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Trust**

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BY EMAIL to Peter.Blake@cambridgeshire.gov.uk

Peter Blake
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Dear Peter,

Cambourne to Cambridge Park and Ride Project - Public Consultation

I write with reference to the proposed Cambourne to Cambridge Better Public Transport project, Phase 2 of which is currently out to public consultation. The National Trust welcomes the opportunity to comment on the Greater Cambridgeshire Partnership's proposals for Phase 2, and also wishes to follow-up earlier comments submitted on 18 January 2018 in response to the Phase 1 of the Scheme.

In our Phase 1 response, we drew your attention to the National Trust's 1958 Deed of Covenant with the Cambridge Preservation Society (now Cambridge Past Present and Future) which covers several parcels of land to the south of the A1303 and north of Coton, and which was put in place to maintain the open aspect of the western approach to Cambridge. As previously advised, the Covenant includes the following stipulations:

"No act or thing shall be done or placed or permitted to remain upon the said land which in the opinion of the Trust shall materially alter the natural appearance or condition of the said land or which in the opinion of the Trust shall be prejudicial to the amenities of the said land or of the neighbourhood or to the Trust" ... and "No new building or other erection shall without the previous written consent of the Trust at any time be erected or allowed to remain upon any part of the said land".

The attached plan identifies the extent of the Trust's covenants, much of which would be bisected by the preferred off-road route of the proposed busway.

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The National Trust's covenants at Coton were established in 1958 in order to give greater protection to this area of countryside lying to the south of the A1303 from urban development. The covenanted land extends for a distance of approximately 1km from Madingley Road, the western approach to the city, through Coton Orchard to the M11 and West Cambridge, and includes Madingley (Whitwell) Hill, which at 62 metres AOD is the highest point west of Cambridge.

The founders of the Cambridge Preservation Society, now Cambridge Present and Future (CPPF) purchased land in this area to protect the rural character of the area and associated views of the city from the western approaches to Cambridge at a time when the area was at risk from proposals for a ring road to the south of the city. The land was subsequently included within the Cambridgeshire Green Belt, and for the past 50 years Green Belt policy has effectively prevented the encroachment of Cambridge into Coton and the surrounding countryside.

The National Trust's Current Position

The National Trust objects to the Phase 1 proposal for an off-road busway between Madingley Mulch and Cambridge city centre because of its impact on a valued landscape which has intrinsic visual, historic and cultural significance, and which is fundamental to preserving the setting and special character of the historic city of Cambridge in accordance with its Green Belt purpose. However, the Trust does not oppose the scheme in principle, which is supported by national and local planning policy. The Trust understands the need for new high quality public transport infrastructure that improves journey times and reduces congestion, and is generally supportive of the aims of the project.

We outline our grounds for objection below.

Outline Grounds for Objection

The Trust considers that the proposed busway would create a linear engineered feature across this landscape which would have an urbanising effect on the western approach to the city, and the Cambridgeshire Green Belt.

The Trust is also concerned about the phased approach to scheme development and consultation, and the approach to option appraisal. In our view, the phased approach to consultation is unhelpful in that the scheme can only proceed if both phases are implemented. In addition, important information on option appraisal has only emerged subsequent to the close of the Phase 1 consultation and it is unclear how early options were assessed. The Trust considers that the disjointed approach to option assessment, coupled to the lack of detailed operation information, is problematic.

We understand that the GCP intends to bring the Phases together for approval as a single scheme in October 2019. We are therefore taking this opportunity to comment on the scheme as a whole, including our grounds for objection to Phase1, as this provides important context for our Phase 2 response.

By way of background to the comments which follow, a brief overview of the planning policy context to land at Coton is provided below.

Planning Policy Context

The Corporation of Cambridge recognised the special qualities of agricultural land to the West of Cambridge before the existence of the Green Belt, and in 1932 it entered into covenants on land owned by the Cambridge Preservation Society at Coton. The intention was to ‘guard the famous views to and from the city and to safeguard the special features of the neighbouring countryside and villages’. In effect therefore, these early covenants served as Cambridge’s first Green Belt.

Shortly afterwards, the term Green Belt was used to describe open land around the City which was protected by planning policy, and in 1962 Government set out detailed advice on the purpose and permanence of Green Belts. The general presumption against development was subsequently reinforced in Circular 14/84 and PPG2, Green Belts, published in 1998.

During this period, the 1980 Cambridgeshire County Structure established the broad extent of the Green Belt around Cambridge and the 1992 Green Belt Local Plan, prepared by the County Council in close collaboration with the district councils, defined precise boundaries. The main aim of the plan was ‘to preserve the special character of Cambridge and to maintain the quality of its historic setting’.

This purpose is closely aligned to current Government policy for the Green Belt as set out at Section 13 paragraph 134, which lists five specific purposes, the fourth being ‘*to preserve the setting and special character of historic towns*’.

Option appraisal

Our understanding is that following an initial consultation in 2015, the Partnership took the decision in principle to promote the preferred off-road option in 2016. The Phase 1 Option Consultation followed in November 2017 and in December 2018, following further technical work and scheme review, the GCP Exec Board agreed to proceed with Option C, an off-road busway running between Madingley Mulch roundabout and Grange Road, Cambridge. At that time, the ‘Blue Route’ was identified as the ‘Recommended Specific Route Alignment’.

A number of Studies and Technical documents have emerged whilst the scheme has been in development, the earliest of which dates back to 2014. These include two Option Appraisals Reports (OAR Part 1 and OAR Part 2), prepared by consultants Mott MacDonald in February and December 2018 respectively, which provide evidence of the assessments undertaken to date. However, both reports were only published after the close of the Phase 1 consultation.

Environmental Impacts

The consideration of landscape, visual and amenity impacts is a particular concern.

In relation to Phase 1, the OAR Part 1 section 8.7.5.1 comments on the visual impact of the Blue Route on the Madingley Hill area (referred to as Area 2: Madingly Mulch) as follows:

'For area 2 the blue route crosses open fields for the majority of the route. Therefore, the public transport vehicle would be visible from distance but the infrastructure has a low likelihood of being seen. Hedgerow planting would introduce a feature not out of place with the existing views, so would be a minor impact on landscape character.'

We also consider that potential impacts on the Green Belt have not been fully addressed.

the Part 1 OAR asserts that the Blue Route would have 'no adverse impact on openness' in the Madingley Mulch/ Madingley Hill area (para 8.7.11.1), whilst the Part 2 report describes the impact of both Park and Ride sites as 'minor adverse' with appropriate mitigation.

Similarly, the December 2018 Board report includes an assessment at Para 9.5 which states that the Blue Route 'can be better incorporated within the existing landscape because it follows a lower, less prominent route'. We question whether the published studies provide robust evidence in support of these statements, which in our view overlook both the sensitivity of the landscape and the likely effects on the openness of the Green Belt.

We would draw your attention to the 2002 Green Belt Study prepared by Landscape Design Associates on behalf of South Cambridgeshire District Council, which includes the following analysis of landscape setting of Cambridge at Section 6.2.14:

It is important that the landscape surrounding Cambridge retains this rural character. The rural nature of the landscape around Cambridge is a defining quality of the setting and special character of the city, particularly in providing a setting to the urban form when seen from key views (section 6.2.3), in providing settings to necklace villages, and in contributing to people's perception of the city as they approach it along communication routes.

The rural setting of Cambridge is of great significance within the immediate vicinity of the city. It is here that the rural landscape should be most strongly preserved, or opportunities taken to restore or enhance the rural character and the soft green edge to the city.

The sensitivity of this area of landscape to change is reinforced at Section 6.3.2 in relation to the Vision for Cambridge, and at Section 6.3.3, which provides guidelines for areas of the Green Belt. Specifically, the Vision highlights 'the significant number of short and /or distinctive approaches to Cambridge is a particular feature of its special character, and all these key routes need to be protected', and refers the quality of views from key viewpoints. The guidelines identifies Areas 4 (Grantchester) and 5 (West of City) as areas which possess the greatest concentration of qualities essential to the fourth purpose of Green Belts, namely to preserve the setting and historic character of towns.

In our view these comments remain valid and are consistent with independent advice provided to the Trust as at April 2019. Furthermore, the agricultural viability of land bisected by the busway could be compromised, increasing the risk of further incremental change.

We would also draw your attention to the status of Coton Orchard as a Traditional Orchard and biodiversity Priority Habitat. We consider that the loss of priority habitat at Coton Orchard would be detrimental to the natural appearance and condition of the land.

In terms of impact beyond our covenanted land that might be considered prejudicial to the neighbourhood of the said land, we consider that insufficient information is currently available to fully assess the likely extent of harm to the historic character of Coton Village, part of which lies within a designated Conservation Area. However, the proposed route crosses falling ground to east of Chrome Lea, passing close to Coton village where it crosses Cambridge Road. Elevated views of the village are available from a public right of way which links the High Street to Madingly Road and in our view the scheme is likely to result in harm to the setting of St Peters Church, a Grade 1 Listed Building. It is also likely that archaeological assets will be present and impacted by the scheme.

In addition, we consider that insufficient consideration has been given to the direct impact of severance on access and permeability, and to the indirect effects, such as impact on the future viability of agricultural holdings. In particular, where the busway crosses Cambridge Road, which is one of principal gateways to the village, and at other crossing points, the intrusion of the busway is likely to be detrimental to the appearance of Coton village. The combined effect of such impacts could result in further urbanising changes over time.

Phase 2 Madingley Mulch roundabout to Cambourne: Route Option and Park & Ride

As previously stated, the Trust is concerned about the relationship between Phases 1 and 2 of the Project which would mean that approval for Phase 2 would be predicated on approval for Phase 1 of the scheme. The Trust's objection to Phase 1 is based on the harmful impact of the scheme on covenanted land, and our objection relates in principle to both phases.

In terms of direct impact on covenanted land arising from Phase 2, the proposed P&R at the Waterworks site would impinge on the area referred to as Comberton Plantation. This forms a linear tree belt which runs alongside St Neots Road from the Madingley Mulch roundabout to Long Road and then continues for some distance along the east side of Long Road. The plantation is shown on the attached plan and is subject to the same stipulations and restrictions as other covenanted land at Coton.

We are concerned that the construction of the Park and Ride site in this location would, as a minimum, require the removal of part of the plantation to create access to the Park and Ride site to the south of St Neots Road. In addition, the creation of extensive areas of parking and associated infrastructure, including signage and lighting, would have a significant impact on the appearance of the covenanted land and its immediate neighbourhood. The proposed development would fundamentally change the character of St Neots Road, and would in effect urbanise one of few remaining approaches to the city which currently retains its historic rural character.

In addition, the Trust is concerned about the landscape and visual impact of the proposed busway on important views to and from Madingley Hill. This includes views from public rights of way to the south of the Waterworks site, notably from Whitwell Way, a historic route

which is now part of Wimpole Way, which runs west from Coton to Long Road and from which there are uninterrupted views across open countryside looking north towards the proposed Park and Ride site. The presence of lighting columns and the requirement for lighting generally in this elevated and visually sensitive location is a particular concern.

Approach to Mitigation

Insufficient information is currently available to fully assess the extent and severity of likely landscape and visual impacts of the proposed busway and Park and Ride on the covenanted land and its environs. However, should Orders for the scheme be approved we would expect to see a comprehensive package of mitigation and enhancement measures to address not only visual impacts but also impacts on amenity, priority habitat, economic viability, access and severance.

The proposed approach to mitigation as set out in the Green Lane Concept Report (August 2017) proposes planting to screen the busway but would not fully address the Trust's concerns. We note the reference at para 8.7.5.1 of the OAR Part 1 to '*historic mapping from 1888-1983 shows hedgerows dividing the large field north of Coton*', however the 'green lane' concept appears to have emerged without a full understanding of the existing landscape character. Whilst planting could soften the appearance of the corridor from key viewpoints, the Trust is concerned that the proposed approach to mitigation will require significant additional land take and could result in further inappropriate change, and could possibly interrupt significant views. We would expect the detailed scheme design to be informed by a baseline assessment of landscape character and key sensitivities.

Conclusion

In summary, the National Trust objects to both Phases 1 and 2 of the proposed Cambourne to Cambridge busway and Park and Ride. In our view the scheme would fundamentally erode the unique character of the area which has been protected from inappropriate development since 1932. Given the scale of likely change, the impact of the proposed scheme on this elevated landscape, and on the corridor as a whole, would be severe.

The Trust welcomes the intention to incorporate mitigation measures into the detailed scheme design, and understands that no firm commitment to specific mitigation measures exists as yet. The Trust intends to explore mitigation options and opportunities with your officers at an appropriate future date, however I should stress that any dialogue we enter into would be wholly without prejudice to our current objection.

We trust these comments will be given careful consideration.

Yours sincerely,

Mary Marston

Mary Marston
Planning Adviser (East of England Region)