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

I 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 application has seriously understated and misrepresented the environmental damage that will be caused by the off-road section of the proposed scheme. It will effectively destroy Cambridgeshire’s largest traditional orchard – a Priority Habitat and County Wildlife Site with exceptional biodiversity. It will also cut across vital wildlife corridors and remove areas of valuable agricultural land. These are losses that Cambridgeshire, the most nature-depleted county in the UK, cannot afford.

The GCP claim that they will mitigate the loss by delivering 20% Biodiversity Net Gain (BNG). But experts report that this is simply not possible if the ancient orchard is removed. Moreover, since there *is* a viable on-road alternative – for which the GCP have failed to provide any reasoned rejection – they are not abiding by the the first principle of good practice in relation to BNG¹, which requires that everything possible is *first* done to avoid impacts on biodiversity. If this is not done, then any claims to deliver BNG are invalidated.

This infringement is compounded by the fact that this application for the “off-road” busway uses badly out-of-date modelling, and a budget that has not been accurately updated to reflect the rising costs of construction.

The many objections to this scheme will trigger a public inquiry, but the shocking inadequacy of this application makes the time and vast expense of that exercise completely unjustified. I therefore urge that the application is subjected to careful scrutiny by your department before reaching that stage.

Yours faithfully

Dr Deborah Pullinger

1. As developed by CIRIA, CIEEM and IEMA in 2016. Baker (2016) *Biodiversity Net Gain and good practice principles for development*, CIEEM, IEMA, CIRIA,, UK