

closely with those affected by their proposals to evolve designs that take account of the views of the community”.

Natural England³⁶ noted that based on the level of detail available they were “unable to make any judgement regarding likely impact of [any of the three] proposed options”.

Subsequent materials published by GCP misrepresented these consultation responses as being favourable to a southern off-road route. A Freedom of Information request uncovered evidence that some transport officers had expressed significant concerns about the way these important responses had been selectively presented by GCP (further information on this point can be provided on request).

While the CPC understand that some further ecological studies were undertaken in 2018 they are not aware of further heritage assessments having been undertaken as recommended by Historic England, and note that consultations with the community on heritage aspects as recommended have not been carried out to date. Nor does CPC know whether English Heritage and Natural England have confirmed that such concerns and their recommendations have been addressed and hence provided a sufficient evidence base for informing the subsequent Stage 2 appraisal.

4.3 Charities and Landowners

Ahead of the August 2017 consultation, the National Trust³⁷ expressed concerns that the proposed southern off-road route crossed land with National Trust covenants. The National Trust requested assurances that prior to publishing the proposal for public consultation, all alternatives that avoided such land be fully explored and that reasoned justification or the preferred option, taking account of such issues, is given. As by this time it had been established that both on-road alignments would be constrained through lack of full segregation on Madingley Road, it is not clear why exploration of other fully segregated routes that did not cross covenanted land was not undertaken ahead of consultation as requested.

These concerns were reiterated in a later submission to GCP by the National Trust,³⁸ as was their previous unease regarding the appraisal process. Furthermore, in view of the announcements regarding EWR the Trust requested a pause in advancing the project to reevaluate its potential to deliver value for money, and supported reconsideration of an in-bound busway along Madingley Road together with a new cycleway. Inexplicably, this correspondence, dated 13 February 2020, was not circulated to the GCP Joint Assembly or Executive Board prior to their June 2020 meetings at which decisions were taken on the route options.

The Campaign for the Protection of Rural England (CPRE)³⁹ most strongly objected to the southern off-road alignment due to its extensive location within areas of Green Belt closest to the historic centre of Cambridge and the impact on the tranquillity and setting of Coton. CPRE considered there to be insufficient transport advantages compared to a fully optimised on-road option.

³⁶ Post consultation response from Natural England dated 21 January 2018 (Appendix 8)

³⁷ National Trust Letter from Paul Forecast of 1 August 2017 (Appendix 7)

³⁸ National Trust, Letter from Paul Forecast to GCP, of 13 February 2020 (Appendix 6)

³⁹ Email from CPRE to GCP (Appendix 3)

4.4 Timing/validity of consultation

CPC notes that Phase 1 consultation was undertaken in late 2015 and late 2017 /early 2018 i.e. before adoptions of CAM by the GCP and CPCA. CPC therefore questions the validity of an assessment process that determines major public expenditure informed by stakeholder views on a scenario (i.e. busway operation) which does not represent a realistic future situation (i.e. CAM operation). CPC note that the CPCA has stated that CAM delivery will take place in the window of 2023 – 2029, the first part of which directly overlaps with the delivery timetable for C2C. It is therefore reasonable to expect that C2C should be planned and delivered in a fully integrated way with CAM. Indeed, considering the delivery timetables, it could be legitimately argued that there is only weak justification for why these two schemes should be separated in their planning, design and delivery.

The CPC wishes to draw to the Auditor’s attention the fact that:

- Despite the southern offline route consistently being strongly opposed by a substantial majority of stakeholders (residents, their representatives, environmental organisations and others), GCP have persisted in promoting it;
- The responses of the statutory consultees, Natural England and Historic England, were misrepresented in GCP consultation literature to give the misleading impression of supporting a southern off-road route, even though they were clear that the level of detail provided at consultation was too low to enable judgement of whether such a route would be acceptable to them, or whether other routes might be preferable;
- Relevant communications from key stakeholders have not been circulated by GCP administrators to decision-makers on the Joint Assembly and Executive Board;
- There is a preference, subject to avoidance of land-take from Madingley Wood SSSI and the American Cemetery, for the principle of a bus route running on or adjacent to existing transport routes, rather than creating new routes across open countryside;
- A route along the A1303 is not the only such option within the defined corridor. Consideration should be given to use of routes adjacent to A428 between the MMR and the GI, and the M11 from the GI to High Cross;
- In view of the commitments made by both the GCP and CPCA to delivery of CAM, consultation on, and hence stakeholder input to, the project has been based on a project scenario that is not the most likely one to occur, even by the GCP’s own documentation of strategy.

5 Robustness of Appraisal Method and its application

Concerns regarding the appraisal methodologies and criteria selected, as well as over the transparency and robustness in their application have been raised on various occasions, including in the letters from the CPC legal advisor⁴⁰ and from the National Trust⁴¹ to the GCP. These have both identified specific examples of inconsistent and biased approaches, and highlighted that many more exist. The CPC

⁴⁰ Letter from Richard Buxton Environmental and Public Law to GCP dated 19 September 2017 (Appendix 1)

⁴¹ National Trust, Letter from Paul Forecast to GCP, of 13 February 2020 (Appendix 6)

concur with their legal advisor's view that the GCPs assessment method has utilised specific criteria that "ensure that Option 3a [i.e. the southern off-road alignment] emerges as the strongest candidate".

CPC understand that it will have an opportunity to further elaborate on questions regarding the assessment methodology in the later submission to the Auditor. They do, however, wish at this stage to highlight a specific concern over the strong reliance on the 'Wider Economic Benefits' in developing the OBC and question the level of confidence that can be placed in the process adopted. It is understood, for example, that the OBC assumes that the project brings about a 100% uplift on the land value at Bourn Airfield and Cambourne expansion, yet it takes no account of the fact that a significant proportion of this of that uplift has already been unlocked through securing planning consents, and because a large number of those dwellings have already been built (hence the uplift has already occurred in the absence of the scheme), and that other projects (e.g. A428 to Caxton Gibbet) also claim to deliver an element of the uplift. These practices appear to fall short of what might be expected in a robust economic appraisal.

CPC wishes to draw the Auditor's attention to previous communications with the GCP expressing concern over the robustness of the options assessment process including the multicriteria assessment and comparisons of BCR and WEBS applied during States 2 and 3 of development of options and the OBC for the preferred scheme.

It is understood that the CPC will have an opportunity to provide further details of such concerns in their second submission to the Auditor in March 2021.