

COTON PARISH COUNCIL

Chair: Mark Abbott

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Dear Mr Swann

Coton Parish Council welcomes the independent audit of the ***Cambourne to Cambridge Better Public Transport Project (C2C)***. It similarly welcomes the opportunity to comment on the auditor's Statement of Assumptions and Constraints, dated 25th March 2021, to enable such comments to be considered during the auditor's forthcoming analysis of the *validity and appropriateness of the constraints and assumptions*.

The C2C project has generated significant concerns and objections from a wide range of stakeholders, including the residents of Coton and other potentially affected communities. In order to ensure its' response to the auditor's Statement was both objective and technically robust, Coton Parish Council engaged the services of i-Transport LLP, a specialist professional transport planning consultancy with offices throughout the UK, to provide an independent response to the Statement of Assumptions and Constraints and their application during the scheme development process. Their report is an essential part of the Coton Parish Council submission and is provided as a stand-alone document.

This Coton Parish Council submission therefore comprises four documents as follows:

- **This covering letter** which includes a short summary of key issues identified in Coton Parish Council's review.
- **Part 1.** Coton Parish Council 'response to the auditor's Statement of Assumptions and Constraints, presented in the same tabular format as that used in the auditor's original Statement.
- **Part 2:** i-Transport's Report which (in Section 4) also responds to the auditors' statement of Assumptions and Constraints as listed in their original tabulated format. In addition the i-Tansport report also highlights potential shortfalls in elements of the C2C scheme development and the the audit process to date which do not readily fit into the auditor's tabular structure (Sections 5 – 7 of the i-Transport report); and

- **Annex A:** Coton Parish Council's first submission to the auditor made on 22 February 2021, which includes supporting information referenced in Parts 1 and 2 of our second submission.

Coton Parish Council and i-Transport have identified a range of weaknesses and omissions, both in the Statement of Assumptions and Constraints and in the C2C scheme development process, and hence also in the resulting Outline Business Case. In summary, these are in several key areas, notably:

1. Insufficient robust interrogation of the C2C scheme objectives against wider policy objectives.
2. Insufficient examination of policy, particularly in respect of scheme objectives, to determine whether the assumptions and constraints remain appropriate in the context of the current strategic frameworks.
3. The C2C option selection process for Phase 1 does not appear to have included appraisal of the following, which are significant omissions from the development of options in the C2C OBC:
 - a fully optimised single on-road option along the A1303
 - any consideration of bus lanes in both directions along the A1303
 - segregated provision alongside the A1303; or
 - sufficient appraisal of off-road options to the north of A1303.
4. The need for a more thorough investigation of how C2C can be both CAM compliant and complementary to East-West Rail (EWR), particularly considering patronage forecasts, interchange and co-working within a single travel corridor and / or alignment. These aspects are all likely to affect the C2C OBC and have not currently been considered either in the OBC or in the audit process to date.
5. Insufficient evidence to date to confirm that suitable alternatives (potential alignment via A428 and Girton Interchange and potential on-highway options along the A1303) have been assessed to the degree that one can conclude that they do not afford greater protection to the Green Belt which is fundamental in the context of the TWAO process that C2C will be considered against.
6. That the constraint should include providing a standard BCR of at least 1 to represent an acceptable level of Value for Money consistent with other GCP projects, particularly in light of the use of Government and public funds.
7. The need for greater consideration of public consultation responses, the majority of which are not supportive of many aspects of the C2C proposals. This is particularly important in light of Government and public funds being used for this scheme; and
8. The requirement for the constraints relating to development and evaluation of alternatives to be reconsidered on a more equitable and transparent basis.

The evidence we present shows the C2C scheme assumptions and constraints – and therefore the appraisal and OBC based on them – are not robust and do not withstand scrutiny. Such shortcomings will undoubtedly be exposed through the TWAO process. These limitations and risks should therefore be fully considered and reflected in the analysis of the *validity and appropriateness of the constraints and assumptions*, which we understand will be undertaken in the next stage of the audit.

Coton Parish Council considers that, based on the evidence presented in both Parts 1 and 2 of its submission, the auditor cannot be in a position to conclude that the assumptions and constraints are robust and hence *valid and appropriate*. We consider that the evidence we present strongly suggests it is more appropriate for the auditor to reach a conclusion that directs the GCP to:

1. revisit the option development stage and fully and robustly examine all reasonable and viable alternatives to the currently preferred option;
2. Consider the C2C scheme more explicitly in the context of both CAM and EWR.

Thank you for your consideration of our representation and we look forward to hearing from you in due course. In the interim we are available to answer any queries or points of clarification that you may have.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Abbott', with a stylized, cursive script.

Mark Abbott
Chair
Coton Parish Council