

INITIAL SUBMISSION FROM ‘THE CAMBRIDGE TO CAMBRIDGE LOCAL LIAISON FORUM’ (LLF)

Aim: to feed into the determination of assumptions and constraints to be investigated through the Independent Audit.

Three general reports accompany this document that summarise the LLF’s concerns at various stages of the process:

- i. Formal response to public consultation, December 2017. (See appendix 1)
- ii. Formal response to public consultation, March 2019. (See appendix 2)
- iii. Letter to councillors, June 2020. (See appendix 3)

Other more specific reports and letters that accompany this submission are referred to below.

Based on formal minuted meetings held by the LLF, and resolutions and recommendations published as a result, it is suggested that the following assumptions and constraints be investigated.

1. 2013-2014: What were the assumptions and constraints that led to the initial choice of potential alignments? Were all reasonable options considered, and were the most optimal selected?¹ In particular, why was an alignment via, or close to, the Girton Interchange, ruled out at this early stage, despite being within the defined corridor?

1.1 Given the Girton Interchange is the largest interchange in the East of England, why was an alignment in its vicinity, with Park and Ride provision, never considered at this point? Support for the integration of the Girton Interchange in any mass transit scheme has been vocally made since this time by local parish councils, councillors and interest groups. It has potential to vastly increase patronage and modal shift. (See appendix 4: Open Letter to Secretary of State, May 2019; relevant section highlighted in red).

1.2 Despite predicted stated demand in those early documents being City Centre 45%, Science Park 31%, West Campus 9%, none of the options considered provided a direct and/or segregated route to the Science Park or the NW quadrant as well as the city. Why? This would have brought routes further north into consideration.

1.3 GCP finally agreed (after much lobbying by the LLF) to undertake a Technical Review of an alignment via the Girton Interchange, published May 2019, but it was considered by the LLF to be a wholly inadequate piece of work. (See appendix 5). No attempt was made to identify a continuous bus route, cost it, analyse its benefits or its futureproofing potential despite:

- (i) clear transport benefits in terms of greater patronage, modal shift, BCR and connectivity to the key employment destinations of the Science Park via the A14 and the Biomedical Campus via the M11, and
- (ii) lower environmental impacts than the preferred alignment because it uses an existing transport corridor

It was dismissed with spurious reasoning, largely on the basis that it was c.2k longer in length. However, this is c.2 minutes longer for a bus is travelling at 60mph, and that may well have been offset by the additional benefits above. (See appendices 6 & 7 for LLF letters to Peter Blake, April & June 2019 – relevant sections highlighted in red).

Should an alignment via the Girton Interchange have been considered earlier, and was the Technical Review of 2019 sufficiently robust to justify its rejection later in the process?

¹Atkins 2014 <https://citydeal-live.storage.googleapis.com/upload/www.greatercambridge.org.uk/transport/transport-projects/C2C_Madingley_Road_A428_Corridor_Study_Options_Appraisal_Report_20.06.2014.pdf>

2. Were the assumptions that underpinned the selection of the three options in November 2015 sound? Were the emerging constraints adequately considered?²

2.1 The two off-road alternatives selected (Area 1 North & Area 1 South) may have been among the shortest routes, but they were also the most sensitive environmentally of any the options considered. The southern option passed through (a) National Trust covenanted fields north of Coton; and (b) the West Fields, which the High Court ruled in 2008 should be protected against development. The northern option passed close to a scheduled monument (the American Cemetery) and a Site of Special Scientific Importance (Madingley wood).

Were environmental constraints given sufficient consideration at this early stage given the sensitivity of the landscape?

2.2 From this early stage, it was evident that both of the off-road alternatives had very low BCRs and adjusted BCRs - between 0.12 and 0.22 - well below the usual minimum of 2.0 for a publicly funded transport scheme - and poor modal shift potential.

Why were the unacceptably low BCRs associated with the off-road alternatives not seen as a constraint? Why was no attempt ever made to consider alternative routes that may have offered a better BCR and fewer adverse environmental impacts?

2.3 Even the fundamental “requirement” that the scheme be “segregated off-road” was not properly evidenced. The Local Plan required only a “high quality public transport” scheme, which could be on-line or off-line. And the Cambridgeshire Guided Bus scheme connecting St Ives and Cambridge, which was often cited by transport officers as a model, is on-line once it crosses the A14 and approaches the city centre.

Why was a comparable hybrid route not evaluated as part of the original option assessment process?

3. Were emerging issues with the scheme adequately considered in the selection of the preferred option in December 2016?³

3.1 **Connectivity:** It was clear that connectivity to the Science Park, the Biomedical Campus and the city centre offered by the preferred option was sub-optimal from the outset. This was particularly the case for the Area 1 South/Option 3 alignment (the preferred route) which, ending at Grange Road, brings many additional problems:

- (i) How was Grange Road optimal for onward travel to the city centre? The LLF has consistently argued that onward journeys to the city centre are more effectively made further north, via Northampton Street, Magdalene Bridge and the largely car-free zone from Bridge Street to Emmanuel Street, and bus operators have expressed a preference for that route too. The GCP’s proposal to access the city centre from the south, via Silver Street, is sub-optimal, especially in the outbound direction which requires travel via Lensfield Road, as Downing Street is one way for motorised traffic. The issue was again dodged in the January 2020 Board Papers when no outbound data was provided. (See appendix 8). The LLF will be providing more information on this aspect of the scheme.

² https://www.greatercambridge.org.uk/asset-library/imported-assets/C2C_Draft_Interim_Report_01.06.2015.pdf

³ https://www.greatercambridge.org.uk/asset-library/imported-assets/C2C_Draft_Interim_Report_01.06.2015.pdf

- (ii) How can buses connect to The Biomedical Campus? If they take the M11 (a journey less reliable since the Western Orbital scheme was ditched in 2016), they must double back northwards, through the West Cambridge site, to reach the Madingley Road slip road. If they are to access the Biomedical Campus through the city, then that is a highly congested, lengthy onward journey.
- (iii) How can buses connect with the Science Park without looping back northwards to Madingley Road, through the West Campus again and travelling on non-segregated streets through Eddington? This journey would be achieved far more quickly and efficiently via, or alongside, the existing infrastructure of the A428, the Girton Interchange and the A14.

Were these constraints on connectivity adequately considered when crucial decisions to progress the scheme were being made?

3.2 Environmental impacts on Coton & the West Fields: Very significant issues had emerged with the preferred option alignment, as the confirmed in the August 2017 report by LDA Design reports (See appendix 9, pp.54-58).⁴ The summary of this report produced by Strutt and Parker in 2019 (see appendix 10) materially misrepresents the findings of the previous LDA Design report.

The LLF has consistently raised issues concerning the representation of environmental issues and reports by GCP, including from Historic England, Natural England and the National Trust, and the LLF will be submitting more information in due course.

Were the known environmental constraints of the Madingley Hill and West Fields sections of the route adequately considered when crucial decisions to progress the scheme were made?

3.3 Proximity to houses in Hardwick: Despite repeated questions by the LLF, the serious implications of the proposals for 104 households along St Neots Road were not finally revealed until the Autumn of 2020. (See appendix 7, relevant paragraphs highlighted in blue). The late admission by GCP that mature trees would need to be removed means those households will be facing directly onto eight lanes of continuous traffic, including four (sometimes raised) carriageways of the A428.

Were the adverse impacts on the local community of the Hardwick section of the route adequately considered when crucial decisions to progress the scheme were being made?

4. What assumptions underpin GCPs decision never to develop an optimal on-road alternative to the preferred option?

4.1 The preferred option was selected in December 2016 (Option 3; previously Area 1 South), without comparing the costs and benefits of the scheme with an optimised, end-to-end, on-road. From that point, a do-minimal option has been the only alternative. This is particularly concerning given the constraints to connectivity of the preferred option (see 3.1 above), and its poor BCR and predicted modal shift, and that when on-road options were in development (never completed), their performance was not significantly worse. The LLF will be submitting more evidence on the on-road alternatives in due course.

What constraints have consistently prevented the development of an optimal, on-road, end-to-end alternative to the preferred option?

⁴This report is not available on the GCP website.

4.2 Even the request by the LLF and other local groups for GCP to develop an interim on-road solution, given the increasing strategic uncertainties about the scheme (see sections 5-7 below) has not been undertaken in good faith. The Technical Note published by GCP in May 2019 (see [appendix 11](#)) was considered to have been set up to fail from the outset by the LLF Technical Group. (See [appendices 6 & 7 highlighted section in blue](#)). The LLF will be submitting more evidence on the quick win alternative in due course.

Were the assumptions made in this report sound, and is it thus robust enough to dismiss the potential to deliver 90% of the benefit at 10% of the cost?

5. Following the decision in February 2018 to adopt the CAM proposal into the long-term plans of GCP for C2C, what assumptions were made regarding CAM, and what are the constraints of the preferred option? Have they been adequately addressed?

5.1 In October 2018, the Combined Authority commissioned ARUP to undertake an assessment of the A428 corridor in relation to its compatibility with CAM and declared the preferred option the 'best performing option' and 'compatible'. (See [appendix 12](#)). Apart from serious concerns with the report itself (see 5.2 below), how could this compatibility assumption be made when fundamental aspects of the scheme were not known (and still are not known)? This is important since this report has been used to justify the continuing work on the preferred option in multiple GCP reports since. Moreover, in June 2020, a subsequent report by Jacobs, again commissioned by the Combined Authority, concluded that the preferred option does not meet some of the 12 CAM sub objectives nor support the main CAM objectives. (See [appendix 13](#)). Yet the ARUP report continues to be cited, in Section 6.2 of the Executive Board Papers, 10 December 2020, to demonstrate CAM compliance and CPCA support for the preferred option, despite thus being superseded by the contradictory Jacobs report.

How can the ARUP report of October 2018 still be cited to justify the compatibility of the preferred option with CAM when it has been superseded by the contradictory Jacobs report of June 2020?

5.2 The ARUP report of 2018 was never robust enough to justify the subsequent work to further develop the preferred option. The final report is known, through a FOI request, to have been heavily influenced by GCP senior executives in its final form (see [appendix 14 for the initial extent of the work](#)).

Were the assumptions made in the ARUP report of 2018 sufficiently robust on which to base two further years of development on the preferred option?

5.3 There are too many unknowns about CAM at present, and too many constraints with the alignment of the preferred option, to warrant it being declared compatible, i.e.:

- Where will optimal tunnel portals be?
- Where will the new East/West Rail station be in Cambourne?
- What type of CAM vehicle, guidance systems and surface will be chosen?
- Will those vehicles be able to cope with at least 10 right-angled turns in the preferred C2C option?
- Is off-road segregation an absolute requirement? If so, how can the preferred C2C scheme be compatible given that significant stretches (the first kilometre out of Cambourne, the approach to/from the proposed Scotland Farm Park & Ride and the use of Charles Babbage Rd through the West Cambridge site, for example) are on-road?
- If segregation will be required, what form will it take and will it be safe for high-speed buses to travel so close to residential properties in Cambourne, Hardwick and Coton?
- What will be its hours of operation? Are those hours appropriate given C2C's proximity to residential properties?

Resolution 1, passed unanimously at LLF meeting 14 November 2018 stated:

The LLF recommends that no decision be taken on a preferred route until greater clarity on CAM is provided: the proposed network, connectivity and funding. As it currently stands, this off-line bus road, with its poor connectivity to the Cambridge Biomedical Campus, Science Park and the City Centre; its poor transport benefits and low BCR, does not stand up to scrutiny.

How could the preferred option ever have been declared ‘compatible’ when fundamental aspects of CAM are still unknown? This potentially also reduces the ability to make the right decisions later.

- 5.4 The decision to amalgamate the C2C scheme with CAM in 2018 undoubtedly represented a changing of the goalposts. Yet the only alternative to the preferred option since has been a ‘do minimum’, on-road, non-segregated option. This certainly does not meet the aspirations laid out by the CPCA and articulated in the Steer Davies Glebe report of January 2018. (See Appendix 15, page vi.)

Why was the decision taken to proceed with an alternative that was almost certainly not CAM compliant especially given the emerging constraints of the preferred option itself? Is this decision sound?

6. **What assumptions have been made following the decision by EWR to locate the East West Rail station in Cambourne? How has the design of the C2C scheme been changed to ensure it is complementary and how has this affected the business case for C2C?**

- 6.1 The location of a rail station at Cambourne also represents a major shift in the goalposts for the C2C scheme. Until 2018, the alignment was believed the alignment would be via Bassingbourn (see appendix 16).

How did the previous assumed alignment affect assumptions made between 2013 and 2018 about C2C?

- 6.2 The new alignment of East West Rail raises fundamental questions about what constitutes a complementary scheme: how will this change travel patterns? Will most people choose to use the train rather than C2C to access The Biomedical Campus, Cambridge Central or The Science Park? Should a fundamental objective of C2C be to move people to the Cambourne station? Where will that station be located? Indeed, where will the exact alignment of East West Rail be?

On what assumptions is GCP’s assertion based that the preferred option of C2C is ‘complementary’.

- 6.3 In the Executive Board papers of December 2020, it stated, without any rationale, on p.67 §6.22: ‘it is unlikely that EWR will have an impact on the core business case for C2C’.

On what assumptions is GCP’s assertion based that the business case for C2C is unlikely to be affected by East West Rail?

There is a fundamental discrepancy in GCP’s reasoning of late. Why is East West Rail not taken into consideration in the development of C2C, on the basis that the decision is not yet finalised, yet the opposite is the case with CAM? Yet there are far more unknowns and uncertainties about the latter.

7. Conclusion and suggestions:

In the latest two meetings of the LLF, held in June and December 2020, the following resolution has been passed unopposed by all members present (21F; 1Ab):

The LLF opposes a premature decision on the current Cambourne to Cambridge busway scheme. It is unfit for purpose, anachronistic and environmentally damaging, and is now out of step with emerging proposals for EW Rail & CAM.

The LLF recommends a pause until:

- (i) The Mayor's CAM consultation has concluded, and his proposed route - suitable for autonomous vehicles, MRT and adaptable into a metro – is published.*
- (ii) The location of the new EWR station in Cambourne is confirmed, and the business case for the busway re-worked in light of its impact. This is a multi-billion- pound scheme that needs to be thoroughly understood first.*

In the meantime, we support the CPCA's interim high-quality bus priority measures and/or improved services on existing infrastructure, that can support the local plan and provide immediate transport benefits to key employment locations whilst the bigger picture falls into place.

Were GCP to proceed with the preferred option for C2C, it would be based on a plethora of potentially unsound assumptions. There are simply too many unknowns with regard to CAM and East West Rail, and too many constraints with the preferred option, to justify such a move. The LLF recommends interim solutions be adopted, using existing infrastructure, whilst the bigger picture falls into place.