

From:
Friends of the Cam



To:
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Date: 30 September 2025

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

UPDATED STATEMENT OF CASE

Friends of the Cam is a consortium of concerned organisations and individuals, with c3,600 registered supporters. Tony Booth and I who're here today are 2 of the 7 co-founders, and 2 of the 8 current steering group members. For your information I was, until I retired from my University, a Professor of Geography. I am representing FotC here today.

FotC's aim is to defend the Cam and its tributaries from pollution and over-abstraction and we do so through education, direct action, policy advocacy, and celebration of the rivers. We are concerned about both the immediate/short term state of the river, and its longer term sustainability. Hence we are concerned with any activity which compromises the health of the river and all who depend on it, at

whatever scale. This includes so called growth, and speculative development, which does not benefit most of the resident population.

We ignore our environment at our peril: history is littered with examples of how disregarding natural constraints has ultimately led to the destruction of cities, cultures and empires. Even if we accept that growth is desirable - which we do not, for reasons which will be explained shortly - situating that growth in the most vulnerable part of the country is madness: East Anglia is the most nature-depleted, driest, most drought prone, lowest-lying and most flood threatened region in the UK.

For an example of how perilous both our economic and hydrological situation is, we need look no further than the imminent collapse of the two locks which keep the Cam at navigable levels. While the Mayor has now promised £500,000 to make urgent repairs to Baits Bite Lock, this is a drop in the lake that is the estimated millions of pounds required for its long term survival. Cambridge is falling apart. Apart from the disintegrating locks, we have the worst cycling roads in the UK according to an endurance cycling group, a library falling apart so that on the day we met with Peter Freeman to discuss our concerns about the Cambridge Growth Agenda, the top floor where we had booked our meeting room was closed because of flooding. Moreover, Cambridge is the most economically unequal city in the country. Millions are spent in consultations with nothing to show for them. The busway under discussion has no cost-benefit advantage, other than land-value uplift according to even its proposers. Surely the money earmarked for this could be better spent on creating a 'world class city' that actually works?

The city and its surroundings cannot support the projected growth which the C2C busway is designed to promote, and which is implied by 'land-value uplift': 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 on the grounds of as yet untested water credits becoming available. There is no evidence to suggest that these are workable. In August 2025, the UK National Drought Group (submitted in our evidence) declared a 'nationally significant water

shortfall'. The rivers Lark and the Great Ouse at Ely were 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, as is its capacity to deliver the water needed), and where the chalk aquifer is already dangerously low and over-abstracted, this poses a serious limit to growth.

We note with interest that the applicants have based their annual rainfall data on 1981-2010 records, when the more recent 1991-2020 data would have been available. From this they would have seen that the more recent annual rainfall - at 559.37mm/year - is 140mm less than the 700mm they quoted.

UKAI - representing businesses in the AI sector, and therefore, we might assume, is in favour of AI growth, are cautioning about the placement of this water-thirsty industry. They state that [and I quote] 'the rapid growth of AI technologies has driven demand for data centres that rely heavily on fresh mains water to cool their servers. This surge has created a significant blind spot in government water planning, complicating forecasts and raising fears of more severe shortages than previously estimated.'

Further, UKAI states that 'The government's ambitions to position the UK as a global AI leader—outlined in its AI Opportunities Action Plan—envision the creation of AI Growth Zones to streamline planning and expand data centre capacity. Prime Minister Keir Starmer has backed fast-tracking these projects, citing their potential to boost local growth and innovation. However, some proposed sites, including areas near Abingdon, Oxfordshire—already flagged for water scarcity—pose notable environmental risks.' This will undoubtedly be true of Cambridge also.

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. Indeed, Anglian Water has recently been refusing to approve new developments on the basis of lack of capacity.

As already mentioned, East Anglia is the region with greatest water scarcity and most prone to high temperatures in the UK. This, and inundation from rising sea levels in this lowest lying area of the country, will only get worse, threatening inflexible infrastructure, as the Climate Central flood risk map clearly illustrates. According to Dr Rob Larter of the British Antarctic Survey, the one meter projected sea level rise 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 a recent talk he gave to Friends of the Cam he concluded that the projected development and growth in this region was madness.

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.

Furthermore, the Cambridge Water Resources Management Plan of 2024 is making claims that simply cannot be supported.

For example, its target to achieve a 50% reduction in leakage from 2017/18 levels by 2040. CW claims that it is already one of the strongest performers in the industry for levels of leakage but fails to acknowledge that Anglian Water has the highest leakage rate of all water companies (7.9% to CW 0.7%; Affinity Water 1.8%). Cambridge Water will be relying on transfers from Anglian Water to supply new developments (via pipeline from Grafham Water).

Cambridge Water claims that it will reduce household consumption by 2050. It claims one of the lowest household consumptions in the industry, no doubt facilitated by the relatively high proportion of single person households, and fertility rates which are the lowest in the country. <https://www.discoverwater.co.uk/amount-we-use> However, the water companies are currently failing to make their reduction targets. (AW Target -4.5; actual -2.2; CW Target -5; actual -2 in 2023/24)

Cambridge Water anticipates a 9% reduction in non-household consumption by 2038. However, the enthusiasm for data and AI centres, and growth in laboratories, are a huge unknown quantity here:

- AI datacentres use a large amount of water, as their servers generate heat. To prevent computer systems overheating and shutting down, the centres use cooling towers and outside air systems, both of which need clean, fresh water. For example, Microsoft's global datacentres consume between 1.8 and 12 litres of water for each kilowatt hour of energy usage, and energy used by AI could be 25 times higher by 2040
Guardian 2025:

A [Cambridge University report](#) too recent to have been included in our evidence has called the assumption that AI development is consistent with planning for a climate emergency 'magical thinking at the highest level' based on AI's extortionate energy needs.

Cambridge City, South Cambridgeshire District Council and Cambridgeshire County Council have all declared a climate emergency. Apart from the climate damage that unleashed development will cause, the climate damage by the proposed busway will be enormous and as far as we can see the carbon cost of building the busway has not been included in the project's carbon budget.

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, as Miranda Fife has already pointed out to the Inquiry. 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, both presented as evidence).

We are concerned about the 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.

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. This is needed for people already living outside Cambridge, regardless of future residents. 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 - as even the project proposers indicated in their opening statement (the Benefit-Cost Ratio for the GCP scheme being less than 0.5 which indicates extremely poor value for money).

For all these reasons, we urge the Public Inquiry to find against the proposed unnecessary and damaging fixed busway.

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

Extra resources:

<https://ukai.co/ai-data-centres-spark-fresh-fears-over-future-uk-water-shortages/>

<https://www.theguardian.com/technology/2025/jan/13/labour-ai-datacentre-growth-zone-water-shortages-abingdon-reservoir>

<https://www.cam.ac.uk/research/news/banking-on-ai-risks-derailing-net-zero-goals-report-on-energy-costs-of-big-tech>

<https://www.discoverwater.co.uk/amount-we-use>