

From: [REDACTED]
To: [TRANSPORTINFRASTRUCTURE](#)
Cc: [Joanna Vincent](#); adam.Richards@wbd-uk.com; [FeCRA Committee](#)
Subject: THE PROPOSED CAMBRIDGE COUNTY COUNCIL AND GREATER CAMBRIDGE PARTNERSHIP CAMBOURNE TO CAMBRIDGE ORDER
Date: 12 April 2025 08:44:04

Transport Infrastructure Planning Unit,
Transport Infrastructure Planning Unit: transportinfrastructure@dft.gov.uk
Programme Officer: joanna.Vincent@gateleyhamer.com
cc: adam.Richards@wbd-uk.com

Dear Sir/Madam

Ref: "Application for a Transport and Work Act Order to the Department for Transport (DfT) for a new busway linking Cambourne to Cambridge", as submitted by the Cambridge Greater Partnership on 12 November 2024 and further to your emails,

The Federation of Cambridge Residents Associations submits our Statement of Case (below) in response to your invitation. We strongly object to the above application by the unelected Greater Cambridge Partnership (GCP), to the Department for their support to build an off-road busway between Cambourne and Cambridge and a representative of FeCRA would like to speak at the Public Inquiry.

Statement of Case by the Federation of Cambridge Residents' Associations (FeCRA)

Summary

Our main objection to the new off-highway busway fixed route is that it will be used to justify opening up more land for further unsustainable development in the UK's most water-short region.

Cambridge's acute water scarcity is well known. The government has set up the Cambridge Water Scarcity Group to address the city's water shortage. In our response to the Inquiry we would like to present information shared by experts and many residents and environmental groups such as Friends of the Cam, Cam Valley Forum, the Environment Agency and The Hobson's Conduit Trust about the Cam green belt and Cambridge's water scarcity and the likely impact of further development beyond what is in the current local plan.

Many residents strongly object to the off-road section between Maddingley Mulch and West Cambridge. While they agree that improving public transport should be a priority and they support this, residents tell us that they do not think that this proposal is the best use of taxpayers' money. The Benefit Cost Ratio for the GCP scheme is less than 0.5 which indicates extremely poor value for money and does not meet the Department's criteria for considering such a scheme, whereas a suggested alternative from Cambridge Past Present and Future is a fraction of the cost. However, many residents and a number of the Mayoral candidates, support the need for a tram or light rail system to serve Cambridge. They say that what Cambridge needs is an integrated transport approach not the piecemeal approach of the GCP's off highway busway schemes and that much better alternative long term transport plans proposed for light

rail and or trams have not been fully assessed or explored by GCP. The proposed route of the Cambourne to Cambridge busway would not be the preferred route for light rail.

The beautiful views and attractive heritage green belt setting of Cambridge one of the UK's premier heritage cities with its medieval villages is known and loved all over the world. This destructive scheme will spoil that unique heritage setting and urbanise the attractive rural and historic village of Coton.

Cambridgeshire is the most nature depleted county in the country. This scheme will destroy Coton Orchard, a county wildlife site, East Anglia's largest remaining ancient orchard and the eighth largest in the UK. The orchard supports a well-documented range of wildlife and bio-diversity.

A specific function of the green belt is to preserve the setting and special character of historic towns and cities like Cambridge.

The National Planning Policy Framework (NPPF) sets out the role and function of Green Belt and defines the purposes of the designation. NPPF Dec 2024 **Chapt 2 Achieving Sustainable Development Footnote 7** states

- i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area ⁷; or
- ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole...

For decision making this means granting permission **unless**

- i. the application of policies in this Framework that protect areas or assets of particular importance ⁷ provides a strong reason for refusing the development proposed;

The NPPF explains footnote 7 'The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space'

Many Cambridge residents believe that GCP's off highway proposal has very little to do with improving public transport. The real reason they conclude for this destructive off highway busway scheme is that the claimed major benefit is "Land Value Uplift". In other words, to break up some of the UK's best farmland and countryside, including within the Cambridge Green Belt, for further development. See GCP document: "Cambourne to Cambridge Better Public Transport Project - Outline Business Case - Economic Case" dated 17 January 2020, Section 13.4 Value for Money Statement reads:

"The monetised Level 1 economic benefits (based on transport modelling outcomes) show that the scheme produces an initial Benefit to Cost Ratio (BCR) of 0.43 from a PVB of £93.334m (2010 prices, discounted to 2010) and a cost to public accounts of £195.141m (2010 prices, discounted

to 2010). According to DfT guidance and criteria the BCR of 0.43 yields poor VfM.

Taking into account the monetised Level 1 benefits and Level 2 additional benefits of the scheme, relating to Wider Economic Impacts based on fixed land use, the scheme produces an adjusted BCR of 0.48 from PVB of £93.334m (2010 prices, discounted to 2010). According to DfT guidance and criteria the BCR of 0.48 reflects poor VfM.”

and Section 13.5 Indicative Monetised Impacts - Value for Money reads:

“As the strategic case that underpins the need for investment is based on the scheme supporting future economic growth by unlocking dependent housing sites, the scheme's Wider Economic Impacts in relation to land use change must be taken into consideration. Taking into account estimated Land Value Uplift (LVU) impacts, the scheme has the potential to deliver additional PVBs valued up to £287.8m (2010 prices). Applied these as a switching value moves the scheme into a Medium VfM category.

If the value LVU drops by 25%, either because not all houses are built and occupied, or to reflect the transport external costs impact (not accounted for in the initial LVU value), then the VfM category still remains Medium. This would drop to low if only 50% of the LVU value is realised and linked to the scheme. In all cases, this is still greater than the poor VfM category based on the core PVB used to calculate the initial BCR.”

Even including Land Value Uplift arising from developments at Cambourne West, Bourn Airfield, and West Cambridge and other development opportunities that will arise from the creation of uneconomic farm units along the route, the Value for Money of this scheme remains at best Medium.

But, there is no point in entering into any discussion about transport schemes and land uplift or opening up the Cambridge green belt for further housing expansion and employment led growth until the water shortage in the Cambridge area is resolved.

At a time when the rest of the UK is crying out for funding for investment Cambridge residents say it does not make sense to be concentrating the greatest employment-led growth in the UK's most water-stressed region, an area which is also affected by rising sea levels and flooding.

Cambridge and the wider East Anglia area is the driest part of the UK, so there is less rainfall to replenish water supply, a fact that has only been exacerbated by climate change and the increased levels of paving driven by urbanisation, which slows the natural capture of rainwater.

Water supply for the city region is managed by Cambridge Water, a small water company which does not own any reservoirs and provides water by sucking it up from the chalk aquifer below ground, which, if overused, can cause aquifer levels to fall and rivers to dry up.

Cambridgeshire's chalk aquifers are not only the main source of water for residents and businesses locally they also supply globally- unique chalk streams such as Cherry Hinton Brook, Hobson's Brook, the River Cam and River Granta, which support a range of diverse wildlife.

If you talk to residents in Cambridge many will tell you that what they really love about their city and its approaches are the city's green spaces. The fact that the city has developed on the river and has close connections with the farms here makes its character quirky and distinctive. That makes Cambridge attractive and world famous. Once you start to lose Cambridge's unique *rus in*

urbe character it makes famous heritage city much less interesting.

Regarding the region's known water scarcity the earliest a new reservoir can be delivered is 2036 but the one proposed at Chatteris in the Fens will be built in an area of rising sea levels. Farmland pond reservoirs have been suggested as an interim solution but this farm water is needed for agriculture. The earliest that water pipe transfers can be delivered is 2032. The case made for water credits to address shortages in the meantime is dubious and untested.

In 2023 a Cambridge 2040 Delivery Group was set up by the government to lead the development of the city, backed by five million pounds and led by the chairman of Homes England, Peter Freeman. It was stated that Mr Freeman would work on the "detailed vision for Cambridge's future" including what it meant for housing, businesses - including in the technology and life sciences sectors - transport, healthy living and green spaces. But, as Stephen Kelly the Director of Greater Cambridge Shared Planning Service has said (quoted in leading building and housing journals, see referenced) "Our water scarcity issue makes it slightly indulgent to try and meet the country's housing need in a place that doesn't have any water. " In the same reported interview Mr Kelly highlighted that the new reservoir proposed for Chatteris "would only supply requirements for the existing local plan".

For all of these reasons we strongly object to this busway proposal and we look forward to participating in the Public Inquiry to present our case on the special character of the Cambridge green belt and its relationship with the Cam chalk streams and the city's water concerns

Yours sincerely ,

Wendy Blythe,

Chair, FeCRA

References

Building Design 27 March 2024 – Plans for 150,000 houses but no water to supply them

Building.co. UK A vision for 150,000 homes but no water to supply them

Housing Today 24 March – a vision for 15,000 homes but no water to supply them

National Planning Policy Framework 2025

Anglian Water Thriving East <https://www.anglianwater.co.uk/corporate/strategies-and-plans/thriving-east/>

Woodland Trust Orchards <https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/habitats/orchards/>

The Orchard Project <https://www.theorchardproject.org.uk/about-us/>

Chris Blandford and Associates Greater Cambridge Landscape Character Assessment

<https://consultations.greatercambridgeplanning.org/sites/gcp/files/2021->

08/LandscapeCharacterAssessment_GCLP_210831_Part_A.pdf

Greater Cambridge Green Belt Assessment

Information and documents cited in

<https://infrastructure.planninginspectorate.gov.uk/wp-content/ipc/uploads/projects/WW010003/WW010003-001444-Federation%20of%20Cambridge%20Residents%20Association%20-%20FeCRA%20response.pdf>

<https://www.wildlifebcn.org/news/new-report-reveals-drought-now-considered-biggest-risk-uk-nature-reserves>

https://www.south-staffs-water.co.uk/media/v51ijw1n/appendix-p4-ssw-final-wrmp24-sea-environmental-report_issue-4.pdf

and information on the Websites of Friends of the Cam; Cam Valley Forum and FeCRA

Information cited in FeCRA's previous objections

Pure Clean Water a documentary feature film about the Cam chalk stream crisis in Greater Cambridge and information cited in the film (see trailer)

<https://www.youtube.com/watch?v=5tWvjAip0Gg>

GCP "Cambourne to Cambridge Better Public Transport Project - Outline Business Case - Economic Case" dated 17 January 2020,

Wendy Blythe
Chair, FeCRA

www.fecra.org.uk
www.facebook.com/CambridgeRAs
www.twitter.com/fecra2