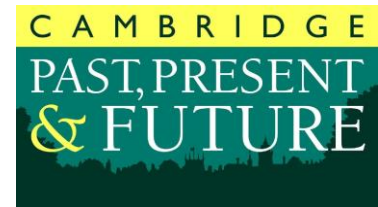


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Cambridge Past, Present & Future
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09/12/2020

Dear Jane

Response to consultation on Cambridge South East Transport Scheme (CSET)

Cambridge Past, Present & Future is Cambridge's largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Manage green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel, Bourn Windmill and Hinxton Watermill.

Cambridge Past, Present & Future has considered the consultation material and has the following comments to make:

1. GCP Transport Strategy - Busways

We understand the justifications for the CSET and other busway projects are that:

- Demand to travel into Cambridge will continue to grow as more houses and jobs come to the region.
- Roads into Cambridge will, for the foreseeable future, continue to be congested with private, mostly solo-occupancy, cars at peak times.
- Building new bus-only roads into the city, and bus lanes within the city, are the only measures available to the GCP to give buses a time advantage relative to private cars stuck in congestion.

However we challenge those justifications because:

1. Demand management measures, which are part of GCP's City Access programme, are an alternative way to shift incentives in favour of public and active transport. With only a small reduction in the number of peak-time trips by private vehicles into Cambridge, there would be little congestion. In that case, existing roads would have sufficient capacity to carry all public, private and commercial vehicles.

The covid pandemic has demonstrated that when car use is reduced there is a fast and reliable bus service.

2. Since the Bus Services Act 2018 was passed, the Combined Authority can exercise much greater control over bus services than the County Council could when the Transport Strategy for Cambridge and South Cambridgeshire was adopted.
3. Our limited ability to decarbonise transport, along with the ecological and public health costs of private transport, creates an imperative on GCP and transport authorities to implement measures urgently to *reduce vehicle-miles*.

We therefore believe that GCP should prioritise implementation of demand-management measures in Cambridge instead of building the CSET busway and car park:

- Develop and implement demand-management measures in Cambridge.
- Build a comprehensive, coherent and safe walking and cycling network.
- Work with transport authorities and operators to expand the quality, coverage and integration of public transport *services* in the region.
- Build appropriate infrastructure, such as travel hubs, to give people everywhere in Greater Cambridge convenient and safe access to public transport services.
- Intervene tactically in the road network to prioritise buses.

2. CSETS scheme

- **We do not support this busway** due to the likely impact that it will have on the landscape of the Gog Magog Hills – both the direct impact (a significant new road) and the indirect impact (parcels of land severed by the busway adjacent to villages coming forward for future development). Evidence of the pressure for the latter is now available via the Local Plan call for sites.
- The Gog Magog Hills landscape is a key priority for the greater Cambridge area for biodiversity, heritage and public benefit. As a charity we are working to try and reconnect habitats for people and nature in this landscape.
- We are concerned that this busway scheme will be expensive, damaging to the environment and it will also under-deliver unless it is accompanied by traffic demand management and/or tunnelling for public transport (and at the moment there is no immediate prospect of these).
- We note that you have dismissed the idea of using the former Haverhill Line through Great Shelford and Stapleford but we do not agree with this assessment. I-transport have been commissioned by the Parish Councils of Stapleford and Great Shelford to review the work carried out by the GCP in relation to this option. This report was presented in November and concludes that:

this independent technical review confirms that the alternative Shelford Railway Alignment is a technically feasible alternative to the preferred route option. It shows that the Mott MacDonald Report 2020:

- Substantially overestimates the extent of Demolition required;
- Omits to identify that there is a feasible route which achieves full Segregation; and
- Over-states concerns in respect of Deliverability.

Therefore, the alternative Shelford Railway Alignment is likely to be a viable alternative to the GCP's preferred Brown route.

This option has not been consulted on by the GCP even though it would score more highly than other options that have been consulted on. **We would encourage you to do all that you can to take forward the alternative Shelford Railway Alignment rather than the one proposed in the consultation.**

- A giant Park & Ride will encourage more solo occupancy car journeys to the fringes of Cambridge and new bus services will compete with those currently serving the communities along the A1307 and A1301. Which is likely to further reduce bus services and increase car use.

3. Scoping for Environmental Impact Assessment

We are aware that whilst this consultation has been underway the GCP has applied to the Department for Transport for scoping for the EIA and we have submitted our views to the DfT and to the local planning authority. We wish to highlight the following to you and encourage you to include these in the EIA:

- **Cumulative Impact**

The EIA scoping does not include proposals for Cambridge South Station. Whilst that scheme is not yet approved it is roughly at the same stage of development as the CSETS scheme and is in the same location and would need to be constructed ahead of the CSETS scheme. There will clearly be a significant cumulative impact caused by two major transport infrastructure projects taking place in the same location. We believe that the ES should consider the cumulative impacts associated with Cambridge South Station.

- **Air Quality - Construction Dust**

The CSETS scheme will be constructed close to Magog Downs. This is a chalk grassland restoration site which is relatively new and therefore it is not currently designated, but it would meet the criteria for Local Wildlife Site status. It is further than 200m from the CSETS route but it is downwind (from prevailing wind direction) from the CSETS scheme. Magog Downs would be susceptible to (ie damaged by) nitrogen deposition from construction dust. The ES should consider the impacts of construction dust on Magog Downs.

- **Biodiversity**

Non-Statutory Sites for Nature Conservation

Magog Downs is a chalk grassland restoration site which is relatively new and therefore it is not currently designated, but it would meet the criteria for Local Wildlife Site status. It is located within sight of the CSETS scheme and therefore should be included in the list of Non-Statutory Sites for Nature Conservation. We would also advise that Stapleford Chalk Pit also be included.

Scoped-In

There is not a direct reference for the potential of the scheme to impact on the River Granta CWS from vehicle pollution due to run-off or the impacts that could be caused by the scheme increasing or decreasing water flows.

- **Landscape**

Photo-montage

The most significant impacts of this scheme on the landscape and views will be:

- between Nine Wells and north-east of Stapleford
- crossing the River Granta
- in the vicinity of Babraham
- users of the NMU adjacent to the busway

The ES should prioritise photo montages which will show the impact in these key locations. As well as the locations shown we believe that photo montages should be included for:

- Hinton Way, looking both north and south
- Nine wells looking towards Hinton Way
- From the public right of way between Stapleford and Babraham, where the busway crossed the PROW.

We would welcome discussion with the GCP about the exact location of photomontages.

Local Landscape Character Assessment

A local landscape character assessment for South Cambridgeshire is being carried out by Chris Blandford Associates for the Greater Cambridge Local Plan. This work should be completed by early 2021 and available to the GCP to use. This should be included in the landscape character assessment for the CSETS scheme.

Visual Receptors

There is a significant omission from the scoping report. Visual receptors will also be people using local roads. In the study area this includes cyclists, walkers and horse-riders as well as people using vehicles. There will be clear/unfiltered views from:

- Granham's Road
- Hinton Way
- Haverhill Road

- Sawston Road
- Babraham High Street

These must also be included in the ES.

In addition, those people who use the new NMU once it is constructed will also be confronted with a significant piece of transport infrastructure cutting through the landscape (they will be users of it). At present such views are not being considered because the land is private but after construction these views will exist and it is important to understand what it will look like and how the impacts will be mitigated.

- **Land Use & Land Take/Green Belt**

One of the biggest likely impacts of this scheme on the environment is that it will create a demand for new development on the edges of existing villages. The Greater Cambridge Local Plan process is underway and already a significant area of land adjacent to CSETS has been put forward for future development in anticipation of this scheme (this land is in the green belt). The ES methodology must take into account the indirect impact that the CSETS Scheme will have on future development in the vicinity of the scheme. The GCP can use the evidence base for the Greater Cambridge Local Plan to assess this, as well as considering issues such as the extent to which land parcels will be created that are likely to facilitate future development and/or removal from the Green Belt.

4. Responses to consultation material

Notwithstanding **our objections to the scheme**, below we have provided our views on the consultation material:

[Question 7. When gaining access to Nine Wells local nature reserve, if there was only one access route in the future, which would you prefer?](#)

The track alongside Hobson's Brook Conduit to be retained.

If an additional path was provided from the north then a circular walk would be created from the Biomedical Campus. Whilst this might prove popular/desirable with workers on the site it would add to the visitor pressure that this small nature reserve is already suffering – and as a consequence there would be a negative environmental impact.

[Question 9. Having seen the proposals for the landscaping shown in the fly-through of the scheme and the description for proposals for the Nine Wells area, how far do you support the landscape planting proposals?](#)

We object to the scheme because of the negative impact that it will have on the landscape, as well illustrated in the fly-through.

Nine Wells area = Strongly support. It is unclear in the consultation material if the meadow planting will be extended to Granham's Road or if this just a future possibility for the landowner. We would press the GCP to include this as part of the environmental mitigation for this scheme. We have previously discussed with you the need to ensure that land parcels are of sufficient size that they can be managed in economical ways and that funding is provided for this management. The area of meadow proposed around Nine Wells and to Granham's Road would be welcome but it is unlikely that this would be suitable for grazing and would require annually cutting and bailing – which is unlikely to be economical and would therefore need to be subsidised in perpetuity through this scheme.

Granham's Road to Hinton Way = unsure. This stretch of route provides an opportunity to improve ecology by planting woodland (or natural regeneration from scrub) and linking the woodland blocks which are located to the north of Granham's Road and north of Hinton Way. We are unclear why you have proposed grassland on the section nearest to Granham's Road? The route passes through an arable field and is therefore unlikely to contain meadow species. The alignment of the route between Nine Wells and Hinton Way will have a very significant negative impact on the landscape and we would imagine that tree planting would be more likely to help ameliorate that impact than grassland. In addition, managing a small area of grassland is likely to be difficult.

River Granta = We support the creation of habitat in this location due to ecological connectivity provided by the River Granta. The two meadows combined represent a reasonable sized parcel but are split by the river, making

grazing difficult (ie moving grazing animals between them). We could not see from the consultation material what type of grassland is being proposed and how it might be managed, but we note that it is currently arable and therefore likely to have very high nitrate content. The bridge will have a significant negative impact on the landscape in this location and we would recommend that species of large growing tree are planted alongside the full length on both sides in order to eventually screen it. The visualisations seem to show scrub or low growing species with the bridge standing out in the landscape. Trees planted in the flood zone could also be beneficial from a natural flood management perspective in slowing any flood flows. It is unclear if the public would have access to the two new habitat parcels as part of the linear park concept or if they are intended to be private. If the public is to have access then, as per grazing, the river would be a barrier (to cross using the busway bridge would involve walking over 300 metres).

Between Sawston and Babraham High Street = unsure. The strips of grassland are likely to be difficult (and expensive) to maintain as they can not be grazed or easily cut and collected. We are not sure that there are any adjacent meadows which might justify this choice of habitat. Woodland would be easier to maintain, provide a natural habitat extension from Babraham and also better hide the busway in this fairly exposed location. An alternative to planting woodland would be to allow woodland to regenerate naturally.

Babraham Park & Ride = Oppose. We don't support the idea of a picnic site here (see our response to Q13). There does not appear to be any precedence for meadow habitat which would be difficult to maintain. We would prefer to see a larger area of woodland planting which would add to the woodland habitat around Babraham and help to better hide the busway and travel hub. An alternative to planting woodland would be to allow woodland to regenerate naturally. Woodland planting in the flood zone would have value as natural flood management (slowing flows and trapping sediment).

Bus stops. Strongly oppose. The screening of all the bus stops from the wider countryside (and viewpoints such as Magog Down) does not appear to have been considered. The infrastructure for these stops will be an urban intrusion into the countryside and should be heavily screened with trees. The visualisations show a hedge which will not provide adequate screening, particularly from elevated viewpoints. The bus stops will include tall infrastructure such as lighting which will urbanise and which cannot be screened by hedges. We do not believe that the landscaping proposed would be compliant with planning policy.

Link to Magog Down. We are very disappointed that there is not a proposal to link the active travel route to Magog Down and to create linear habitat alongside. We would encourage you to consider this as part of the linear park.

[Question 10. Sawston to Babraham. How far do you support the proposed realignment of the route between Babraham and Sawston?](#)

We object to the scheme because of the negative impact that it will have on the landscape, as well illustrated in the fly-through.

No Opinion. Due to the open nature of the countryside the route will have an impact, however the route appears to follow field boundaries. Screening the route with vegetation will be important.

[Question 11. What planting would you like to see between stops and nearby residential properties?](#)

We object to the scheme because of the negative impact that it will have on the landscape on the edge of villages, as well illustrated in the consultation material.

Other. Hedges/scrub close to residential properties, grading to woodland towards the stop. This will provide both screening and security for residential properties. Grass will be difficult and expensive to maintain and will be less effective at screening.

[Question 12. Do you have any preferences on potential landscape planting that you would like to see around the bridge crossing over the River Granta near Stapleford?](#)

We object to the scheme because of the negative impact that it will have on the landscape, as well illustrated in the fly-through.

The bridge will have a significant negative impact on the landscape in this location and we would recommend that species of large growing tree are planted alongside the full length on both sides in order to eventually screen it. Trees planted in the flood zone would also be beneficial by providing natural flood management (ie slowing any flood flows and trapping sediment).

In terms of the two land parcels, we would like to see these created to provide meadow habitat with some scrub/hedgerow planting around the boundaries. Consideration will be needed as to whether these would be grazed or cut (grazing would require fencing, water supply for troughs, etc; cutting will require subsidy).

[13. Would you like to see picnic areas set up along the route for users of the Active Travel path to access, near the River Granta crossings?](#)

Yes, near to the Stapleford/Sawston crossing. Although this leads to a question about who would manage them and how the ongoing costs would be met (ie would it be adopted by the County Council or would an endowment be provided to eg the Parish Council?).

No, to the Travel Hub crossing. We question whether people would want to picnic in a giant car park wedged between the busy A11 and a busway – and whether they should be encouraged to do so. This seems like an expedient rather than desirable outcome. Babraham village is an attractive location for people using the active travel path and we would encourage you instead to discuss with the parish and Babraham Institute whether you could create some new green space next to the village which could serve both their needs and users of the path.

[Question 15. As part of the linear park concept and to leave a lasting legacy of the scheme, we could include an avenue of trees along sections of the route. How far do you support these proposals?](#)

There was no supporting information provided with this question to inform people of the factors that they would need to consider when answering it, such as the impact that this might have on the landscape and the alternative options available, such as planting trees in clusters or using hedgerows to screen and provide habitat. As a result, the question reads as though people are being asked if they would like trees to be planted - and we would expect most people to say “yes” to that. We believe the question to be highly leading and therefore does not meet market research standards. As a result, the answers to this question should be disregarded and not used to inform decisions on this issue. If the GCP wishes to garner public opinion then they should do so by re-consulting using a valid form of questioning.

Through our involvement in the Landscape, Ecology & Heritage Group we are aware of the issues and **we do not support the planting of an avenue of trees**. Although there are avenues of trees at Wandlebury and Babraham these are associated with country estates and we are not aware of any precedent in the wider landscape for avenues of trees. Such an avenue would introduce an unfamiliar feature and serve to highlight the route of the modern infrastructure. We support the planting of vegetation to screen the route, provide habitat and help to capture carbon but we do not believe that an avenue of trees is the way this should be done. A more appropriate solution would be to provide a mixture along the route of: clusters of trees (copses), individual trees (irregularly spaced), hedgerows/scrub and meadow. These should be located to knit together linear ecological features and habitats and in consideration of the wider landscape and views of it.

[Your Thoughts 17. We welcome your views. If you have any other comments on the proposals, including any suggestions for inclusion on the design.](#)

Linear Park

We are very disappointed by the lack of ambition shown towards the linear park and the lack of information provided. We accept that the GCP cannot realise the ambition alone through this scheme but the resources that will be available for this scheme (over £200m) can be used to help lever in additional funding to help achieve this. This will only come if these opportunities are shown as part of the scheme. We would encourage the GCP to show these on a separate diagram, to make clear the ambition if additional funds can be secured. This could include new permissive routes, new habitats or new public green space. For example, there is a strong desire to

create a new NMU route from Stapleford/busway to Magog Down which could also provide linear habitat. This would then provide connections to Wandlebury Country Park and Roman Road – potentially creating a circular cycle/walking route for people living in Trumpington or Queen Edith's.

Bus stops at Shelford & Stapleford

We are concerned by the proposals put forward for bus stops at Shelford and Stapleford because they will have an unnecessarily large negative impact compared to the likely benefit/use:

- These are very urbanising and not appropriate to the surrounding countryside. Including traffic lights, signage, lighting and CCTV all of which would completely transform the rural/village interfaces for Shelford and Stapleford.
- We have significant concerns whether the bus stops for Stapleford and Shelford would prove sufficiently popular to justify their impact (and expense). Both are on the far extremes of the villages, and do not serve many people within a 1km radius. For most residents it will be quicker to use existing public transport or cycle infrastructure than to travel out of the village in order to use the busway.

As a consequence, we object to the current bus stop proposals for Stapleford and Shelford and if they are to be built, we would recommend that alternative designs for these bus stop areas are developed which are smaller in scale, more in keeping with a rural location, further from neighbours and better screened.

I trust that you will take our comments into consideration.

Yours sincerely



James Littlewood
Chief Executive