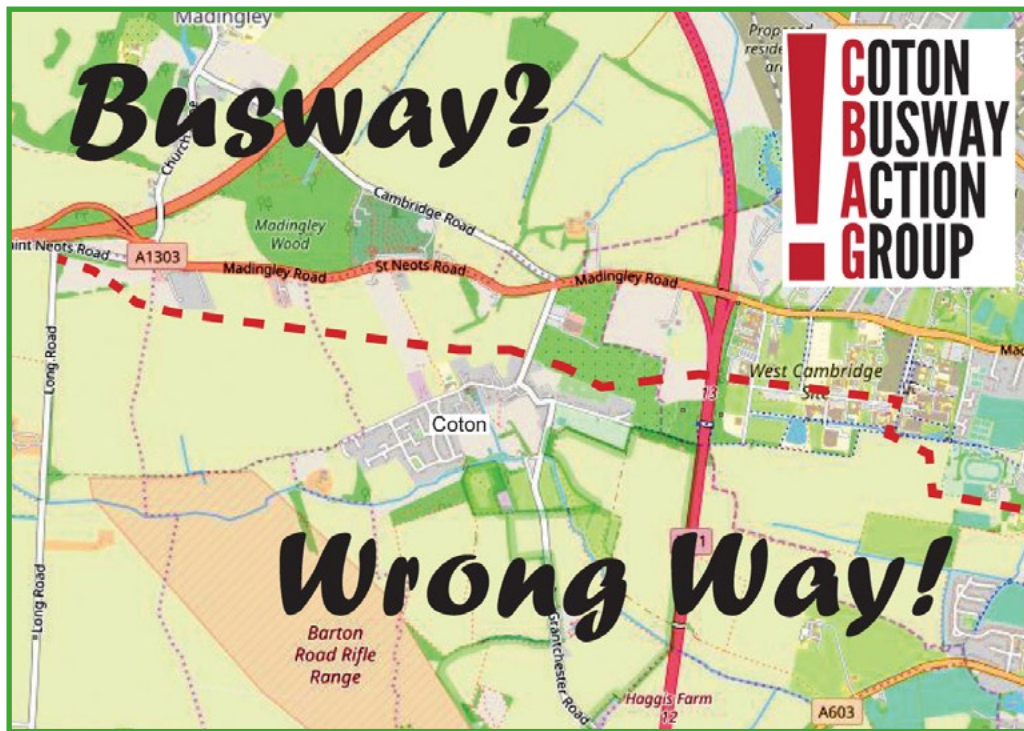




# Coton Busway Action Group (CBAG)

Initial Submission to Independent Audit of  
Cambourne to Cambridge Busway (C2C)



Coton is one of Cambridge's rural necklace villages situated in the green belt to the west of the M11. It lies in a dip below Madingley Hill, which can be seen from miles around, surrounded by farmland, National Trust covenanted land, and land owned by Cambridge Past Present and Future. It has a grade 1 listed church and a 100-year-old orchard, many listed buildings and a thriving community. The view from the top of Madingley Hill was described in 1929 as, "The most beautiful...of all the views of Cambridge" and it was, in part, to preserve this which led to CPPF's land purchase in the village.

The Coton Busway action group was formed by residents in 2015. It represents the views of local residents who, whilst supporting the concept of better transport links for residents situated to the West of Cambridge to major employment sites and the City, speak with one voice in opposing the environmentally-destructive GCP preferred route. 183 households are signed up to receive the 50 CBAG newsletters sent out to date. The CBAG committee works hard to represent the views of the whole village and there is standing room only at village meetings organised by CBAG or the Parish Council to discuss the busway. Members of the CBAG committee represent the views of residents at all GCP, CPCA and other public meetings where C2C is discussed.

CBAG has worked constructively with other groups to the west and across Cambridge lobbying for a less environmentally-destructive solution. It is CBAG's view that environmental aspects of the GCP's preferred route have been misrepresented by officers and poorly scrutinised by Board members throughout. Talk of mitigation and bio diversity net gain are used as a smokescreen whilst officers oscillate between talk of cut and cover (too expensive) and an open aspect with a few shrubs being more in keeping with the current landscape.

CBAG has lobbied from the start for a medium-term on-road solution and deplores the fact that the GCP has made no attempt over the last seven years to institute minor improvements to allow faster transit of buses along the corridor to places of work and education. In the longer-term residents feel that any new mode of local transport should follow existing transport corridors, following the A428, to Girton, the A14 & M11. The GCP's lack of insight regarding the effect that East West Rail's decision to route the line via Cambourne will have on their already poor business case with a BCR of 0.42 is shocking.

The following report focuses on several cases of the GCP bypassing and misrepresenting environmental reports.





# Coton Busway Action Group (CBAG)

Initial Submission to Independent Audit of  
Cambourne to Cambridge Busway (C2C)

## Environmental Concerns

### Introduction

The purpose of this document is to highlight environmental reports that are considered to have been bypassed or misinterpreted in evidence for meetings of the Greater Cambridge Partnership (GCP) Executive Board, their forerunner the City Deal, and the Local Liaison Forum (LLF) over the period that the GCP has developed their preferred option for the C2C.

We illustrate that the actions of the GCP, in selectively ignoring environmental constraints, have made incorrect assumptions and single-mindedly pursued their preferred option which transects the green belt. Their actions amount to predetermination. During the whole period GCP Joint Assembly members have made no meaningful attempt to scrutinise the actions of the GCP officers or the GCP Executive Board.

As an example, we quote from a letter dated 13.02.20 written by the Regional Director of the National Trust (see Appendix 1): "At the same time, we have also raised concerns about the option appraisal process, flawed analysis, and the availability of information." "I feel sure that you will want to allow for due process, minimise the risks of legal challenge, and avoid further abortive work" "From the initial consultation held in 2015 to the present day the GCP has been reluctant to modify the scheme as originally conceived."

Decisions favouring the GCP preferred route through Coton have often been made on the basis of very poor-quality reports ignoring environmental constraints. One such report was redrafted at the direction of the GCP as uncovered in an FOI which followed an inadequately-answered question asked at a GCP Executive Board meeting regarding the October and November 2018 Arup reports. This wholly inadequate report was subsequently quoted by the GCP on many occasions to justify selection of their preferred route.

Some relevant documents are attached appendices, some as links. Please note that we intend to submit further information following publication of the assumptions and constraints in the w/c 15th March 2021.

We can be contacted by email: [emailcbag@gmail.com](mailto:emailcbag@gmail.com), or [mtreacy@gmail.com](mailto:mtreacy@gmail.com)

*Dr Marilyn Treacy*

(Coordinator, Coton Busway Action Group)

## 1. A428 Cambourne to Cambridge Segregated Bus Route, Consideration of Green Belt Issues ([LDA, August 2017](#))

This report, which was commissioned by the GCP, concludes on page 60 that, “The conflict with Green Belt purposes in sub area C.1 would result in a moderate degree of harm in close proximity to Coton, due to the potential conflict with Cambridge Green Belt purpose 2, which also equates to conflict with National Green Belt purpose 4. This would be due to the changes in the setting of Cambridge that result from changes to the character and setting of Coton as a necklace village”.

The papers for the subsequent GCP Executive board ([see agenda papers](#)) for 20 September 2017, page 44, para 43) only paid lip service to environmental concerns, showing the GCP’s bias in minimising environmental impacts on Madingley Hill and Coton village.

**Constraints and Assumptions:** the GCP have selectively ignored environmental constraints around their preferred route, making the assumptions on which they have based their decisions unsound. Encroaching on a few feet of green belt on a verge or trimming overhanging trees on the on-road route was sometimes given equal weight in presentations to that of ploughing up many acres of agricultural land protected by covenants. The lack of attention given to harm to green belt north of Coton as highlighted in the LDA report is illustrated on Page 44 Para 43 of the agenda papers for the GCP Board meeting on 20 September 2017. The 2017 LDA report was not posted on the GCP website until 2019. If the LDA report stating that very special circumstances would be required for a route through the green belt north of Coton had been given appropriate weight in 2017 would other options have been more actively pursued at that point in the process? Data appears to be being used in such a selective way, that the scoring systems of route options used by GCP and their consultants do not appear to be objective, appear to be less than transparent and frequently show bias in favour of their preferred option.

## 2. Historic England response to consultation dated 30/01/2018 (see Appendix 2)

This response in a letter from Historic England stated “All 3 potential routes and sub routes are likely to cause harm to heritage significance either to the American Military Cemetery or to the significance of Coton”. However, in para 8.19 on page 29 of the subsequent [Executive Board Agenda](#), this response was misrepresented.

**Constraints and Assumptions:** in ignoring environmental constraints affecting Coton village the GCP have based their assumptions that a route through the fields on Madingley Hill and the hundred-year-old Orchard in Coton is preferable to alternatives which have been sifted out prematurely and have not been properly examined. There is clear misrepresentation of reports and selective use of quotes to favour the off-road route, as was also pointed out in questions from the CEO of Cambridge Past Present and Future. (See [GCP Executive Board Agenda – Public Questions and Answers](#), 6th December 2018, question 6i sub question 2).

### 3. National Trust (see Appendices 1 and 3)

The proposed route would pass through National Trust covenanted land. We would strongly urge you to read and note the contents of the two attached National Trust letters, in particular the 13th February 2020 letter. This letter has never been circulated nor included in Executive Board papers. We are well aware of the heritage importance of the American Military Cemetery and Madingley Hall but the impact of the GCP's preferred route on views of and towards Madingley Hill, the village of Coton and its community are minimised and misrepresented time and again by the GCP. We feel that there has been an extraordinary degree of dishonesty and manipulation of data in the selective presentation of reports and scoring of options which indicates predetermination on the part of the GCP.

**Assumptions and Constraints:** The GCP has again suppressed information detrimental to selection of their preferred route, ignoring environmental constraints regarding Coton village, National Trust covenants and other factors, then basing their premature sifting out of alternatives on erroneous assumptions. This has never allowed transparent data analysis or honest debate.

### 4. Cambridge Past, Present and Future (CambridgePPF)

Cambridge Past, Present and Future purchased farmland near Coton village in the 1929 with the specific aim of preventing urban sprawl and preserving the green belt to the west of Cambridge. CambridgePPF have been single-minded in their opposition to the damaging off-road scheme, and have actively lobbied for less damaging alternatives to be properly worked up. CambridgePPF owns some of the green belt land along the proposed route.

We would refer you to the section of the [CambridgePPF website](#) about the Cambourne-Coton-Cambridge Busway, and to question 6i asked by CambridgePPF CEO at the 6 December 2018 [GCP Executive Board meeting](#) under Agenda Item 4. CambridgePPF makes clear that there has been a significant breakdown in the trust between the community and the GCP officers resulting from the officers' preference for an off-road route leading to bias on their part .

**Assumptions and Constraints:** There is concern across Cambridge city and within the coalition of parish councils in South Cambridgeshire that the GCP has ignored environmental constraints relating to their preferred route whilst over-emphasising environmental constraints relating to an on-road solution. There is a belief that GCP schemes are irretrievably destructive to the natural environment. Trust has broken down between the public and the GCP as confirmed by the CEO of CambridgePPF.

## 5. 2018 Arup A428 Report

The 2018 Arup report commissioned by the Cambridgeshire and Peterborough Combined Authority (CPCA) was used by the GCP to progress the business case for the environmentally-damaging Southern Off-Road route. It was not fit for purpose and the GCP directed that it be redrafted for the subsequent Executive Board to 'pad it out'.

The CPCA commissioned Arup to write this independent report to inform decision-making to support the development of the CAM. Arup were directed to provide the mayor and his team with evidence and confidence in progressing the A428 corridor including advising on delivering an interface with the CAM network. Residents considered the report to be inadequate for decision making. It was a 4-page report containing no new information. ([Initial Arup Report](#)) GCP were made aware of this and prior to the report coming to the subsequent GCP board Rachel Stopard wrote the following email suggesting edits to what should have been an independent report. This FOI illustrates a pattern of GCP officer behaviour.

### Extract from the FOI [Link to full FOI](#)

Email from Rachel Stopard to Joanna Rowelle copy Chris Twig  
Subject CAM A4284 assembly report 31st October

*Thanks Joanna. The CA meeting is this morning so will be interesting to see what is said, but I'm just trying to answer the criticism of the Arup appendix to the CA report that it is too light, by doing all we can to pad out what comes to GCP. People are literally quoting the £Thousand per page, so we want this to show there was more substantial thinking behind it while focusing mainly on the 428 and not attempting to be the SOBC in any way. Just including some of the uncontroversial context of that exists anyway will help I think.  
Sorry I know this is a pain – will help us all in the long run  
Rachel*

### [Link to edited ARUP report](#)

The Arup report should be seen in the context of 6 December 2018 GCP Exec Board papers as a whole, but specifically in connection with [questions from the public related to Agenda Item 4](#). See all relating to C2C but in particular 6a, 6e, & 6i.

**Assumptions and Constraints:** in placing so much emphasis on this inadequate report the GCP ignored the constraints associated with placing a track for rapid transit vehicles through residential streets in Camborne, close to residential housing along Saint Neots Road in Hardwick, and in close proximity to residential property in Coton as subsequently pointed out by the mayor of the CPCA. This FOI illustrates a pattern of GCP officer behaviour that we have become familiar with. A formal complaint was made following this disclosure. The edited Arup report has been quoted on subsequent occasions to support decisions to progress the GCP's preferred route. To mirror Rachel Stopard's words, "it is not worth the paper it is written on".

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### List of Attachments

Appendix 1 - Letter dated 13.02.20 from the Regional Director of the National Trust  
Appendix 2 - Historic England letter dated 30/01/2018 in response to consultation  
Appendix 3 – Letter dated 01.08.17 from the Regional Director of the National Trust

## Appendix 1 - Letter dated 13.02.20 from the Regional Director of the National Trust



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

13<sup>th</sup> February 2020

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

### **Greater Cambridge Partnership Executive Board 19<sup>th</sup> 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 19<sup>th</sup> 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 30<sup>th</sup> 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,



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Paul Forecast  
Regional Director, National Trust



## Appendix 2 - Historic England letter dated 30/01/2018 in response to consultation

### 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-advisorv-servicesiextended-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 alternatives 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 associated 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

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## Appendix 3 – Letter dated 01.08.17 from the Regional Director of the National Trust



**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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Regional Chairman: Inga Grimsey  
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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

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