



## Coton Busway Action Group Response to the GCP EIA consultation

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### Introduction

Coton Busway action Group (CBAG) is a non-political organisation which represents the views of the vast majority of residents in Coton village who strongly believe that the village will be adversely affected by the GCP's preferred off-road route for the C2C busway. Residents have repeatedly attempted to make their views heard through consultations, at GCP, CPCA, SCDC meetings, the LLF and through the media.

CBAG was formed in 2015 and has closely followed the GCP's promotion of its preferred route. CBAG members support improvement in travel links from the West of Cambridge to commuter and leisure destinations around the city but believe that a viable on-road solution down Madingley Hill using existing infrastructure has never been openly and transparently explored. In responding to this EIA consultation CBAG is not endorsing the off-road route. We do not feel that the GCP's EIA is valid without a comparator with an optimised on-road solution.

We believe that this is a poor scheme, and that Grange Road is an inappropriate destination given that the two major commuter destinations are the Biomedical Campus and Science Park. These destinations are not served well from Grange Road without travel through the city centre. We also believe that in the context of a climate emergency the construction of a new concrete-based tarmac road with a poor benefit/cost ratio is completely unjustifiable. Our comments will be largely confined to section F in the consultation document.

### Greenbelt Concerns and the Viewscape of Madingley Hill

Coton is one of Cambridge's few unspoilt rural necklace villages in the greenbelt. The village contains many listed buildings and the Grade 1 listed Church, St Peters. It has a central conservation area. Important to the setting of the village are the surrounding CPPF owned and National Trust covenanted arable fields which form the northern border of the village. Some of this land surrounding the village was purchased by the founders of CPPF to prevent it being damaged by urban sprawl and to protect the views of Cambridge from Madingley Hill, which is one of the few high points in the Cambridge greenbelt.

Section 5A of the most recent LDA Cambridge Greenbelt Study report commissioned in 2002 by South Cambs District Council states:

*"From the west Cambridge is approached along the historic route, Madingley Road. The first view of the city is an elevated panoramic view just before the turn off to Coton. Development has occurred up to the M11 but the distance from the open countryside to distinctive Cambridge is still short emphasising the quality of Cambridge as a compact city".*

*"To the West of Cambridge is the Western Claylands landscape character area. This area is characterised by a combination of open arable fields and mature vegetation. This vegetation includes deciduous woodland on ridgetops and hedgerows along routes and field boundaries. The overall impression is of a mature peaceful rural landscape which enhances the topography of east-west ridges. There are some distant views of Cambridge from*

*highpoints, but the majority of these views are screened by vegetation in the summer months. An important approach into Cambridge from Bedford passes through the western Claylands. Adjacent to the road is the American cemetery, a memorable feature within the setting of the city. Just beyond the American cemetery is a key elevated view of Cambridge.”*

It is precisely this viewscape that the C2C busway will bisect that was eloquently described by the superintendent of the Cambridge American Military Cemetery to the GCP Executive Board in the summer of 2021.

*“The Madingley Hill landscape is a place of beauty that has been valued by many generations and is worthy of preservation. Its stunning viewshed extends north towards Ely Cathedral, east towards King’s College Chapel, south over Red Meadow Hill, and beyond; with the picturesque villages of Coton and Madingley nestled either side.*

*“In 1945, Major-General Lee of the US Army requested Madingley Hill to become the site of a permanent commemorative cemetery and memorial to honour fallen US service personnel of the Second World War specifically because of its natural beauty and unparalleled viewshed. The US Government asked for this specific terrain – no other terrain would do – because the viewshed was the key “selling point” then, as it is now.*

*“Today, the Cambridge American Military Cemetery is a world-renowned monument and a Grade 1 listed landscape by Historic England. Extending south, the unspoilt open countryside, located in the Green Belt, is extensively protected by National Trust covenants.*

*“We are concerned that GCP’s proposal to build a tarmac bus road across the south side of the hill would irreparably damage this unique and precious landscape, compromising the setting of the American Military Cemetery, severing historic community access routes, and paving the way for further urban encroachment in its vicinity.”*

The GCP executive dismissed his concerns.

In one of its concluding paragraphs the 2002 LDA report states:

*“There are a variety of landscapes within the Cambridge greenbelt. The diversity of landscapes within the setting of Cambridge is one of the city’s defining characteristics”.*

Just as we can see Cambridge city when standing on Madingley Hill, features of Madingley Hill can be seen from the city and its surroundings, and the busway will become an unattractive scar across the hillside. The GCP specifically mentions the view of Madingley Hill from Red Meadow Hill in the consultation document; however, the fields of Coton on Madingley Hill can be viewed from many areas on the approach to Cambridge. The GCP may have examined the sight lines from Red Meadow Hill and ascertained that the tarmac of the busway would not be visible. We understand that the width of the construction cut into the side of Madingley Hill for the entire length from Madingley Mulch to Cambridge Road will be a minimum of 19.5 metres, but possibly as wide as 30 metres to allow for a cutting or embankment slope. It is inconceivable that the escarpment created by the road will not be visible from miles around. The buses travelling along it will be clearly visible from many vantage points.

In the GCP C2C Outline Business Case Options Appraisal Report January 2020 greenbelt scored only one point higher for an on-road option than the off-road option even though the off-road option introduced a tarmac roadway across arable fields and the on-road route would use existing infrastructure. We were told that one of the reasons for this was because

the on-road route still passed through the greenbelt even though it used the existing A1303. We do not believe that this scheme reaches the 'exceptional circumstances' National Planning Policy Framework (NPPF) threshold for breaching the greenbelt. It has never been compared to an optimized on-road scheme.

## Coton Orchard

The village's 100-year-old orchard forms the eastern border to the village. The orchard would be bisected, and land obtained through compulsory purchase by the GCP for its preferred route. The orchard was planted in 1922 and contains hundreds of veteran fruit trees, including rare varieties of apples, pears, greengages, and cherries that are unique to Cambridgeshire. It offers wildlife a virtually undisturbed habitat. The destruction of this natural habitat would be an unmitigated disaster. CBAG endorses the submission by Coton Loves Pollinators to this EIA consultation which goes into considerable detail regarding environmental issues affecting Coton Orchard.

## Active Travel

The GCP is promoting better walking, cycling and horse riding along the service road for their proposed off-road busway through Coton. We are asking why the GCP is planning three parallel cycle routes all within a few hundred yards of each other (1 - the off-road busway, 2 - along Madingley Road, and 3 - the Greenway along Whitwell Way). For safety reasons, following two fatalities, new speed limits of 20 mph or 30 mph have just been imposed on the existing St. Ives busway in urban areas, to protect cyclists and pedestrians. These speed restrictions may well apply to the on-road sections through developed areas in Cambourne, the new Bourn airfield site, the proposed on-road route through Hardwick, in the West Cambridge site and on the route to final destinations within Cambridge after Grange Road. How will these new speed restrictions affect journey times? In our view these potential speed restrictions will make the proposed busway slower than some current on-road routes, for example, the Citi4.

## Section F, entitled 'North of Coton'

To head this section 'North of Coton' is a gross misrepresentation of fact. The C2C off-road route bisects the village of Coton. The village extends to the houses on the A1303 and includes the 100-year-old orchard. Coton is a village with a very cohesive sense of community and residents feel that their rural way of life could be fractured by this tarmac busway going through the village.



Map showing the boundary of Coton



GCP preferred route through Coton

## **Biodiversity net gain**

It is difficult to see how any landscaping or biodiversity measures can be taken to mitigate the potential damage caused by this route. The proposed measures appear cosmetic rather than to represent true biodiversity net gain.

The only way to mitigate the damage caused by the off-road route would be not to build it.

Any new trees planted to replace those removed will take years to mature. Although areas of new tree planting are shown on the indicative map in the consultation document, when the representative of the GCP came to present in the village recently he admitted that the GCP would be reliant on local farmers and landowners giving up land for woodland planting and that realistically any land planted for mitigation would be very dependent on how it added to the cost of the project. In view of the escalating costs of this project, we are not confident that the mitigation measures in the consultation brochure will materialise. Much of what is shown seems to be indicative.

In the options appraisal report of the C2C outline business case published in January 2020 biodiversity scored lower for an on-road route than an off-road route even though the off-road route introduces a tarmac roadway across arable fields. We do not recognize the methodology used in this assessment.

The GCP claims to have refined the C2C route through the north of Coton. It passes close by the back of Coton Primary School, continues down close to Coton Village Hall and the houses along the High Street, and crosses Cambridge Road within 40 metres of the nearest houses. CBAG considers this to represent unacceptable urbanization of a rural environment.

## **Environment**

### **Flooding**

The GCP environmental impact assessment states that, "Drainage will also be an important consideration", and proposes a drainage pond to be put in place slightly to the west of the section that is proposed to pass through agricultural fields north of Whitwell Way and Coton High Street (see map p. 28 and text p. 30 public consultation document).

This so-called "drainage strategy" does not consider the existing drainage systems that run through these fields, nor a past history of flooding. There are two open drainage ditches running down the rise from north to south. One lies to the west, running open past Gray's sporting goods site before continuing underground into a drain on Whitwell Way. The other runs further west, as an open ditch through the back gardens of properties on the High Street to the west of the village hall. It too then runs underground to join the main drain on the High Street. It has always been the responsibility of homeowners and the farmers in the relevant fields to ensure these ditches are kept clear. In the last decade there has been at least one flood across the gardens of these houses due to a ditch becoming blocked at a position further up the field.

The environmental assessment makes no mention at all of these existing drainage ditches, nor their past history of flooding. The proposed drainage pond is positioned too far west to be connected with them. It is of great concern that the environmental assessment does not even recognise, much less propose, measures to mitigate the specific risk of flooding to fields, gardens and houses along the north side of Whitwell Way and Coton High Street. This is one further piece of evidence of the many ways in which the scheme is poorly thought out.

## Cleaner Transport

Whilst the intention is to reduce emissions with this scheme, we are aware that initially the GCP may use diesel buses running on rubber tyres on this tarmac pathway. GCP representatives have stated to us at meetings that it is unlikely that car usage will reduce significantly through the introduction of this busway. Building a new tarmac busway through the fields of Madingley Hill will free up more space on the A1303 for cars. If modal shift is not significant, motor vehicle usage is likely to increase. We have concerns about the increase in particulates from vehicles using rubber tyres travelling at speed near the village and Coton Primary School.

### **Bus stop**

On page 30 of the GCP document there is a diagram showing a proposed bus stop to the west of Cambridge Road opposite Coton Orchard; however, on the drawing on page 28 the bus stop is clearly shown on the east side of Cambridge Road occupying space which is currently part of Coton Orchard. Quite why the consultation which is part of the EIA process has been used to introduce the possibility of siting a bus stop on Cambridge Road is puzzling. The bus stop would not serve the village well. The houses in some of the less affluent areas of Coton are approximately 1100 metres away from the proposed bus stop.

On his recent visit to the village, at public meetings, and on consultation webinars the GCP project lead for C2C has repeatedly said that residents in Coton have asked about having a stop in the village and that he believes a stop would be an asset to residents. During all the previous well-attended, standing-room-only, public meetings held in Coton Village Hall where GCP representatives have attended, only one individual out of hundreds has ever asked about having a bus stop in Coton. We are disappointed by the misrepresentation of this issue. At the more recent meeting regarding the EIA consultation only one other resident made the point that if the busway does eventually go through the village a stop might then be seen as compensation.

There were, however, many contrary views expressed regarding the potential damage to the village which may come to be seen as a convenient park-and-ride spot at the last stop to the west of the M11.

Would commuters travelling north on the M11 drive to a park-and-ride at Scotland farm when they could drive off the motorway straight into Coton and park?

It is therefore clear that the proposal for a bus stop on Cambridge Road is ill thought out, and likely to inflict enormous damage on the village as part of this badly designed scheme.

### **Conclusion**

In conclusion we do not think that there are any mitigation measures that would compensate for the destruction caused by ploughing a concrete track covered in tarmac through the arable fields of Madingley Hill close to homes, school and the undisturbed wildlife haven of Coton Orchard. We do not believe that the claims made regarding biodiversity net gain are robust. There has been no demand for a bus stop in Coton and it will have an unacceptable impact on the village.

*Coton Busway Action Group*

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