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From: Annabel Sykes <[redacted]>
Sent: 07 March 2025 22:12
To: TRANSPORTINFRASTRUCTURE
Subject: Objection to Transport and Work Act Order Application to the Department for Transport in respect of a new busway to the southeast of Cambridge

Dear Sirs

I am writing to object to the Application for a Transport and Work Act Order to the Department for Transport (DfT) for a new busway, travel hub and path for walkers and cyclists to the southeast of Cambridge, submitted by the Greater Cambridge Partnership on 9 January 2025. The grounds for this objection are the following:

(a) Greater Cambridge needs a many-to-many transport system linking Greater Cambridge's polycentric housing and employment sites. The existing and proposed guided busways, including the proposed busway to the southeast of Cambridge which is the subject of this application, do not achieve this. They are disconnected and the busway to which the application relates potentially uses difference guidance systems from the existing busways, ilmiting scope for inter-operability. Instead Greater Cambridge needs a light rail system, such as that proposed by Cambridge Connect and, in particular, it needs the Isaac Newton line in those proposals, which is to run from Cambourne in the west, through the centre of Cambridge, to Trumpington Meadows and Haverhill.

(b) Light rail from Cambridge South station to Granta Park (along a reinstated section of the railway line to Haverhill), would be less environmentally damaging than the scheme envisaged in the application and would not involve the rubber pollution that bus tyres inevitably do. It could also far better serve the communities of Pampisford, Sawston, Stapleford and Great and Little Shelford than the proposed edge of village bus stops envisaged in the application. For example, I would need to walk for at least 25 minutes to reach the Great Shelford bus stop. Shelford railway station, which is on the way, is a mere 8 minutes walk and Cambridge South station will be approximately 35 minutes walk. I have an alternative and more direct cycle route to Sawston. I can envisage no circumstances in which I would use the CSET busway or its maintenance and access track. The situation is even starker for those who live west of me (i.e. west of the Great Shelford recreation ground) and in Little Shelford.

(c) Such a light rail system would also better link Granta Park to the Cambridge Biomedical Campus ("CBC") than the proposals the subject of this application. This scheme, as Greater Cambridge Partnership's own website acknowledges, does not directly join CBC with either Granta Park or the Babraham Research Campus or the village of Babraham. They are "connected" with the travel hub near the A1307/A11 junction.

(d) The proposed route runs alongside a retirement village and between it and the country park being created with that village. This is potentially dangerous and adversely impacts an important new village amenity for Stapleford.

(e) The application relies on amendments made by the Transport and Works (Guided Transport Modes) (Amendment) Order 2022 ("SI 2022/1380") to the Transport and Works (Guided Transport Modes) Order 1992 ("SI 1992/3231"). The relevant provisions may be *ultra vires* as it is not clear that

there was power to make the sensor guidance provisions of SI 2022/1380 under section 1(1) Transport and Works Act 1992 ("TWA").

Under this section, an order may be made relating to the construction or operation of a transport system of a specified kind. The section includes a power which allows systems using a mode of guided transport to be prescribed. "Guided transport" is defined, for the purposes of TWA in its section 67(1), as "transport by vehicles guided by means external to the vehicles (whether or not the vehicles are capable of being operated in some other way)".

SI2022/1380 purports to extend the kinds of guided transport prescribed under SI1992/3231 to include road or track-based systems with sensor guidance.

The provision permitting sensor guidance reads as follows:

"are guided wholly or mainly by means of sensors on the vehicles which, by reference to the vehicles' external environment or to the receipt of electromagnetic information, provide data which is used to guide the vehicles".

In other words, a vehicle which is guided *wholly* by sensors which, by reference to the vehciles' external environment or to the receipt of electronagnetic information, rovide data which is used to guide the vehicles". (It is assumed that "mainly" is included to allow for some driver input.)

There is no power unders section 1(1) TWA to prescribe a particular mode of guided transport unless it is:

(i) a "transport system" (this is not a defined expression); and
(ii) falls within the TWA's definition of "guided transport".

Looking at these in turn:

(i) what is a system? Although "system" has more than one meaning, the most appropriate one in context is "a set of things working together as parts of a mechanism or an interconnecting network; a complex whole". A vehicle guided wholly (or even mainly) by sensors which take information from the vehicles' external environment would seem to be an autonomous vehicle, rather than a transport system. Nothing in the drafting specifies that the vehicle must work with the road or track or that the road or track is a critical to its operation. It would cover a vehicle with lane-centering or other steering assistance technology operating on any road whatsoever. It therefore includes vehicles and roads or tracks which do not together form a "transport system".
(ii) does a vehicle which guides itself by reference to information received by its own sensors fall within the TWA's definition of "guided transport"? It seems obvious that it does not do so where the sensors receive information from the vehicles' external environment. The guidance system is all internal to the vehicle and does not rely on any external signals forming part of a 'transport system" to guide it. As regards electro-magnetic information, there is an overlap with an existing provision of SI 1992/3231 - "road-based with cable guidance". To fall within the existing provision "road-based with cable guidance", a vehicle would need to have sensors to pick up signals from the cable. This example tends to illustrate the fact that there are, at least in theory, limits to the kind of vehicle sensor system using electromagnetic information which falls within the definition of "guided transport". The existing definition of "road-based with cable guidance" envisages a system which requires sensor and external cable. The sensor guidancet provision of SI2022/1380 does not envisage anything external to the vehicle with which the vehicle forms a "system". It may well be *ultra vires*.

(f) If a sensor guidance system is to be used (rather than a side guidance system) maintenance vehicles can use the road itself and there is no need for a separate maintenance and access track and thus no power to include it in any order under the TWA.

Yours sincerely

Annabel Sykes

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