

From: [REDACTED]
To: [TRANSPORTINFRASTRUCTURE](#)
Subject: Objection to the Proposed Cambourne to Cambridge (C2C) Busway Route
Date: 05 January 2025 20:18:28

Dear Secretary of State for Transport

I, Andrew Davidson of [REDACTED], object to the proposed plan for the Cambourne to Cambridge Busway Route that was submitted as a Transport and Works Act Order (TWAo) in November 2024. The primary reason for my objection is that after carefully reading the submission, I am concerned that the proposed structure over Bin Brook will increase the flood risk to the Gough Way estate, further upstream.

Additional reasons for my objection are that the obvious cheaper and unharmed solutions, including the one offered by Cambridge Past Present and Future (CPPF) and the original proposal of transit along Adams Road, have either, not been considered or rejected without adequate reason. Lastly, the consultation processes revealed that most participants wanted an on-road solution, yet the submission has been written in a way to diminish and obfuscate that common viewpoint.

Please note that I am supportive of a busway into Cambridge that will help reduce traffic and therefore improve air quality, but I am opposed to the proposed route given the increased risk of flooding to surrounding areas and that there are better alternatives.

Increase Flood Risk

The diagrams included from page 31 to 35 in the document, Appendix TR 13.1: Flood Risk Assessment, with filename "Appendix TR13.1 - FRA.pdf", appear to exclude the Gough Way Estate from the flood model. The diagram is truncated, perhaps deliberately, only showing a very localised view around the Bin Brook crossing and does not show the impact less than half a kilometre further upstream. This calls into question the integrity of WSP and whether they intended to mislead the department of transport to get their proposal approved.

Additionally, the documents are dated October 2024 suggesting the flood risk assessment was conducted recently. Perhaps this is the reason that the residents of the Gough Way estate have not been consulted about the findings from this assessment or perhaps the intention was to never consult them. We only became aware of this assessment after the submission in November 2024.

Please note that this estate suffered flooding in 1978 and again in 2001 as illustrated in the following diagram:

https://www.damtp.cam.ac.uk/user/pvl/FLOOD/bin_brook01.jpg

A relief channel was dug along the western edge of the estate after the first flood but proved completely inadequate the second time.

I am not a flood risk expert, but I think even a layman can identify that a highly elevated bridge with wide embankments could act as a dam during spells of sustained and heavy rainfall and this could eventually result in flooding of the Gough Way estate. Today and without a busway over Bin Brook, the Gough Way estate is already vulnerable to flooding.

I also do not believe the model submitted by the GCP accounts for scenarios where debris entering the watercourse, blocks it at the crossing. I have lived next to Bin Brook for 20 years and I can testify that I have witnessed countless trees, vegetation and other debris gathering in it following storms. Fortunately, there are public spirited residents who clear debris from the culvert following storms, but would be unaware of blockages at the proposed Bin Brook crossing.

More important than ever, with the increase in flood risk from climate change, it is essential that designs are compliant with the National Planning Policy. This means that the designs must ensure that they either reduce the risk of flooding or do not increase flood risk to surrounding areas. In my opinion, the submission demonstrates neither and is therefore not compliant, and I urge you to commission an independent flood risk assessment using the Environment Agency. Sadly, I no longer trust the GCP and their consultants to do this with impartiality.

Better Options

East-West Rail

As mentioned, I'm generally supportive of a busway which could complement the East-West Rail link, which is currently in a consultation process due to conclude on 24th January.

<https://eastwestrail.co.uk/consultation2024>

East-West Rail promises to deliver a transport link from Cambourne to Cambridge North (Science Park), Cambridge Central station and Cambridge South (Biomedical Campus), i.e. to workplace destinations as opposed to Grange Road. It is worth considering that if the East-West Railway is delivered, it will positively impact the estimated transit times detailed in the C2C consultation document (calculated pre-pandemic).

Cambridge Past Present and Future's (CPPF) On-Road Option

Rather disappointingly, the proposal by CPPF was not considered by the Greater Cambridge Partnership (GCP), the CPPF proposal can be downloaded from here:

<https://www.cambridgeppf.org/Handlers/Download.ashx?IDMF=19b623a9-920d-425e-b8bd-41f2c95dc0fd>

The CPPF proposal was written by a leading consultancy firm specialising in transport planning, transport infrastructure design and environmental assessments in the UK.

In the CPPF proposal, large improvements to bus journey times along Maddingley Road can be achieved relatively quickly with in-highway interventions. The design includes 1,135m of bus lanes and other technical interventions, which would reduce a 42-minute delay to under 10 minutes. It is expected to cost well under £10M and to provide most of the same social benefits as the GCP option, at a benefit-cost ratio (BCR) in excess of 4.0, compared with 0.48 for GCP's option. The GCP's option will only yield £63 million of benefit for a budgeted outlay of £192 million representing poor value for money.

Adams Road Option

The GCP's option (involving the Bin Brook crossing) avoids a short section of transit along Maddingley Road. I urge you to take a brief look at a map of this area and observe the many alternative options from the Cambridge University West Site, using existing infrastructure. Utilising existing roads such as Adams Road or Wilberforce Road would remove the need for the Bin Brook crossing which would save considerable cost but crucially, not contribute to increased flood risk.

If there is a public inquiry, it will be very interesting to find out why the Bin Brook crossing became the preferred option given better options were made aware to the GCP. Given the current state of the economy, reallocation of funds should be considered in favour of wasting nearly £200M of public money, excluding likely, overrun, increased scope and extra costs which the previous Cambridge busway project incurred (~50% over original budget).

Unfair Consultation process

The consultation was run twice because the GCP did not like the results from the first consultation where an overwhelming majority voted for the on-road option along Maddingley Road. The objective of the second consultation was to provide multiple options for the on-road route hence diluting down and dividing votes that objected to the off-road option. I would urge any reviewing body to assess the questionnaires from both consultations and compare the raw results with the carefully fashioned statistics presented in the final submission. It's disappointing that public money was spent by the GCP on expensive consultants specialising in techniques to bypass and suppress local democracy. As mentioned previously, this has led to a loss of trust in the GCP as it is unclear what their motive really is.

Yours sincerely
Mr Andrew Davidson

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