

CBAG second submission to Auditor: Appendix A Comments from Coton Busway Action Group (CBAG)

Cambourne to Cambridge Better Public Transport Project: Independent Audit Statement of Assumptions and Constraints

The Greater Cambridge Partnership (GCP) has instigated an independent audit of the key assumptions and constraints underpinning the selection of the preferred route for the Cambourne to Cambridge Better Public Transport Project. The focus of the audit is on the assumptions and constraints that underpinned the analysis that led to the selection of the preferred route and the elimination of alternative options. The objective is to test the robustness of those assumptions and constraints and determine whether they remain appropriate in the context of the current strategic frameworks, the emerging Cambridgeshire Autonomous Metro (CAM) network and the East West Rail plans.

This first stage of the audit comprises the preparation of a statement on the assumptions and constraints. This statement will be published on the GCP web site and will form part of an invitation to representative groups to submit further written representations on the assumptions and constraints and their application throughout the process.

The assumptions and constraints are documented in the tables below. These are derived from the Outline Business Case for the scheme together with supporting materials prepared for the business case and other reports produced by the GCP and its partners. The information sources are referenced against each entry in the table.

Examination of these sources has revealed 51 individual assumptions and constraints which are grouped into 12 categories: **(CBAG comments in Green)**

- A. Policy Context – [A.2](#), [A.6](#), [A.7](#), [A.8](#), [A.9](#)
- B. Scheme Objectives – [B.1](#), [B.2](#), [B.3](#), [B.4](#), [B.5](#), [B.6](#)
- C. Project Deliverables – [C.1](#), [C.2](#), [C.3](#)
- D. Strategic Fit – [D.1](#), [D.2](#), [D.4](#)
- E. Connections to CAM and EWR – [E.1](#), [E.2](#), [E.3](#), [E.4](#)
- F. C2C Options Selection – [F.1](#), [F.2](#)
- G. Economic Case – [G.1](#), [G.3](#), [G.5](#), [G.6](#), [G.7](#), [G.8](#)
- H. Financial Case – none
- I. Commercial Case – [I.5](#)
- J. Management Case – [J.1](#), [J.2](#)
- K. Full Business Case – none
- L. Covid-19 Impacts – [L.1](#)

Table A: Policy Context

Assumptions & Constraints Register				
	Assumptions	Constraints	Reference	CBAG Comments
A. Policy Context				
A.2	Local Plan policies for the strategic developments of sites along the C2C corridor require High Quality Public Transport (HQPT) to link new homes to employment and services in and around Cambridge.	Local Plans prepared by Cambridge City & South Cambridgeshire Councils: Confirm targets for housing and employment growth and allocate sites in West Cambourne, Bourn Airfield and other sites along the A428 corridor for development as well as at West Cambridge and North West Cambridge.	<i>Greater Cambridge Local Plan. Transport Evidence Report. Cambridgeshire County Council Transport Strategy and Funding Team, November 2020.</i>	Areas of housing growth largely follow the Local Plan; however, destinations of employment at the two main employment sites, the Biomedical Campus (BMC) and Cambridge Science Park, have grown. The GCP preferred route does not directly serve either of these destinations. The assumptions GCP made regarding commuter destinations in 2015 have altered significantly.
A.6	In April 2020 the CPCA published a draft Sub-Strategy to the Local Transport Plan specifically dealing with CAM. The route along the A1303/A428 from Cambridge City centre towards Cambourne, St Neots and Bedford has been highlighted as a strategic project to help make travel by foot, bicycle and public transport more attractive than private car journeys, alleviating congestion and supporting the region's growth issues.	The C2C proposals have been assessed against the policies in the Sub-Strategy and it is concluded that the scheme is compliant, although further review of the eastern end of the scheme (City Access) has been undertaken and a review of the western end will be required once there is clarity with regards to proposals for EWR and a station in the Cambourne area.	<i>Cambourne to Cambridge Better Public Transport Project, Report to GCP Executive Board, 10 December 2020</i>	The report to the GCP Executive Board of 10 December 2020 ignores the findings of the CPCA-commissioned Jacobs report of 2020. The Jacobs report says: <i>"It can be concluded that C2C currently does not fully meet 12 of the CAM sub-objectives, and in turn does not support the four main objectives."</i> Link to Jacobs Review

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A.7	National Infrastructure Commission: The NIC has identified the Cambridge – Milton Keynes – Oxford arc as a national priority stating that its world-class research, innovation and technology can help the UK prosper in a changing global economy.	NIC has proposed the development of EWR. Integrating mass rapid transit with this scheme will enable effective first/last mile connectivity, in a way that enhances the value of these strategic infrastructure projects.	<i>NIC Report, November 2020.</i> https://nic.org.uk/studies-reports/national-infrastructure-assessment/	EWRail is likely to provide a superior mode of transport for passengers travelling to the BMC, Central Cambridge and Cambridge North. A route for the remaining % of passengers travelling to the West Cambridge site is no justification for building a busway through the greenbelt. It cannot be argued that EWRail will not significantly reduce the GCP’s estimates of WEBS.
A.8	Highways England. Duelling of A428 Black Cat to Caxton Gibbet included in RIS2 programme, 2020-2025. HE has no other major road schemes planned for the GCP area having recently completed the upgrade to the A14 and Girton interchange with the M11.	DCO submitted in February 2021 for this Nationally Significant Infrastructure Project connecting the A1 to the A14. Preparatory works are underway. Scheduled for completion by 2023-24?	<i>Highways England. Route Investment Strategy. Road projects in the Eastern Region.</i> https://highwaysengland.co.uk/our-work/east/#roadprojectform	Consideration of the construction of an all-ways junction at Girton has been brought forward by Highways England. The GCP did not actively lobby for this but the community and local MP did. Link to article
A.9	East West Railway Company formed to create a new railway connection between Oxford and Cambridge. Consultation is anticipated on the preferred route alignment which includes stations at Cambourne and in the Sandy/St. Neots area.	The Bedford to Cambridge section is the third stage of the project and construction is not expected to start before 2025 with the train service beginning later this decade at the earliest.	<i>Connecting Communities: The Preferred Route Option between Bedford and Cambridge Executive Summary. EWR, 2019</i>	With all the delays to C2C and factoring in the need for a public enquiry, the construction date for C2C may not be significantly ahead of EWRail. In 2014 the GCP assumed an East West Rail route through Bassingbourne (p15 Technical note). Even when EWRail looked likely to opt for a route via Cambourne the GCP did not consider how this might influence modal shift away from a busway. Now that the route via Cambourne has been announced it would seem that significantly fewer commuters will catch the bus from Cambourne or Bourne to Central Cambridge or the BMC via Grange Road when the train is likely to become the preferred mode of transport. Link to C2C Technical Note

Table B: Scheme Objectives

	Assumptions	Constraints	Reference	CBAG Comments
	B. Scheme Objectives:			
B.1	<ul style="list-style-type: none"> ● Achieve improved accessibility to support the economic growth of Greater Cambridge ● Deliver a sustainable transport network/system that connects areas between Cambourne and Cambridge along the A428/A1303 ● Contribute to enhanced quality of life by relieving congestion and improving air quality within the surrounding areas along the A428/A1303 and within Cambridge city centre 	<ul style="list-style-type: none"> ● Existing car mode share and car ownership within the A428/A1303 corridor is high, and future growth is expected to generate additional demand for car use in this area. ● Traffic data shows that AM peak hour traffic speeds are 75% slower than night time average speeds on the route between the Madingley Mulch Roundabout and M11 Junction. ● Planned growth, between 2011 and 2031, along the A428/A1303 corridor eastbound car trips are forecast to increase by 14% in the AM Peak hour, 82% in the Inter-peak period and, 37% in the PM Peak period. Without intervention this could lead to a further deterioration in traffic speeds and reliability of journey times. ● Travel to work data for key origins along the C2C corridor also illustrate the high level of car use along the route, with the car mode share for residents of Cambourne being particularly high (65%). ● Residents of Cambourne and surrounding villages currently have limited options to use public transport due to the low level of service and current unreliability. ● In the absence of substantial bus priority in the corridor, congestion and delays mean journeys of around 10 miles can take over an hour during peak times. Buses therefore offer no competitive advantage over private cars in terms of journey times and reliability. 	<p><i>C2C Outline Business Case, Strategic Case GCP January 2020.</i></p>	<p>Over the last seven years GCP have doggedly pursued their vision of constructing an off-road busway through the Coton Corridor. They have made no attempt to trial an interim low cost on-road bus priority scheme or indeed to subsidise more direct bus routes to places of work. The mayor of CPCA has now done that. Residents now have more options to commute directly to the BMC and Science Park.</p> <p>Link to announcement</p>

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B.2	Supporting development through the busway corridor: The scheme is assumed to promote growth in the area and increase investment. It is designed to be the first in a series of steps to push forward growth.	Longer-term plans for the CAM network and EWR need to be considered.	'C2C Outline Business Case, Strategic Case GCP January 2020.	<p>There are inconsistencies in the way the GCP factor CAM compliance into their business case when it supports their arguments. It seems illogical to consider this early stage proposal, when the mode, speed and frequency of the service are unknown.</p> <p>It would seem prudent and logical for the effect of EWRail to be factored in as it is a well-recognised mode of travel.</p>
B.3	Support for the labour market: Through the wider effects of the scheme it is assumed that there will be an increase in accessibility to jobs, education and training. This has the potential to give easier access into both Cambourne and Cambridge and thereby expand the labour market.	Constraints in this are linked to ticketing and frequency of service. If this is an expensive service, then some may still be priced out. There is no information on ticketing and service schedules have yet to be confirmed.	'C2C Outline Business Case, Strategic Case GCP January 2020.	It is erroneous to assume that constraints around support for the labour market linked to ticketing or indeed frequency of service predominate. The real question is "Does this bus take commuters to where they want to go?". The resounding answer is that in the majority of cases it does not. C2C takes passengers from Cambourne to Grange Road. Grange Road is not a popular commuter destination and even with a new City Access scheme, commuters are unlikely to wish to travel through the City centre by bus to get to the station, the BMC or Science Park. EWRail may ultimately be the solution for commuters to the major site of employment - the BMC. A route via the A428 via Girton is the obvious first choice for commuters to the Science Park or they may choose to take the train from Cambourne to Cambridge North.
B.4	The scheme will create a congestion free, high quality public transport corridor: The OBC assumes that the scheme will be able to create this corridor as a segregated busway.	<p>There are still several pinch points and interactions with general traffic that could create congestion and delay along the route.</p> <p>Scotland Farm P&R access</p> <ul style="list-style-type: none"> • The section of the scheme which runs through Bourn Airfield must comply with the SPD for the site and complement the development Masterplan. • The section of the scheme which runs through West Cambridge must complement the development Masterplan. Consideration must be given to vibration and EMI impacts on sensitive receptors such as the Department of Materials Science and Metallurgy. 	'C2C Outline Business Case, Strategic Case GCP January 2020.	<p>The impact upon road traffic at St Neots Road, near the water tower site, and Cambridge Road, Coton (where up to 12 buses per hour may be crossing) may necessitate the closure of both roads to traffic. The GCP have stated that other buses and emergency vehicles would also be permitted to use this tarmac 'busway'. If Cambridge Road at Coton were to close villagers would have a 10-mile round trip to the 'local' supermarket.</p> <p>If the route is to be CAM compliant the nature of CAM (i.e. speed, size, frequency of vehicles) would need to be known before the route could be deemed to be CAM compliant. Currently it is proposed that CAM vehicles are smaller and run at a more frequent rate than buses. This is more likely to cause interruption to traffic on Cambridge Road and possible road closure.</p>

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<p>B.5</p>	<p>In the City Centre, GCP's City Access project is proposing measures to reduce reliance on car travel and free up the city centre's congested road space, to run better public transport services.</p> <ul style="list-style-type: none"> • The objectives of the City Access scheme complement the C2C project by seeking to improve conditions for sustainable transport within the City Centre, thereby benefitting users of the C2C scheme either through improved journey times for public transport or better connectivity to pedestrians and cyclists. • City Access will also complement C2C by providing an alternative to car journeys for trips from new developments served by the scheme. 	<p>Bus services across the city centre incur substantial delays due to traffic congestion and the layout of city streets. Significant reallocation of road space to active travel and buses alongside on-street parking management measures will be required to improve bus journey times.</p>	<p><i>Report to GCP Executive Board, 18 March 2021</i></p>	<p>Cambridge's narrow streets where cycling is being given increasing priority are not best suited to significantly increased bus numbers. There is opposition from residents in central Cambridge to increased bus numbers. There would seem to be little justification for buses to travel via C2C to Grange Road across town through narrow Silver Street to reach the Central station or BMC. The journey back via the narrow Fen Causeway would also be problematic. The buses would have to pass through narrow congested streets as soon as they reach the edge of Cambridge. These streets - including Grange Road, West Road, Silver Street and Downing Street - are heavily used by cyclists, pedestrians and tourists, and are unsuitable for the frequent passage of large bus vehicles.</p>
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<p>B.6</p>	<p>On 31st October 2018 the CPCA Board agreed that the C2C scheme should be progressed by the GCP as an essential first phase of developing proposals for the CAM. They accepted the independent review of alignment between the C2C scheme and the CPCA plans for a CAM, undertaken by consultants Arup and commissioned by the CPCA in 2018.</p>	<p>Arup has undertaken a high-level review of route options and concluded that:</p> <ul style="list-style-type: none"> • The process undertaken to date to determine the route is robust and the optimal solution for the corridor is confirmed; • The route is reclassified as a CAM route to serve the wider network, and not an independent guided busway corridor; • The vehicle operating along the A428 corridor will comply with the principles of the CAM; • The route will continue to be designed to align and integrate with the overarching CAM network, comprising one of the phases of the CAM network; and • Options for mitigating the impact of the scheme at West Fields and Coton will be incorporated into scheme design for the SOBC. 	<p><i>Cambridgeshire and Peterborough Combined Authority CAM Expert Advice A428 Report. Arup, October 2018</i></p>	<p>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 Exec Board to ‘pad it out’.</p> <p>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 (see Initial Arup Report). The GCP was 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.</p> <p>Extract from the FOI</p> <p>Email from Rachel Stoppard to Joanna Rowelle copy Chris Twig Subject CAM A4284 assembly report 31st October</p> <p><i>“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”</i></p> <p>Link to edited ARUP report Link to full FOI</p> <p>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.</p> <p>This FOI illustrates a pattern of GCP officer behaviour with which we have become very familiar. 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 Stoppard’s words, <i>“it is not worth the paper it is written on”</i>.</p>
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Table C: Project Deliverables

	Assumptions	Constraints	Reference	CBAG Comments
	C. Project Deliverables:			
C.1	<p>The project is made up of three key elements:</p> <ul style="list-style-type: none"> • a public transport link between Cambourne and Cambridge, • a new Park and Ride facility off the A428/A1303 to supplement the existing Madingley Road Park and Ride, and • new cycling and walking facilities. 	<p>The C2C scheme will need to deliver on the following elements:</p> <ul style="list-style-type: none"> • A HQPT system using rapid transit technology on dedicated routes. • High frequency, reliable services delivering maximum connectivity. • Continued modal shift away from car usage to public transport. • Capacity provided for growth, supporting transit-oriented development. • State of the art environmental technology, with easily accessible, environmentally friendly, low emission vehicles such as electric/hybrids or similar. • A fully integrated solution, including ticketing and linkages with the wider public transport network to maximise travel opportunities. <p>Achieving these may be constrained by factors outside of the GCP's control.</p>	<p>'C2C Outline Business Case, Strategic Case GCP January 2020.</p>	<p>Assumption C.2 should be negated by EWRail's plans with provision for parking at Cambourne Station.</p> <p>Assumption C.3 is now negated also. Cycling and walking facilities will be a duplication along the proposed C2C route. They will be superseded by the GCP's Comberton Greenway, a few hundred yards from GCP's proposed C2C which will avoid a commute home up Madingley hill and is ideally placed to have a link to the new Bourne Airfield development.</p> <p>Link to Greenway project</p>

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<p>C.2</p>	<p>Scotland Farm site chosen as preferred location for Park & Ride site with a capacity for up to 2000 cars. It will also provide a travel hub with potential for cycle storage as well as waiting rooms/information point and retail outlet.</p>	<p>Scotland Farm is attractive location for commuters from areas to the west of Cambridge along the A428 corridor but less so for car users from the south exiting at jnc 13 of the M11. The success as a travel hub will depend on the number of car users and cyclists attracted to the site.</p> <ul style="list-style-type: none"> • Any new Park & Ride service will need to be to a standard similar to that currently operating for Cambridge's Park & Ride services as set out in the current Access Agreement, which states that the Bus Operator will operate the Park & Ride Bus Services in accordance with the established minimum requirements. • Provide appropriate traffic calming and management proposals to mitigate rat-running to Park & Ride sites. • The alternative P&R site at Madingley Road may be redeveloped for other use when the lease expires later this decade. 	<p><i>'C2C Outline Business Case, Strategic Case GCP January 2020.</i></p>	<p>Scotland Farm P&R is unlikely be an attractive location for commuters from areas to the west of Cambridge. The plan for a Scotland Farm P&R may be superseded by the decision of EWRail to site the station at Cambourne with a preference for north of the town. Once EWRail is up and running commuters from north and west of Cambourne will be unlikely to drive to Scotland Farm to get on a bus to sites of employment Ref https://eastwestrail.co.uk/</p>
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<p>C.3</p>	<p>Increase active travel through improved infrastructure for cycling and walking:</p> <ul style="list-style-type: none"> • Comberton Greenway will complement the C2C project as it develops improved pedestrian and cyclist routes with a segregated path continuing beyond the proposed bus route. • Madingley Road cycling improvements enabled by reallocation of road space that complements C2C scheme 	<p>The scheme must provide a segregated route for non-motorised users, as a minimum to include cyclists and walkers, but where appropriate equestrians, and to ensure that all pedestrian facilities are accessible for all. The existing cycling network between Cambourne and Cambridge has sections of segregated links of uneven quality but is discontinuous and does not in total provide a high-quality segregated route which would cater for the potential increased modal share of cyclists along the corridor. Madingley Road potential bus lane/priority measures reallocated to cycling infrastructure.</p>	<p><i>'C2C Outline Business Case, Strategic Case GCP January 2020.</i></p>	<p>The planned Comberton Greenway should negate the need for a cycle route alongside the proposed C2C route or the A428/1307.</p> <p>If the C2C route is eventually to morph into a CAM route it may be unsafe for cyclists, walkers and certainly equestrians because of the proposed use of rapid transit autonomous vehicles. There have been fatalities on the existing St Ives busway.</p> <p>The Comberton Greenway will run a few hundred yards from Madingley Hill in the Coton Corridor and if correctly designed should become the only dedicated cycle route necessary taking cyclists into the West Cambridge Site and Cambridge from the west. One has to question why the GCP is planning to duplicate a cycle route. The fact that cycle routes are at present of uneven quality and discontinuous is no justification for spending upwards of £160M on an off-road busway through the greenbelt.</p> <p>Link to Greenway project</p>
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Table D: Strategic Fit

	Assumptions	Constraints	Reference	CBAG Comments
	D. Strategic Fit:			
D.1	A substantial level of housing and employment development is planned, or is already under development, along the C2C corridor include Cambourne West, Bourn Airfield, West Cambridge and North West Cambridge (Eddington).	Based on current plans, both those within the current Local Plan or well established through planning applications or known to be emerging, there are around 11,700 additional houses planned and around 13,400 additional jobs along the C2C corridor. Around 50% of all housing planned (c. 6,000 houses) would be directly linked to Cambridge City centre and other key employment locations via the C2C project.	'C2C Outline Business Case, Strategic Case GCP January 2020.	GCP's preferred route is no longer the best strategic fit. Since the GCP drew a straight line from Cambourne to Cambridge on a map in 2015 a lot has changed. The BMC and Science Park have expanded significantly and central Cambridge is not the number 1 destination for commuters. The BMC and institutes to the south of the city are the largest and fastest growing employment centres in Cambridge together with the Science Park. Housing growth planned for commuters West of Cambridge will be best served by EWRail to the BMC. A route following the existing transport corridor of the A428 to Girton and on via the A14 would serve the Science Park. Link to 2020 Evidence Study
D.2	The C2C project has been recognised in the Local Plans and local transport strategy as a key project to help address these infrastructure constraints on growth by linking Cambridge to growth areas to the west. The provision of a HQPT service supporting journeys to key employment sites presents a viable alternative to car use/purchase for residents in new developments.	Two significant new planned developments (Cambourne West and Bourn Airfield) are, in housing terms, judged to be fully dependent upon the C2C project given the clear policy position within the adopted Local Plan and as supported by Section 106 commitments and ongoing negotiations.	'C2C Outline Business Case, Strategic Case GCP January 2020.	Growth and development at Cambourne West can no longer be judged to be dependent on C2C. EWRail would appear likely to cut passenger numbers substantially. GCP has doggedly refused to factor the effect of EWRail into their modelling. EWRail will better serve this development for commuters to the BMC and Central Cambridge. Commuters to the Science park may also choose to use EWRail but if not, a C2C route via Girton would serve commuters to the Science Park whilst the GCP's preferred route would not. Commuters from Bourne may choose to cycle or drive to the new Cambourne station and travel by fast train.
D.3	Supporting increased development density of the corridor: The assumption is that the added capacity of the scheme will support the densification in the areas easily accessible to the busway.	The growth depends on the scheme providing enough capacity to meet anticipated demands.	'C2C Outline Business Case, Strategic Case GCP January 2020.	The GCP have failed to factor in the changes that EWRail will make to commuter behaviour and how EWRail will influence the next local plan with a concentration of plots immediately north and west of Cambourne put forward in the 2020 call for sites. Link to 2020 Site Submissions

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D.4	The scheme offers further capacity and therefore underpins growth. Whilst there is a wealth of supporting evidence for this assertion, it is hard to establish how much effect on relieving the capacity this scheme will have and how much growth that this scheme in isolation will enable. The scheme is assumed to be the launch point for further connections and shift away from private vehicles.	Existing network cannot increase travel capacity much further. A major constraint is whether this scheme can successfully create the conditions for modal shift? Are other measures required to achieve the 30% modal shift targeted in the GCP transport strategy?	<i>'C2C Outline Business Case, Strategic Case GCP January 2020.</i>	The scheme may increase capacity but unless it takes people to where they need to go they are likely to vote with their feet and take the train to sites of employment. The C2C scheme has been all about trying to shave minutes off the journey on some parts of the route but it takes passengers through the congested city centre. When faced with a bus journey of 32-39 minutes via Grange Road or 10-15 minutes to Cambridge South/BMC and a few more minutes to Cambridge Central and to Cambridge North/Science Park, passengers are likely to choose the train. https://eastwestrail.co.uk/
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Table E: Connections to CAM and EWR

	Assumptions	Constraints	Reference	CBAG Comments
	E. Connections to CAM and EWR			
E.1	The CAM project proposes an expansive metro network that seamlessly connects Cambridge City Centre, key rail stations (Cambridge, Cambridge North and the future Cambridge South), major City fringe employment sites and key 'satellite' growth areas, both within Cambridge and the wider region.	The GCP routes will form the first phase of the Combined Authority's CAM project. This scheme is still at the planning stage (SOBC) and the preferred alignment, scheme costs and appraisal has yet to be confirmed in an Outline Business Case. There is uncertainty regarding the timeline for CAM implementation; the SOBC indicated a construction period between 2024 - 2030 but the timeline for the preparation of the OBC has already slipped so this appears to be optimistic.	<i>Cambridgeshire Autonomous Metro Strategic Outline Business Case, CPCA, February 2019</i>	The mayor of the CPCA stated in May 2020 that the proposed C2C route is not CAM compliant. This was backed up by the Jacobs report. CPCA announcement

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<p>E.2</p>	<p>CAM SOBC assumes the portal connecting the city centre underground section to the C2C route will be in West Cambridge at the southern edge of the proposed development area. The CAM station will be at ground level in this vicinity.</p>	<p>Alternative route options for the CAM are still being explored. So far, these rule out any alignment going via the Girton Interchange. A northern route corridor option(s) has been proposed. These would follow an alignment to the north of the A1303 and American Cemetery and connecting to the north side of the A428 and proceeding to Scotland Farm P&R and then crossing over to Bourn Airfield development. An alternative option to extend the CAM tunnel to the west of the M11 on the northern side of A1303 has also been explored. A preliminary evaluation of these route options indicates that they would be higher cost alignments for the busway/CAM and would have environmental impacts on the American Cemetery, 800 Wood, Madingley village and White Pits Plantation, incur longer journey times compared to the preferred busway option and would not attract as many bus riders.</p>	<p><i>CAM Indicative Northern Route Corridor Options Map, CPCA, October 2020.</i></p>	<p>An evaluation of a route following existing transport corridors to the Girton interchange through the pre-existing cutting and down through Eddington has never been properly explored by the GCP. This route would serve a higher number of new developments than the currently proposed off-road route. No evidence has been presented by the GCP that a route via Girton would not attract more bus riders, nor has this suggestion ever been adequately examined by the GCP. In fact, the route was dismissed by the GCP at an early stage and was then dismissed again in the Mott MacDonald technical report of 2019 which did not consider any potential advantages to the route. The GCP have not investigated whether this option could be put in place prior to the Girton Interchange becoming an all-ways junction.</p> <p>A route via the Girton Interchange, with an extra 1.2 miles compared to the current proposal would add about 2 minutes to the journey time. This solution would neither encroach on the American Cemetery, nor its views to the north, Madingley, nor views from Madingley Hall. A road cutting already exists, which would be suitable for the busway.</p> <p>A busway adjacent to the A428 would be unlikely to require land take from the edge of the 800 Wood. If any additional land were required, then this would have to be balanced against building a busway through the middle of the 100-year-old Coton Orchard - a historic orchard established 90 years prior to the planting of 800 Wood.</p>
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E.3	CAM: As a segregated route, the preferred option for the C2C is aligned with the CAM project, at least on the section between West Cambridge and Bourn Airfield. CAM connections through/around Cambourne will depend on the EWR station location. Connections to rest of the CAM network will be via a tunnel through the City Centre.	C2C travel hubs at Scotland Farm P&R site and in Cambourne may require the CAM to follow a different alignment to the C2C busway in these sections in order to access these facilities depending on the vehicle technology chosen.	<i>'C2C Outline Business Case, Strategic Case GCP January 2020.</i>	It would be irresponsible and profligate of GCP to construct C2C prior to the EWRail route being confirmed, the CAM route being confirmed, and a decision has come from Highways England on the Girton interchange.
E.4	EWR: The C2C full business case will also need to include a sensitivity test to assess the impact of EWR Rail once there is clarity with regards to the proposals. It is unlikely that EWR will have an impact of the core business case for C2C given that it is unlikely that any EWR proposals will have achieved consent during the C2C assessment period.	EWR focuses substantially on longer term growth beyond the Local Plan period and not the immediate and worsening issues of congestion and lack of connectivity for expanding communities west of Cambridge. Once a preferred alignment has been agreed for EWR and confirmation of the location of a Cambourne station there will need to be a programme to ensure integration between EWR, C2C and the wider CAM network.	<i>'C2C Outline Business Case, Strategic Case GCP January 2020.</i>	The timeline for C2C has slipped. It may end up dovetailing with EWRail. There are too many uncertainties. The GCP should adopt a low-cost interim on-road scheme such as that proposed by Smarter Cambridge Transport for Cambridge PPF This interim proposal could have been implemented several years ago. Please also refer to this 2020 article by Smarter Cambridge Transport.

Table F: C2C Options Selection

	Assumptions	Constraints	Reference	CBAG Comments
	F. C2C Options Selection			
F.1	Options Sifting: The scheme options were developed in two phases. In total 34 options were considered which were sifted through a multi-criteria assessment framework to derive 6 options (3 phase 1 & 3 phase 2) including the P&R site options. These were then combined into 5 options for both phases including a scheme comparator which was eventually selected as the preferred option. The optioneering process reviewed a wide range of options suggested by stakeholders and following consultation. The assessment criteria followed DfT appraisal guidelines and covered a broad range of issues from policy goodness-of-fit to local environmental impacts.	The MCAF criteria is a qualitative exercise that measures the performance of each option against a wide range of factors grouped into 6 themes. The option scoring is justified on the available evidence but by its nature is subjective. The results indicated that the best performing option was the segregated off- road option with Park & Ride at Scotland Farm but only by a small margin. The preferred option would create a new busway crossing designated green belt in West Fields, Coton Orchards and National Trust lands. Options following alignments for the CAM and EWR were not evaluated as these are not confirmed, nor are they committed schemes.	<i>C2C Outline Business Case, Options Appraisal Reports 1, 2 & 3, GCP January 2020.</i>	<p>The MCAF was subjective and was scored by the GCP with such bias towards their preferred option as to render it worthless. Statements such as, “<i>Due to the route options being run in parallel to the existing A428 and A1303 transport corridors the landscape and visual impact would be minimised</i>” are clearly misleading as the route ‘parallel’ to the A1303 clearly bisects one of the two highest points in the greenbelt and will be visible from miles around.</p> <p>The statement “... <i>due to the urban character of the settlements and existing transportation corridor present within the landscape, a significant adverse permanent impact on the area is not anticipated</i>” is also clearly misleading. Coton is a necklace village nestling within the greenbelt in a rural setting. It can hardly be described as having “<i>an urban character</i>”. In the biodiversity scoring, statements regarding encroachment on the SSSI wood are also erroneous with the trimming of overhanging trees being scored more favourably than ploughing 2 miles of busway across a prominent greenbelt landscape and the destruction of a 100yr old orchard.</p> <p>Link to Atkins MCAF report</p> <p>A subsequent LLF reappraisal of the MCAF showed no significant difference in the options.</p> <p>Link to Technical Note</p>

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<p>F.2</p>	<p>Alternative alignments to avoid Coton and Hardwick were evaluated as part of the options development process. These were not found to be suitable and performed worse than the preferred option and no better than the other options assessed.</p>	<p>Alternative northern route options via Girton interchange are not deliverable within the time horizons for the project and not compatible with CAM route corridor options. Other northern route options to the north of the American Cemetery are constrained by environmentally sensitive areas and heritage assets. The Cambridge American Cemetery and the American Battle Monuments Commission is regarded as a unique national memorial which honours the American military personnel killed in the second world war. They would oppose any on-road or off-road scheme which impacted the setting of the cemetery including removing the verges along the A1303 and the uninterrupted views to the north. On-road options for bus lanes/bus tidal flows are also constrained by impact on SSSI and American Cemetery along the A1303 as well as impacts on properties along the route.</p>	<p><i>C2C Outline Business Case, Options Appraisal Reports 1, 2 & 3, GCP January 2020. Madingley Road 'Quick-Win' Options Outline. Technical Note. Mott Macdonald. May 2019.</i></p>	<p>Throughout the process the GCP have made their own rules to fit their preferred option. This is exemplified by the GCP's use of CAM compliance to argue their case in two contradictory ways as in the final paragraph in F1: <i>"Options following alignments for the CAM and EWR were not evaluated as these are not confirmed, nor are they committed schemes."</i> and the first paragraph in F2: <i>"Alternative northern route options via Girton interchange are not deliverable within the time horizons for the project and not compatible with CAMroute corridor options."</i></p> <p>Environmental constraints affecting Hardwick and the Coton Corridor have been downplayed throughout.</p> <p>Northern route options were either never pushed far enough away from the American Cemetery or were pushed ridiculously far north so as not to be acceptable to any stakeholder.</p> <p>Going as far as the Girton Interchange was dismissed without considering the potential future benefits of locating a Park and Ride there which could remove tourist coaches from the City Centre. Returning through Eddington which is a growing residential area may add significant passenger numbers. To quote from the Mott MacDonald technical note :</p> <p><i>"A northern alignment was discounted in the early stages of planning for C2C, in favour of alignments travelling in to the city centre, prioritising the quickest and most convenient access to Cambridge employment hubs for new and growing communities in villages and towns to the west."</i></p> <p>However, we cannot emphasise enough that the GCP preferred route C2C does not prioritise the quickest and most convenient access to Cambridge employment hubs, the two fastest-growing and largest of which are located at the BMC and the Science Park. Commuters will not wish to travel via Grange Road to reach either of these destinations. There is little point in transporting commuters, albeit rapidly, to destinations they do not need to travel to.</p> <p>The GCP's attempts to make any interim on-road option unworkable were implausible and included placing gantries directly outside the American Cemetery and unnecessary land take from sensitive verges on the northern side of the A1303.</p> <p>Technical Note: quick wins</p>
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Table G: Economic Case

	Assumptions	Constraints	Reference	CBAG Comments
	G. Economic Case			
G.1	Options Appraisal: The preferred route from Cambourne to Grange Road has been analysed for its economic benefits and costs. Benefits were assessed at 3 levels following Transport Appraisal Guidelines: level 1 measures the transport user benefits to bus riders and decongestion benefits for car users; level 2 estimates the wider economic benefits assumed to accrue from the scheme from agglomeration; and level 3 estimates the wider economic benefits from land use changes at national and local level, including Gross Value Added through jobs created and the land value uplift from the scheme. These level 3 additionality benefits are what justify the scheme producing a BCR of 1.47 (increased to 3.48 with Greater Cambridge additionality benefits) compared with just 0.43 for the level 1 benefits and 0.48 for the adjusted level 2 benefits.	The scheme has been presented as creating 975 new jobs and increasing housing by around 6,000 which are dependent on the scheme. There is an increase in GVA of £102.8m per annum attributed to the scheme. Over a 30-year period this delivers a significant benefit of £676.1m plus £458m from land value uplift, giving a total benefit of £1.13bn. What constrains this assumption is that if the scheme does not support the housing and jobs growth as expected then there is a danger of reduced economic growth.	<i>C2C Outline Business Case, Economic Case GCP January 2020.</i>	<p>This scheme has a BCR of 0.43, way below the accepted level for a national scheme. One can only assume that this number would reduce if EWRail were factored in as EWRail’s business case will include passengers from the Cambourne area, further North and West.</p> <p>There is no sound evidence for the GCP’s claim of such significant wider economic benefits. The claims are speculative and beyond any realised by similar schemes.</p>

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<p>G.3</p>	<p>Journey Times, Reliability and Ridership: The traffic modelling for the preferred option estimates a 167% increase in bus ridership when the scheme opens and 233% by 2036 when all the housing and employment in the corridor is assumed to be built. This amount of mode shifting, mainly from private car, is predicated on the C2C delivering significant journey time savings to users from Cambourne, Bourn village and the Scotland Farm P&R. For instance, C2C passengers from Cambourne to Cambridge city centre are predicted to have 23 minutes lower journey time in the morning peak hour compared to a do minimum scenario. Alternative on-road options do not offer anywhere near this journey time saving or reliability.</p>	<p>Despite the forecast increase in bus ridership, there will still be a lot of traffic generated by the developments in the corridor so traffic congestion will remain a problem. The predicted mode shift only increases the bus mode share east of the Scotland Farm P&R site from 4% to 6% of travel demand. Off peak C2C journey times are slightly longer due to the diversion from the busway to the Scotland Farm P&R site.</p>	<p><i>'C2C Outline Business Case, Economic Case GCP January 2020.</i></p>	<p><i>“The traffic modelling for the preferred option estimates a 167% increase in bus ridership when the scheme opens and 233% by 2036 when all the housing and employment in the corridor is assumed to be built”.</i></p> <p>This assumption, in particular the 2036 calculation no longer applies now that EWRail have decided on a route via Cambourne. With the train removing most passengers from this corridor by the end of this decade the C2C busway will be largely redundant.</p>
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<p>G.5</p>	<p>Environmental Impact: Overall it is assumed that environmental factors are very limited in terms of the schemes impact on the proposed route. Noise, Air quality and emissions are all very limited. It is assumed they will have minor benefits or be neutral. Similarly, for the landscape impact it is neutral for the proposed route. There is a slightly higher impact on biodiversity, however there are mitigation opportunities for the scheme to reduce impact.</p>	<p>The scheme must achieve a 20% net biodiversity gain. The segregated busway alignment has been designed to minimise the impacts on the environment. Nevertheless, it will require mitigation measures to lessen its impact on the landscape especially where it crosses the green belt and National Trust land. There is also the limitation that if the targets for modal shift are not reached then there will be reduced benefit to the environmental factors such as emissions and air quality.</p>	<p><i>C2C Outline Business Case, Economic Case GCP January 2020.</i></p>	<p>A number of surveys, including bat, hare and badger were conducted in 2018 by Cambridge Ecology on behalf of the GCP. In particular, the Badger Survey states, “The presence of Badger setts and signs of Badgers within the survey area indicate that Badgers currently constitute a constraint to the scheme and therefore are of material consideration during a planning decision process”. Whilst these surveys have been contained within the board papers extensive list of appendices, they have never been mentioned in the main bulk of the Officers Report to the Joint Assembly or Executive Board.</p> <ul style="list-style-type: none"> • Badger Survey • Brown Hare Survey • Bat Activity Survey • Bat Inspection Survey Report
<p>G.6</p>	<p>Green Belt: Whilst it is always preferable to avoid any impacts on the Green Belt, in the case of C2C, impact is inevitable. The National Planning Policy Framework establishes that “certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include local transport infrastructure which can demonstrate a requirement for a Green Belt location.”</p>	<p>The C2C scheme has been developed to provide linkage from new settlements located outside the Green Belt to the City of Cambridge. Given the need to connect development outside the Green Belt to the city, some degree of impact on the Green Belt is inevitable.</p>	<p><i>A428 Cambourne to Cambridge Segregated Bus Route Consideration of Green Belt Issues, LDA Design, August 2017</i> <i>C2C: Report to GCP Executive Board, 10 December 2020</i> <i>Interim Addendum Report to Planning Appraisal 2017: Cambourne to Cambridge public transport route (C2C) – Phase 1, Strutt and Parker, September 2019</i></p>	<p>There need be no greenbelt impact associated with the on-road schemes using existing transport corridors. The greenbelt impact of the off-road scheme is highly significant. The case for development within the greenbelt has not been made and is likely to be challenged at the public enquiry.</p> <p>The GCP have argued in meetings that the greenbelt impact of both routes is not significantly different as both traverse the greenbelt. This is clearly misleading as in the case of the on-road route the transport corridor already exists whilst for the off-road route runs through unspoilt landscape and CambridgePPF-owned National Trust covenanted land.</p>

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<p>G.7</p>	<p>Mitigation measures will be firmed up following the Environmental Impact Statement and in consultation with local landowners and the communities affected.</p>	<p>There are specific concerns about the impact on the Green Belt, West Fields, the Orchards near Coton as well as the alignment close to Coton conservation area, and the busway section between St. Neots Road and the A428 at Hardwick.</p> <ul style="list-style-type: none"> • Coton Conservation Area including Grade 1 listed Church. 	<p><i>C2C: Report to GCP Executive Board, 10 December 2020</i></p>	<p>The environmental issues associated with the GCP’s preferred option are huge and this factor together with the expense of the scheme have reverberated across the whole of Cambridge, giving rise to much publicity in the local press and city-wide marches. The public feels that alternative routes have not been adequately explored, which raises the question as to whether encroachment on the greenbelt to this extent is justified. If other routes were not adequately explored and this is uncovered at public enquiry there is likely to be further delay to any workable solution.</p> <p>LDA report 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 “<i>very special circumstances would be required for a route through the green belt north of Coton</i>” 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.</p> <p>Historic England Historic England stated “<i>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</i>”. However, in para 8.19 on page 29 of the subsequent GCP Executive Board Agenda, this response was misrepresented.</p> <p>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).</p>
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		<ul style="list-style-type: none"> • Land parcels owned by Cambridge Past, Present and Future, which are protected by National Trust Covenants. • Fitting within available space in areas where the alignment passes relatively close to properties. For example, along some parts of the St Neots Road. Where necessary noise barriers will need to be explored as an option to ensure that traffic noise experienced by residents reduces. • Minimising the impact on the Coton Orchard and a City Wildlife Site, to the west and east of the M11 respectively which are bisected by the alignment for the preferred option 		<p>National Trust</p> <p>The proposed route would pass through National Trust covenanted land. We would strongly urge you to read and note the contents of the two National Trust letters attached to our first submission, 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 minimized and misrepresented time and time 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.</p> <p>CambridgePPF</p> <p>Cambridge Past, Present and Future purchased farmland near Coton village in 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.</p> <p>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 of trust between the community and the GCP officers resulting from the officers’ preference for an off-road route leading to bias on their part.</p>
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<p>G.8</p>	<p>Social Impact: Overall the scheme is assumed to benefit a range of social areas. Reduced accidents due to lower private vehicle use. Providing access to services, which are affordable is also assumed. Creating a more secure and easy to use bus service will attract a broader cohort of users.</p>	<p>Cost and accessibility are an issue for people on low incomes. High fares will reduce demand. The transport scheme needs to be financially sustainable and too many services with low patronage will drive costs up threatening service levels which in turn could reduce demand.</p>	<p><i>'C2C Outline Business Case, Economic Case GCP January 2020.</i></p>	<p>Pre Covid-19 the only point of congestion between Cambourne and the M11 junction was on Madingley Hill. Congestion in this area only occurred for around two hours during the morning peak on approximately 165 days per year. Given that the entire route is congestion free at all other times it is hard to imagine the scheme would encourage modal shift or be financially sustainable. The St Ives to Cambridge Busway is always quoted as being “a success” but as it is run by a private company they are not obliged to declare whether the route is financially viable or not. Even if it is, it does have the advantage of terminating at a major employment centre.</p>
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Table I: Commercial Case

	Assumptions	Constraints	Reference	CBAG Comments
	I. Commercial Case			
1.5	There are several options for the Busway maintenance which will be reviewed further at FBC.	The busway maintenance option decided upon will depend to an extent on the arrangement used for the Operation of the bus service, which is yet to be determined, as noted above.	<i>C2C Outline Business Case, Commercial Case GCP January 2020.</i>	The track record on busway construction and maintenance in Cambridge is poor. Maintenance issues on the St Ives busway have been very significant and are ongoing. BBC News 17 July 2020 New Civil Engineer 20 July 2020

Table J: Management Case

	Assumptions	Constraints	Reference	CBAG Comments
	J. Management Case			
J.1	The management case also identifies the key risks and mitigations for the project. The management case does not differentiate in terms of the options under consideration.	<p>The success and financial viability of the C2C project will be dependent on several factors. Scheme design and delivery will therefore need to consider the following dependencies outlined in the OBC:</p> <ul style="list-style-type: none"> • Delivery of housing and employment sites allocated within the South Cambridgeshire Local Plan • Emerging CPCA Policy specified in the Local Transport Plan. Also need to consider Cambridgeshire Transport Delivery Plan (TDP) for transport capital schemes on the local network to be delivered on a three-year time frame and the Transport Investment Plan (TIP) that includes the C2C scheme, developed alongside the TDP to identify schemes to support growth • Monitor how development of CAM progresses as the C2C project aims to deliver the first phase of infrastructure for the larger CAM network • City Access Strategy which aims to improve congestion on routes into the City Centre which will be key to reducing the journey times for buses and therefore making the Park & Ride attractive and successful • Oxford-Cambridge Arc. Both the Expressway and EW Railway will impact on the C2C route and whilst the scheme is not dependent directly upon these proposals, they may have a significant influence • Emerging Technologies. The final specification of C2C will be driven by technology advances and the range of solutions available at the procurement stage 	<i>C2C Outline Business Case, Management Case GCP January 2020.</i>	<p>Large elements of the management case are no longer relevant.</p> <p>The Oxford-Cambridge expressway has been scrapped.</p> <p>The EWRail route has changed and will now have a stop at Cambourne. https://eastwestrail.co.uk/</p> <p>Locations of the major sites of employment have shifted</p>

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J.2	The Management Case reviews the process of public consultation and engagement. A communication plan sets out how this process is managed, identifying key stakeholders and how engagement is managed including the facilitation of a project specific Local Liaison Forum.	Public and stakeholder consultation is essential to ensure that the various aspirations of the general public and key stakeholders are taken into account throughout development and delivery of the project and to manage the communication and flow of information relating to the project.	<i>C2C Outline Business Case, Management Case GCP January 2020.</i>	The views of the public and stakeholders across Cambridge have been treated with disdain by the GCP. Reports of consultations have been reported in board papers in a manipulative manner. The chair of the LLF, which represents the views of councillors and community groups from Cambourne to Grange Road, has had cause to make official complaints about being given minimum notice to call meetings and present findings. The views of the LLF have not been properly considered by the Joint Assembly. or Executive Board. This has contributed to the public losing confidence and trust in the GCP. We would urge you to read comments submitted to the 2017 consultation
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Table L: Covid-19 Impacts

	Assumptions	Constraints	Reference	CBAG Comments
	L. Covid-19 Impacts			
L.1	The implications of the global pandemic remain unknown. While there has been a short-term impact on the use of public transport, the longer- term impact is uncertain. The C2C scheme is consistent with the government’s agenda for innovative public transport solutions and mode switching from private car use in support of climate change goals and net-zero carbon by 2050. So, the prospects for the scheme are considered good in the long-term.	This matter will remain under review. Scheme appraisal will be revisited at Full Business Case stage with sensitivity tests of varying levels of demand and wider economic impacts.	<i>Transport use during the covid pandemic. Transport use by mode: Great Britain, since 1st March 2020. Department for Transport. https://www.gov.uk/government/statistics/transport-use-during-the-coronavirus-covid-19-pandemic</i>	Indeed, the effects of the pandemic remain unknown. However Information produced by The Cambridge Research Group - (December 2020 Executive Board Report page 135 of 232) suggests that working from home, flexible hours and fewer days spent at the work place will be the norm for the foreseeable future. This sentiment is also reiterated by Cambridge Ahead Despite this information the Officers have concluded “ <i>that the case for Cambourne to Cambridge scheme will be stronger as a result of Covid 19</i> ”- 1.13 page 57 of 232