



Cambridge Area Bus Users
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Dear Greater Cambridge Shared Planning,

Response by Cambridge Area Bus Users to the Draft Greater Cambridge Local Plan

Cambridge Area Bus Users was formed to stand up for the interests of bus passengers in and around Cambridge. View the [group's website](#) and [read about its priorities for bus travel](#). Please find our response to the Draft Greater Cambridge Local Plan below.

Summary

The Local Plan envisages development that 'minimise[s] carbon emissions and reliance on the private car'. It will not achieve these ambitions unless bus travel is a genuine choice for residents. To have the greatest chance of success, policies relating to buses in the Local Plan's policies should be strengthened. They should include the following principles:

1. New developments must be designed to facilitate direct and efficient bus operation, taking regard of the principles outlined in [Bus Services & New Residential Developments Second Edition](#)
2. Bus services are as, if not more important, for bus travel as dedicated bus infrastructure.
 - 2.1. The Local Plan must set out a service pattern for key routes (frequent services, 7 day a week operation, long operating hours, guaranteed last bus) that will make bus travel attractive for all everyday journeys, not just travel to work.
 - 2.2. Measures to enable buses to travel into and through Cambridge unimpeded are essential. Without these, bus services to and from new developments will be highly unreliable, slow and expensive to run.
 - 2.3. Buses should also serve key destinations (employment, education, medical and leisure) directly.
3. Travel by bus must be easy and attractive from day one of occupation of a new development, and developer contributions should support bus services for an extended period (we suggest ten years) so residents have the services they need to build the habit of bus travel.
4. The ability of residents in new developments to travel by bus depends to a large part on the quality of the whole bus network (which is currently inadequate for its communities' needs), not just the quality of the infrastructure/services that come with

new developments, The Local Plan should establish methods to raise funds for an expanded bus network across Greater Cambridge.

5. A good bus network is a lifeline, connecting people with social networks, personal development opportunities and essential services at a cost they can afford. It is particularly important for young people, whose transport options are limited and financial circumstances often challenging. Bus travel is therefore an important tool to boost health, wellbeing and social inclusion. The Local Plan should recognise it as such, and establish policies to bring about easy bus access to key services, education providers and community, sports and leisure facilities, especially those delivered via the Plan.
6. The Plan treats electric cars as a form of sustainable transport. This is contrary to its vision to minimise reliance on the private car. Electric private cars also have the same impacts on congestion and road safety as petrol or diesel cars. The Plan must be explicit that it prioritises travel by public transport, walking/wheeling and cycling.

Detailed consultation response

Summary of the Greater Cambridge Local Plan

We support the statement in the 'Vision for Greater Cambridge' that '*new development must minimise carbon emissions and reliance on the private car*'. The high level of private car traffic in and around Cambridge is already a significant hindrance to reliable and attractive bus transport. [Over 50% of non Park&Ride bus users interviewed at Drummer Street bus station in Cambridge by the Travel Alliance](#) said they would describe their services as late or unreliable. Any further increases in private car volumes will reduce bus reliability, journey times and frequency yet further and increase the likelihood of bus cancellations. Motor traffic congestion also increases bus operating costs. [Whippet calculated that operating costs for the Universal bus service would be reduced by 40% if traffic were free-flowing](#). The cost to Cambridgeshire and Peterborough Combined Authority of running the future franchised bus network in Greater Cambridge will be linked at least in part to congestion levels in Cambridge. It is critical that the new developments envisaged in the Local Plan minimise reliance on the private car.

Despite the Local Plan's ambitious vision to minimise reliance on the private car, it is not clear the policies it contains will achieve this aim. The [Transport Evidence Report](#) (Part 4, p 41) estimates that only just under half of trips from new developments will be made by non-car modes. The [new settlement at Grange Farm is expected to have a 60% mode share of car trips; the figure for Cambourne is 55%](#) (p38). There is therefore a mismatch between the vision and the expected outcomes.

The Local Plan would be more likely to achieve its Vision if a greater percentage of the new housing was planned for sites in and on the edge of Cambridge, or next to existing public transport hubs (including railway stations), instead of in new settlements miles from the city. Planning to locate sites of employment closer to new developments (e.g. in Cambourne) would also help the Plan to bring about its stated transport goal.

Policy I/ST: Sustainable Transport and Connectivity

Prioritising walking, wheeling, cycling and public transport, not electric vehicles

The phrase 'sustainable transport' is not defined in this policy, however [elsewhere in the Plan](#), electric vehicles are included as a form of sustainable transport alongside public transport, cycling or walking. In the [glossary](#), the phrase 'sustainable modes of transport' is also defined as: "any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport". The Local Plan will not achieve its vision of minimising reliance on private cars if electric vehicles are treated as a sustainable transport mode; new developments will instead increase road traffic congestion and reduce road safety in Cambridge

It should be made clear throughout the Plan that the ambition is to encourage the greatest possible movement by walking, wheeling, cycling and public transport. Policy I/ST should be renamed '**Walking, wheeling, cycling and public transport**' and subsequent references in the text updated accordingly. The definition of sustainable transport in the glossary should also be amended to remove low and ultra-low emission vehicles.

Following up a strong vision with a strong public transport policy

The ambitious wording of the *Vision for Greater Cambridge* (from the section *Summary of the Plan*) does not follow through into this policy. The vision therefore risks being 'warm words' unless the sustainable transport policy is strengthened:

- 1. Development must be located and, through a vision-led approach, designed to reduce reliance on the car, and promote sustainable travel appropriate to its location.

'Reduce reliance' should be replaced with 'minimise reliance' in accordance with the wording in the *Vision*. The equivalent policy from the [adopted local plan for Cambridge](#) (Policy 80: Supporting sustainable access to development) opens with the statement that 'Development will be supported where it demonstrates that 'prioritisation of access is by walking, cycling and public transport' and also talks about making travel by public transport, walking and cycling the "best and safest means of moving around Cambridge'. There should not be backsliding; the sustainable transport policy in the new Local Plan should be as or more ambitious than Policy 80.

- 2. Planning permission will only be granted for development where the site has (or will attain) sufficient integration and accessibility by walking, wheeling, cycling or public and community transport...

The word 'sufficient' is very weak here. The phrase 'or will attain' leaves open the possibility that sustainable transport infrastructure and services will not be in place until long after developments are first occupied (as, for example, has happened with incomplete cycle routes in Northstowe, which was first occupied in 2017). We suggest: "Planning permission will only be granted for development where the site will, by first occupation, prioritise integration and accessibility by walking, wheeling, cycling and public transport."

Bus travel as a real choice

- 2b Ensuring major developments are supported by high quality public transport linking them to Cambridge city centre and major centres of employment

Point 2a in the Policy talks about 'Ensuring development is designed around the principles of walkable neighbourhoods and healthy towns...**to provide real travel choice** for some or all of the journey.' The phrase 'to provide real travel choice' should be repeated in point 2b (public transport should be a real choice, as well as walking/wheeling and cycling). Moreover the 'real travel choice' should be for *all* of the journey.

The phrase 'high quality' is extremely vague. The wording should be strengthened and a new sub-section added with enforceable essential bus service patterns and minimum frequencies.

Residents will also need to access a variety of destinations, including educational centres, medical centres and community centres, not just Cambridge city centre and major centres of employment. This should be recognised in Point 2b.

We suggest a new wording for Point 2b and a new 2bi as follows:

'2b Ensuring major developments are supported by high quality public transport routes and frequent services linking them to Cambridge city centre, and other key destinations including major centres of employment, education and services, to provide real travel choice for all journeys.'

**2bi Public transport services to and from new developments should:
Run at least every 15 mins in peak periods
Run 7 days a week
Run in the early mornings and late at night
Include a guaranteed last bus**

- 2c Provision of new mobility (travel) hubs...

The list of facilities should include comfortable waiting areas.

The phrase 'located within walking, wheeling and cycling travel distance of residents' should be strengthened so that it reads 'located within **easy** walking, wheeling and cycling travel distance of residents.'

- 2g Ensuring that where new road or road access is provided within or into the site it accords with the following:

The needs of buses are entirely missing from 2g. It is important this section is revised as follows:

2gii reads 'it [new road or road access] restricts through access for general motor traffic where appropriate'. It should instead read 'it restricts through access for **private cars** where appropriate', so as not to exclude buses.

There needs to be a new sub-section in between 2gi and 2gii as follows:

- **It [new road and road access] is designed to facilitate direct and efficient bus operation**

The supporting information that accompanies this policy should make clear that streets in new developments should be designed as outlined in [Bus Services & New Residential Developments, Second Edition, January 2025 \(Bus Centre of Excellence\)](#) in line with expectations set out in [DfT Circular LTN01/24 "Bus User Priority"](#). In particular, we draw attention to the following quote from this publication:

Streets intended for use by buses need to be identified at the start of the design process, with a logical rationale as to how the links provided will contribute to the rational evolution of the wider bus network. Introducing bus routes simply to achieve a nominal walking distance threshold to bus stops is not appropriate and is not supported by the National Bus Strategy (p4)

There should also be an additional sub-section about adoption of new roads by The Highway Authority.

- Cambridgeshire County Council should adopt new roads as early as possible in the construction process.

As explained in the blog [Embedding public transport in new developments: time to adopt a new approach?](#) (Bus Centre of Excellence 2024):

New developments are routinely built in a way that virtually guarantees car dependency because councils often adopt new roads far too late in the construction process. For years, estates can sit with unadopted roads, incomplete footpaths, and missing cycle links. Bus services are delayed, sometimes indefinitely. By the time proper connections are finally delivered, residents have already built their daily routines around the car, often helped along by generous parking provision that exceeds genuine household need.

The importance of tackling existing challenges around bus travel in Greater Cambridge

- *'3 Developments will only be permitted where they do not have an unacceptable transport and highways safety impact.....This will be achieved through direct improvements and/or or contributions ...to address transport infrastructure in the wider area including across the district boundary, services or behavioural change measures to encourage the use of sustainable modes of transport'*

We welcome the inclusion of 'services' in this subsection, alongside infrastructure and behavioural change measures. We emphasise that for bus travel, services are as, if not more important, as dedicated bus infrastructure. A busway, for example, will not increase the uptake of bus travel if services running on it are poor quality (e.g. infrequent and poorly-timed). We have outlined above that this policy should enforce essential service patterns and minimum service frequencies. The final phrase of this sub-section should be amended from 'to encourage the use of sustainable modes of transport' to **'to encourage the use of walking, wheeling, cycling and public transport.'** It should be clear that electric private

cars, while preferable to diesel and petrol vehicles, are not the modes of transport the Plan prioritises.

We also welcome inclusion of the phrase ‘to address transport infrastructure in the wider area’ (our emphasis) in this sub-section. The geographical consideration is relevant to services as well as infrastructure, however. The point should read:

“to address transport infrastructure **and services** in the wider area including across the district boundary, or behavioural change measures....”

The ability of residents in new developments to travel by bus rather than by car will depend to a large part on the quality of the bus network as a whole, including the reliability of services, not just the standard of additional infrastructure/services provided with new developments. (“The standard of bus service offered to occupiers of new developments will depend largely on the standard already available on the existing network.” [CIHT, Buses in Urban Developments](#)).

If new development is going to minimise reliance on the private car, then the Local Plan and the accompanying Greater Cambridge Transport Strategy must have a wider aim of making public transport convenient and much more reliable across Greater Cambridge (or more widely), not just to provide new bus links to Cambridge from new developments. Will a resident of Grange Farm consider bus travel a real choice if bus services to and from that development are highly unreliable due to motor traffic congestion along Hills Road in Cambridge? Will that household forgo purchasing a car or a second car if few daily journeys are easily achievable by bus?

The Local Plan must include strong policies to support the introduction of the following (which should also be detailed in the Infrastructure Delivery Plan):

- Measures to enable buses to travel through Cambridge freely, e.g. more bus gates, traffic filters, a circulation plan, road charging.
- Schemes to raise funds to invest in public transport e.g. Workplace Parking Levy, road charging.

These policies will enable the delivery of an expanded bus network and the provision of the attractive, reliable services our communities require to make bus travel a genuine choice for all.

Providing bus services from first occupation of a site

- 3 ...Such measures should be provided to meet the first or early occupation of a site in order to influence travel behaviour from the outset

It is essential that travel by bus is easy, safe and attractive from day one of occupation of a new development, otherwise driving a car will immediately become the default choice. The wording ‘to meet the first or early occupation of a site’ is too ambiguous and should be tightened. Public transport can start as a feeder service to local travel hubs, served by rail and/or express bus services, then evolve over time.

Travel by bus must also remain in place even if the development of a site is slower than expected and passenger numbers are lower than originally forecast. We suggest that developer contributions should support bus services for at least ten years (or five years after

full occupation of a site, whichever is the longer), so residents have the services they need to build the habit of bus travel, as is set out in [The City of York adopted plan](#) (p294/295).

Policy WS/HD Creating healthy new developments

A good bus network is a lifeline, not only connecting people with education, employment, shopping and essential services, but also family and social networks, volunteer work, and recreational activities. It is particularly important for young people, whose transport options are limited and financial circumstances often challenging. Bus travel is therefore an important tool to boost social inclusion, wellbeing and health. The Local Plan should recognise it as such, and establish policies to bring about easy bus access to key services and community, sports and leisure facilities.

Section 1e of this policy discusses how new developments should facilitate walking, wheeling and cycling and promote accessibility for all, but does not mention public transport. A new subsection should be added below 1e:

- **Ensuring that developments provide easy access to bus stops, mobility hubs or railway stations for easy onward travel across the wider area.**

The supporting text should also outline the importance of buses to reducing social exclusion and promoting wellbeing and health.

Policy WS/CF: Community, sports and leisure facilities

Community, sports and leisure facilities only benefit those who can travel to them easily and affordably. This policy should prioritise access to those facilities by walking, cycling and public transport. This will both reduce the negative impacts of increased car traffic and ensure they can be used by all.

Policy S/CBC Cambridge Biomedical Campus (including Addenbrooke's Hospital)

We support plans to improve bus access to Cambridge Biomedical Campus (CBC) and links between the Babraham Park&Ride and CBC.

Infrastructure Delivery Plan

With the exception of major bus infrastructure schemes already in development (C2C, CSET), details of the additional public transport measures to connect sites to Cambridge are vague ("A series of public transport improvements are to be delivered to connect the development sites to the existing network. These may include: Route extensions, Bus priority measures, Timetable amendments to support staff shift patterns." [p47](#)). These additional public transport measures will largely determine, however, whether bus travel is a genuine choice for residents.

A detailed Infrastructure Delivery Plan should be established, including both infrastructure and services (we have suggested a service pattern above). As already noted, measures to enable buses to travel through Cambridge freely (e.g. more bus gates, traffic filters, a

circulation plan, road charging) and schemes to raise funds to invest in public transport (e.g. Workplace Parking Levy, road charging) are also crucial and should be included as strategic transport measures. Without these, buses will not be able to operate reliably or cost-effectively in Cambridge, and it will be more challenging to bring about the expanded bus network communities need for the bus to be a genuine option for all.

Kind regards,

Peter Griffin

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On behalf of the Cambridge Area Bus Users Executive Committee