

[REDACTED]

From: Jonathan Durward <[REDACTED]>
Sent: 26 February 2025 17:40
To: TRANSPORTINFRASTRUCTURE
Subject: Objection to Transport and Work Act Order to the Department for Transport (DfT) for a new busway to the southeast of Cambridge

To whom it may concern,

I Jonathan Durward of [REDACTED] 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 to the southeast of Cambridge”, as submitted by the Cambridge Greater Partnership on 9 January 2025. The grounds for this objection are the following:

The construction of 5 miles of new road through open countryside is unnecessary to deliver improvements in transport. Similar transport and economic benefits can be achieved by building a version of the scheme first proposed by the applicant in 2018. This would involve building sections of bus lane adjacent to the A1307 and 1 mile of new road (busway).

This alternative would avoid building two bridges over the River Granta chalk stream and putting Hobson's Conduit chalk stream into a culvert.

This alternative would avoid creating a scar in the Gog Magog Hills landscape, one of the most important landscapes in the Cambridge area.

This alternative would avoid building a new road through a countryside park, to the detriment of its future users and nature.

This alternative would avoid severing fields close to villages making them vulnerable to future development and further harm to the countryside.

This alternative would better serve the planned expansion of the Cambridge Biomedical Campus and serve more of the Campus.

Cycle routes in this area are already under construction and include the Linton Greenway which will connect Cambridge to Babraham, Granta Park and Linton; and the Sawston Greenway that will connect Cambridge to Sawston. Stapleford and Shelford are already served by the DNA cycle path.

Great Shelford already has a railway station and is linked to the Biomedical Campus and Addenbrookes Hospital by the DNA path, so there is no benefit of a new busway to people who live in the village. Why would people walk or cycle to a bus stop that is located to the north of the village when they can already walk to the train station and cycle to the Biomedical Campus.

In Table 10.7 on page 164 of the Environmental Statement (Document Reference CSET-10-02) it states that the Impact magnitude on bats will be Minor and the significance of impacts will be slight adverse and not significant. It also states that the majority of the footprint of the construction works is on managed arable land of low value for commuting and foraging bats - there is no evidence to back this statement up as there have been no radio tracking studies of Barbastelles or other bat species to show how they use the landscape. Given that there is little woodland in this area, arable land is of value for commuting and foraging bats, you only have to look at recent Barbastelle radio tracking studies from EastWestRail data to know that.

In Table 10.8 on page 172 of the Environmental Statement (Document Reference CSET-10-02) it states that the Impact magnitude on bats will be **Minor** and the significance of impacts will be **slight adverse and not significant**. Increased artificial lighting will be introduced in areas where bat foraging and commuting have been recorded at Granham's Road crossing, Hinton Way crossing and Haverhill Road crossing and that some species of bats may avoid foraging or commuting in these areas.

In Appendix CSET-10-32-00, Woodland W3, which is shaded in light green on Figure 2a on page 27 of this document (16 out of 572 scrolling on the PDF toolbar), has been assessed of being of **Low Value** to bats. This woodland is just to the northwest of the proposed Granham's Road crossing point, and has a bat hibernation site that has been monitored annually by the Cambridgeshire Bat Group since 2002. A Barbastelle bat was found hibernating in this woodland on the 15th of January 2025. This woodland has not been correctly evaluated for bats by White Young & Green in 2019, (WYG are now known as Tetra Tech). There is no reference to this hibernation site in any of the ecological reports or appendices as far as I am aware.

There are a number of discrepancies in Appendix CSET-10-32-00, with woodlands being evaluated differently in Table 9 on page 12 than in Figures 2a and 2b.

W2 - Table 9 evaluated as **Low**, and in Figure 2a evaluated as **Moderate**.

W4 (between Granham's Road and Hinton Way) - Table 9 evaluated as **Low**, and in Figure 2b evaluated as **High**.

W6 (Hinton Way) - Table 9 evaluated as **Negligible**, and in Figure 2b evaluated as **Moderate**.

There is quite a discrepancy between these evaluations and they are not consistent. Given that these woodlands are in areas with contiguous habitat across where the proposed scheme is due to be built and lit up by artificial lighting, then habitat connectivity for bats to and from important roosting areas will be disrupted. To say that the Impact magnitude on bats will be **Minor** and the significance of impacts will be **slight adverse and not significant** is not correct. If you constructed the scheme alongside the existing A1307 you would avoid these impacts as there is already infrastructure in place, and you would not need to build an entirely new infrastructure scheme.

Evidence of casualties of bats with vehicles in the local area include a dead Barbastelle bat, that was found at grid reference TL480503 near Huckeridge Hill on Cambridge Road, Sawston on the 27th of August 2024 (Guy Belcher, pers.comm.). This is an area of open countryside with hedgerows, so it is highly likely that the bat was using the hedgerows and died crossing the road.

Data search records undertaken for this proposed scheme does not include Cambridgeshire Bat Group hibernation site data.

If whoever is proposing to build this scheme is insistent on building it across open countryside, then more detailed research on the local bat populations needs to be undertaken.

Kind regards,

Jonathan Durward

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