

From: [Robert Warnock](#)
To: [TRANSPORTINFRASTRUCTURE](#)
Subject: RE: Objection to Transport and Work Act Order to the Department for Transport (DfT) for a new busway linking Cambourne to Cambridge.
Date: 08 January 2025 20:22:25
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Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minster House
33 Horseferry Road
London SW1P 4DR

Objection to Transport and Work Act Order to the Department for Transport (DfT) for a new busway linking Cambourne to Cambridge.

Robert Warnock
Director, Ancient Tree Forum
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Registered Office:

Ancient Tree Forum, 85 Great Portland Street, First Floor, London W1W 7LT.

Dear Sir/Madam

I Robert Warnock, Director of the Ancient Tree Forum, 85 Great Portland Street, First Floor, London, W1W 7LT am writing to make a formal objection to the “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.

The Ancient Tree Forum (ATF) has pioneered the conservation of ancient trees for over 25 years and is the only UK organisation focused solely on ancient and other veteran trees. Our vision is for ancient and other veteran trees, their wildlife, and their heritage and cultural values to be safeguarded now and in the future. Our published material and training has sought to raise the profile and importance of ancient and veteran trees, including how to identify and manage them, which is constantly evolving. We have been influential in achieving recognition of their high biodiversity and cultural value in policy and guidance.

Ancient and other veteran trees are iconic features of the English landscape and by their continued presence over generations they echo the lives of past generations of people in ways that no other part of our natural world is able. Britain has an internationally significant population of ancient trees and other veteran trees those that survive here are not merely of local importance but are of international significance.

Grounds for Objection

The proposed busway would transect Coton Orchard, a County Wildlife Site and East Anglia’s largest remaining ancient orchard, which is the eighth largest in the UK.

The ATF objects to this application on the basis of the proposed unacceptable loss of veteran trees. The assertion that the orchard’s trees are mostly “young” is inaccurate; the majority are mature or veteran

trees – the 12 original 1922 Bramley trees are recorded in the Woodland Trust Ancient Tree Inventory.

The loss of these trees will have very significant adverse impacts on biodiversity and habitat which, in the case of ancient and veteran trees, cannot be replaced, and is contrary to the National Planning Policy Framework para 193c. This policy puts ancient and veteran trees on a par, in terms of protection, with Scheduled Ancient Monuments and Grade 1 listed buildings in that it requires ‘wholly exceptional’ reasons to be put forward for any loss or deterioration of irreplaceable habitat.

The application, which involves the felling of veteran fruit trees located at Coton Orchard. These trees are of significant ecological and cultural value and should be protected under the Biodiversity Net Gain (BNG) Statutory Instrument, effective from February 2024.

1. **Irreplaceable Habitat:** Veteran fruit trees are recognised as irreplaceable habitats due to their age, biodiversity value, and the unique ecosystems they support. The BNG Statutory Instrument mandates the protection of such habitats to ensure biodiversity net gain.
2. **Biodiversity Loss:** The removal of these trees would result in a significant loss of biodiversity, affecting various species of flora and fauna that depend on them. This is contrary to the objectives of the Environment Act 2021, which aims to enhance biodiversity.
3. **Cultural and Historical Significance:** These trees are part of our local heritage and have significant ecological value but also hold historical and cultural importance. The loss of such habitats would be detrimental to the local biodiversity and contradicts the principles of sustainable development.
4. **Alternative Solutions:** The Ancient Tree Forum urges the Department of Transport to consider alternative solutions that would allow for the busway to proceed without the need to fell these veteran trees. There is an excellent on-road alternative including new bus lanes and bus priority measures following the A1303 which has never been properly assessed by the Greater Cambridge Partnership (GCP).

The Greater Cambridge Partnership (GCP) has acknowledged the environmental impact of the proposed route through Coton Orchard but has not provided sufficient justification for why alternative routes, which would have less environmental impact, have not been pursued.

In summary, the Ancient Tree Forum objects to this application and calls upon the Department for Transport to explore alternative solutions that would achieve the project's objectives without causing irreversible damage to these irreplaceable habitats at Coton Orchard.

Thank you for considering our objections.

Yours sincerely,

R Warnock

Bob Warnock

Director

Ancient Tree Forum

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My working days are Tuesday, Wednesday and Thursday



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