



28<sup>th</sup> Feb 2025

### **Objection to Transport and Work Act Order to the Department for Transport (DfT) for a new busway to the southeast of Cambridge**

Cam Valley Forum, contactable at 95 Burnside, Cambridge CB1 3PA, is submitting this 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 Cam Valley Forum (CVF), a voluntary charitable organisation, works with many other bodies to protect and improve the river Cam and its riversides, including its many tributaries and its sustaining aquifers. As an association of local individuals with diverse environmental, recreational, academic and business interests, CVF is concerned both directly and indirectly with the rivers in the catchment. This response focuses mainly, therefore, on the group’s concerns for the future of the rivers and their environment. The Chalk streams in the UK are internationally important in the conservation of biodiversity. The UK has about three-quarters of the world total, including the rivers Cam, Rhee and Granta and their many tributaries and headwaters. For reasons of long-standing environmental abuse these streams are not in the best environmental condition (on account of channel modification, abysmally reduced flows and enduring and widespread pollution). Despite this they are still valued highly for their biodiversity, aesthetic appeal and their provision of recreation and well-being for local people.

The grounds for this objection are the following:

The proposal involves the construction of two bridges over the River Granta chalk stream and part of Hobson's Brook being directed through a culvert. We are concerned about the impact of construction of the Busway at both these locations. In particular, we have major concerns about the impact of construction on Nine Wells, the springhead for Hobson’s Brook, a classic chalk stream. Hobson’s Brook Corridor is a vital green infrastructure corridor, running from Nine Wells on Cambridge’s southern fringe northwards to the city centre, where the Brook flows via underground culverts and the Vicar’s Brook to the River Cam. It plays a key role in the city’s cultural heritage, with part of it forming the unique historical waterway of Hobson’s Conduit, which dates back to 1614, and has provided a freshwater vein through the heart of Cambridge for over 400 years.

In 2005 Nine Wells was designated a Local Nature Reserve (LNR), and is considered one of the most important of Cambridge’s LNRs given the ecological role of the springhead and the high biodiversity of the surrounding areas (a recent Bioblitz identified over 160 animal and plant species). The importance of the Brook and Nine Wells, both as a water supply and a valuable nature reserve is evidenced by the substantial investment made by the Environment Agency to provide a backup water supply to the springs in times of drought and over extraction of groundwater, and by the investment in time and effort by both Cambridge Water and Hobson’s Conduit Trust to measure water flow at the springs’ outlet.

The CSET Busway will change the area around the LNR forever. It will introduce new sources of noise, movement, light, vibration and pollution to the rural setting of Nine Wells and cause significant visual intrusion. Several elements of the plan associated with the Busway, such as ecology and attenuation ponds are cause for concern. In addition, we have major concerns about Compound 7, which we note from the Proposed Site Plans (Vol 2 CSET-12-DP4B-00, sheet 2) includes part of Hobsons Brook and the ditch along the north western edge of Nine Wells, the springhead of the Brook. This covers much of the field between Nine Wells and the railway and will be in place for up to three years during the construction phase, bringing noise, disturbance and pollution risk.

Our specific concerns and recommendations are:

1. Location of proposed site boundary for Compound 7 along the northwest edge of the Nine Wells enclosure and proposal for a temporary structure where the chalk stream exits the enclosure: Compound 7 will incorporate all of Hobson's Brook (watercourse and both banks) between Nine Wells and the railway, and also the access track. The boundary should be set back at least 16 metres from the drainage ditch to provide a wildlife buffer and to maintain access. A bund should be constructed to prevent runoff from the site compound and haul roads into the drainage ditch.
2. The following activities which will take place within the construction compound will have a major negative impact on the water quality of the Brook: concrete handling, storage of chemicals and fuels, washing of vehicle wheels, artificial lighting. We consider that Compound 7 should be used only for activities such as storage of dry, inert materials, and for material associated with longer term storage that will not be constantly accessed and less likely to disturb wildlife. No vehicle wheel washing should be permitted in the Compound: this should be done at an alternative compound (e.g. closer to Addenbrooke's Road) to minimise the risks of pollution to the watercourse (including to the South Ditch). Use of artificial lighting should be agreed with the Trust and minimised.
3. As designed, the haul roads will be intrusive with a high risk of runoff from passing vehicles. The proposed Bailey bridges add to the risks of pollution entering the brook. Traffic on the haul roads near to Nine Wells could be greatly reduced by using the planned Granhams Road compound. Instead of Bailey bridges, temporary bridge structures should be used with full decks to avoid runoff and pollution.
4. Ecology Pond 3 will abut almost the full length of the southeast edge of Hobson's Brook between Nine Wells and the new Busway, and Attenuation Pond 1 will abut the southern corner of the Nine Wells enclosure. The excavation of both these ponds will potentially sap spring flow from the Nine Wells springheads. The potential for relocating both ponds should be assessed, and bunding must be used to keep the associated excavation to a minimum. Attenuation Pond 1 could be located west of the railway, where it could provide compensatory water vole habitat.
5. The Busway will run on an elevated embankment which will be visually intrusive; the plans for tree and shrub planting for screening on and around the embankment are inadequate and need reviewing. Additional planting is needed to screen the embankment, and wood clad barriers of appropriate strength should be placed along the eastern side of the embankment.
6. The bridge is planned to have an unbroken deck of 15 sq. m., that will create a dark sterile cavern through which the Brook will pass. The negative impact of this on the Brook and its wildlife could be avoided by using two bridges or dividing the bridge into two sections, one for the busway and the other for the multi-user path.

7. Despite the new proposal for the concrete bridge wings (supporting structures either side of the bridge) to be placed parallel to the busway (rather than at 45 degrees), they will still be highly visible from Nine Wells. There will need to be substantially more tree planting than proposed to screen the bridge wings.

Sue Wells

Co-chair, Cam Valley Forum