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09 January 2025
Letter sent by email to the Secretary of State:
transportinfrastructure@dft.gov.uk
Copy to: office@cprecambs.org.uk

Dear Secretary of State,

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.
CPRE Cambridgeshire & Peterborough (CPRE), objects in the strongest possible terms 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 for the reasons given below.

We recognise that improving Public Transport is an absolute national priority at this time of rapidly increasing climate change effects and increasing costs of transport fuels whether electric or oil-based. However, we consider that scarce national funds must be spent most wisely and cost-effectively with minimal ecological and climate impact. This proposal does not meet any of those criteria.

Reason for Construction and Cost Benefit Case: Having reviewed the associated GCP documentation it is clear that this proposal has little to do with improving public transport. The real reason and claimed major benefit is "Land Value Uplift". In other words, to break up productive Cambridgeshire farmland and the 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.*"

So even by 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**.

This proposal is certainly not good value as a public transport scheme and it is not a great deal improved by adding in the notional land value uplifts of developments which would be much better served by a more flexible and better integrated approach to public transport.

Furthermore, the proposed end to end routing, Cambourne to Central Cambridge, duplicates the Cambourne to Central Cambridge routing of the proposed Cambridgeshire section of East-West Rail, an equally flawed project. How can such duplication be contemplated when much better Return On Investment could be obtained by investment in other transport projects in Cambridgeshire and in other locations across the nation?

Above all else, the assumed 'growth' levels for Greater Cambridge are completely unsustainable and not in the national interest. The potable water resources for even currently approved development do not exist and the proposed solutions, pipelines from N. Lincs. and a Fens Reservoir will soon be subsumed by the increasing rate of sea level rise and the consequent flooding of the Fens (see Environment Agency objections to proposed developments). Current waste-water treatment is already causing water body pollution and this is likely to continue.

The 'cluster' effect claimed for Cambridge is economically and scientifically uncompetitive in the global life science and IT arenas. Clusters were a 1960's idea, brought in to enable ease of meeting and discussion when there was no telephone conferencing and just voice phones and teletext communications. International meetings would be held at airports and clustering enabled local interaction and conversation. Today, we have the internet. Additionally, the largest life science 'cluster' is now the Research Triangle Area covering 14 counties of North Carolina, USA containing three major universities, an area not much smaller than England. In an equivalent area the UK has over thirty world-class universities, all engaged in various aspects of life science, IT and other science research and development. In global terms it is the UK that should be regarded as a research cluster, not a single entity such as Cambridge. Take just three examples; the discovery of a treatment for a strain of motor neurone disease by Sheffield; the Biosphere and Centre for Life in Newcastle and the Egenis Centre for the Study of Life Sciences in Exeter. Co-operation across these and other centres of excellence in the UK would deliver far greater and better distributed economic and scientific returns than the over-heating of Cambridge.

Cambridgeshire is the most nature depleted county in the country and is sited in the area with greatest water scarcity and some of the hottest weather. The Cam catchment is subject to increased upstream run-off from development and increasingly intense rainfall. It is also widely affected by rising sea levels and the increasing rate at which sea levels are rising. Both of these factors increasingly threaten this lowest lying area of the country with inundation.

This concentration of transport expenditure on Cambridge also represents poor use of public money at a time when the County Council spending on highways and transport elsewhere in the county is so badly constrained.

Effects on Landscape, Ecology and Heritage: We are appalled by the effect that this proposal will have on the landscape and ecology along the route.

High earth banks with tarmac or concrete topping will form ugly and unsightly intrusions upon the gentle landscape.

They will cause tremendous damage to the local ecology all along the route, perhaps the best example being the division of the Traditional Orchard at Coton, very few of which remain. This Traditional Orchard is the largest one in Cambridgeshire and the eighth largest in the UK. The loss of its biodiversity will be impossible to restore.

Traditional Orchards are orchards designated Priority Habitats, recognised as "hotspots for biodiversity", which make a "significant contribution to biodiversity and local distinctiveness", and frequently contain Nationally Rare or Nationally Scarce Species (UK Biodiversity Action Plan Priority Habitat Descriptions: Traditional Orchards, Defra 2016, p. 1).

Surveys of Coton Orchard demonstrate that parts of the orchard are notable for their high level of bat activity. At least 8 different bat species use it for foraging, including the the highest numbers of Noctule and the rare Nathusius pipistrelle in the area to the west of Cambridge. The presence of the extremely rare Barbastelle bat, which is an IUCN red list species, a UK Biodiversity Action Plan species, and a conservation priority both locally and nationally, has also been recorded.

The UK Government has signed an international biodiversity treaty which is committed to addressing biodiversity loss and restore ecosystems. In 2019, Cambridge City Council pledged *'to provide leadership and to ensure that we work with partners and our communities to reverse the decline in biodiversity and deliver measurable biodiversity net gain within Cambridge and the wider region'*. This proposal ignores those commitments.

This proposal will cause a further negative effect on the American Cemetery at Madingley, the setting of which has already been severely damaged by the unsympathetic A14 flyovers to the north. The cemetery will become at additional risk if the break up of agricultural units to the south leads to applications for development there. Do not the 3,811 American war dead buried at Madingley, all of whom died fighting for the freedom we enjoy today, and the many thousands of visitors (many of them their descendants) who come every year, deserve more respect?

Effectiveness of Segregated Busways: Busways are not an effective way of maximising the use of bus services. The fixed routes mean that services cannot be adapted or changed as travel patterns develop and they are very costly to maintain. Furthermore, they are unable to serve any of the smaller communities that they pass by without those residents driving to the nearest bus park.

CPRE has the advantage of the advice of a transport engineer, a member of another CPRE branch, who has worked globally on transport projects including busways. He has told us:

"Guided buses are used in a few places around the world but they have not caught on. I have used them in Rouen and Caen in France. Caen has since ripped them out and replaced them with a light rail scheme after experiencing many problems. The Rouen ones are guided by a white line whereas the Caen system used a single rail to guide and return power supplied by an overhead wire. Caen effectively spent its money twice over. Like most French cities, Rouen also has a light rail system. That was far better than its guided buses both in terms of capacity and ride.

In the late 70's I did a Highways and Transportation MSc and we had a visit to the fairly new Runcorn busway which was not guided but had a reserved track. This was planned together with the surrounding development. I believe it fell foul of bus-deregulation like the bus-rail interchange in Gateshead and it has also suffered from social problems and vandalism. Some sections have been abandoned."

In Cambridgeshire, we have seen similar problems, including the high costs of maintenance, with the existing busway which is now suffering from capacity constraints despite much of the community it was supposedly built to serve, Northstowe, remaining unbuilt.

Need for an Integrated Approach to Public Transport: In our response to the Cambridge and Peterborough Combined Authority (CAPCA), Draft Bus Strategy, CPRE made the point that there is an urgent need for a plan for integrated public transport across and even beyond the county boundaries.

We will not repeat those arguments here. However, we think this proposal should not proceed until such integrated planning, which includes bus, rail, metro, cycling and walking, has concluded. See our response to the CAPCA consultation for more.

For example, we seriously question whether the GCP has properly taken into account the effect on travel numbers of the change in working practices that has occurred since the COVID pandemic. Hybrid working is here to stay. All integrated public transport planning needs to take this into account.

We also question whether the GCP has properly modelled the effect on car use and congestion of simply providing better bus services along existing highways with a mixture of stopping and express services and appropriate capacity vehicles.

Alternatives: Clearly as indicated above, the proposed East-West Rail route between Cambourne and Cambridge is an alternative to the proposed busway and claims some of the same benefits in its business case. However, we consider that the need is for a more accessible, flexible, affordable public transport system along this route, in order that people may travel not just between Cambourne and Cambridge but also between existing villages along this corridor and serving the proposed development at Bourne if it should proceed.

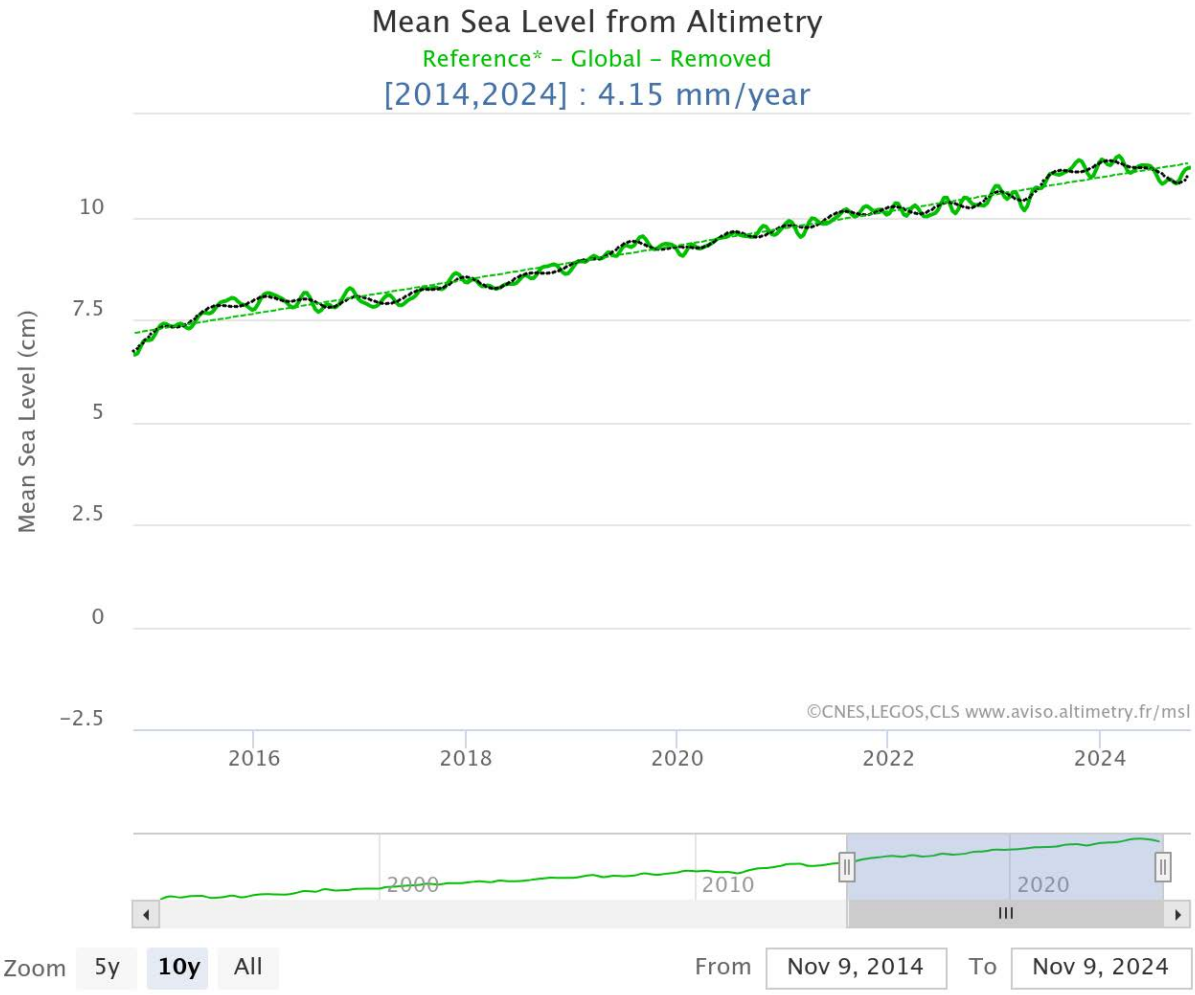
We consider that the alternative proposal by Cambridge Past Present and Future, (CPPF), to make use of the existing road network, with some improvements, along this corridor would provide a considerably more flexible service at a much lower cost. This is more likely to reduce car usage because the flexible routing will serve settlements along the route as well as the single destination at Cambourne. Some services could be extended beyond Cambourne to other villages and to St Neots.

The CPPF proposals can be implemented considerably faster and will mesh more neatly with CAPCA's Bus Strategy. It is far less costly than a fixed bus-way. The Benefit Cost Ratio for the GCP scheme is less than 0.5, which is very poor value for money.

The money saved could be used on other urgently required public transport improvement across the county ranging from the re-opening of rail lines and improvements to bus service frequency and routing as planned by CAPCA if funds are made available.

Climate Change: CPRE is well aware of the climate crisis affecting the globe and locally, in particular the threat to the Fens and even the city of Cambridge, as the rate of sea level rise is steadily increasing due to glacial ice melt in Greenland and Antarctica.

See how the rate of sea level rise has increased over the past 10 years in the graphic below.



(Source, CNES.LEGOS.CLS. Aviso Global Satellite Altimetry. France)

According to the UK Committee on Climate Change, manufacturing & construction, along with buildings, are second only to surface transport as major emitters of carbon dioxide.

We therefore question how many years it will take to reach a balance between the reduction in carbon emissions arising from buses on the busway replacing car usage and the one-off emissions of building the busway instead of making better use of the existing road network as proposed by CPPF.

According to the Cambridgeshire & Peterborough Independent Commission on Climate, Cambridgeshire and Peterborough's greenhouse gas emissions are almost 25% higher per person than the UK average.

The Cambridge area will exhaust its carbon budget to 2050 in another two years and must therefore take the need for carbon emission reductions very seriously.

Conclusions

CPRE is concerned that the reason for the current application by the Greater Cambridge Partnership is not better public transport but is purely financial with the core benefit being Land Value Uplift.

Even taking Land Value Uplift into account, this proposal has a weak financial case with at best Medium Value for Money.

CPRE considers that the 'growth' and 'clustering' projections claimed for Cambridge, which underpin this proposal, are unsustainable and not in the best national interest. Development of the entire UK as a science cluster would be more competitive on a global scale.

CPRE considers that the effects on landscape and ecology of this proposal are totally unacceptable.

CPRE is particularly concerned by the effect upon the 100-year-old Traditional Orchard at Coton with its high levels of bio-diversity supporting many rare species of flora and fauna, and in particular listed bat species.

CPRE considers that the actual and potential effects of this proposal on the American Cemetery at Madingley are disrespectful.

CPRE believes that there is a growing body of evidence that segregated busways are not an effective means of cost-effective, flexible, public transport provision.

CPRE understands that CAPCA is the authority for planning bus service provision in the county and that any proposal for bus service provision along this corridor should be planned and managed by CAPCA.

CPRE believes that the county needs and deserves an Integrated Approach to public transport planning, not the piecemeal approach that this proposal and others by the GCP represent.

CPRE is concerned that if this busway is built it will be the council tax-payers of the County that will be left to pick up the ongoing high maintenance bills, just as they have been with the existing busway.

CPRE is very concerned by the effect on greenhouse gas emissions of the major construction project this proposal predicates.

CPRE objects most strongly to this proposal.

Finally, please note that our submission is in respect of the current proposal and based upon available publications. While we have taken every effort to present accurate information for your consideration in our role as a consultee, we are not a decision maker, therefore we cannot accept any responsibility for unintentional errors or omissions and you should satisfy yourselves on any facts before reaching any decisions.

Yours sincerely

Alan James BSc.Tech., PhD, CITP, CEnv
For and on behalf of CPRE Cambridgeshire and Peterborough