**For the GCP Secretariat – from Cllr H Kettel, Chair Stapleford Parish Council**

**Cambridge South East Transport: CSET**

I wish to submit the following comments for consideration by the GCP Joint Assembly on 10th June 2021.

**1. Lack of transparency and poor value**

At the CSET Local Liaison Forum meeting on Monday 7th June 2021 we were informed that the GCP were proceeding with the scheme on the basis of their original BCR of 0.81 (indicative of poor value relative to the GCP Board’s own desired ratio of 1.5-2.0). However, their more recent analysis is based on a new economic model which is apparently still undergoing final tweaks and has thus been kept from the public domain. Having been told of this new economic model 3 months ago and now being on the brink of the GCP applying for a Transport and Works Order, we question why the revised economic justification for CSET remains hidden and not open to public scrutiny.

**2. Flaws in the Consultation**

At the LLF meeting on Monday we were also informed that the Babraham ‘Travel Hub’ has been reduced in size from the publicly consulted 2000 space car park to 1250. No evidence for this departure was offered nor any justification in terms of the Outline Business Case or impact on passenger numbers, projected revenues and the BCR. We were merely told that a further 250 spaces could be made available over the decade after its initial opening to meet increasing demand. Given the proposed rate of house building between S Cambs and Haverhill, we suggest that 250 spaces will be insufficient and wish to see the modelling upon which this has been based. Additionally, in this intervening decade, landscaping elements will have matured, only to be ripped out again in favour of additional car park space.

The independent i-Transport report logs multiple failures in the appraisal process which subsequently affected the validity of the public consultation process, including:

* The former Haverhill railway route being discounted at the outset without proper appraisal against the same objectives applied to other routes. As one example, arbitrary ‘gateway’ tests were applied to rule it out
* The railway route was excluded from the study area without justification
* Lack of transparency in the assessment process, with key decisions unsubstantiated and feedback from public consultation overlooked and not properly taken into account. For example, following the Preferred Option Consultation 2019, there does not appear to be any consideration of key comments made or any documentation showing how key themes were responded to.

**3. A true valuation of environmental cost**

The *qualitative* analysis in the economic appraisal concludes that the preferred option route will have adverse impacts on landscape, but only air quality, greenhouse gases and noise have been costed in the GCP report on the Economic Case covering Environmental Impacts. In contrast, the Transport Appraisal Guidance (TAG) requires monetising environmental, social, heritage and other ‘non-market’ features of the project.

The GCP should properly demonstrate the economic case of CSET by monetising environmental factors, including special landscapes, as required by the TAG. The business case is already poor (BCR of 0.81, whereas to be acceptable it would be expected to exceed 1.5 and if these costs were also fully quantified this would make the BCR even worse.

**4. A sustainable scheme is required**

Park and Rides were developed in the UK in the 1960s in response to congestion on main routes into city centres and a lack of parking therein. They are now outdated. To counter the climate crisis a comprehensive, integrated public transport strategy is required to encourage modal shift. The ‘Travel Hub’ proposed on the A11 will simply attract more cars onto our roads and increase emissions, and at the same time erode the viability of existing local bus services.

At present, transport schemes across Cambridge are being promoted in ‘silo’ fashion as standalone projects and will neither magically come together to form an integrated transport service nor be scalable over time. CSET will operate at full capacity upon opening, which cannot equate with the significant development envisaged for the Cambridge Biomedical Campus, let alone support economic growth targets within the wider region.

**6. Consideration of the alternatives**

The ‘independent’ Atkins report just commissioned by the GCP into i-Transport’s proposed Shelford Rail Alignment (SRA) reports that there are no ‘showstoppers’ to the design of the alternative railway route and, in respect of land acquisition, deliverability and cost, these are matters that the GCP should now be investigating based on i-Transport’s conclusion that the route is viable. In particular, the i-Transport report has demonstrated that the GCP’s claim of large-scale demolition associated with the SRA is not evidenced, despite claims to the contrary by a GCP Board Executive on ITV Anglia News on 3rd June 2021.

Another factor in the GCP’s rejection of the SRA was their claim that journey times would be expected to increase with the alternative railway route and that overall patronage would therefore decrease. Our recent findings indicate that with on-route bus stops located 1-2 two kilometres away from the centres of population, the reverse is true, and hence the GCP’s calculations need to be reviewed.

With the likely demise of CAM there is no reason why a suitable scheme at very modest cost could not be developed at speed. The GCP originally proposed the A1307 as a CSET option but later rejected it for, amongst other factors, not being CAM compliant. Countering this, Mott McDonald claimed at the LLF on 7th June that “…the scheme [CSET] predates any conception of CAM and the justification for the scheme exists without CAM. The concept of ‘CAM compliance’ has only come about…since April 2020, after the development of shortlisted route options.” The former may be correct but the latter perhaps not. The GCP Executive Board paper dated 18th October 2018 notes perceived problems with making the A1307 route CAM compliant: “The adoption of the bus lane based Strategies 2 and 3 [both A1307-based options] would not align with the objectives of the CAM” and that “[the preferred greenbelt route] is the only solution that provides for delivery of the long term transport objectives of both the GCP and the Combined Authority, and it is the only option that will have the full support of the Combined Authority.”

Another reason given by the GCP for downplaying an A1307 route was that it was not favoured in public consultation. However, this is misleading: the GCP originally offered two options on the A1307 and thus split public opinion between them. Taken together, they were overwhelmingly favoured above an off-road, greenbelt route. Data from a recent survey of residents by Great Shelford Parish Council suggests that public opinion has now moved firmly behind an on-road, A1307-based solution.

**Conclusion**

In the light of the above Stapleford Parish Council are requesting a pause to this scheme and a strategic reassessment taking all the above factors into consideration and to develop an integrated/holistic/coherent/ambitious plan that can replace a high proportion of vehicular movements.