

**CAMBRIDGESHIRE GUIDED BUSWAY ORDER
(Transport and Works Act 1992)**

FORMAL OBJECTION

HISTON & IMPINGTON PARISH COUNCILS

CAMBRIDGESHIRE

Mrs A J Young
Clerk to the Councils
The Parish Office
New Road
Impington
Cambridge CB4 9LU

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Background

Histon & Impington are a settlement to the north of Cambridge, in the District of South Cambridgeshire. They are regarded as a single settlement for planning purposes.

The proposed guided busway at times runs along the boundary between the two Parishes, and much of the impact of the proposal will be felt by both Parishes.

As with previous strategic matters, therefore, the two Councils have agreed to make a joint submission in response to this matter.

Summary

The Councils object to the scheme on the following grounds:

- to the principles of the proposal;
- to the lack of fair and equitable assessment of the alternatives to the CGB;
- to the lack of clarity and openness about the costs of the scheme;
- to the lack of safety at level crossings and elsewhere;
- to the levels of obvious errors in the documentation.

Representing the community of Histon and Impington, which will take the heaviest impact of the scheme, the Councils object to the following matters of local importance:

- to inadequate targets being set for emission standards, and the lack of commitments to maintain the highest available standards;
- to the destruction of Histon Station purely for the provision of car parking;
- to the wholesale destruction of the fauna, flora and habitat and the felling of the trees at the Copse and elsewhere;
- to the loss of privacy by residents adjacent to the busway, particularly given the use of double decker buses;
- to the treatment of noise;
- to the threats to local businesses during the construction phase, and also during the operation of the CGB;
- to the inadequate provisions at the Histon & Impington stop;
- to the absence of detailed assessment of surface water drainage and flood protection issues.

Principles

The Councils object to the principles of the proposal:

The CGB is a local solution, when a regional approach and solution is required. Significant changes have taken place since the CHUMMS study that require a wider scope to be considered. Two of the changes are the RPG14 London Stansted corridor (which now extends to Peterborough) development, and the Alconbury Freight interchange. There is little indication in the CHUMMS report that the *advantages* and potential of rail as an alternative to guided bus were considered in any depth. Train operating companies do not appear to have been widely consulted about integration with existing services, passenger or freight, at Cambridge or on the East Coast Main Line. The Rail Strategy for the A14 corridor was rejected prematurely by the CHUMMS study and should be re-visited in the light of these later developments.

The proposal is for a busway. It is **not** for a transport system since there is no operator committed to the system. Given the open nature of the busway, there is no guarantee that any operator will wish to use the system, nor that they will be prepared to pay the premiums (usage cost or cost of buses) required.

Therefore the cost/benefit analysis must be flawed. In addition, benefits are based in part on assumptions of diversion of existing services to what is actually a slower route. This further distorts the calculations. Also, the demand from residents at Northstowe cannot yet be forecast. The settlement is being designed as self contained and sustainable.

The busway will have a marginal impact on A14 traffic. However, in reality the presence of the scheme will increase traffic on the A14 since its existence will be used as an argument to support further development on this corridor.

Effective operation is dependent on the performance of the on-street sections. There is no evidence presented that suggests that adequate design, consideration or modelling has been done to prove that this will perform adequately. The TROs necessary to implement modifications to the road sections are not subject to determination through the TWA process, and cannot therefore be guaranteed.

Parts II 18(4) and IV 36 define busways as roads (Road Transport Act 1985), and at part IV 38 reference is made to the Transport Act 2000 (bus quality partnership schemes). As part of

the consultation process, within the Order, or accompanying documents, the applicants have failed to publish:

- Full details of service routes, frequency, proposed fares and timetables for even the basic core guideway services;
- Concurrently with, or, as accompanying documents, full details, with traffic modelling, environmental impact assessments, Traffic Regulation Orders (TROs) for the on-street sections of the proposed routes in Hungtindon, the A1123, St Ives and Cambridge City;
- Details of proper consultation (if any) with Eastern Area Traffic Commissioners regarding new bus routes together with impact on existing registered services.

The Councils strongly object to the separation of legal process (T&WAO - TROs), the absence of technical detail, robust evidence of operational feasibility, written draft contracts with potential operators and corresponding commitments to invest in new bus fleets. The order is premature and should be withdrawn pending proper determination of on-street running issues.

The Councils object to the implementation of the concept - the creator of the guided bus technology said he has not designed it for the way it is being proposed for Cambridge. The guideway is being used successfully in Leeds and Bradford as a "congestion buster" to speed the bus past the congestion and traffic queues, allowing the bus to jump to the front of the waiting traffic. In Cambridge the guideway will come to an end just as the bus approaches the most congested parts of the city (Hills Road/Catholic Church/Drummer Street etc.). It is the opposite of that which is required.

Assessment of Alternatives

The Councils object to the lack of fair and equitable assessment of the alternatives to the CGB.

Option 1 has inadequate scope. If any benefit from the CGB arises in the reduction of traffic on the A14 this will arise from the provision of park & ride sites. Such facilities should have been considered as part of this option, which should have also considered the provision of a dedicated bus lane.

Option 2 assessment is based on the CHUMMS study. As has been shown by the CAST.IRON group there are significantly different answers that can be achieved for the costs (and therefore cost/benefit calculations) of a rail link. The external assessment relied upon is not available for public scrutiny. Negative comments regarding the rail route are not balanced by some of the positive possibilities, e.g. rail access to the Science Park (which must improve accessibility for out-of-town visitors), access to the shopping developments at Newmarket Road and the Abbey Stadium. At no stage is this assessment *balanced*.

Option 3 assessment is again flawed and limited. Most of the arguments in Vol 1, 5.2.15 are at best weak, and at worst countered elsewhere in the proposal.

Air Quality

The Councils object to inadequate targets being set for emission standards, and the lack of commitments to maintain the highest available standards.

The busway will not start operation until 2007 at the earliest. Therefore Euro V standards (due to be adopted in 2008) must be the minimum starting standard.

Furthermore, the busway must commit to rigorous and timely adoption of further Euro emission standards as they are brought in. Given the frequency of operation, and operation in the historic City of Cambridge, only buses operating to the highest standards are acceptable.

In addition, maintenance standards and timing should be enforced such that performance does not degrade measurably from these standards.

Built Heritage

The Councils object to the destruction of Histon Station purely for the provision of car parking.

Plans show that the station yard is still undeveloped, contains no buildings of significant value, and could be used for parking provision, with the Station buildings retained.

The Councils object to the “futuristic” draft designs for the stop. It is accepted that common branding and facilities are required. However, they require to be adapted and modified to fit in with the local built environment. As presented they are unacceptable for the village built environment in the vicinity of the Station.

Ecology

The Councils object to the wholesale destruction of the fauna, flora and habitat and the felling of the trees at the Copse and elsewhere.

The Councils object to the siting of pond 7A, the loss of amenity woodland arising from its development and the misclassification of the land at that site. Appendix 11A figure 14 defines this area as “improved/amenity grassland”. Rather, this is planted woodland established to mark the 75th Anniversary of the Women’s Institute and currently subject to Countryside Access Agreement via the adjacent level crossing now proposed to be closed.

The Councils object to the destruction of the hedgerow on the north side of King’s Hedges Road (chainage 80+000 through 81+125) which is particularly old and mature and therefore of value.

Landscape and Visual Assessment

The Councils object to the loss of privacy by residents adjacent to the busway, particularly given the use of double decker buses.

The Councils object to the lack of detail designs for noise attenuation and planting schemes alongside the busway, and therefore the lack of evidence that an acceptable visual impact is achievable.

The Councils object to the visual impact of the 11+ metre wide track and maintenance track through open countryside etc.

Noise and Vibration

The Councils object to the treatment of noise.

At least two factors have been omitted in the consideration of the likely increase in noise levels, namely: acceleration/deceleration cycles; and the scope for the track (a rigid, shaped surface) to amplify/reflect noise.

The proposal to leave a level of noise (2-3dB - corresponding to a doubling) not attenuated is unacceptable.

By omitting design details for the attenuation barrier the CGB proposal fails to prove that the required levels of attenuation are achievable, or that the visual impact thereof is acceptable.

In addition, a level of attenuation should be provided for the Copse (chainage approximately 17+375-17+500), an area of public space used for enjoyment and which excessive increases will significantly affect.

Furthermore, working to the precautionary principle, allowance should be made for the provision of noise barriers on the Arbury Camp (Arbury Park) development. The design of this site is as yet incomplete, and it is possible that there will be a requirement for noise attenuation given the proximity of some properties to the route of the guideway.

In all cases, the maintenance methodology, and costs of maintenance also need to be specified.

Socio-Economic Assessment

Background - the two convenience shops in the vicinity of the Histon & Impington stop (Impington Post Office, Station Stores) provide an essential lifeline and support service (including deliveries) for residents (particularly the elderly) in the vicinity. As with many village shops, they provide an effective adjunct to more formal services to allow the elderly to remain in their own homes.

*Their survival is therefore essential to the **community**, not just the business owners.*

In addition, Bishop's garden and hardware (comparison) store is a valuable supplier in the community and provides full and part time employment to largely local workers.

The Councils object to the threats to these businesses during the construction phase, and also during the operation of the CGB.

Both convenience shops rely on a significant level of passing trade, which requires adequate parking provision for short stays. In addition, these shops also receive deliveries from the front of the business, and space must be provided for delivery vehicles. A lay-by outside of Station Stores may contribute to an overall solution.

The construction phase will add further pressures, diverting traffic and reducing the opportunity for safe stops. There is significant risk of any or all of these stores folding during the construction phase.

The loss of these businesses, during or after the construction of the CGB would be unacceptable to the local community, and would have a knock on effect on other services for the elderly etc.

Transport and Access

The Councils object to the provision at the Histon & Impington stop, specifically:

Pedestrian crossing facilities are required on all four possible routes at the junction in order to provide safe routes for users of the stop (and who may have parked in the car park) and particularly for children and young people walking to and from the schools in the village. The need for pedestrian crossing facilities on both east and west sides of the crossing has been identified in safety audits carried out by County Council staff.

The lack of provision of ‘residents’ only’ parking constraints from day one of the scheme. Current experience already demonstrates the need for such facilities, and these must be designed in from the start in order to minimise the loss of amenity by local residents. The Parish Councils may be prepared to accept responsibility for the necessary administration.

The Councils object to the impact of the extended construction periods on the traffic using Cambridge Road. Because of disruptions at the crossing, traffic that otherwise would have approached the area (for example, lorries going to/from the factory in Villa Road) will be forced to use Cambridge Road. This road is not kerbed, and significant damage to the verges is therefore likely. This should be prevented.

The Councils object to the likely gridlock at the B1049/A14 junction arising from bus priority measures at the Cambridge Road/King’s Hedges Road junction. Today, at peak times, it is not unusual for the southbound queue to back up to, and onto, the roundabout. This will be exacerbated by signalling changes at the Cambridge Road/King’s Hedges Road junction, and will not be reduced by any of the proposed road changes in the vicinity. This will cause the A14/B1049 junction to function below capacity, and lead to possible queuing onto the A14 from slip roads.

The Councils object to the possible impact on essential current bus services (e.g. Citi 7) and the lack of information about this. Citi 7 serves a wider area, picking up passengers through the village (and many who could not use the CGB). Because of similarities between the routes, there is potential for conflict and negative impact on current provision. The potential for loss of this service would have a major negative impact.

The Councils object to (i) Part V 32 extinction of Rights of Way. Level crossings have been used by vehicles, pedestrians and horses for over 100 years (ii) the intention under the wide provisions of Part II 4 and 6, to eliminate level crossing facilities at footpath, bridleway and existing ‘‘occupation’’ or private crossing points without recourse to Part II 5 (3) ‘‘gaps in the mode of guidance’’. A safety audit would almost certainly identify hazards in advance of buses approaching at 55 mph.

Furthermore, the Councils object to the lack of consideration of the issues arising from the Disability Discrimination Act 1995 which set about giving disabled rights in areas which include access to facilities and services. In addition, the Countryside and Rights of Way Act also requires every county/unitary authority to produce ‘ Rights of Way Improvement Plans’ (ROWIPs); the regulations require that the needs of disabled countryside users are considered through these plans. Disabled users are effectively excluded from access to current routes and locations by the lack of appropriate gaps in the busway.

Drainage

The Councils object to the absence of detailed assessment of surface water drainage and flood protection issues. Given the critical nature of fen drainage and river quality to the north west of Cambridge. Part V 51 (2) does not acknowledge the specific powers and rights of Internal Drainage Boards and South Cambridgeshire District Council as authorities responsible for drainage in the area. Furthermore, the powers sought under 51 (3) are draconian in terms of time limitation for works approval. **All** drainage authorities should be give adequate time for assessment of discharge volumes, works, balance ponds etc.

The anomaly in respect of pond 7A has already been noted under ‘Ecology’.

Costs

The Councils object to:

The lack of clarity and openness about the costs of the scheme. The TWAO costs figure is £86.4M. However, the 2003 LTP specifies additional costs associated with the CGB (cycle and pedestrian provisions, Huntingdon, St Ives, Cambridge bus provisions) that total a further £13.1M. ;

The lack of a clear statement and commitment regarding the likely impact of the scheme on Council Taxpayers, and other works. At a time whilst costs have risen at around 25% per annum (from £73M to £99.5M), and when not all of the scheme details have been determined, Council Tax payers fear the worst - that the costs of the scheme, and over-runs will fall on their shoulders, or will be covered by fund transfer from other schemes. We seek a commitment that this will not be the case, both for capital and on-going costs.

Uncertainty regarding the operational costs, and whether there will be a need for regular subsidy to support the CGB. There is clear evidence that the basis for the operational costs have changed from Annex E to the TWAO, and, has been pointed out above, this does not yet cover all of the ongoing costs.

Safety

The Councils object to the lack of safety at level crossings. The TWAO (section 15) provides scope for the installation of barriers, and it is believed that near misses, incidents, drivers jumping the lights and children travelling to and from school will eventually require barriers to provide adequate safety. The impact of such provision needs to be considered now, since it is only at this time that the proper assessments on the overall scheme and its impact can be made.

The Councils object to the inadequate proposals for emergency and recovery vehicles, and control of access to the emergency track, specifically:

It is specified that police and emergency vehicles will be able to access the guideways at junctions. Vehicles other than cars (ambulances, fire engines, breakdown/recovery vehicles) which approach the width of buses will require to be guided in order to travel the route at any speed. They will also require to be guided in *both* directions in order to be able to exit the guideway safely.

Furthermore, necessity of sequential access will significantly hamper the management of any emergency situation.

Since it is possible for emergency vehicles to do this, it will also be possible for car drivers to do so. There is a real risk of stolen vehicles being abandoned in the guideway, possibly even burnt out. There is no indication that CGB is prepared for this eventuality.

Similarly, cars and motorbikes could also use the emergency track. This would be a potential safety hazard to pedestrians and other users, and would disturb nearby residents.

The Councils object to the dangers presented by the fixed guide wheels, particularly when running off the guide way. In addition, the fixed guide wheels can be a safety hazard of themselves if buses exceed extremely slow speeds (2-3 mph) at breaks in the guideway since they can become forcibly detached.

Errors & Omissions

The Councils object to the levels of obvious errors in the documentation.

Errors include (this list is not exhaustive): Land ownership; Omitted build issues; Road naming; Location identification (i.e. whether Histon or Impington).

In the case of the land ownership and build issues these are clearly vital. The remaining errors indicate a lack of care and consistency which when translated to the more technical and financial areas could have significant impact.

These matters should be attended to - at the very least they will continue to give rise to ongoing confusion which will not be helpful to the TWA process and Public Inquiry. Indicative details of the errors are listed in Appendix A.

Appendix A

Land Ownership

- The Councils challenge the land ownership boundary on the north side of the busway, chainage 15+500 - 15+450 (adjoining Pease Way, Park Lane Histon). Network Rail boundary is believed to be along a straight line between points L2 and L9, figure 31 Appendix 13E;
- The ownership of the land fronting Station Stores (at and around chainage 17+375) is subject to challenge, and is currently being clarified. Impington Parish Council is supporting the resolution of this lack of clarity, but the legal process to do so has only just commenced;
- Land at the eastern end of the Copse (at and around chainage 17+500) is believed to be in the ownership of Histon Football Club, not Cadbury Schweppes.
- There appears to be a survey error at chainage 16+800 - 16+850 figure 33 Appendix 13 E. Guideway and north side planting are shown outside the designated land parcel 407 and not in the ownership of Network Rail Infrastructure Ltd. This apparent error is vital in that the available width between boundary fences is 10.6 metres at this point. The minimum width for guideway and maintenance track is quoted at 11.4 metres (2002 LTP Annex E)
- Groundcover Shrub planting is not within land to be purchased (chainage 16+350 - 17+200) and over a sewer rising main (Work Area No 8).

Omitted build issues

- Balance pond 7A (shown, for example, in Appendix 11A, figure 14) at chainage 16+050 is not shown in Appendix 13E, Illustrative Technical Development Drawings or Works & Land Plans.

Road Naming

- Repeated references are made to the junction of King's Hedges Road and Histon Road. King's Hedges Road does not meet Histon Road. At the point where it meets the B1049 this is still Cambridge Road, Impington;
- References to Station Road, Histon/Station Road, Impington are confusing. It is believed that these refer to Station Road (Histon & Impington) meeting Cambridge Road, Impington (which is to the south of the current level crossing);
- There are a variety of references to Park Lane, New Road, and even, at one point, Park Lane/New Road. This is marked on mapping as Park Lane and New Road, but is locally known as Meadow Road.

Location identification

- Again, there are a number of examples of this. As one, an air quality monitoring point is identified on the A14, Histon. The A14 does not pass through Histon. Though it does pass through (in sequence, from the west) Girton, Impington and Milton.