

# COTON PARISH COUNCIL

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Consultation Questionnaire. Cambourne to Cambridge Better Public Transport and Active Travel Project. Environmental Impact Assessment: Public Consultation. Response from Coton Parish Council.

Thank you for the above consultation. Thank you also for the efforts you have made to engage with local communities. This is a formal response on behalf of Coton Parish Council.

## **Introduction**

As you are aware from previous correspondence, Coton Parish Council supports the improvement of bus connections between Cambourne and Cambridge, and thus supports the “need” for a C2C project as set out in the GCP’s Outline Business Case (OBC), approved in January 2021.

However, as the OBC says (p.21):

“The off-road route lies mainly in Green Belt land. An assessment of the key planning policy considerations ... needs to be weighed against the impact in environmental terms, particularly accounting for the location of large parts of the proposed route being situated within the Cambridge Green Belt. The impacts on the Green Belt will continue to be assessed as the project proceeds.”

And, again in the OBC section on Impact on Environment and Heritage:

“Between Madingley and Coton there are parcels of land on either side of Madingley Road that are subject to covenants held by the National Trust to protect the landscape in the area but the landscape is not designated in any other manner. As the route crosses the open landscape from the Waterworks site at Madingley down to Coton it would have an impact on the pattern and tranquillity of this rural landscape. ... The setting of the Coton listed buildings and conservation

area is likely to be impacted by the introduction of the new infrastructure through the rural edge of the village.”

## **C2C Consultations 2014–2022**

As set out in the OBC (p.22 onwards), there have been several consultations on the proposed C2C route:

**2015 public consultation.** The majority of respondents agreed that better bus services are needed, and most preferred an on-road bus lane in-bound from Madingley Mulch roundabout into the city centre.

**July–August 2017 busway user research.** Speed, reliability of journey and frequency of service are key service elements which motivate people to use the service; this has assisted in informing the specification of the proposed scheme.

**December 2017 – January 2018 public consultation and focus groups (Phase 1 options).** 40% of respondents preferred Option B, an on-road tidal public transport lane. 18% of respondents preferred Option A, an on-road tidal eastbound public transport lane.

**2019 Workshops with local liaison forum “technical group”.** Publication of technical notes “explore ‘quick win’ options along Madingley Hill”. Viable projects avoid land take and significant environmental impact, and minimise input from, or impact on, third parties, restricting options to a short section of public transport lane, extension of cycling improvements and review of signal timings.

## **What is the most appropriate C2C Route between Madingley Mulch Roundabout and Cambridge?**

The GCP’s own data shows that:

- Congestion along the Cambourne to Cambridge route causes significant traffic delays only in the city-bound morning “rush hour” (7–9 am). Real-time bus journey data generated pre-Covid, by transport specialists Vix, indicated that there were no material traffic delays along the A1303/Madingley Road outside the morning peak in the in-bound direction, or at any time out-bound. GCP modelling conducted before the Covid pandemic indicated that that would still be the case beyond 2031, even with projected new home building. This has been confirmed repeatedly in GCP technical documentation.

The post-pandemic transformation of work patterns and the resulting changes in commuting patterns lend further support to the GCP’s pre-pandemic projections and to the case for in-bound interventions only. The Office for National Statistics study, *Is Hybrid Working here to stay?* (ONS 23/05/22) found that “most people who took up homeworking because of the coronavirus (COVID-19) pandemic plan to both work from home and in the workplace (‘hybrid work’) in the future, according to data from the Opinions and Lifestyle Survey (OPN).”

Workers were asked about their future plans in February 2022, after government guidance to work from home when possible was lifted in England and Scotland. More than 8 in 10 who had to work from home during the coronavirus pandemic said they planned to hybrid work. Since then, the proportion of workers hybrid working has risen from 13% in early February 2022 to 24% in May 2022.

This, of course, may only be the start of the flexible working revolution, as both employers and employees identify significant advantages in terms of cost, productivity and quality of life. Moreover, in a knowledge-based economy such that in Cambridge, hybrid practices are even more likely to become quickly and widely adopted.

Coton Parish Council also notes that Cambridge City Council has advertised its own hybrid working policy: “we have adopted a flexible office base arrangement where flexible working arrangements are encouraged and should be informed by business need”, and that South Cambs District Council voted on 13<sup>th</sup> June this year for a new hybrid work policy where flexibility is “accepted as the norm rather than the exception”. Leader of South Cambs District Council Bridget Smith said after the vote, “It is important that we do not just go back to our way of working pre-covid, because I think we have identified many advantages from a different way of working and certainly by working in a hybrid fashion.”

The GCP found that there was no case for an outbound bus lane before the pandemic, and Coton Parish Council believes that, in the light of changing working practices, there can certainly be no case for it post-pandemic.

- An in-bound bus lane for all or most of the section from Madingley Mulch roundabout to the West Cambridge campus turnings would deliver essentially the same Cambourne-to-Cambridge journey times as an off-road scheme between Madingley Mulch roundabout and Grange Road.

According to the GCP’s own documentation (e.g., C2C consultation brochure, November 2017) the journey time between Cambourne and Cambridge city centre would be 21.5–33.5 minutes for the proposed off-road scheme, as compared to 25–35 minutes for a generic (non-optimised on-road scheme). Pre-Covid Vix data and the recently conducted GCP assessment of on-road options (C2C Outline Business Case, Options Assessment Report Part 1, Section 8.9) clearly show that elimination of any delays on Madingley hill by means of a free-running in-bound bus lane would deliver journey times between Madingley Mulch Roundabout and Lady Margaret Road of less than 9 minutes, consistent with an overall Cambourne to Cambridge journey time comfortably in the 20–25 minute range.

For some routes, an on-road option would in fact be a few minutes faster than the proposed off-road scheme, most notably to and from the Cambridge Biomedical Campus via the M11 (avoiding three left turns within the West Cambridge site); to and from the Cambridge Science Park via Eddington (avoiding traversing the West Cambridge site); and returning from the City Centre (avoiding the elongated return route via Lensfield Road).

- An in-bound bus lane on the A1303 would fit within the current highway boundary for the entire stretch from Madingley Mulch roundabout to the West Cambridge site. Other arterial routes into Cambridge – Huntingdon Road, Trumpington Road and Milton Road, for example – have a bus lane alongside two lanes of general traffic and a cycle lane within a road width as little as 12 metres, which is as narrow as the A1303 gets.

The detailed analysis of on-road options in Section 8 of the C2C Outline Business Case Options Assessment Report confirms that construction would be feasible.

- An in-bound bus lane along the A1303 could be implemented at minimal cost compared with the estimated £150–200 million cost of an off-road scheme.

Coton Parish Council therefore concludes that, given the GCP’s recognition of the environmental damage an off-road bus lane would cause, and the lack of business case benefits behind the off-road option, there is no rationale for preferring an off-road busway over an on-road solution between Madingley Mulch and Cambridge. The preferred route will result in the destruction of many acres of greenbelt, including priority bio-diversity habitats, a 100-year-old orchard and cherished viewsapes protected by National Trust covenants.

Given the lack of requirement for an outbound intervention, the duplication of active travel routes and the acknowledged ability of an in-bound on-road bus lane to provide at least equivalent transport

benefits, Coton Parish Council believes that the proposed scheme does not meet the “exceptional circumstances” criteria for breaching the greenbelt as required by the National Planning Policy Framework (NPPF).

### **Specific Questions in the Environmental Impact Assessment**

#### *Active Travel*

The GCP proposals for the C2C busway contain provision for a cycle lane, or “active travel route”. This is additional to their proposals for a “greenway” or cycle route, from Cambridge, running through Coton and along the Wimpole Way, to Hardwick and Comberton. It is also additional to the GCP’s planned investment in the existing cycle lane along Madingley Road. In short, within a 500m north–south corridor between Cambridge and Hardwick, the Cambridge authorities are planning to spend money on three separate cycle lanes.

GCP officials are proud of this approach, claiming in meetings that it will make Cambridge “more like Belgium”, or other European countries with good cycle provision, and that the off-road cycle path would be the most “direct route into town”. However, whilst measures to encourage commuters out of cars and onto bicycles are to be welcomed, Coton Parish Council believes that building three separate cycle tracks within a 500m corridor is an extravagant duplication of infrastructure, an unnecessary greenbelt incursion and a waste of taxpayers’ money. Moreover, the active travel route goes over a significant hill (with a height gain of 40 metres), will be adjacent to vehicles (either buses or highway traffic) and will be distant from some residents in Bourn Airfield and Cambourne. It is therefore not an ideal route to encourage commuters out of cars and onto bicycles and is arguably not the “inclusive” option.

The council strongly recommends that the off-road busway, and its cycle route, are not taken forward.

#### *Construction*

Coton Parish Council does not agree that CPPF land at the northern edge of the village is a suitable site for a local area compound. It is a prominent location with poor access.

#### *Bus Stop*

Coton Parish Council would like the bus services, which should in any case be delivered along the Madingley Road, to stop at the American Cemetery and at the existing bus stop at the Coton turn.

The planned bus stop at the junction with Cambridge Road is at least a kilometre from the majority of social housing in the village and would not serve Coton well.

Coton Parish Council believes that there is a strong likelihood that commuters using the bus stop would use the village as a park-and-ride site, which would lead to parking congestion. It would also potentially materially compromise the Comberton Greenway since much of the commuter parking would most likely take place on the Greenway route (Coton High Street and The Footpath).

Coton Parish Council is concerned that the bus stop and crossing point at the Cambridge Road is “an area where wayfinding features, lighting, seating points and cycle parking may be proposed”. This would represent undesirable urbanisation on the edge of the village and a further incursion on the greenbelt.

#### *Impact on the village, conservation zone, views, sight lines and bio-diversity loss*

There has been a settlement at Coton for over 1000 years. The village is surrounded by fields and trees, has the 11<sup>th</sup>-century, Grade I listed St Peter’s Church at its heart, and a further 13 listed buildings, most of which sit within the historic centre of the village and the designated conservation zone. There

are also two moated sites and the remains of ancient ridge-and-furrow field patterns, which are designated Historical Monuments (*An Inventory of the Historical Monuments in the County of Cambridgeshire, Volume 1*, West Cambridgeshire. HMSO London 1968). Coton Parish Council believes that the route of the proposed Busway through the fields immediately to the north of the village centre and then directly through the village as it crosses Cambridge Road and goes through Coton Orchard would irreparably damage the village setting and compromise its rural integrity.

The fields to the north of the village centre leading up to Madingley Road and Madingley Rise are protected by National Trust covenants because of their importance to the setting of Cambridge. The significance of these fields and the views of Cambridge from the hill are highlighted in the most recent LDA Cambridge Greenbelt Study, commissioned by South Cambs District Council in 2002.

The views from the village, and in particular from Whitwell Way across the fields and up towards Madingley Rise, are fundamental to Coton's rural setting. The proposed engineer-led 'straight line' approach to the busway route through these fields is particularly brutal and indicative of a lack of appreciation and respect for the landscape value of this area.



The Grade I listed Cambridge American Military Cemetery at the top of Madingley Hill is the only military cemetery in the United Kingdom that commemorates American service men and women and civilian volunteers who died in World War II. More than 3,800 are buried there, and the Walls of the Missing list over 5,000 names in the sacred memory of those who were lost missing in action. Dedicated in 1956 on land donated by the University, the site was chosen because of its situation at the top of Madingley Hill and the views afforded across surrounding countryside. This was articulated by Matthew Brown, Superintendent of the Cemetery, in representations made to the GCP Executive Board in 2021. Mr Brown stated that the site was chosen, "Specifically for 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". He went on to say, "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 EIA consultation document does not address these concerns.

At the east of the village lie the community allotments and The Coton Orchard, which was first planted in 1922 and celebrates its centenary this year. The orchard contains venerable specimens of rare local

fruit tree varieties, including apple, pear, greengage and cherry. Both Coton Orchard and the allotments are protected by National Trust Covenants. Coton Parish Council believes that the consultation fails to describe adequately the impact of the proposed scheme on this traditional orchard and its significant bio-diverse habitat. In this, it could be deemed to be misleading. Under the Natural Environment and Communities Act 2006, traditional Orchards are classified as Priority Habitats. Based on a proposed scheme width of between 20–30 metres, the destruction of priority habitat in the orchard will amount to between 3–4.5 acres. Furthermore, the most recent bat survey conducted in 2019 identified the eastern part of the orchard as being “notable for bat activity” and identified several rare species, including the extremely rare Barbastelle bat, which are national conservation priorities.

Coton Parish Council believes that the current proposed mitigation and offsetting improvement measures do not robustly evidence Bio-diversity Net Gain (BNG) as required. The EIA document does not properly account for habitat loss – not least because the Orchard surveys are incomplete. The offsetting schemes do not appear to provide real ecological benefits. In particular, the proposed small and isolated grassland habitats are (as highlighted by Cambridge Past Present and Future on other schemes and in their response to this consultation) of dubious long-term ecological benefit. Coton Parish Council is also concerned that the planned offsets are subject to landowner consent, which, as GCP officers have confirmed is considered unlikely in a number of areas. Coton Parish Council therefore believes that there is considerable uncertainty as to whether a BNG is achievable along the section of the route that runs from Madingley Mulch to Ada Lovelace Road, and this is not properly acknowledged in the consultation document. Again, this could be deemed to be misleading.

Red Meadow hill to the south of Coton is the highest point locally and provides important views to both Cambridge and Madingley Hill. Coton Parish Council is concerned that the new road would be visible from Red Meadow Hill. The consultation documents state that this would not be the case but there is no evidence to support this. Coton Parish Council requests that the GCP provide evidential sightlines to support this statement.

#### *“North of Coton”*

Coton Parish Council rejects this terminology. The proposed off-road bus lane would not go “north” of Coton village, but through arable fields at the back of the houses on the High Street, through Coton Orchard, and through a largely undisturbed rich wildlife habitat beyond the Orchard and within the village boundaries. It also cuts across the fields around the village, which have been protected for 100 years and have National Trust covenants on them. Coton Parish Council believes that the bus route should be delivered using Madingley Road.

#### *M11 Bridge*

Coton Parish Council believes that a new M11 bridge to carry an off-road busway is unnecessary and should not be built, given that the bus services between Cambourne and Cambridge could be delivered no less effectively along Madingley Road. The “Rectory Farm Bridge Options Report”, produced by Atkins for GCP in June 2016, provided multiple options, including a dedicated in-bound bus lane on the existing M11 overbridge, alongside two lanes of general traffic and a lane for non-motorised users – all at minimal cost compared to that of an entirely new bridge.

#### *“Quick wins”*

The GCP Executive Board has repeatedly been urged by stakeholders to consider “quick wins” on the A1303 that could improve C2C bus journeys prior to or in the absence of implementing an off-road busway. At the Executive Board briefing meeting in December 2018, the Board agreed to explore such “quick wins”. In response, in May 2019, Mott MacDonald produced a technical note titled “Madingley Road ‘Quick-Win’ Options Outline”. This provided some suggestions, but with an extremely restrictive

set of criteria, including no land take, no significant vegetation loss and no impact on or input from any third parties. Considering the impact of the off-road option on land take, vegetation and third parties, Coton Parish Council argues that it was unreasonable to have placed such extreme restrictions on alternative on-road approaches.

In 2021, the independent audit of the C2C project noted: “the range of measures that would improve conditions along Madingley Road for bus users as well as general traffic are worth re- considering given the recent changes in the government’s transport strategy and policy towards buses accompanied with additional funding. It is possible that the GCP shied away from considering any substantial improvements along the A1303 because of the cost implications and fearing that it would divert resources away from the preferred option. The two options are not mutually exclusive and could be considered compatible.”

Coton Parish Council notes that the auditor’s recommendation has still not been followed through by the GCP and that consideration has still not been adequately given to less destructive, less costly on-road opportunities. At parish consultations in 2022, GCP officials defended the lack of activity by claiming, falsely, that previous “quick win” explorations were only to consider cycle routes, rather than bus routes. Coton Parish Council would note that the GCP has therefore not undertaken the necessary due diligence on on-road alternatives to its preferred off-road busway scheme.

### **Other responses**

Coton Parish Council supports the responses to this consultation made by Coton Loves Pollinators, Cambridge Past Present and Future and the Coton Busway Action Group.

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Coton Parish Council