

Coton Parish Council

First Submission to Auditor

List of Appendices

- 1. Letter from Richard Buxton Environmental and Public Law to GCP dated 19 September 2017**
- 2. CPC letter to Rachel Stopard dated 5 April 2018**
- 3. Email from CPRE to GCP**
- 4. Post consultation response from Natural England dated 21 January 2018**
- 5. Letter Secretary of State for Transport and Highways, dated 1 May 2019**
- 6. National Trust, Letter from Paul Forecast to GCP dated 13 February 2020**
- 7. National Trust Letter from Paul Forecast of 1 August 2017**
- 8. Post consultation response from Natural England dated 21 January 2018**
- 9. Letter from Richard Buxton Environmental and Public Law to GCP dated 26 October 2017**
- 10. Open Letter to GCP Executive Board dated 13 January 2020**

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Cllr Lewis Herbert, Vice Chair
Cllr Ian Bates

Our ref: COT1-001/AC
Email: acopithorne@richardbuxton.co.uk

19 September 2017

Dear Sirs

Cambourne to Cambridge Better Bus Journeys Scheme

We are instructed to write to you by Coton Parish Council regarding the proposed bus route scheme between Cambourne and Cambridge. Our client's interest in this matter will be evident from the parish's location adjacent to one of the proposed routes. In addition, they have been an active member of the Local Liaison Forum ("LLF"), which is supported by the Greater Cambridge Partnership ("GCP"). However, the views expressed in this letter are those of the Parish Council alone.

We are writing now in advance of the meeting of the GCP Executive Board on Wednesday, 20 September 2017. We have considered the documents to date in relation to the proposal and in particular the reports to the Executive Board submitted prior to its last meeting on 26 July 2017 and the report recently produced by officers in relation to the meeting on 20 September.

Our clients have been active participants in the consultations and discussions to date regarding the Cambourne to Cambridge bus journey proposals. Having been dismayed by the (in their view premature and illogical) selection by the GCP of Option 3/3A as the preferred route option last autumn, they were cautiously pleased when the GCP agreed (confirmed in a letter dated 27 April 2017) to assess Option 6, the LLF's alternative proposal, on the same basis as Options 1 and 3A.

However, our client is becoming increasingly concerned that the GCP is merely paying lip service to its assessment of Option 6. For reasons which shall be set out in this letter, there is a real danger of unfairness resulting from the GCP's approach. In the documents produced by the GCP's consultants and officers, analysis is slanted in order to present Option 3A in a favourable light, whilst Options 1 and 6 are treated unfavourably.

Many of these issues have already been ventilated by the LLF to the GCP, although no effort has been taken by the GCP or its consultants to answer them properly. In

particular, our clients wish to draw attention to the following points as an illustration of their overarching concerns regarding the progress of the proposal.

“Future proofing”: the MCAF gives full marks to Option 3A for ‘future proofing’, which is taken to mean its potential to be upgraded to ‘bullet buses’ running over 100 mph, increased frequency of buses or a light rail system. Yet nowhere is there any evidence or analysis to support this contention. If a ‘bullet bus’ solution is introduced, will Coton have buses running faster than cars on a motorway within metres of its primary school? What would be the safety, noise or air pollution impact of that? If a light rail system is introduced, what evidence is there that the Option 3A route would be optimal for that mode of transport? What consideration has been given to other future possibilities, such as autonomous, on-demand vehicles using the standard road network? It is hard to understand how the potential for future proofing can be assessed without having answers to these very basic questions.

“Last mile”: neither the MCAF nor the officer’s reports deal with the question as to where buses in Option 3A go after Grange Road. The September officer’s report states categorically at para 59 that “it is not intended to consult at this stage on specific measures beyond Grange Road given the contingency with the emerging City Access Study and that such measures would in any case fall outside the FOBC.” As the GCP will be well aware, this is an issue which has drawn a substantial degree of public interest and concern. It is highly artificial to propose a scheme whereby the ‘end point’ is nowhere that will actually deliver any benefits for users. The clear implication is that the GCP is unwilling to specify that the buses will then move back to Madingley Road (as has been proposed by the bus operator) or go down to the city centre via Silver Street because both options are likely to be met with opposition. It is also difficult to see how the options can be fairly compared if there is no clear indication of where they will end up.

“Connectivity”: this point is linked to a degree with the “last mile” question. Why are buses being brought into the city centre, while the employment growth areas are elsewhere? This is a question which has plagued this proposal ever since it was first put forward to the public in 2015, but with no clear answer from the GCP. It does not seem to us that this issue has been dealt with in the MCAF, despite obvious differences between the routes in terms of their potential for connectivity.

“Journey times”: the officers’ report calculates, using assumed bus speeds, an interpeak journey time between Cambourne and Grange Road for Option 6 of 27 minutes, considerably longer than the estimate for Option 3A. However, the existing Citi 4 service currently does that journey very reliably in just 18 minutes. How can it be that an optimised route running half on an uncongested dual carriageway and most of the remainder on a dedicated bus lane can be 50% slower than the existing service which has virtually no bus priority? This suggests that the assumed bus speeds for Option 6 are grossly inaccurate and calls into question all the journey time estimates for the on-road schemes.

Although we do not propose to go into the MCAF in detail at this stage, there are a many points which strike us as inconsistent and indicative of a biased approach. For brevity’s sake we refer to one example. At 2.1.20, there is reference to a reduction in CO2 emissions arising from all routes due to the modal shift taking cars off the road. However, at 2.1.9, “Volume Capacity”, it is stated that the model relied upon there assumes that any spare capacity produced by buses going ‘off road’ for option 3A would be filled with car users. At 2.1.20 it is proposed that each option has the same score in terms of impact on air quality because the same number of buses runs on each route. This fails to appreciate however that the on road routes already

experience a certain level of air pollution due to existing traffic, whereas option 3A would be introducing air pollution into a previously pristine environment.

The impression given is that the assessment strains to design the criteria in order to ensure that option 3A emerges as the strongest candidate.

The SOBC for Option 6

Our client also has concerns as to the process by which the options are to be assessed. In keeping with the promises made in the letter from the GCP dated 27 April 2017, the July report by the officer to the GCP Executive Board states at para 11 that further work on Option 6 will be required in order for Option 6 to be presented "on a consistent basis" with Options 1 and 3A for consultation in November 2017. Options 1 and 3 were analysed as part of a Strategic Outline Business Case presented to the GCP EB last October. Option 6 was not included as it was proposed by the LLF in February 2017. The report goes on to state at paragraph 27 that an SOBC has not been undertaken for Option 6, "due to competing calls on the Cambridge Strategic Regional Model (CSRM) and the need to undertake further environmental assessment." The report comments at paras 29 and 30 that an environmental/property assessment and a Benefit Cost Ratio need to be prepared as part of the SOBC for Option 6.

However, the report states (although a word appears to be missing) at para 48 that an SOBC for Option 6 will be completed for the EB's September meeting and states at para 50 that the EB was committed to assess fully Option 6 to the same level as Option 1 and 3/3A "to the level of SOBC".

The minute of the EB's decision on 26 July only records, "that further work be undertaken in respect of an Option 6 alignment". It does not specify that the further work comprise a SOBC for Option 6.

The End of Stage report prepared for the 20 September EB meeting says in relation to Option 6:

- Transport, environmental and MCAF analysis has shown that Option 1 and Option 6 are comparable and therefore both will be taken forward to public consultation as on-road alternatives to Option 3a. It is considered that Option 6 provides a feasible alternative to Option 1 in that it:
- Allows for two-way bus priority along Madingley Road (AM inbound and PM outbound);
 - Potentially has a reduced impact on residents of Madingley Road (east of the M11); and
 - Allows for bus priority across the M11 to JJ Thomson Avenue.

The officer's report for the 20 September 2017 meeting confirms at para 22 that Option 6 (and Option 1) should be taken forward for further public consultation along with the Specific Route Alignments ("SRAs") proposed for Option 3A.

However, it is nowhere clearly stated in the officer's report that Option 6 will be worked up to a level of an SOBC, as previously committed to by the EB. The officer's report recommends consulting on Options 1, 3A and 6 as part of the Full Outline Business Case only. Please could the GCP explain this change in approach?

It is notable that consultants employed by the GCP continue to produce highly detailed and technical reports in relation to Option 3A (such as the Atkins Bus

Options report, the LDA Design report on Green Belt impact and the protected species and habitats report by Cambridge Ecology).

It appears to us that there is potential for unfairness to result if Options 1 and 6 continue to be evaluated against Option 3A, but only the latter has the benefit of a robust information base and thorough assessment. Our client's expectation was, as promised by the GCP, that Option 6 would be treated in a consistent way with Option 3A in order that all options would be considered in a fair and transparent manner.

Proposal for next steps

Our client suggests that the GCP should postpone the consultation planned for November 2017 until early in the new year, following publication of the Inspector's report on the Local Plan and the Mayor's report on light rapid transit. This will also allow the GCP, their officers and consultants, with the involvement of the LLF, to develop the SOBC for Option 6 so as to put it on an even footing with Option 3A.

Our client also urges the GCP to review the substantive criticisms made in this letter and in the submissions made by them and the LLF on the MCAF and other reports before proceeding further.

Our client believes strongly that this is the only way that the consultation on Options 1, 3A and 6 can take place in a context that is fair and fully informed.

There is a consistent dissatisfaction among local residents, including our client's electors, regarding how the GCP has considered the C2C Bus Journey proposal to date. This is wholly avoidable given that the residents who have been involved have a strong desire to see a reliable and robust public transport system put in place between Cambourne and Cambridge. We fail to see how the GCP will succeed in its aim without strong local support for the option that is chosen.

For the avoidance of doubt, this letter is not intended as a pre-action protocol letter in judicial review. Should our clients decide to take a claim in judicial review in future, a full pre-action letter will of course be sent.

Yours faithfully



Richard Buxton Environmental & Public Law

cc. Mark Reeve (Greater Cambridge Greater Peterborough LEP)
Professor Phillip Allmendinger (University of Cambridge)
James Palmer (Mayor)
Rachel Stopard (Interim Chief Executive GCP)
Heidi Allen (Member of Parliament, South Cambridgeshire)
Chris Tunstall, Interim Transport Director

Appendix 2

Mark Abbott
The Old Rectory
73 High Street
Coton
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CB23 7PL

Ms Rachel Stopard
Interim CEO
Greater Cambridge Partnership
SH1311
Shire Hall
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CB3 0AP

5th April 2018

Dear Ms Stopard

I am writing on behalf of Coton Parish Council to complain in the strongest possible terms about the exclusion of the Council's formal response from the recently published "Cambourne to Cambridge Better Bus Journeys" Phase One Consultation Report.

The list of stakeholder responses considered (see page 101 of the report) includes five named Parish Councils but not Coton. Our response was submitted on 24 January 2018 and acknowledged by Katy Rogerson by e-mail at 17.06 the same day. As arguably the most significantly affected of all stakeholders by the GCP proposals, it is completely unacceptable that our response should have been completely disregarded and demonstrates an extremely disappointing lack of respect on the part of the GCP for the residents of Coton.

This is not the first time that Coton Parish Council's written submissions have been ignored or written out of reports by the GCP (or its predecessor the City Deal). This latest omission must be righted and accordingly we formally request that the report be re-published immediately with our response clearly acknowledged and our comments fairly represented in the discussion section. This should be accompanied by an appropriate media release to ensure that the public is made aware to the greatest extent possible of the corrected consultation report.

Yours sincerely



Mark Abbott
Chair
Coton Parish Council

Appendix 3

Dear Sir

Cambourne to Cambridge Better Bus Journeys Consultation

CPRE (Campaign to Protect Rural England) Cambridgeshire & Peterborough Branch submits the following comments.

Park & Ride

Scotland Farm site. CPRE strongly PREFERS this site. It is less visually prominent in the landscape than the Waterworks site and has good connections to the surrounding road network. Whilst the site is in the Green Belt, it is on the absolute periphery and thus we do not object to it as we do for land nearer to the City (see further information below). The fact that it is 1.7 miles farther from the City is not a significant disadvantage for cyclists, and arguably is actually advantageous. If travellers into Cambridge do park at Scotland Farm and wish to continue their journey by cycle, they can do so. Other cyclists have the option of getting the bus into the City and then using a folding bike. We see an advantage in the Park & Ride site being farther from the City because more time and mileage will be on a bus and less in a car, with consequent reduction of vehicles on the A1303 road into the City.

Waterworks site. CPRE OBJECTS to the Waterworks site because of the lighting and buildings, which would have an adverse impact on the setting of Coton and Madingley. Given the availability and advantages of an alternative site (Scotland Farm), we see no special circumstances justifying such a location squarely within the Green Belt and it would therefore constitute inappropriate development.

Route

Route B. CPRE strongly PREFERS Route B. It essentially limits the use of Green Belt land to any unavoidable widening of the existing route of Madingley Road. The tidal busway flow will enable faster journeys on services into and out Cambridge at peak times. While the Consultation leaflet states that Route B would require the widening of the existing M11 bridge (or the erection of an adjacent cycle/footbridge), we understand that it may be possible to avoid this by careful remanagement of the carriageways and cycle/footpaths. This could then be cheaper than the estimated cost of £17.7m and thus bring the total cost nearer to the estimated cost of £12.4m for Route A.

It is felt that the benefits of Route B outweigh the additional cost and note that Route B is significantly cheaper than Route C.

Route C. CPRE most strongly OBJECTS to Route C (in any of its sub-options) which lies extensively within the Green Belt. The Green Belt serves to protect the historic setting of Cambridge. In its eastern section, West Fields (alongside the University West Cambridge site) represents one of the closest areas to the historic centre and is thus of particular importance. The irredeemably negative impact on the tranquillity and beauty of Coton, and its environs and this approach to the city, would be a permanent loss to the region. Whittling away of the Green Belt absolutely must be resisted. The estimate high cost of Route C is a further objection.

Based on the evidence present, there are insufficient transport advantages to Route C in comparison to what would be achievable through a fully optimised version of Route B. There are no advantages to Route C which would outweigh the enormous negative environmental impacts on the Green Belt and to the historic heritage of the city and its environs.

Yours faithfully

(REDACTED)

CPRE Cambridgeshire and Peterborough

Appendix 4

From C2C Stakeholder responses

Published on 20 Nov 2018

<https://www.greatercambridge.org.uk/transport/transport-projects/cambourne-to-cambridge/cambourne-to-cambridge-consultation-2017/18/>

Received 30/01/2018 from Historic England in a letter

Dear Sir / Madam,

Ref: Cambourne to Cambridge consultation

Thank you for consulting Historic England on the proposed new bus route and park and ride site between Cambourne and Cambridge.

Historic England have already provided advice to you through our pre-application service both at meetings and through our response to the previous public consultation in November 2015. Historic England offer an initial free pre-application service, after which we offer extended pre-application advice for ongoing cases. The current public consultation falls within our extended pre-application advice (<https://historicengland.org.uk/services-skills/our-planning-services/enhanced-advisor-services/extended-pre-application-advice/>). As you are aware, our extended pre-application advice is provided on a cost-recovery basis.

Following our meeting in December and our discussions, we offered extended pre-application advice to cover this consultation. As you have not accepted this offer of advice, we are unable to respond to the current consultation. However, if you would like further pre-application advice from us regarding this scheme, we will be happy to provide that advice through our extended pre-application service. This service only relates to ongoing pre-application advice. Once a planning application is made, Historic England will respond as a statutory consultee on proposals affecting the historic environment.

If you have any further questions, please do get in touch. Yours faithfully

[REDACTED]

Principal, Historic Places Team

FURTHER RESPONSE RECEIVED ON 28 February 2018:

Dear [REDACTED]

Pre-application Advice

CAMBRIDGE TO CAMBOURNE (BUS ROUTE)

Thank you for consulting Historic England about your proposals for the above bus route and the associated park and ride site options. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the proposed alternative routes for this important new transport link. We will not be providing a view on which option is preferred, but will instead consider what harm, if any, each option would cause to the significance of heritage assets. This letter should be read alongside our previous consultation response (Nov 2015).

Summary

The proposals offer three alternative routes for a dedicated route for buses between Cambridge and Cambourne using a mixture of new and/or existing road infrastructure. These are presented as Routes A, B and C, of which C has a number of potential alternative routes. In addition there are two

potential park and ride car park options being consulted upon: Scotland Farm, north of Hardwick on the northern side of the A428 junction with Scotland Road; and The Waterworks, located at the junction of the A1303 Madingley Road and St Neots Road. We consider that all three of the routes, and the car parking location options, are likely to cause a level of harm to the significance of heritage assets, and that considerable attention needs to be paid to the mitigation strategies of all options in order to meet the requirements of national planning policy. We also strongly recommend that, prior to the final selection of the route, a detailed heritage impact assessment is carried out that identifies the harm to heritage assets for each potential option, and which can be used to inform the route selection process.

Advice

This consultation focuses on Phase 1 of the bus route, which is the section of the route between the Madingley Mulch roundabout to Cambridge. It is stated that the second phase, between Cambridge and Madingley Mulch, will be consulted upon at a future stage. Our response therefore only considers the routes as presented between the two proposed park and ride sites and their termination in Cambridge.

Route A and B

Route A would operate along the existing line of Madingley Road out towards either of the two proposed park and ride car parking sites, and would require the widening of the existing road along this route to facilitate the construction of a dedicated bus lane along one side. The option would mostly use the existing alignment of the carriageway, with the exception of a short section of road immediately east of the American Military Cemetery, which would be realigned to reduce the angle of the existing bend.

Route B would be very similar to Route A, and would involve the widening of the existing road to accommodate a central 'tidal' bus lane sandwiched between two normal carriageways, with a pedestrian and cycle way along the northern edge of the road. Route B also differs from Route A in that it would not require the realignment the A1303 to the east of the American Military Cemetery, and would make use of the A428 instead of the St Neots Road were the Scotland Farm park and ride site selected.

The American Cemetery and Memorial is a Grade I Registered Park and Garden with a Grade II* memorial chapel. The cemetery is one of twenty four permanent Second World War cemeteries erected on foreign soil by the American Battle Monuments Commission and is the only permanent United States of America Second World War military cemetery in the British Isles. It is built on land gifted to the United States by Cambridge University, and is subject to a 1954 international agreement signed by United Kingdom Prime Minister Anthony Eden and United States Ambassador Winthrop W. Aldrich. This agreement includes various clauses that protect some areas of the land around the cemetery, including that along the roadside, from future development. The original buildings of the cemetery, which are constructed of very high quality Portland Stone, were designed by the architects Perry, Shaw, Hepburn and Dean of Boston, Massachusetts, and are set within a ceremonial landscape laid out by Olmsted Brothers, an important firm of twentieth century landscape architects based in Brookline, Massachusetts.

The site of the cemetery is located on the north facing side of the hill on the north side of the A1303. Its location and siting creates a strong emphasis on its relationship with the landscape to the north, reinforced through soft landscaping within the cemetery site and the north-east orientation of its principal features. The graves of the cemetery are laid out in arc facing north-east, with the flagpole on its raised platform forming the focal point of the fan. From within the cemetery the topography allowing expansive views north across the Cambridgeshire countryside towards Ely, with its

cathedral visible on the horizon. To the east of the flagpole is a series of reflective rectangular pool gardens, linking the flag to the Memorial Chapel, which is also orientated to the north. However, the principal approach to the main entrance of the cemetery is along the A1303 from the east and west, with its main ceremonial entrance gateway flanked by two small classically proportioned loggias that face each other across an area of hard landscaping that leads through to a circular garden containing a central flagpole.

The present A1303 runs directly along the southern boundary of the cemetery, and is separated from it by a sloping strip of road verge and a thick roadside hedge, inside which is narrow tree belt that contains areas of car parking set within the trees. A tall brick wall encloses the area of the cemetery to the north and separates it from this car parking, although pedestrian access is possible. Despite these barriers, the noise generated by the relatively high levels of traffic travelling along the road is a constant presence within the cemetery, with larger road vehicles remaining visible above the high brick wall. These factors detract from the sense of spiritual calm that one would normally associate with a cemetery, although the effect is lessened further into the cemetery and down the hill.

The cemetery is a designated heritage asset of the highest significance, reflecting not only an important international and historic relationship between the United Kingdom and the United States - demonstrated by the original gift of the land - but also the spiritual significance attached to the resting place of 3,812 United States service personnel who lost their lives and who are commemorated by the cemetery. It is the only American Second World War cemetery in the United Kingdom. Underlying these factors, the cemetery is also an important example of the work of an internationally renowned family firm of landscape architects, and an unusual example of their work in the United Kingdom. This importance is reflected by its Grade I status.

Both Route A and Route B would involve the encroachment of the highway further towards the cemetery, the removal of part of the cemetery's site along its boundary with the road, and would also involve the intensification of the road use along the A1303. These effects are considered to be harmful to the significance and special interest of the cemetery, and are explored in more detail for each option below.

Specific Commentary on Route A

This route will impact upon both the physical fabric of the American Military Cemetery and its setting.

We would highlight that there is a discrepancy between the photo-montage image on p14 of the consultation document and the larger format photo-montage. The consultation document shows a pedestrian path immediately abutting the cemetery hedge, while the larger photo-montage document shows a bus lane.

The option presented by Route A would require the removal of a section of the cemetery site along its boundary so that that the highway can be widened in order to accommodate a cycle path or a bus lane. The section of land that would be lost to the highway currently comprises open green space in which the entrance stone to the cemetery sits prominently at a perpendicular angle. The route A option would see this area converted to highway which would immediately abut the hedge row boundary with the cemetery. The entrance stone is shown as repositioned to sit parallel with the cemetery boundary. The rationalisation of the entrance space in the way proposed would alter detrimentally the ceremonial approach to the cemetery and reduces the prominence of the entrance stones. The red asphalt surface treatment of the bus lane and road markings immediately against the cemetery boundary would conflict with the subdued palette of colours evident within

the cemetery itself which would be harmful to its contemplative, commemorative nature. There would also be an intensification of the road use with its associated noise and traffic, although we note that this factor is already an element affecting the setting of the cemetery. This would be harmful to the appreciation of the entrance to the cemetery when approaching it along the A1303, and from within the cemetery site.

The proposal, by reason of the proximity of the highway to the cemetery and loss of verge, would result in irreversible, adverse impacts upon the approach, setting and layout of the cemetery site. This harm would be compounded by the associated intensification of the road which would further erode the experiential significance of this nationally important contemplative space both in terms of noise, pollution, vibration, and visual intrusion. It is acknowledged that planting would be retained along the boundary of the highway with the cemetery in an effort to differentiate space, but this planting is unlikely to be successful in mitigating the harm which has been identified to the designated heritage asset and it is recommended that mitigation measures are explored further. We consider that the proposal would result in less than substantial harm to the heritage asset, as defined by paragraph 134 of the NPPF.

Specific Commentary on Route B

This route has the potential to have physical and setting impacts on the American Military Cemetery Registered Park and Garden (Grade I Registered). Like Route A, the option presented by Route B in the photo montages would require the removal of a section of the cemetery site along its boundary, and an urbanising of its immediate surroundings to provide a cycle path. There would be the loss of the existing road verge, and the carriageway would encroach into this area to abut the hedge. There would also be an intensification of the road use with its associated noise and traffic, although we note that this factor is already an element affecting the setting of the cemetery. This would be harmful to the appreciation of the entrance to the cemetery when approaching it along the A1303, and from within the cemetery site.

In terms of the carriageway treatment, we consider that the option of Route B would be marginally less harmful to the immediate setting of the cemetery than Route A, at least as illustrated in the large-scale photo-montages. This is owing to the presence of the less intrusive pedestrian and cycle path immediately adjacent to the cemetery gates which would act as a buffer between the cemetery and vehicular movement. The less intensive use profile and more muted surface colour treatment of which would be less harmful to the appreciation of the cemetery's entrance than the red tarmac proposed for the bus lane in Route A, and it would also allow pedestrian or cycle access to the cemetery. Notwithstanding that point, cycle lane markings on the pedestrian footway should be carefully positioned so as to reduce their impact upon the immediate approach to the cemetery,

We are, however, concerned about the position, size, scale, and detailed design of the traffic signal gantries proposed. The gantries are large, spanning across both the pedestrian and vehicular routes and would introduce an unduly urban, over-engineered element into this relatively rural location. The height and position of the gantries along with the illuminated signage would visually intrude upon the cemetery, affecting views both from within and into the Registered Park and Garden to the detriment of its overall character. The consultation documents do not contain a justification for these large gantries nor is it clear why a gantry would be required immediately outside the southern boundary of the cemetery.

Overall, we consider that Route B as presently illustrated would cause a moderate level of harm to the appreciation of the heritage asset within its setting and from within the asset itself. This would be caused by encroachment of the carriageway into the existing verge truncating its principal entrance, as well as the placement of the proposed signal gantry. There would be long term and

permanent impacts to the setting of the cemetery as a result of the additional carriageway, and the intensification of the road use. As with Route A, we recommend that possible mitigation measures are explored further. We consider that Route B would cause a moderate level of harm to the heritage asset, which would, in planning policy terms, be considered 'less than substantial'. Were Route B presented without the construction of the large signal gantry immediately outside the cemetery boundary, the harm would be less, and would be marginally lower than Route A as presented in the large format photomontages.

Please note, however, our comment regarding the potential discrepancy between the consultation imagery discussed under Route A above. Were Route A also to locate the pedestrian and cycle path against the cemetery, overall Route A would cause a lower level of harm than Route B to the significance of the cemetery.

Route C

Route C comprises three different potential routes. All three share the principle of a new bus and cycle route on an alignment through presently undeveloped land between the village of Coton (designated as a Conservation Area, and containing a number of listed buildings) and the line of the A1303 to the west of the M11; a new crossing over the M11; and routes south of Madingley Road and the University Sports Grounds that would terminate at Grange Road. From Grange Road the bus service would either run north to travel into the city using the existing Madingley Road route to Magdalene Street, or south and east along a new route that would terminate at Silver Street.

We would note that all three potential options for route C run through the Green Belt. The Green Belt around Cambridge helps to meet the requirement of paragraph 80 of the NPPF, 'to preserve the setting and special character of historic towns.' Any local transport infrastructure proposals in the Green Belt need to take into account the importance of preserving the openness of the Green Belt, paragraph 90.

The historic village of Coton is a small, historically primarily agricultural village with its origins in the early medieval period. The core of the village is arranged along the Whitwell Way, a linear route running east-west through the village, past the twin focal points of the Church of St Peter and the adjacent moated site which surrounds the present rectory. The presence of this archaeological feature probably indicates the presence of a small and moderately prosperous manorial site in the medieval period. There is a minor road from Grantchester that runs through the village from the south, joining the A1303 north of the settlement. To the west of the historic core of the village is an area of twentieth century housing, built on land south of Whitwell Way. The significance of Coton is principally related to its historic, architectural and archaeological interests as an example of a small rural settlement of moderate prosperity, set in the Cambridgeshire countryside to the west of Cambridge.

To the north west of the village, the landscape rises towards the A1303, and the countryside is presently of a relatively open character allowing long views from public rights of way across the village towards Cambridge and, in the distance, the Suffolk countryside beyond, including glimpses of Coton and the Church of St Peter amongst the trees. Immediately north-east of the village is the Coton Orchard, an area of fruit trees evident on historic maps from the beginning of the twentieth century. Both these areas of landscape, with their different agricultural uses, contribute to the still largely rural character of the setting of Coton and its conservation area. This is particularly appreciated in views north west from the village across the landscape, and is also appreciated when travelling along the northern route into the village past the orchard.

The construction of the new linear route with associated hard infrastructure and signage, and the introduction of regular vehicular movement and noise, through the village's presently rural surroundings, will detract from the appreciation of the village within its setting. It will introduce an element of urbanising development into the landscape to the northwest, north east and on the present northern approach to the village, which is presently a relatively narrow country lane, enclosed by natural hedges. There will also be the loss of a part of the century old Coton Orchard, which contributes considerably to the setting and character of the village, especially on its north side. Either of the routes to the north-west would be partly screened by the existing reservoirs, but harm would nonetheless be caused by the inherent change to the generally rural, open landscape in this location.

We consider that both the pink and blue route would cause harm to the significance of the Coton Conservation Area and the Church of St Peter, owing to development in their settings. The harm would be of a moderate level. In planning policy terms, this would be within the 'less than substantial' range, which would need to be weighed against the public benefits of the proposal. The alignment of the blue route and the southern M11 bridge option may represent marginally less harm, as it would not bisect the Coton Orchard in as harmful a location, allowing it to retain more integrity and link with the present garden centre. The blue route also runs further from the American Cemetery, thus minimising the potential for harmful impacts on this heritage asset.

We consider that, the harm associated with either of the options for Route C could be minimised or avoided subject to a robust mitigation strategy to ensure that the route appears as a rural feature in an existing landscape. In the long views north and west from the village, mitigation would need to present the appearance of a mature and substantive agricultural field boundary, For example, planting could be used to screen the busway, this would be most successfully achieved by using an appropriate mix of native species, including appropriate hedgerow trees such as dogrose, hawthorn, hazel, crab apple and dogwood. Environmental and ecological benefits should also be incorporated in any mitigation strategies. Any intersection with Cambridge Road will need to be sensitive and will require careful consideration would also to minimise the visual intrusiveness of the busway on this road.

Route C also has the potential for harm as it runs through the West Cambridge conservation area and near to two Grade II listed buildings on Grange Road. The potential exit points for the busway would need to be carefully designed to avoid or minimise the harm to the character of the conservation area or the settings of these listed buildings in either of the potential locations. At this stage it is difficult to comment as to how harmful such a route could be as the harm could vary greatly depending on the final detail of the proposal.

Waterworks Park and Ride Site

We consider that this site has the potential to cause low level of harm to the significance of Coton Conservation Area and the Madingley Hall Park and Garden owing to development in their setting. The harm to the former relates to the further urbanisation of the existing rural setting the village owing to the presence of the associated buildings, CCTV and signage that may be visible in longer views, and the potential for harm to Madingley Park relates principally to the potential for additional light pollution visible at night, rather than any direct visual impacts.

Mitigation of this site would be key to minimising those harmful effects. For instance, the site would need to present the appearance of woodland/shelterbelt to avoid and minimise the urbanising of the landscape. The present suggested line of trees along its boundary would likely be inadequate to achieve this effect. In order to minimise the impact of street lighting, this would need to be

specified to be of a type that directed all light downwards, minimising sky-glow, and other infrastructure should be designed to avoid being visible in longer views.

Scotland Farm Park and Ride Site

We consider that this site has the potential for a low level of harm to the Madingley Park Registered Park and Garden, and Madingley Hall. The harm would be related to the potential for visually intrusive light pollution caused by the additional lighting that may be required. As above, these effects would need to be minimised through an appropriately robust scheme of soft landscaping and dense tree planting around the perimeter of the site, and the specification of lighting types that would direct light downwards with minimal associated sky glow.

Policy Considerations

Paragraph 128 of the National Planning Policy Framework requires applicants to describe the significance of any heritage assets, including any contribution made by their settings, affected by a proposal. Paragraph 129 contains a requirement for local planning authorities to identify and assess the significance of heritage assets affected by a proposal (including development in their setting), and take that assessment into account when considering the impact of the proposal on the heritage asset, to avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal. Paragraph 132 of the NPPF sets out that, when considering the impact of a proposed development on the significance of a heritage asset, great weight should be given to the asset's conservation. It goes on to state that the more important a heritage asset, the greater that weight should be. The policy makes clear that, in addition to direct physical impacts, the significance of a heritage asset can be harmed or lost through development within its setting. As heritage assets are an irreplaceable resource (paragraph 126) any harm identified as being caused by the proposed routes will require a clear and convincing justification. Where harm is judged to be less than substantial to the significance of the heritage asset, paragraph 134 requires that this harm should be weighed against the public benefits of the proposal.

Conclusion

To conclude, we consider that all three potential routes and their sub-options are likely to cause harm to heritage significance, either to the American Military Cemetery or to the significance of the village of Coton. Prior to the determination of a final option for this busway therefore, we strongly recommend that detailed heritage impact assessments (HIA) covering all of the route and parking site options should be carried out in order to meet the requirements of paragraphs 128 and 129 of the NPPF. The HIAs should be used to explore the significance of the designated and non-designated heritage assets that would be affected by the proposed routes and park and ride sites, and subsequently determine the harm that would be caused to that significance by the proposals. They should also determine whether and to what extent that harm can be mitigated and, if so, used to explore and inform appropriate mitigation measures.

Next Steps

Thank you for involving us at the pre-application stage of Phase 1 of the Cambridge to Cambourne bus way. At present, we consider that there remains considerable work to be undertaken to fully assess and describe the impact of the various proposed routes and park and ride sites on the heritage assets identified. Your scheme may benefit from our continued engagement; if so, we would welcome the opportunity to continue our Extended Pre-application discussions to see if our concerns can be addressed. If you would like to discuss this option further, please do contact me.

Yours sincerely

[REDACTED]

Historic Places Advisor, East of England

CAMBRIDGE TO CAMBOURNE (BUS ROUTE)

Pre-application Advice

List of information on which the above advice is based

Better Bus Journeys - Phase 1 Consultation Pack and associated maps/photo montages

LETTER OF COMMUNITY CONSENSUS FROM CAMBRIDGE PARISH COUNCILS, DISTRICT COUNCILLORS AND COMMUNITY GROUPS

01 May 2019

The Rt. Hon. Chris Grayling MP
Secretary of State for Transport

cc: The Rt. Hon. **James Brokenshire** MP, Secretary of State for Housing, Communities and Local Government

Heidi Allen MP for South Cambridgeshire
Daniel Zeichner MP for Cambridge
Lucy Fraser MP for East Cambridgeshire
James Palmer, Mayor, Cambridgeshire & Peterborough Combined Authority
Councillor Bidget Smith, Leader of South Cambridgeshire District Council
Councillor Lewis Herbert, Leader of Cambridge City Council
Rachel Stopard, CEO Greater Cambridge Partnership
Jim O'Sullivan, CEO Highways England

Dear Secretary of State,

Open Letter of Community Consensus on the need for all-ways connectivity at the Girton Interchange serving the M11, A428, A14 and A1307 at Cambridge.

The Girton Interchange is a key strategic junction on the Cambridge regional road network, connecting the M11, A14, A428 and A1307. The junction is severely hampered by a lack of all-ways connectivity. Enabling full connectivity will provide faster and more efficient connections on the road network, help to alleviate some of the long-standing congestion problems in the region and facilitate regional transport links to support economic growth. Moreover, it will improve connections between new housing developments west of Cambridge, the M11 motorway and the rapidly growing biotechnology cluster south of Cambridge city. Longer-term, the junction is vital to proposed improvements to east-west links.

Purpose of this letter

We are a group of Parish Councils and South Cambridgeshire District Councillors, representing over 30,000 people living in communities in and near Cambridge, and selected community interest groups. We note the letter from the Greater Cambridge Partnership (GCP) to Highways England (19 Oct 2017) regarding the urgent need for all-ways connectivity at the Girton Interchange; we welcome the consensus among local governments, the Combined Authority for Cambridgeshire and Peterborough, the GCP, MPs and business groups to progress this scheme; and we warmly welcome the positive indications from Highways England for delivery in due course.

We are concerned, however, that Highways England has not yet committed to include the Girton Interchange in the Road Investment Strategy (RIS-2) work period between 2020 and 2030, and that no clear plan has yet been articulated.

We write to express, in the strongest terms possible, our support for this development, which is long overdue, and to request that it be given urgent priority.

Requests for urgent action

1. We request that work on improvements to the Girton Interchange to enable all-ways connectivity be accelerated and given urgent priority as part of the strategic transport improvements needed in this region.
2. We request that the strategic importance of the Girton Interchange be fully recognised by ensuring it is integrated with any mass transit scheme taken forward to the west of Cambridge.
3. We request that improvements help to reduce, and not exacerbate, the already detrimental impacts of traffic on the local road network and on the immediately surrounding communities.
4. We request that present proposals to constrict the capacity of the A428 eastbound where it joins the A14 at the Girton Interchange, from the present two lanes down to one lane, be reconsidered in anticipation of future needs.
5. We request that, where practicable, this work be integrated with on-going work on the A14 to make the most cost-effective use of resources and supporting works already mobilised.
6. We request that funding be made available and that all stakeholders work together to give their full commitment, with the aim of delivering these improvements by 2023 at the latest.

The letter from the GCP and MPs and the response from Highways England are encouraging, and we are pleased that support is broad and analysis is underway. However, we note that these improvements have been called for by the community for more than twenty years, with little action to date. Much as we welcome the ongoing work of Highways England, there is currently no commitment to a timetable for completion of the improvements at the Girton Interchange. We believe the time for clear, unambiguous action has arrived, and a plan and timetable for delivery of this essential infrastructure is urgently needed.

In summary, all-ways interconnections at this critical junction are in the local, regional and wider national strategic interest and are in need of urgent action by all relevant parties.

If it would be helpful, we would be pleased to meet you or your officials to provide more information on the views of the community on the scheme.

We look forward to hearing from you.

Coalition of Parish Councils



Steve Jones
Chair

Cambridge Connect



Dr Colin Harris
Director

Parish Councils, District Councillors and Community groups expressing support for this letter

The Coalition of Parish Councils comprising Arrington, Barton, Bourn, Boxworth, Caldecote, Caxton, Comberton, Connington, Coton, Croxton, Dry Drayton, Elsworth, Eltisley, Eversden, Grantchester, Hardwick, Knapwell, Longstowe, Madingley, and Toft parish councils.

Girton Parish Council and South Trumpington Parish Council, which are not members of the Coalition, also have endorsed the letter. Cambourne Town Council has also long-expressed support for all-ways connectivity at the Girton Interchange.

South Cambridgeshire District Councillors:

- Cllr Ian Sollom (Harston & Comberton) (the Parishes of Barton, Comberton, Coton, Grantchester, Harlton, Harston, Haslingfield, Hauxton and South Trumpington)
- Cllr Philip Allen (Harston & Comberton)
- Cllr Tony Mason (Harston & Comberton)
- Cllr Grenville Chamberlain (Hardwick) (the Parishes of Hardwick and Toft)
- Cllr Tumi Hawkins (Caldecote) (the Parishes of Bourn, Caldecote, Childerley, Kingston, Little Gransden and Longstowe)
- Cllr Tom Bygott (Girton) (the Parishes of Dry Drayton, Girton and Madingley)
- Cllr Dr Shrobona Bhattacharya – Cambourne
- Cllr Ruth Betson – Cambourne

Selected Community interest groups:

- Cambridge Ahead
- Cambridge Connect
- Cambridge Past, Present & Future
- Federation of Cambridge Residents Associations (FeCRA)
- Smarter Cambridge Transport

Background

On 19 October 2017 an open letter was written from the Greater Cambridge Partnership to Jim O’Sullivan, Chief Executive of Highways England regarding the Roads Investment Strategy 2 (RIS2) – M11 in Cambridgeshire. This letter noted a clear consensus within our region for the improvements to the Girton Interchange, as indicated by the broad representation in the letter of local government, the academic and business communities, and Members of Parliament for Cambridge City and South Cambridgeshire.

Martin Fellows, Regional Director of Operations (East) Highways England, responded on 17 Nov 2017 that the agency is assessing the strategic road network (SRN), including pressures on the M11 and the case for improvements at Girton Interchange, which will feed into RIS2. Following consultation, the Investment Plan for RIS2 will continue to be developed over 2018. In due course the Secretary of State for Transport will decide on priorities for RIS2, to be published in 2019.

The Girton Interchange is a key strategic junction on the regional road network, which is severely hampered by a lack of all-ways connectivity. Enabling connectivity will provide faster and more efficient connections on the road network, help to alleviate some of the long-standing congestion problems in the region, facilitate regional transport links and support economic growth. Moreover, it

will improve connections between areas west of Cambridge, such as Cambourne, and the M11 motorway, and support the increasing population. Longer-term, the junction is vital to proposed improvements in East-West links between Cambridge, Milton Keynes and Oxford, as recommended by the National Infrastructure Commission.

We recognise that some villages lying in close proximity to the Girton Interchange are already significantly affected by noise and air pollution from the current road system. It is important therefore that improvements should help to reduce, and do not exacerbate, any impacts on local communities.

Coalition of Parish Councils

The Coalition of Parish Councils to the West of Cambridge was formed to provide a coordinated voice on planning issues.

Cambridge Connect

Cambridge Connect was formed in 2016 to promote enduring and sustainable transport for Cambridge, in particular a light rail metro with an underground in the historic city core. The Girton Interchange is considered a key node on the network, where the metro would link with important strategic highways. Cambridge Connect works closely with Railfuture, UK Tram and Rail Haverhill, amongst others.

More information on Cambridge Connect is available at www.cambridge-connect.uk

Address for Correspondence

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Director
Cambridge Connect
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Coton, Cambridge CB23 7PP

Email: colin.harris@cambridge-connect.uk

Tel: 01954 212 847

Girton Interchange – Peak Hour traffic with A1303 gridlock

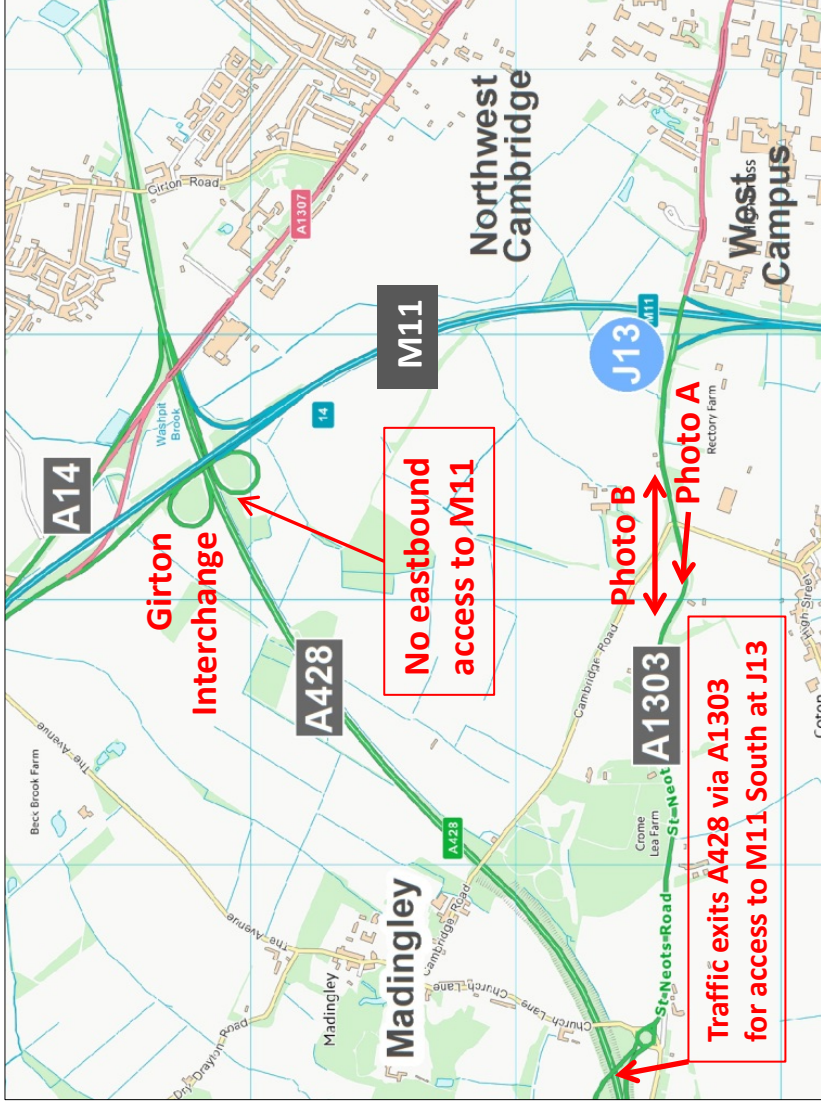


Photo: courtesy Natasha Hodge 2018

Photo A: 08:20 19 Sep 2018 – A1303 (Maddingley Rise) gridlock. Only access onto M11 from Cambourne off A1303 at J13. No access at Girton Interchange.

- Inefficient, wastes time, generates pollution, costly to economy



Photo B: 08:36 26 Feb 2019 – A1303 (Maddingley Rise) gridlock continues... No access at Girton Interchange

Girton Interchange – Effect of reduction to one lane east on A428 at Girton Interchange (peak) – 2016 - 2019



Photo: Colin Harris 2016

Photo A: 01 Feb 2016, 08:50 am (peak)

- A428 looking east from Maddingley bridge over A428
- 4-lane highway, 1800 m to M11
- Lack of congestion
- **No eastbound connection or access to M11**



Photo: courtesy Natasha Hodge 2018

Photo B: 26 Feb 2019, 08:26 am (peak)

- A428 east from same location as Photo A – with reduction to one lane at Girton Interchange
- **No eastbound connection or access to M11 at Girton Interchange**

Photo C: 26 Feb 2019, 08:28 am
A428 west from same location as Photos A & B with reduction to one lane at Girton Interchange





**National
Trust**

paul.forecast@nationaltrust.org.uk
Direct line: +44 (0) 1284 747560

BY EMAIL to Nicholas.Mills@cambridgeshire.gov.uk

Councillors Ian Bates, Aidan Van de Weyer, and Lewis Herbert
Greater Cambridge Partnership Executive Board
Shire Hall
Cambridge
CB3 0AP

13th February 2020

For the attention of: Councillors Ian Bates, Aidan Van de Weyer and Lewis Herbert

**Greater Cambridge Partnership Executive Board 19th February 2020
Better Public Transport: Cambourne to Cambridge**

I am writing to you ahead of the meeting of the Greater Cambridge Partnership Executive Board Meeting to be held on 19th February. The National Trust has grave concerns about Item 10 on the agenda, Better Public Transport: Cambourne to Cambridge, and about your officers' recommendations to develop the scheme and submit a Transport and Works Act Order for the preferred route.

You will be aware that the Trust has objected to the scheme because of the unacceptable impact it will have on sensitive landscapes, including land protected by deed of covenant so as to 'guard the famous views to and from the city and to safeguard the special features of the neighbouring countryside and villages'; you will also be aware that we first raised these concerns over two years ago. Over that period, we have engaged with both phases of the consultation process and with subsequent discussions, believing that this would provide the most effective route to securing a positive legacy for the historic places that we care for, and for important habitats. At the same time, we have also raised concerns about the option appraisal process, flawed analysis, and the availability of information.

I would now urge you to pause and re-consider your commitment to pressing ahead with this costly and damaging scheme. The choice of the Preferred Route Option for the Bedford to Cambridge section of East West Rail, announced on the 30th January, is hugely significant to the business case for the busway. The northern rail corridor passes through Cambourne and will inevitably mean lower passenger numbers using the busway, hence both the 'do

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nothing' and 'do something' options now need to be re-evaluated. Whilst I welcome the intention to undertake an 'assessment of complementarity of C2C with the selected East West Rail route', this must take place prior to the decision to submit a Transport and Works Act Order for the scheme. I feel sure that you will want to allow for due process, minimise the risks of legal challenge, and avoid further abortive work, and for these reasons, I believe that the Better Public Transport: Cambourne to Cambridge should not get the green light in its current form.

Instead, a fundamental reconsideration of public transport options for the west of Cambridge should commence which will have the support of local communities and stakeholders. From the initial consultation held in 2015 to the present day the GCP has been reluctant to modify the scheme as originally conceived. By contrast, the East-West Rail decision has clearly taken consultation responses into account. Specifically, the Preferred Route Option was chosen following detailed analysis which found that:

- It would deliver the best value for taxpayers, returning the most benefit for every £ spent;
- It was the most popular option with people who responded to EWR Co's 2019 consultation;
- It would deliver the best opportunities for supporting and enhancing the environment.

Green transport is vital but opposition to the preferred off-road scheme is growing, not only because of its harmful impact on the natural and built environment, but also because it is now clear that the scheme does not deliver good value for money. Benefits such as land value uplift would be provided by the railway and interim lower cost solutions which avoid impact on the environment, green belt, and local communities, should be considered. For example, could an in-bound on-road bus lane along Madingley Road, alongside a new cycle route, meet predicted demand?

The National Trust would be pleased to work with you in ways that will enable the project to move forward to this next phase so that a Better Public Transport: Cambourne to Cambridge scheme can be delivered in both a timely and cost-effective way whilst ensuring that special places remain protected for future generations to enjoy.

Yours faithfully,



Paul Forecast
Regional Director, National Trust

Appendix 7



**National
Trust**

Cllr Francis Burkitt
Greater Cambridge Partnership,
SH1311,
Shire Hall,
Cambridge,
CB3 0AJ

Paul.forecast@nationaltrust.org.uk
Direct line: +44 (0) 01284 747560
01 August 2017

Dear Cllr Burkitt

A428 Park and Ride options - Cambourne to Cambridge

I am writing regarding the review of the possible Park and Ride options for the Cambourne to Cambridge Better Bus Journeys scheme. It is understood that the Greater Cambridge Partnership (formerly City Deal) are currently in the process of reviewing the location of the proposed Park and Ride which will facilitate the A428 Cambourne to Cambridge new busway. It is noted that the proposals will be published for public consultation this autumn.

As you are aware, the initial route options for the proposed busway are adjacent to, or incorporate land which is under the protection of the National Trust historic covenants. The Coton Corridor band of covenanted land was established in 1958 in order to protect this area of countryside from urban development.

The National Trust acknowledges that the aim is to deliver a new high quality public transport infrastructure that improves connectivity, reduces congestion and enhances the environment and that this approach is supported by national and local planning policy which promotes sustainable transport and a strong competitive economy in areas where a lack of infrastructure would hinder economic growth.

It is understood that further consideration is being given to a number of options; including a segregated route, an on-road alternative and low cost comparator options. The National Trust is extremely concerned about the impact of the proposals on covenanted land and the visual impact of the proposed infrastructure. It is therefore requested that all options for the Park and Ride facility and associated bus route (on-road and off-road) that avoid National Trust covenanted land are fully explored prior to publishing the proposals for public consultation. As part of this process the National Trust would like to be assured that all alternative options avoiding such land have been considered and that a reasoned justification for the preferred option is given.

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President: HRH The Prince of Wales
Regional Chairman: Inga Grimsey
Director, East of England: Paul Forecast

Registered office:
Heelis, Kemble Drive, Swindon, Wiltshire SN2 2NA
Registered charity number 205846

I look forward to receiving a response to this request in due course once an options appraisal has been carried out. Should you wish to discuss this further please do not hesitate to contact me.

Yours sincerely

Paul Forecast
Regional Director

Cont/d

Appendix 8

From C2C Stakeholder responses

Published on 20 Nov 2018

<https://www.greatercambridge.org.uk/transport/transport-projects/cambourne-to-cambridge/cambourne-to-cambridge-consultation-2017/18/>

Received 22/01/2018 from Natural England in an email

Dear [redacted]

Cambourne to Cambridge Better Bus Journeys Phase One consultation

Thank you for consulting Natural England on the above in your email dated 13 November 2017.

You will be aware that Natural England provided comments at the earlier options stage of this scheme, in our letter dated 12 October 2016 (ref: 197667).

Please note that our comments below only apply to the proposed route between Madingley Mulch roundabout and Cambridge. We are not aware that route options from Cambourne to Madingley Mulch roundabout form part of the current consultation. Natural England will expect to be consulted on the rest of the proposed route in due course.

It is also important to note at this stage that the level of detail provided for the proposed route options is too indicative for us to provide any detailed comments or advice. Based on the detail currently available Natural England is unable to make any judgement regarding likely impact of the proposed options. This is particularly the case with respect to on-line route options A and B which are located in very close proximity to Madingley Wood Site of Special Scientific Interest (SSSI).

Further plans should clearly indicate the boundary of the SSSI in relation to detailed route options. Traffic modelling / air quality screening should be undertaken for the different route options, to inform the assessment process and preferred route selection. This will be particularly important in assessing potential impacts on the sensitive ancient woodland habitat of Madingley Wood SSSI. This is located within the 200m screening distance' for air quality impacts associated with road schemes. As mentioned previously we are supportive of the aims of the scheme to achieve improved connectivity and reduced congestion between residential and employment areas while improving the quality of life in Greater Cambridge. Natural England is pleased that potential impacts on the natural environment have been given better consideration. Whilst we welcome preparation of an environmental constraints map we are aware that a number of locally designated wildlife sites have been omitted from the plan. These should be included and given appropriate consideration through this and future phases of scheme development.

Route Options A and B

The route plans do not show the boundary of Madingley Wood Site of Special Scientific Interest (SSSI) and the supporting habitat of the adjacent 800 Wood. Options A and B are located in close proximity to this nationally designated site and proposals could have an adverse impact, through direct and indirect effects, on the notified features of the ancient woodland. Potential impacts are not considered in the route descriptions.

Route option A appears to be an on-line scheme involving widening of the transport corridor to the north. This would bring the road corridor closer to the boundary of Madingley Wood SSSI. This option therefore appears to pose the greatest risk of direct and indirect impact to the SSSI. The strip of land between the existing road corridor and the SSSI provides an important habitat buffer which protects the SSSI from adverse effects associated with the road corridor including traffic emissions, contamination, noise, lighting and access.

The nationally important and sensitive habitats of this site are very limited in extent and isolated from similar habitat; consequently this habitat and dependent species are extremely vulnerable to environmental change through the effects of development. Natural England will not support any project likely to have an adverse impact on this designated site or buffering habitat. Detailed ecological assessment will need to demonstrate that any project will not have an adverse impact on

this site through direct or indirect effects. Ancient woodland is particularly sensitive to changes in air quality associated with transport schemes hence detailed assessment will need to include consideration of air quality impacts on Madingley Wood SSSI.

Natural England advises that options / proposals should seek to reduce the amount of traffic passing close to the SSSI as far as possible. We would also welcome consideration of proposals to deliver an enhanced habitat buffer between the road corridor and Madingley Wood, to reduce traffic related adverse effects to the SSSI and thus provide benefits for wildlife.

Route option B appears to be an on-line scheme involving widening of the existing transport corridor to the south. This scheme is therefore located slightly further from the boundary of Madingley Wood SSSI than Route A and should therefore pose less risk of direct impact to the woodland. Nonetheless our comments and advice relating to Route A apply similarly to Route B.

Route Option C

This off-line route option appears to be sufficiently distanced from designated sites and therefore unlikely to have any adverse impact on these. Potential indirect impacts will need to be assessed in detail.

We are aware of the presence of a number of locally designated wildlife sites, not indicated on the route plans or discussed in the route descriptions, with the potential to be adversely affected by proposed development. This includes potential direct impact to Coton Path Hedgerow County Wildlife Site (CWS) and impacts to several City Wildlife Sites. The plans should be revised to show these sites and potential impacts should be assessed to identify an appropriate route that avoids these sites of local biodiversity importance.

This route also includes Priority Biodiversity Action Plan habitat and areas of Best and Most Versatile (BMV) land (Agricultural Land Classification grades 1 -3a).

Any further development of Route C should ensure that impacts to CWSs and other locally designated sites and Priority Habitat are avoided. Proposals should also seek to prioritise development on lower grade agricultural land, to protect higher quality land, as far as possible.

Park & Ride options

Natural England does not have specific concerns with either of the proposed options as these are unlikely to affect key interests within our remit. However, we would wish to see details of traffic modelling and air quality assessment to be satisfied that proposals will not have any adverse effect on nearby designated sites.

Other comments

A scheme of this scale should deliver significant biodiversity net gain, in accordance with paragraph 109 of the National Planning Policy Framework. Further consultation should include proposals for ecological enhancement including creation of green infrastructure / corridors and ecological networks — implemented and managed to make a valuable contribution to local Biodiversity Action Plan targets and Green Infrastructure Strategy2 objectives.

Natural England will be pleased to provide further comments on proposed route options following the preparation of additional information to address our advice above.

I hope these comments are helpful. For any queries relating to the specific advice in this letter only please contact Janet Nuttall on 0300 060 1239. For any new consultations, or to provide further information on this consultation please send your correspondence to consultations@naturalengland.org.uk.

Yours sincerely

(REDACTED)

Sustainable Land Use Adviser

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Attn. Cllr Francis Burkitt, Chair
Cllr Lewis Herbert, Vice Chair
Cllr Ian Bates

Our ref: COT1-001/AC
Email: acopithorne@richardbuxton.co.uk

25 October 2017

Dear Sirs

Cambourne to Cambridge Better Bus Journeys Scheme

We refer to our letter dated 19 September 2017, to which we have not had a response, despite a promise to do so from Mr Tunstall in his email dated 2 October 2017.

The Greater Cambridge Partnership Executive Board ("GCP EB") decided at its meeting on 20 September 2017 to undertake further consultation on the bus route options known as Option 1, 3A and 6 as proposed by officers in their report to that meeting. This was expressed as "subject to a further meeting with the LLF Technical Group to further refine option 6".

We understand that when the Local Liaison Forum Technical Group met on 5 October, the lead transport officer, Ashley Heller, confirmed that "they were not going to be able to change fundamental assumptions to do with Option 6". Our clients are dismayed by this as they consider the version of Option 6 presented by the GCP to be a sub-optimal on-road comparator and not to accord with the proposal they have been advocating, including but not limited to:

- segregated bus priority is indicated to extend only as far as High Cross, whereas there is no obvious impediment to continuing a median bus lane considerably further, certainly as far as JJ Thomson Ave or even Clerk Maxwell Rd;
- no access is indicated to the West Cambridge site, despite this having always been a key feature of Option 6;
- no 'smart traffic' measures beyond the end of the bus lane east of the M11 are included, which will unnecessarily reduce the bus travel time;
- the median bus lane has been presented as definitively tidal, rather than offering it as an option, for consideration now or as a future development should outbound congestion warrant it;

- the photographic mock-ups of the route depict overhead gantries (of highly questionable safety value) west of the M11, which are not yet known to be necessary and give a potentially misleading perception of detrimental visual impact;
- the journey time presented in the animation is 9 minutes, which is significantly longer than the existing Citi 4 service achieves off-peak, despite the latter having minimal bus priority measures;
- reference is only made to improved outbound journey times in the evenings, whereas there will also be substantial improvements in journey times and reliability inbound in the morning and indeed throughout the day;
- the proposed off-road cycle/pedestrian provision via Coton village is omitted;
- no mention is made of the possibility of the median bus lane being used in the future for innovative or new forms of transport, such as trams, autonomous vehicles, monorail, etc.

Please could you confirm that the GCP's position is that Option 6 will not be amended to take into account the 'optimal' version as has been advocated by the Local Liaison Forum.

We also seek clarification of the GCP's position in relation to the work to be done on Option 6 in order for it to be considered on a consistent basis with Option 3A. As you will recall, in the letter dated 27 April 2017 to the Local Liaison Forum, the GCP promised to examine and put forward Option 6 on a similar/same basis to Options 1 and 3A.

The officer's report prepared for the GCP EB meeting on 27 July 2017 states at paragraph 11 that further work on Option 6 will be required in order for Option 6 to be presented "on a consistent basis" with Options 1 and 3A for consultation in November 2017. Options 1 and 3 were analysed as part of a Strategic Outline Business Case ("SOBC") presented to the GCP EB last October. Option 6 was not included as it was proposed by the Local Liaison Forum in February 2017. The report goes on to state at paragraph 27 that an SOBC has not been undertaken for Option 6, "due to competing calls on the Cambridge Strategic Regional Model (CSRM) and the need to undertake further environmental assessment." The report comments at paras 29 and 30 that an environmental/property assessment and a Benefit Cost Ratio need to be prepared as part of the SOBC for Option 6.

However, the report states (although a word appears to be missing) at para 48 that an SOBC for Option 6 will be completed for the EB's September meeting and states at para 50 that the EB was committed to assess fully Option 6 to the same level as Option 1 and 3/3A "to the level of SOBC".

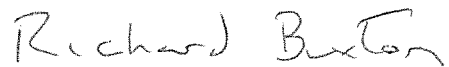
The minute of the EB's decision on 26 July only records, "that further work be undertaken in respect of an Option 6 alignment". It does not specify that the further work comprise a SOBC for Option 6. As far as we understand, a SOBC for Option 6 has never been carried out. In practical terms, the GCP has continued to instruct consultants such as Atkins to produce detailed reports analysing Option 3A, namely the Atkins Bus Options report, the LDA Design report on Green Belt impact and the protected species and habitats report by Cambridge Ecology.

The decision of the GCP EB on 20 September made no mention of further work to refine Option 6.

Please therefore could the GCP confirm that there is no intention to work Option 6 up to a SOBC and that no further work, by consultants or officers will be carried out on Option 6.

As we assume these intentions will already be decided upon by the GCP, we request that a substantive response be given by close of business on Wednesday, 1 November 2017.

Yours faithfully

A handwritten signature in black ink that reads "Richard Buxton". The signature is written in a cursive, slightly slanted style.

Richard Buxton Environmental & Public Law

Cc Rachel Stopard (Interim Chief Executive GCP)
Chris Tunstall (Interim Director of Transportation, Cambridgeshire County Council)
Ashley Heller (Team Leader, Transport Projects)

**STOP THE C2C BUSWAY MADNESS:
THE ALTERNATIVE IS STARING YOU IN THE FACE**

Give commuters what they really need, at a fraction of the cost, a fraction of the time, and a fraction of the environmental and social damage.

An Open Letter to the Greater Cambridge Partnership (GCP)

13th January 2020

Dear GCP Executive Board,

Commuters from the west deserve a fast, frequent, reliable public transport service – and they need something that can be implemented without delay. And taxpayers deserve value for money. This is best achieved with a simple, efficient bus scheme using existing roads. The same is not true of the current off-road scheme that will cause environmental and social damage, at a cost of around £200 million – at least 4 times the alternative – even before considering the inevitable delays and added costs.

Bus lanes on the existing road can be implemented straightaway and:

- Provide journeys to Cambridge Biomedical Campus, City Centre and Science Park that can be **faster, more direct** and **just as reliable** as an off-road busway;
- At a **quarter of the cost**;
- And with **minimal harm to the environment and surrounding communities**.

An off-road busway will take many years to build and take commuters to the wrong place:

- The proposed route via Charles Babbage Road and Adams Road or the Rifle Range onto Grange Road doesn't take people where they need to go.
- It's **extremely poor value for money** and **highly damaging** to the environment and the setting of Cambridge.
- And **local opposition**, public enquiries and judicial reviews **mean it will not be built any time soon**.

A fast and efficient on-road solution is the right thing now and for the future:

- It works in the **short-term**, offering a fast, frequent and reliable commuter service within a couple of years.
- It works for the **longer term** too, given the extra options and capacity that will come with the East-West rail link and, potentially, an upgrade of the Girton Interchange.
- And there's no good reason why it can't be **compatible** with a proposed CAM metro featuring road-running vehicles.

We call on the GCP to jettison their environmentally and socially damaging off-road scheme through Cambridge's precious Green Belt – and focus on delivering a realistic and valuable public transport scheme from Cambourne NOW.

Yours faithfully,

Philip Allen, South Cambridgeshire District Councillor, Harston & Comberton Ward
Anthony Browne, MP for South Cambridgeshire
Rod Cantrill, Cambridge City Councillor, Newnham Ward
Markus Gehring, Cambridge City Councillor, Newnham Ward
Ian Manning, Cambridgeshire County Councillor, Chesterton Division
Anthony Martinelli, Cambridge City Councillor, Market Ward
Tony Mason, South Cambridgeshire District Councillor, Harston & Comberton Ward
Josh Matthews, Cambridge City Councillor, Newnham Ward
Cheney Payne, Cambridge City Councillor, Castle Ward
George Pippas, Cambridge City Councillor, Queen Edith's Ward
Ian Sollom, South Cambridgeshire District Councillor, Harston & Comberton Ward
Dan Summerbell, Cambridge City Councillor, Trumpington Ward