

From: [Martin Baker](#)
To: [TRANSPORTINFRASTRUCTURE](#)
Subject: Cambourne to Cambridge Busway
Date: 19 December 2024 11:27:22
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Dear Sir / Madam,

I am writing on behalf of the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire in response to the above application under the Transport & Works Act.

The Wildlife Trust **objects** to the above application on the grounds that the scheme proponents have failed to select the option that avoids significant adverse impacts on the natural environment. The route passes through 4 local Wildlife Sites, Coton Orchard County Wildlife Site, Coton Path Hedgerow County Wildlife Site, Scrub East of M11 City Wildlife Site, and Bin Brook. The most significant impacts are on Coton Orchard where the busway will bisect and fragment the existing habitats of this locally important site and result in the loss of 20% of the site area, to the detriment of the local nature network. At Coton Orchard there will also be loss of up to six, and a minimum of three irreplaceable ancient apple trees as a result of insufficient prior assessment by the County Council and poor design of the scheme. In addition, the scheme will result in the loss of 16% of Scrub East of M11 City Wildlife Site and 5% of the Coton Path Hedgerow CWS. The design of this busway has not properly applied the first avoidance stage of the mitigation hierarchy and is thus fundamentally unsustainable.

The direct loss of habitats will also adversely impact a range of species including red and amber listed birds, scarce invertebrates and flora, and the scheme may result in other indirect impacts on other priority species such as Barbastelle bats. The full detail of the scheme impacts on species biodiversity will need to be fully assessed by independent ecologists. However, at this stage we note:

- Barbastelle bats fly across the route from roost sites in Madingley Wood SSSI. There have also been six other bat species recorded. The Ecological Impact Assessment has suggested that the use of embankments and vegetation cover at key crossing points will ensure bats fly above the route of buses and thus prevent collisions. The accuracy of this conclusion and evidence supporting it needs to be reviewed and corroborated by an independent bat specialist.
- The loss of scrub and orchard habitats will result in the immediate loss of habitats for a number of red and amber listed bird species. The bird surveys undertaken in 2022 and 2024 have not recorded all of the red and amber listed species previously recorded from the site, with notable absences of Lesser Spotted Woodpecker, Turtle Dove, Spotted Flycatcher and Woodcock. Surveys on one or two years, however thorough, only provide a snapshot of the species that may use a site. The Ecological Impact Assessment should take account of the other species previously recorded in assessing impacts and designing mitigation and compensation measures.
- The position regarding impacts on Great Crested Newts is unclear, as there are two ponds nearby likely to support this protected species. As this scheme passes through a known hotspot for this species in West Cambridge, a traditional approach to GCN species licencing should be undertaken as opposed to using the District Licencing Scheme. New ponds should be created in locations that connect to other suitable habitats on either side of the busway to maintain the local distribution of the species.

The original spreadsheet version of the Defra Biodiversity Metric has not been made available for scrutiny and review. This is unacceptable and does not allow consultees the opportunity to fully analyse the findings and assess whether they are accurate or realistic. Further the assessment of the scheme against the BNG principles is inaccurate or disingenuous at best. By way of example:

- Principle 1 – Apply the Mitigation Hierarchy. FAIL. The application suggests this has been followed, however with 4 Wildlife Sites directly impacted, along with significant habitat loss, loss of ancient trees, and other impacts on priority species, the scheme has manifestly not demonstrated compliance with the mitigation hierarchy.
- Principle 2 – Avoid Losing Biodiversity that Cannot be Offset Elsewhere. FAIL. The loss of the ancient orchard trees results in failure against this principle.
- Principle 5 – Make a Measurable Net Gain Contribution. FAIL. At this stage of the scheme design, and in the absence of an off-site biodiversity solution, the scheme delivers a minimal (less than 5%) net gain in habitats, a net loss in hedgerows (15.15%), and fails to meet the habitat Trading Rules of the Defra Biodiversity Metric.
- Principle 6 – Achieve the Best Outcomes for Biodiversity. UNKNOWN. Without a published biodiversity offsetting scheme it is currently uncertain whether the best biodiversity outcomes will be achieved.
- Principle 7 – Be Additional. UNKNOWN. Without a published biodiversity offsetting scheme it is currently uncertain whether additional biodiversity outcomes will be achieved.
- Principle 8 – Achieve a Net Gain Legacy. UNKNOWN. Without a published biodiversity offsetting scheme it is currently uncertain whether a biodiversity legacy will be achieved.
- Principle 10 – Be Transparent. UNKNOWN. At this stage the original version of the Defra Biodiversity Metric has not been provided for interrogation (lack of transparency) and the uncertainty regarding biodiversity offsetting options means this principle is not yet met.

The scheme does not include any detail on how the desired 20% BNG will be delivered. This is unacceptable and must be addressed prior to the scheme being considered further, as the costs of delivering the BNG and managing it over at least 30 years must be included within the scheme. Failure to do so and giving permission without this would be highly likely to result in BNG commitments being watered down at a later stage, particularly when the almost inevitable cost over-runs and cost cutting associated with a new transport scheme kick in.

If the scheme does process the following areas will need to be fully addressed:

- The route through Coton Orchard should be amended and working practices designed to avoid impacts on all of the identified ancient and veteran trees.
- The scheme must deliver at least 20% Biodiversity Net Gain, and the new habitats and landscaping created must be of sufficient size and well-located to ensure effective management for a minimum period of 30 years post development.
- Off-site BNG should be located within the Boulder Clay & Woodlands Priority Area of the Cambridge Nature Network, within which the scheme sits.
- The details of the BNG scheme must be provided at the earliest opportunity and be available for public scrutiny before an Examination of the scheme.
- Independent assessment of all species surveys and proposed mitigation and compensation measures.

The damage from this scheme could have been avoided by making use of and upgrading the existing road infrastructure. Further, if the UK government and Department of Transport had made provision in the recently completed A14 Scheme for an interconnecting junction between the A428 East and M11 South at the Girton interchange then buses would have been able to quickly enter Cambridge without getting caught up behind local traffic using the existing road to try to go south on the M11. There would then have been no need for a new busway to cross open countryside and pass through multiple Wildlife Sites; buses would have been able to use the existing road network (all be it with some upgrades). The consequences of the short-sightedness of the Department of Transport, is this ill thought out and

environmentally damaging busway scheme.

Please ensure that this objection is taken into account when determining whether to proceed with this TWAO scheme.

Yours faithfully,

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