Greater Cambridge Partnership

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Dear GCP

Response to Waterbeach to Cambridge Environmental Impact Assessment Consultation June/July 2024

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.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel & Barnwell Meadows, Bourn Windmill and Hinxton Watermill.

The following sets out our response to the questionnaire.

Question 2: do you have any comments on the proposed path for walkers and cyclists?

There is no evidence that there is a need for a wide surfaced path for walkers and cyclists as there are at least 4 alternative routes and the path is not needed as a maintenance access track. There would be a significant environmental gain by not constructing this path.

The proposed active travel route next to the busway would create a 5th cycle route in this corridor. It would be in addition to the two existing cycle routes (the River Cam towpath, and next to the A10); the Mere Way and the Waterbeach Greenway. There is no evidence that 5 routes are required and the business case for the 5th route would be a benefit of almost £nil, set against the environmental impacts of construction and the maintenance costs.

You explain that the active travel path in section G will have a gravel surface as the Mere Way is close by and this has been done to reduce costs. In fact, the busway is in close proximity to Mere Way for its whole length and much greater savings could be achieved by removing the path totally.

We note that the consultation brochure explains that the active travel path also acts as the maintenance access track. However, there is no evidence that an optical guided busway requires a maintenance track as maintenance vehicles can use the busway (which is essentially a road). Furthermore, the design of the busway makes it difficult for it to be used for maintenance access. Firstly, the track is separated from the busway by a 2.5m grass verge making it difficult for maintenance machinery to drive from the track onto the busway. Secondly the section from Butt Lane to the St Ives to Cambridge busway does not have a surfaced track beside it so maintenance vehicles would need to use the busway for this section anyway to carry out repairs.

Further, we do not believe there are legal grounds to compulsory purchase the land for a maintenance track if it is not required, and the provision of a cycle and pedestrian path cannot be made through the Transport and Works Act.

If a maintenance track/active travel path is taken forward, then we would encourage you to look at how this has been located and to consider locating it on the western side of the bus road. Locating it on the eastern side will open up public access to the lakes area, which would cause disturbance to wildlife, and it will also create security issues for property owners. These problems would be significantly reduced by locating on the western side.

Question 3: do you have any comments on the proposed bus stop locations?

Bus stops introduce infrastructure more associated with an urban setting into the open countryside. This is particularly the case in relation to the bus stops south of Waterbeach Road and south of Milton Road. The bus stops and where the busway crosses the highway will involve traffic lights, signage and red painted road markings indicating the bus stop and preventing general traffic from going onto the busway. These all introduce urban features and should be kept to a minimum. The route should therefore only have bus stops within walking catchment of residents.

We wonder who will use the bus stop south of Milton Road/Butt Lane because Milton P&R is close by. It is unlikely that pedestrians will walk from Impington, and cyclists from Impington are likely to cycle direct to Cambridge rather than cycle and ride. People being dropped off by car could be dropped off at Milton P&R. We are also aware of aspirations to expand the Cambridge Science Park north of the A14, if that were to happen, they have suggested a bus stop within that development which would further obviate the need for a stop at Butt Lane.

Question 4: do you have any comments on the facilities proposed at the bus stops?

No comment

Question 5: Do you have any comments on the proposed security of the scheme, including along the route and at bus stops?

We request that best practice is be used in relation to lighting the busway and bus stops to minimise impact on nocturnal wildlife.

If a maintenance track/active travel path is taken forward, then we would encourage you to look at how this has been located and to consider locating it on the western side of the bus road between the Waterbeach P&R and Waterbeach Road. Locating it on the eastern side will create security issues for property owners. These problems would be significantly reduced by locating on the western side.

Question 6: Do you have any comments on the construction of the scheme including proposed locations for construction compounds?

No comment

Question 7: Section B Travel Hub

CambridgePPF does not support the principle of building large park and ride car parks in green belt or countryside on the edge of the city because:

- Park & Ride encourages car journeys and therefore a new large P&R will result in an increase in carbon emissions. This has been recognised in the planning application for the South West Cambridge P&R. This is not compatible with zero carbon planning.
- Park & Ride competes with public transport (thereby reducing patronage, which in turn reduces service frequency, which in turn reduces patronage, etc). A more environmentally sustainable approach is to support better public and active transport from surrounding areas – as is now proposed by the GCP and Cambridgeshire & Peterborough Combined Authority.
- It can have a detrimental impact on landscape, ecology and heritage, both directly from the building of these facilities and their associated infrastructure (such as lighting), and indirectly by attracting other development (for example, the location of the Milton P&R was used to justify the development of a new police station in the green belt). It is effectively a form of urban sprawl.

The provision of two Park & Rides, one at Milton and one at Waterbeach raises significant concern about unnecessary development in the green belt and large areas of countryside being surfaced in tarmac. Placing a new P&R at Waterbeach would result in having two park and ride sites within 2-4 miles of each other.

The site is an archaeological site and development could be potentially harmful and needs to be fully assessed before a decision is made.

Not withstanding our objection in principle, we support the installation of PV solar panels over the car parking spaces as seen at other P&R sites around Cambridge – providing that there is adequate screening to avoid negative impacts on the landscape.

Question 8: Section C travel hub to Waterbeach Road

This comment relates to Sections C, D & E.

The busway would be built through open countryside, which is designated Green Belt, resulting in damage to the landscape. There would also be a loss of mature trees and damage to archaeology. You identify environmental issues of archaeology and protected species habitats. Until surveys have been completed you are unable to determine the significance of the impact and if the impact can be removed or reduced. This environmental damage can be avoided by replacing the busway with a single inbound bus lane adjacent to the A10.

It is likely that this could deliver the same (or very similar) transport benefits because there is no outbound congestion along this stretch of the A10. Providing new infrastructure where there is no problem is a waste of public funds and results in a very weak business case. An inbound bus lane would also have the benefit of confining the impacts of the scheme to the A10 as well as being significantly cheaper to construct and maintain, and therefore would have a stronger business case. It would also have the benefit of allowing car drivers to see that they could avoid traffic queues by using a bus, thus encouraging modal shift. This service would also have the benefit of being more accessible for the village of Waterbeach who will find their rail station moved further from them as a result of the New Town.

The Options Appraisal Report (Atkins Sept 2020) and the Outline Business Case indicate that the option of an on-road bus lane performed well in the northern and central sections of the A10 because there are no junctions or roundabouts that would require a bus to stop. However, along the southern section, approaching the A14, the bus would be delayed by the traffic lights at the roundabout and queuing traffic. However, the preferred route now involves buses travelling to the Milton P&R, adjacent to the A10, and then travelling along Butt Lane and avoiding the A14 roundabout. This means that there should be a re-assessment of the bus lane option, because it would remove the poor performing section on the approach to the A14. In other words, following a decision to use Butt Lane as the route for this scheme, there is a requirement to consider the option of bus lanes on sections of the A10/Butt Lane/off-road from Butt Lane to the guided busway – and to consider how that option would perform compared to the preferred option, including BCR.

We request that work is undertaken to assess the preferred option against the option of a hybrid bus lane/off-road option, before further work is carried out on the archaeology and protected species habitats of the preferred route. Failure to do so would leave the project vulnerable to challenge at a public inquiry.

Question 9: Section D Waterbeach Road to Landbeach Road

See response to question 8

Question 10: Section E Landbeach Road to Butt Lane

See response to question 8.

The open fields in this section are used by flocks of birds outside the breeding season, such as gulls and lapwing, often for 'loafing' (sleeping/resting/preening). This site is used because it is open and easy for them to spot potential predators and there is no public access, meaning that they are not disturbed by humans and dogs. It is highly likely that the busway would significantly and negatively impact the use of these fields by these bird species, many of which are red-listed due to their population declines. We have noted that the use of the fields by loafing birds is not consistent and varies through the seasons and between years, and so this is likely to make it difficult to survey, with a risk of under-recoding the impact. We recommend that a bespoke survey methodology is developed which involves frequent but short visits over an extended period from after harvest until March. It is likely that mitigating the impact will be difficult, but options include:

- remove the active travel route from the scheme as this would reduce disturbance from humans/dogs
- avoid planting trees and hedges as these will close the views and harbour predators
- move the alignment closer to the A10, thus retaining the majority of the open fields.

Implementing all three of these in combination is likely to provide a higher level of mitigation.

Question 11: Section F Butt Lane to Milton Road, Impington

Widening the road will result in the destruction of trees in the woodland on the south side of Butt Lane. The scheme could be moved to the north to avoid this ecological damage, but we understand that this would result in loss of hedgerow and impact on property. In order to minimise ecological impact, we would encourage you to consider compromise in this location, eg could the active travel path be narrower (given the rural location and limited likely use).

We note that proposed mitigation is to plant new trees/hedges on the northern side of Butt Lane but this is not a 'like-like' proposal because the southern side is part of a woodland and therefore is likely (when reaching maturity) to have higher ecological value than roadside trees that are adjacent to an arable field.

Question 12: Section G Milton Road, Impington to the busway

The route you are consulting on passes through three blocks of mature trees in order to connect to the Cambridge Guided Busway. Not only will this remove the trees but sever these wildlife corridors. From conversations with you we understand that your route is influenced by other constraints, such as avoiding damage to a pond next to the St Ives guided busway, nevertheless we encourage you to continue to consider alternatives.

Buses using the Waterbeach busway would need to be fitted with two guidance systems: an optical guidance system for operation between Waterbeach and the St Ives busway and then a physical guidance system for operation on the St Ives busway. Surely this increases the costs and difficulties of operating buses on this route? Utilising the Mere Way underpass and the existing road network would avoid this problem and it would also create a route that significantly reduces the loss of mature trees and the ecological severance of the proposed route. We understand the constraints of the Mere Way underpass but given that buses would have to slow to a near stop to access the guided busway anyway, then introducing traffic lights triggered by buses would have no meaningful impact on journey times.

I trust that you will take our comments into consideration.

Yours sincerely

Sarah Nicholas

Principal Planning Officer