

From:
Friends of the Cam



To:
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Date: 18 August 2025

Re: THE PROPOSED CAMBRIDGE COUNTY COUNCIL AND GREATER
CAMBRIDGE PARTNERSHIP CAMBOURNE TO CAMBRIDGE ORDER

Statement of Case and proofs of evidence

Our two main objections to the busway proposal are (i) the climate and biodiversity damage that the C2C scheme will create, and (ii) that this new fixed route will be used to justify opening up land for further, damaging, development. Given that the proposal has absolutely no inherent environmental, social or economic justification, there can be no other explanation for pursuing such a wasteful, destructive and ineffective project. It will destroy cherished and much valued habitats and landscapes, as well as exacerbating the ongoing climate and biodiversity emergencies.

Drought and the impacts on water supply

The city and its surroundings cannot support the projected growth which the C2C busway facilitates: the water resources do not exist for even currently approved development, nor will they in the near to medium term future, as repeated objections by the Environment Agency demonstrate. This situation will not change on the ground simply because the Government has persuaded the Environment Agency to remove their objections. As this submission is written - in August 2025, the UK National Drought Group (Appendix 1) has declared a 'nationally significant water shortfall'. The rivers Lark and the Great Ouse at Ely are at their lowest ever recorded July levels. The Minister for Water has stated that we 'face a growing water shortage within the next decade'. In an area which will not see the completion of a new reservoir for at least 12 years (and this is optimistic), and where the chalk aquifer is already dangerously low and over-abstracted, this poses a serious limit to growth. According to Cam Valley Forum, waste-water treatment is woefully inadequate

and this looks set to continue, while according to the Environmental Agency, Anglian Water currently has the second highest number of polluting incidents of English Water Companies.

East Anglia is the region with greatest water scarcity and most prone to heat in the UK. This, and inundation from rising sea levels (one meter by the end of the century is a conservative estimate and combines with the sinking of East Anglia by 1mm each year as a consequence of the ice sheet retreat) in this lowest lying area of the country, will only get worse, threatening inflexible infrastructure, as the Climate Central flood risk map clearly illustrates. Even Anglian Water's own commissioned report in support of growth - 'Thriving East' - places the region it covers as the second most challenged of the eleven English water regions on climate, and nature and biodiversity. Even on economy and society, on which we might expect a low challenge ranking to compensate for these, the AW region ranks a high 4th of 11 in terms of challenge (Anglian Water).

Climate and biodiversity damage

A fixed route is likely to generate more car-driving to reach the small number of station-stops; moreover, the route is not planned to extend into the centre of Cambridge, nor its most popular destinations (eg hospital/bio-medical campus, schools and colleges, business parks), thereby necessitating transport changes. Building a fixed-route roadway which only serves its own limited bus service is wasteful and will use a huge amount of carbon emitting cement which will push the county's carbon emissions even further beyond its already exceeded limits (see the Cambridgeshire and Peterborough Independent Commission on Climate, 2021, and Allwood et al, 2019).

We are concerned about the climate and biodiversity damage that the C2C scheme will create, and we do not accept the environmental impact statement which claims that the - as yet unspecified - mitigation measures will compensate for the loss of trees, wildlife and habitat, nor for the substantial carbon emissions created by the building of a fixed single use carriageway. Cambridgeshire is already the most nature-depleted county in the country and the UK is one of the most nature depleted countries in the world. A recent briefing from the RTPI argues that while the causes for this are complex, urban development is a known driver (see attached report, RTPI, 2025)

We are surrounded by evidence of the failure of so-called 'biodiversity net gain'. National Highways promised biodiversity net gain of 11.5% for the building of the A14 extension from Cambridge to Huntingdon, and yet, with the death of 75% of trees planted as mitigation along the widened A14 in Cambridgeshire (Forestry Journal, 2023), and onto their 3rd replanting, nature is in a worse state than before the project started.

A flexible system on existing roads

We fully agree with the need for the provision of an accessible, flexible, affordable public transport network so that people may move between the various villages and towns in Cambridgeshire. We support CPPF's alternative proposal to use the existing road network to facilitate a better and more flexible public transport system. This has a better chance of reducing car use as the routes will serve more villages, and can be available much more quickly. This is also likely to be cost-effective, something the fixed bus-way most certainly is not (the Benefit-Cost Ratio for the GCP scheme being less than 0.5 which indicates extremely poor value for money).

We look forward to participating in the Public Inquiry to present our case.

Evidence

Allwood, J., Azevedo, J., Clare, A., Cleaver, C., Cullen, J., Dunant, C., Fellin, T., Hawkins, W., Horrocks, I., Horton, P., Ibell, T., Lin, J., Low, H., Lupton, R., Murray, J., Salamanti, M., Serrenho, A. C., Ward, M., & Zhou, W. (2019). *Absolute Zero*. Apollo - University of Cambridge Repository. <https://doi.org/10.17863/CAM.46075>

Anglian Water (2023) Thriving East

Cam Valley Forum 'Dramatic increase in sewage spills into River Cam'

Cambridgeshire and Peterborough Independent Commission on Climate (2021) Global Challenge, Local Action

Climate Central Flood Risk Map

Forestry Journal 20 March 2023 A14: Half a million trees die alongside road project

RTPI 2025 Are Developers in England delivering ecological enhancement required by planning permission?

UK National Drought Group Report, August 2025