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Heidi Alexander MP
Secretary of State for Transport
Department For Transport
Great Minster House
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06 March 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 known as the Cambridge South East Transport (CSET2) for a public transport route between a new travel hub near the A11 to A1307 and the Cambridge Biomedical Campus, as submitted by Cambridge County Council and the Greater Cambridge Partnership on 9 January 2025.**

CPRE Cambridgeshire & Peterborough (CPRE), objects in the strongest possible terms to the above application by Cambridge County Council (CCC) and the unelected Greater Cambridge Partnership (GCP), to the Department for their support to build an off-road busway between a new travel hub near the A11 to A1307 and the Cambridge Biomedical Campus 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: *"The Cambridge South East Transport Order - Outline Business Case", Reference CSET-20-00,* dated January 2025, but actually written by Mott Macdonald in May 2020, see Page 4.

Table 7.4 of the Section titled "*Outline Business Case - Economic Case"* reads in *2.2.3 Level 3: Wider Economic Impacts (Land Use Change)*

*"The assessment of the Level 3 impacts has been based on a Land Value Uplift (LVU) approach which examines how the CSET Phase 2 project supports the planned development along the corridor."*

The document goes on to say:

*"Overall, the monetised journey time benefits across the options are reasonably consistent, with the scheme generating benefits in the region of £40-£46m over the 60-year appraisal period."*

So that's around £7m per annum from journey time savings. Not a lot for such an expensive project, **£160,989,017** as set out in the Form 3 Estimate of Costs at document reference CSET-09-00-00.

But here comes Land Value Uplift to the rescue:

### *7.4.1 Conclusion of Wider Economic Benefits Analysis*

*In summary it was found that the development of the three residential sites and single employment site identified in the South Cambridgeshire Local Plan (2018)[9] could produce:*

*Approximately 404 gross jobs and £18m of gross GVA per annum; and*

*A single uplift in land values of approximately* ***£113m.***

In other words, without the £113m of Land Value Uplift, this project does not have any kind of reasonable cost benefit case.

According to the document **"Economic Dimension Addendum"**:

*The Benefit Cost Ratio, BCR, for a scheme provides an indicative measure for the VfM, Value for Money, of the investment, whereby a BCR greater than 1.0 indicates that the benefits outweigh the costs. DfT has defined value for money categories, which are as follows:*

*i. BCR less than 1: Poor*

*ii. BCR between 1 and 1.5: Low*

*iii. BCR between 1.5 and 2: Medium*

*iv. BCR between 2 and 4: High*

*v. BCR of 4 and above: Very High*

*Table 1.11 Analysis of Monetised Costs and Benefits (£)* of this document shows a BCR of **1.47, Low**. The document then goes on to say:

*"The new analysis yields a higher BCR improving from 0.81 to 1.47, and a higher VfM from poor to low, as compared to OBC 2020. Table 1-13 below compares the PVB, PVC, BCR and VfM values between OBC 2020 and this Economic Dimension Addendum. This change is a result of a larger increase in PVB (an 83% increase) than the increase in PVC (a 14% increase), with more monetised benefits coming from local air quality (increased by £37,000), economic efficiency for consumer users (increased by £37,541,000) and, business users and providers (increased by £40,522,000). This can be attributed to the different methodologies used in the economic appraisal approach. OBC 2020 assessed economic efficiency using journey time benefits (calculated by the multiplication of the time savings based on a defined Value of Time (VoT) per user purpose split) and MEC methods. The Economic Dimension Addendum did so through TUBA, which aligns with DfT guidance TAG unit A1-1 Cost-Benefit Analysis.*

*The latest BCR of 1.47 gives a project value for money category as Low VfM. Achieving so requires an increase in BCR by 0.3, which can be facilitated by an increase in PVB by £2,607,227, or a decrease in PVC by £1,738,151."*

***Table 1-13 - Summary of PVB, PVC, BCR and VfM of OBC 2020 and MEC calculations***

| | OBC 2020 Calculations | MEC calculations |
|---|---|---|
| PVB | **£69,762,000** | **£127,578,790** |
| PVC | **£85,652,000** | **£86,790,678** |
| BCR | **0.81** | **1.47** |
| VfM | **Poor** | **Low** |

So, having got the BCR up from POOR to LOW, the document goes on to massage the figures further. Suddenly, to meet the requirements of the AMAT toolkit, everyone starts walking and taking to their bicycles. Apparently, people can't walk or cycle without a nearby busway to add risk to their lives which, for some unexplained reason, see *Table 1.19 – Active Travel Benefits*, reduces their risk of premature

death and adds significant journey ambience. Try telling that to the people who have been injured and killed on the existing busway.

The consequent massaged figures are presented in *Table 1-20 - Analysis of Monetised Costs and Benefits (£),* where, the BCR has now been massaged up to 1.53, just about achieving **MEDIUM**.

Our conclusion is that this is not good value for public money and such money would be much better spent elsewhere, such as on carers for the growing numbers of elderly and infirm people in the county, repairing poorly maintained roads and increasing bus access within villages across the county.

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.

**Other Economic Issues**

CPRE believes that the assumed 'growth' levels for Greater Cambridge are completely unsustainable and not in the national interest. The potable water resources for even currently approved developments do not exist and the proposed solutions, a pipeline from N.E. Lincs. and a Fens Reservoir near Chatteris, 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 claimed 'cluster' effect 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 which contains three major universities in an area not much smaller than northern England and the Midlands. 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 entire 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 University; 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.

Many of these locations are crying out for regeneration. There are nearly 700,000 homes in England that are unfurnished and standing empty. Over 265,000 of these are classed as 'long-term empty'. When we add in holiday short-lets and second homes, total vacancy sits at over 1 million homes, meaning that across England, 1 in every 25 homes is empty. Many of these are in areas close to other universities where with proper management a major contribution could be made to regeneration and reducing the housing crisis with least carbon footprint.

In its 2022 state of brownfield report CPRE showed that the availability of previously developed land continues to grow across England. In summary, it found that over 1.2 million homes could be built on 23,000 registered sites covering more than 27,000 hectares of brownfield land.

CPRE's report "Brownfield comes first" published in 2016, analysing 1,040 development projects over three years, showed clearly that brownfield sites were developed more than half a year quicker than greenfield sites (92 weeks against 121 weeks for greenfield). The finding that brownfield sites were faster from permission to completion was consistent for all site sizes. Again, many of these sites were

in areas close to other universities where with proper management a major contribution could be made to regeneration and reducing the housing crisis with least carbon footprint.

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/Ouse 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.

In 2019 the Environmental Audit Committee report "Our Planet Our Health", pointed out that food imports will become increasingly difficult due to the effects of climate change and that the UK must seek to increase food grown at home. The area around Cambridge is nearly all "best and most versatile", so building on it will take some of the best land in the country out of production permanently. Not exactly a wise decision.

**Effects on Landscape, Ecology and Heritage**

CPRE 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, particularly across the Cam valley with the ugly concrete bridge across the river.

This will cause tremendous damage to the local ecology all along the route. Just one example will be the effect on rare bats. The Environmental Report states:

*"The latest bat surveys, undertaken in the summer of 2022, found evidence of six species / groups of bats across seven transect locations, spanning the entire Site, through recordings from static detectors. Barbastelle bats were recorded at all static detector locations indicating their presence across the entire Site. The six species / groups are:*

- *Barbastelle (Barbastella barbastellus)*
- *Common pipistrelle (Pipistrellus pipistrellus)*
- *Soprano pipistrelle (Pipistrellus pygmaeus)*
- *Myotis species*
- *Noctule (Nyctalus noctula) / serotine (Eptesicus serotinus) / Leisler's (NSL)*
- *Brown long-eared (BLE) bats*

*The total number of recordings and species found, combined with the presence of habitats suitable of supporting bats including woodlands, open fields, waterbodies, and linear habitat features such as rivers, streams and hedge lines show that the Site provides suitable habitats for roosting, foraging and commuting bats."*

*"Taking into consideration the highest ecological receptor (barbastelle bats), the assemblage of bats is considered to be of regional importance."*

*"Records of six bat species were returned from the desk study, with seven European Protected Species Licences (EPSL) granted for bats within 2km of the site boundary."*

*"At least eight bat species were recorded on site and the site has been valued at Regional level for commuting bats and District - Regional level for foraging bats."*

The extremely rare Barbastelle bat is an IUCN red list species, a UK Biodiversity Action Plan species, and a conservation priority both locally and nationally.

This is just one example of the rare wildlife that are going to be permanently affected by this unnecessary project.

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

**Effectiveness and Safety 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, particularly in rush-hours, despite much of the development it was supposedly built to serve, Northstowe, remaining unbuilt.

Cambridgeshire County Council have been prosecuted by the HSE over safety violations which have caused three deaths and numerous major injury and minor injury accidents on the existing busway. CCC pleaded guilty.

The latest major accident was on 4 March 2025 when a 13-year-old boy was struck by a bus and reportedly, has been seriously injured.

**Need for an Integrated Approach to Public Transport**

**I**n 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 seriously 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.

The construction of this guided bus route will make use of part of the closed Colne Valley rail line. CPRE considers this to be a serious mistake, because re-opening of the Colne Valley line could provide a rail service to Haverhill, Sudbury and beyond with much greater capacity than the busway and the potential of a much needed third route to London, if only for diversions when the other lines are closed.

If the East-West rail line took a 'northern' route it could use a re-opened Colne Valley line to continue its services eastwards to the Haven Ports, via Colchester. This would likely be less costly than widening the single-track tunnel on the Newmarket line.

**Alternatives**

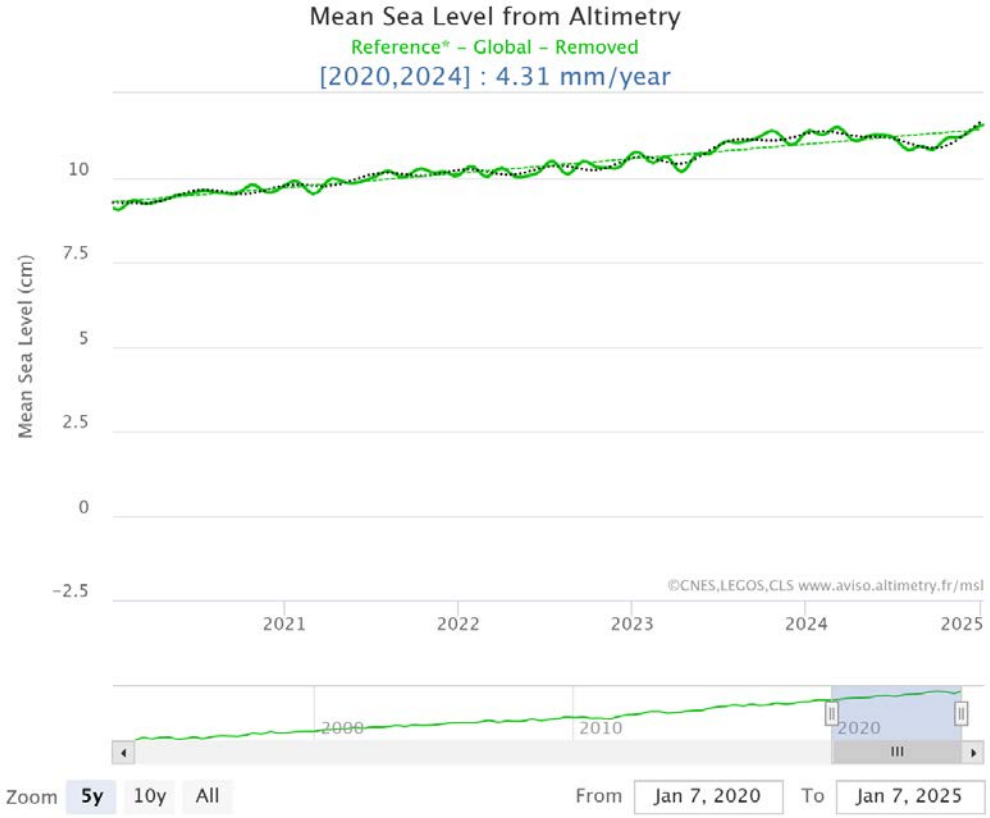
We consider that the alternative proposal by Cambridge Past Present and Future (CPPF) and the Better Ways for Busways (bw4b) campaign to make use of the existing road network, with some improvements, would provide a considerably more flexible service at a much lower cost. This is more likely to reduce car usage because the flexible routing will better serve settlements all along the route.

The CPPF and bw4b proposal can be implemented considerably faster and will mesh more neatly with CAPCA's Bus Strategy. It is a far more cost-effective solution than a fixed bus-way.

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 5 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 building, 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 GCP 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 landscape of the Cam valley with its high levels of biodiversity supporting many rare species of flora and fauna, and in particular listed bat species.

CPRE believes that there is a growing body of evidence that segregated busways are not the best means of safe, cost-effective, flexible, expandable, 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 not the unelected GCP.

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 and legal fees and fines, 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