

**HABITATS REGULATIONS ASSESSMENT FOR AN APPLICATION
UNDER THE TRANSPORT AND WORKS ACT 1992**

Cambourne to Cambridge Guided Busway

08 September 2026

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1. INTRODUCTION

Background

- 1.1 This document (“the HRA Report”) is a record of the Habitats Regulations Assessment (“HRA”) that the Secretary of State for Transport (“the Secretary of State”) has undertaken under regulation 63 of the Conservation of Habitats and Species Regulations 2017 (“the Habitats Regulations”) in respect of the Proposed Transport and Works Act Order (“TWA Order”), for the proposed ‘Cambourne to Cambridge busway’ (“the Proposed Development”). The HRA Report includes an appropriate assessment for the purposes of regulation 63 of the Habitats Regulations.
- 1.2 The Habitats Regulations were amended by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (“the 2019 Regulations”) and the amendments were taken into account in the preparation of this HRA Report. Reference to the Habitats Regulations in this HRA Report are therefore to the latest amended version, unless otherwise stated.
- 1.3 Cambridgeshire County Council (“the Applicant”) submitted an application to the Secretary of State for an order under sections 1 and 5 of the Transport and Works Act 1992 (“TWA”) which was received in full on 13 November 2024. The Applicant has also requested a direction for deemed planning permission under section 90(2A) of the Town and Country Act 1990. The Proposed Development to which the Application relates is described in more detail in Section 2 of this HRA Report.
- 1.4 An Inquiry was held between the 16 September to 21 November 2025. A ‘Report to the Secretary of State for Transport and the Secretary of State for Housing, Communities & Local Government’ (hereafter the “Inspector’s Report”) was produced following the Inquiry and was submitted on 8 June 2026. The Inspector’s Report has been considered as part of this HRA Report.
- 1.5 The Secretary of State’s conclusions in relation to European sites have been informed by the Statement to Inform Habitats Regulations Assessment produced by the Applicant (hereafter the “Applicant’s HRA”) as well the Inspector’s Report and findings from the Inquiry, including representations from relevant statutory bodies, such as Natural England insofar as these have any bearing on the effects of the Proposed Development on European sites.

Habitats Regulations Assessment (“HRA”)

- 1.6 The Habitats Regulations contain the relevant provisions for the protection of European sites. This is the broad term which is used to refer to Special Areas of Conservation (“SAC”) and Special Protection Areas (“SPA”). SACs are designated for their habitat features and populations of non-avian species. SPAs are designated for their bird populations. These sites form the national site network which includes all SACs and SPAs currently designated and new SACs and SPAs designated under the Habitats Regulations (as defined in regulation 8).

- 1.7 The UK Government is also a signatory to the Convention on Wetlands of International Importance 1972 (“the Ramsar Convention”). The Ramsar Convention provides for the listing of wetlands of international importance. Ramsar sites do not form part of the national site network, but all Ramsar sites are treated in the same way as SACs/SPA as a matter of Government policy¹.
- 1.8 For the purposes of this HRA Report, in line with the Habitats Regulations and relevant Government policy, the term “European sites” includes SAC, candidate SACs (“cSAC”), possible SACs (“pSAC”), SPA, potential SPAs (“pSPA”), Sites of Community Importance (“SCI”), listed and proposed Ramsar sites and sites identified or required as compensatory measures for adverse effects on any of these sites.
- 1.9 Regulation 63(1) of the Habitats Regulations requires that:
- “(1) A competent authority, before deciding to undertake, or give any consent, permission or other authorisation for, a plan or project which-*
- (a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*
- (b) is not directly connected with or necessary to the management of that site,*
- must make an appropriate assessment of the implications of the plan or project for that site in view of that site’s conservation objectives...”*
- 1.10 The Proposed Development is not connected with or necessary to the management of any European sites. Accordingly, the Secretary of State, as the competent authority for the purposes of an application for an order under the Transport and Works Act (“TWA”) 1992 has undertaken an assessment in line with the requirements of the Habitats Regulations. This HRA Report (Sections 1 to 5) is the record of the appropriate assessment for the purposes of regulation 63 of the Habitats Regulations.

Consultation with the appropriate nature conservation body

- 1.11 Regulation 63(3) of the Habitats Regulations requires competent authorities (in this case the Secretary of State), if they undertake an appropriate assessment, to consult the appropriate nature conservation body and have regard to any representations made by that body.
- 1.12 The Secretary of State is satisfied that Natural England, as the appropriate nature conservation body in respect of the Application for the Proposed Development, had been formally consulted on Habitats Regulations matters during the Inquiry.
- 1.13 Subsequent consultation with Natural England has been undertaken by the Secretary of State to confirm that Natural England’s position regarding the HRA remains unchanged since the Inquiry and that Natural England are satisfied that the

¹ Paragraphs 185 and 187 of the National Planning Policy Framework, December 2023.

Applicant's HRA is sufficient to inform the Secretary of State's HRA. Natural England confirmed in their response of 15 July 2026 that their opinion has not changed since the Inquiry and that they are satisfied that sufficient information has been provided, and that no additional information or further assessment should be necessary at this stage. They concluded that Natural England agree with the Applicant's HRA conclusions, subject to all mitigation being appropriately secured in any permission given.

Documents referred to in this HRA Report

- 1.14 This HRA Report has taken account of and should be read in conjunction with the documents produced as part of the Applicant's TWA submission and the Inspector's Report dated 8 June 2026.
- 1.15 The Applicant's HRA included a plan showing the European sites considered and their location relative to the Proposed Development (Annex A, 'Figure 1: Map of Internationally Designated Sites').
- 1.16 An Inspector's Report was produced following the Inquiry and has been considered as part of this HRA Report.

Structure of this HRA Report

- 1.17 The remainder of this HRA Report is presented as follows:
 - Section 2 provides a general description of the Proposed Development.
 - Section 3 describes the location of the Proposed Development and its relationship with European sites.
 - Section 4 identifies the European sites and qualifying features subject to likely significant effects, alone or in-combination with other plans or projects (HRA Stage 1).
 - Section 5 considers adverse effects on the integrity of European sites, alone or in-combination with other plans or projects and summarises the Secretary of State's appropriate assessment and conclusions (HRA Stage 2).
 - Section 6 summarises the Secretary of State's conclusion in respect of HRA Stages 1 and 2.

2. DEVELOPMENT DESCRIPTION

- 2.1 The Proposed Development is described in detail in Chapter 3: Scheme Description, of the Environmental Statement submitted with the TWA and summarised in the case details at the start of the Inspector's Report as follows:
- 'The Order would authorise the construction, maintenance, and operation of a guided busway between Cambourne and Cambridge; intermediate bus-stops along the route; an emergency and maintenance access track; a travel hub building and park and ride site at Scotland Farm, Dry Drayton; bridges over the M11 and Bin Brook; access roads; temporary compounds; the stopping-up, diversion and creation of public rights of way; highway crossings; drainage works and attenuation and infiltration ponds. The Order would also permit the compulsory acquisition of land for the proposed works and ancillary purposes; the temporary stopping-up of highways; provisions relating to streets; powers to survey and investigate land; powers to carry out works in the highway; the right to use private roads for the purposes of construction; powers to carry out works to streets including their temporary diversion; and the acquisition of replacement land for exchange open space land'.
- 2.2 A description of the Development site and setting can be found in the Environmental Statement ("ES") Chapter 3: Scheme Description. The proposed route is shown on Figure 2-5: Proposed Route in the ES. A plan showing the European sites considered in the Applicant's HRA Report and their location relative to the Proposed Development is provided in Annex A: Internationally Designated Sites showing all four European sites identified in the Applicant's HRA Report.
- 2.3 The Proposed Development is to be constructed over approximately two years opening in 2028 (paragraph 3.1.2 of the ES). The Proposed Development is expected to operate for 60 years and will undergo regular repair and maintenance during this time. The Applicant's HRA does not include decommissioning of the Proposed Development within its scope on the basis that there is insufficient information now to allow for a meaningful assessment of LSE (paragraph 5.1.6).
- 2.4 The potential effects on European sites associated with the construction, and operation of the Proposed Development are addressed in Section 4 of this HRA Report.

3. LOCATION OF THE PROPOSED DEVELOPMENT AND RELATIONSHIP WITH EUROPEAN SITES

Location and existing land use

- 3.1 The Proposed Development will consist of a 13.6km long mainly dedicated busway connecting Cambourne in the west with Cambridge in the east. An active travel path will run alongside the segregated sections of busway. The Proposed Development will use hybrid vehicles, and electric vehicles in due course, providing a service of around 10 buses per hour each way. A park and ride facility, the Scotland Farm travel hub, will be situated along the route, to the north of the A428 (paragraph 3.1.1 of the ES). The Scotland Farm travel hub will provide space for around 2,000 cars and 300 bicycles as well as coach parking and recharging points for electric vehicles (paragraph 3.4.1 of the ES).
- 3.2 The new bus service is anticipated to operate approximately between 6.00am and midnight, with several bus services using the route along all of part of the length of the Proposed Development (paragraph 3.1.3 of the ES). Single decker buses, approximately 12m long, will be used by the Proposed Development (paragraph 3.3.3 of the ES).
- 3.3 Construction of the Proposed Development is anticipated to commence in 2026 and continue for approximately 24 months, with the scheme opening in 2028 (paragraph 3.1.2 of the ES).
- 3.4 The Proposed Development is located within the administrative boundaries of Cambridgeshire County, Cambridge City Council and South Cambridgeshire District Council (paragraph 1.1 of the IR).
- 3.5 The Scheme (from west to east) begins in Cambourne at Sterling Way passing westwards to Cambridge. The Scheme passes through or in close proximity to the following settlements:
- Cambourne;
 - Bourn Airfield;
 - Highfields Caldecote;
 - Hardwick;
 - Coton;
 - West Cambridge (including West Cambridge University Campus); and
 - Cambridge (paragraph 1.1.1 and section 3.2 of the ES).
- 3.6 The existing land use across the route is a mix of agricultural land, existing footway/cycleway routes, existing roads. The first 2.3km of the Proposed Development passes through current and planned urban development, which is

expected to be completed over the next 10 to 20 years (paragraph 5.2.1 of the ES). The next 1.6km of the route is within an existing road corridor, passing alongside and south of the A428, through grassland and young woodland (paragraph 5.2.2 of the ES). The next 1.8km of the route is within the existing road alignment, in proximity to residential and commercial properties (paragraph 5.2.3 of the ES). The Proposed Development then passes through agricultural land, through Coton Orchard, then onto a new bridge over the M11 before entering the urban fringe of Cambridge along Charles Babbage Road paragraphs 5.2.4 and 5.2.5 of the ES). The route then briefly passes across open arable land before crossing the Bin Brook and entering the urban edge of the City, along an existing track and then joining the existing public highway on Grange Road (paragraph 5.2.6 of the ES).

- 3.7 Scotland Farm travel hub is proposed to be located in the eastern part of the route, to the north of Hardwick, along Scotland Road. The travel hub will occupy 12 hectares (ha) of land that is currently agricultural (arable) land (paragraph 5.2.2 of the ES).

European sites potentially affected by the Proposed Development

- 3.8 The Applicant's approach to identifying relevant European sites is explained in Section 4 of its HRA Report.
- 3.9 The Applicant's principal criterion for identifying European sites to be considered within the HRA process included a zone of 2km surrounding the Scheme (paragraph 4.1.2). This 2km zone of influence was extended in the following circumstances:
- *'Where the scheme crosses, or lies adjacent to, upstream, or downstream of, a watercourse which is designated in part or wholly as an National Site Network (NSN) site or Ramsar site further consideration was given to hydrological impacts at NSN or Ramsar sites within 10km;*
 - *Where bats were identified as a qualifying feature of a SAC within 30km of the scheme;*
 - *Where the scheme has a potential hydrological or hydrogeological linkage to an NSN or Ramsar site containing a groundwater dependent terrestrial ecosystem;*
 - *Where NSN or Ramsar sites were located within 200m of the boundary of the new busway or where, in accordance with Natural England guidance, there was a credible risk that impacts might extend beyond 200m; and*
 - *Where the scheme was located within or adjacent to habitat that may be functionally linked to a NSN or Ramsar site'.*
- 3.10 The Applicant considered the potential for likely significant effects ("LSE") on the following four European sites (paragraph 4.2.9):

- Eversden and Wimpole SAC;

- Ouse Washes SAC;
- Ouse Washes Ramsar site; and
- Fenland SAC.

3.11 Figures showing the European sites identified in the Applicant's assessment are provided in Annex A: Internationally Designated Sites of the Applicant's HRA Report and are reproduced as Figures 1 below. Table 1 presents the proximity of the sites to the Proposed Development.

Table 1 European sites screened into the Applicant's assessment

Name of European Site	Distance from the Proposed Development
Eversden and Wimpole SAC	6km south of the Proposed Development
Ouse Washes SAC	15.49km north of the Proposed Development
Ouse Washes Ramsar site	15.49km north of the Proposed Development
Fenland SAC	15.38km northeast of the Proposed Development

3.12 The Applicant's approach to identifying relevant European sites is explained in Section 4 of its HRA Report (paragraphs 4.1.1 – 4.3.3, inclusive of Tables TR5 4-2 – TR5 4-5).

3.13 As set out in paragraph 4.12 of the Applicant's HRA, the Applicant's methodology excludes sites beyond the 2km zone of influence unless they meet the specified criteria. Table 1, set out in paragraph 3.11, identifies the European sites that have the potential to be affected by the Proposed Development, but excluding sites beyond the 2km zone of influence that do not meet the criteria for further consideration.

3.14 No evidence was presented during the Inquiry to suggest that effects from the Proposed Development could occur to any other European site. The Secretary of State is satisfied that no other European site needs to be addressed in this HRA Report.

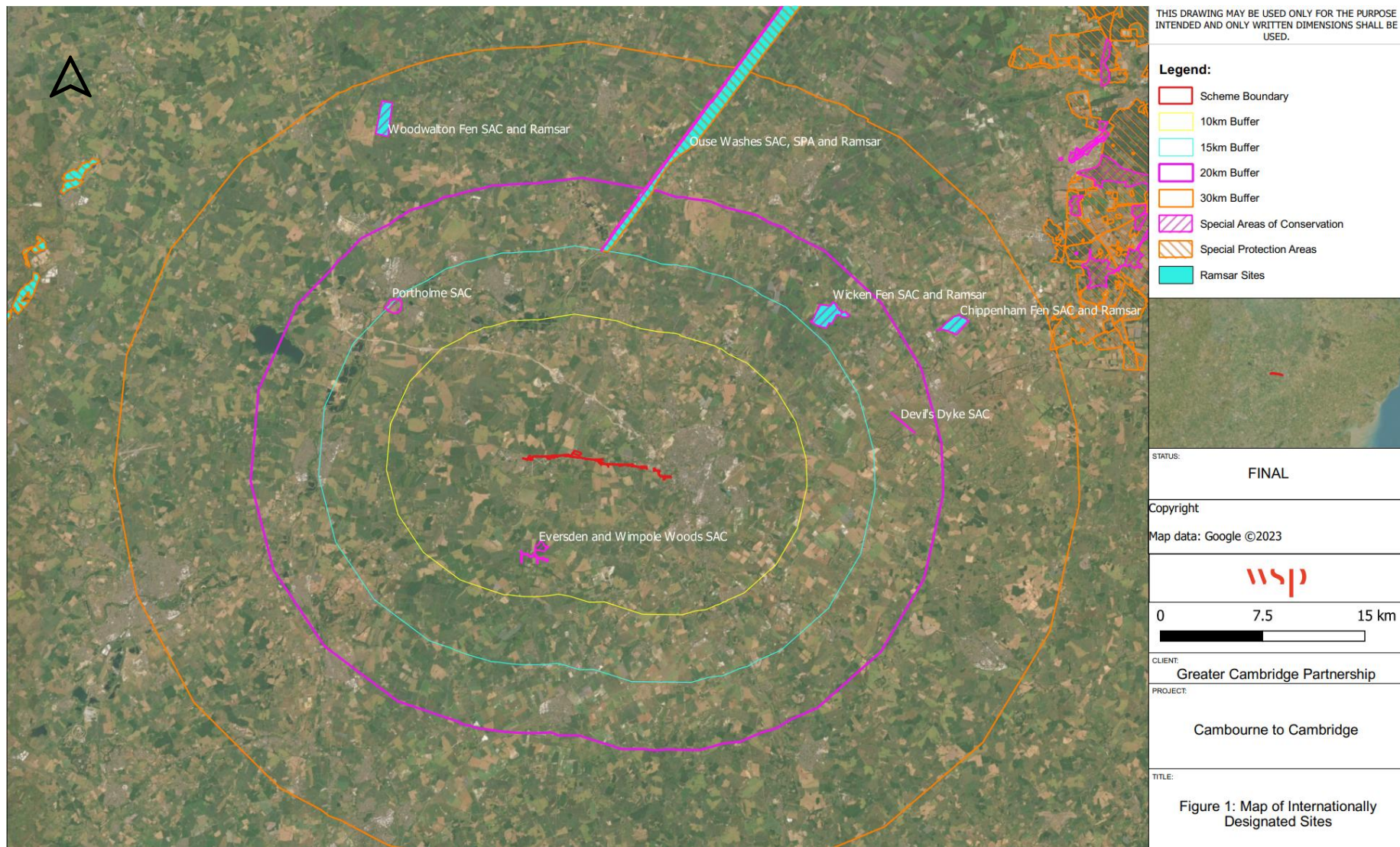


Figure 1 Location of the Proposed Development in relation to European sites potentially affected

STAGE 1: ASSESSMENT OF LIKELY SIGNIFICANT EFFECTS (“LSE”)

Potential effects from the Proposed Development

- 3.15 Section 5 of the Applicant’s HRA outlines the Applicant’s approach to screening for LSE.
- 3.16 The Applicant’s HRA Report identified the following impact types associated with the construction and operation of the Proposed Development as having the potential to give rise to LSE on European sites (paragraph 5.3.1):
- Displacement of or alteration to land use and property, or habitat loss;
 - New features or structures introduced into the environment;
 - New or altered activities generated by or resulting from the scheme; and
 - Release of materials to land, air or water, or of sound or vibration.
- 3.17 No evidence was presented during the Inquiry that the development was likely to give rise to any other effects on European sites.
- 3.18 The Secretary of State is satisfied that the Applicant’s HRA Report has correctly identified all the potential effects on European sites from the Proposed Development alone.

Potential in-combination effects

- 3.19 When determining the potential implications of a plan or project in light of the conservation objectives for European sites, it is necessary to consider the potential for in-combination effects (i.e. the effects of the project combined with potential effects of other planned projects), as well as effects due to the project in isolation (paragraph 5.4.1).
- 3.20 The Applicant’s HRA Report considered the potential for in-combination effects with other plans and projects that have the potential for significant effects on the identified European sites. This included:
- Approved but as yet uncompleted plans or projects;
 - Permitted on-going activities such as discharge consents of abstraction licences; and
 - Plans and projects for which an application has been made and which are currently under consideration but not yet approved by competent authorities (paragraph 5.4.1).
- 3.21 The Applicant identified 11 residential and commercial projects which have the potential for cumulative effect with the Proposed Development:

- Cambourne West (planning ref: S/2903/14/OL) (under construction) – the development of up to 2350 residential units;
- Bourn Airfield New Village (planning ref: S/3440/18/OL) (outline consent granted) – a new mixed use village comprising residential development of approximately 3500 dwellings;
- Land at Highfields (planning ref: S/2510/15/OL) (under construction) – the development of up to 140 residential dwellings;
- Inspired Villages at Comberton: Integrated retirement community (planning ref: 22/03918/SCRE) (pre-application) – EIA screening opinion for the development of an Integrated Retirement Community of up to 200 extra care units with associated community and care facilities;
- West Cambridge Development Site (planning ref: 17/1799/FUL; and 17/1896/FUL):
 - Planning ref: 17/1799/FUL comprises of the development of 37,160sqm for D1 academic floor space, all associated infrastructure, modifications to JJ Thomson Avenue to provide disabled parking and changes to road surface materials, alterations to the existing access to Madingley Road, and the demolition of Merton Hall Farmhouse and the removal of existing Vet School access road from JJ Thomson Avenue (outline planning permission);
 - Planning ref: 17/1896/FUL comprises mixed use building 4907sqm, and all associated infrastructure (under construction);
- Clerk Maxwell Road Scheme (planning ref: 19/1734/FUL) (under construction) – erection of 35 dwellings;
- North West Cambridge Development (planning ref: S/1886/11) (under construction) – the development of up to 3000 dwellings;
- Land Between 21 and 29 Barton Road (planning ref: 18/1993/FUL) (under construction) – redevelopment for College accommodation, comprising four new buildings;
- Darwin Green (planning ref: 07/0003/OUT; and 22/02528/OUT):
 - Planning ref: 07/003/OUT comprises of up to 1593 dwellings, primary school, community facilities, retail units and associated infrastructure (under construction); and
 - Planning ref 22/02528/OUT) comprises up to 1000 residential dwellings, secondary school, primary school, community facilities, retail uses, open space and landscaped areas, associated engineering, demolition and infrastructure works (post application).

- New Development at St Chad's (planning ref: 19/1212/FUL) (consented) – demolition of the existing building and erection of two new student accommodation buildings comprising 23 rooms; and
- Grange Lane College Accommodation (planning ref: S/C/U3) (under construction) – demolition of the existing bungalow and the erection of 41 units.
- In August 2022, the Secretary of State granted consent (reference: TR010044) (via a Development Consent Order) for the A428 Black Cat to Caxton Gibbet Road Improvement Scheme (paragraph 5.4.3).

3.22 More detail on the projects with the potential for in-combination effects identified can be found in Appendix ES3 – Cumulative Developments List provided by the Applicant.

3.23 The above developments were assessed for potential in-combination effects as part of the Applicant's HRA. The Applicant considered that for the majority of the developments there was no plausible impact pathways that could combine to result in significant effects (paragraph 5.5.2). Of the developments, Bourn Airfield was identified as having the potential for in-combination effects to occur to the Eversden and Wimpole SAC given the scale of the development and the spatial overlap with the Proposed Development paragraphs 5.5.4 and 5.5.5).

3.24 A review of projects that have the potential for in-combination effects has been carried out as part of this HRA. This review identified recent information published on 30 March 2026 about plans at Land South of St Neots Road Hardwick, Cambridgeshire (approximately 105m south of the Proposed Development), for:

- Planning reference: 26/01263/OUT: 'Outline application for the development of 138 residential dwellings along with associated infrastructure including provision of new site access, internal access roads, parking, drainage, public open space, landscaping and biodiversity enhancements and other associated works with all matters reserved except for the primary point of access onto St Neots Road'.

3.25 A decision for the project is to be determined. The committed development has not conducted an Environmental Impact Assessment or a Habitats Regulations Assessment. However, it is noted that Natural England have provided a consultee response² to the planning application and have requested further information relating to the potential impacts to the Eversden and Wimpole SAC as a result of the committed development as it is located within the landscape connectivity zone for the SAC. Natural England have therefore requested a HRA be carried out by the Applicant for the committed development. Given the scale and proximity of the

² Natural England (2026). 'Summary of Natural England's Advice: Further Information Required to Determine Impacts on Designated Sites'. Available at: https://applications.greatercambridgeplanning.org/online-applications/files/1E480EBF89DBAB010CB5BD82D72E8968/pdf/26_01263_OUT-NATURAL_ENGLAND-9383084.pdf [Accessed: 28/08/26]

committed development and the potential impact to the Eversden and Wimpole SAC, there is the potential for in-combination effects from this committed development. An in-combination assessment of this project is not possible at this stage due to the lack of information available and therefore such an assessment would be more appropriately carried out by the Applicant of that project.

- 3.26 The Secretary of State is content that all plans and projects with the potential to have significant in-combination effects with the Proposed Development in terms of the HRA have been identified. The Secretary of State is also satisfied that the scope and approach to the assessment of in-combination effects was not the subject of any dispute during the Inquiry.

LSE Screening Conclusions

- 3.27 Table 5-1 of the Applicant's HRA conducts the screening of impact pathways and LSE for the designated sites.
- 3.28 The Applicant's HRA concludes that the Proposed Development would have no LSE, either alone or in-combination with other plans and projects, on the following European sites and their qualifying features:
- Ouse Wash SAC;
 - Ouse Wash Ramsar site; and
 - Fenland SAC.
- 3.29 The Secretary of State has considered the Applicant's conclusions for all European sites, qualifying features and pathways of effect as set out above and agrees that there would be no LSE for the Ouse Wash SAC and Ramar site, and the Fenland SAC.
- 3.30 Potential LSEs were identified by the Applicant for the Eversden and Wimpole SAC (see Table 2). The Inspector's Report agreed with the view from the Applicant that an impact pathway between the Eversden and Wimpole SAC and the busway route would exist, and LSE could not be ruled out for this site (paragraph 20.155 of the IR).
- 3.31 The Secretary of State agrees that the Proposed Development is likely to have significant effects on the qualifying features of this European site when considered alone and in-combination with other plans and projects and therefore that an appropriate assessment is required to be undertaken.
- 3.32 In reaching the conclusion of the screening assessment, the Secretary of State took no account of any measures intended to avoid or reduce the potentially harmful effects on the European sites.

Table 2 European sites and qualifying features requiring an appropriate assessment.

European site	Pathway of effect (construction / operation)	Relevant qualifying features
Eversden and Wimpole SAC	Fragmentation impacts to qualifying features (e.g. disrupting dispersal or creating barriers within functionally linked habitat) as a result of construction and / or operation Killing and injury of interest features/species during operation	Barbastelle Bats (<i>Barbastella barbastellus</i>)

4. STAGE 2: APPROPRIATE ASSESSMENT

- 4.1 As LSE cannot be excluded, the Secretary of State as the competent authority is required to undertake an appropriate assessment to determine the implications for the conservation objectives of the affected European sites. In line with the requirements of regulation 63 of the Habitats Regulations:

“(5)...the competent authority may agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site...”; and

“(6) In considering whether a plan or project will adversely affect the integrity of the site, the competent authority must have regard to the manner in which it is proposed to be carried out or to any conditions or restrictions subject to which it proposes that the consent, permission or other authorisation should be given”.

- 4.2 As noted in Section 1 of this HRA Report, the competent authority is obliged to consult the appropriate nature conservation body and have regard to any representations made by that body. It is noted that consultation with this body was undertaken during the Inquiry and informed the Inspector's Report conclusions. Of note, Natural England have been consulted with on several occasions, including consultation conducted by the Applicant prior to and during the Inquiry. The Secretary of State has conducted consultation with Natural England as part of this HRA, a response from Natural England was received on 15 July 2026.

- 4.3 If the competent authority cannot exclude adverse effects on the integrity of the affected European sites (“AEoI”) on the basis of objective scientific evidence, then it can only consent a plan or project if it complies with the requirements of regulation 64 of the Habitats Regulations. It provides that the competent authority may agree to the plan or project only if satisfied that there are no alternative solutions to the delivery of the plan or project that would have lesser effects on the European sites, and that the plan or project must be delivered for imperative reasons of overriding public interest. In addition, regulation 68 requires compensatory measures to be secured which maintain the overall coherence of the Natura 2000 network.

Conservation Objectives

- 4.4 As mentioned in paragraph 4.1 above, where an appropriate assessment is required in respect of a European site, regulation 63(1) of the Habitats Regulations requires that it be an appropriate assessment of the implications of the plan or project for the site in view of its conservation objectives. Government guidance also recommends that in carrying out the Stage 1 Assessment (screening), applicants must check if the proposal could have a significant effect on a European site that could affect its conservation objectives.
- 4.5 The conservation objectives for Eversden and Wimpole SAC are included in Annex 3 of this document.

Eversden and Wimpole SAC

- 4.6 The Secretary of State has undertaken an objective scientific assessment of the implications of the Proposed Development on the qualifying features of the SAC, using the best available scientific knowledge.
- 4.7 The Applicant's HRA Report assessed the potential for AEol resulting from the matters listed in Table 2 above. The impact pathways are: fragmentation impacts of qualifying features during construction and / or operation; and killing and injury of interest features/species during operation.
- Fragmentation impacts of qualifying features during construction and / or operation: alone
- 4.8 The Applicant's HRA Report identified that '*fragmentation of [bat] flight paths may be through lighting during construction and operation or habitat severance during construction, or a combination of the two*' and could not rule out LSE. The Applicant's HRA conducted an Appropriate Assessment for the Proposed Development in isolation.
- 4.9 Barbastelle bats commute along linear landscape features (e.g. hedgerows and woodland edges) and use them to cross extensive open areas as well as to support navigation, and protection from predation and wind. The Proposed Development has the potential to fragment bat flight paths through the severance of bat habitat, such as functionally linked land, during construction and / or operation. Fragmentation may also occur as a result of artificial lighting affecting bat flight paths during construction and operation.
- 4.10 The Proposed Development is located within the 10km Impact Risk Zone of Eversden and Wimpole SAC. In their 8 January 2025 correspondence, Natural England raised the matter that there is a known maternity roost located in Madingley Wood Site of Special Scientific Interest ("SSSI"), which is close to the route's red line boundary and therefore most at risk of severance. As such, Madingley Wood SSSI is classified as functionally linked to the Eversden and Wimpole SAC population.
- 4.11 Natural England also noted that the Coton Orchard County Wildlife Site ("CWS") has the potential to provide supporting habitat for barbastelle bats, particularly from the nearby Madingley Wood SSSI populations. The design for the Proposed Development cuts directly through the middle of Coton Orchard CWS and so this matter needs bespoke attention.
- 4.12 The Applicant's HRA Report outlines landscaping proposals to mitigate the LSE, these proposals include the planting of woodland, trees and hedgerows at all habitat features to minimise disruption of flight paths for bats through the landscape. Within the landscaping proposals, larger, more mature standard trees have been specified to minimise adverse impacts through habitat severance. Trees are proposed to be planted along the banks of the busway and as close to the service road as reasonably practicable in order to reduce the gap and interruption caused by the Proposed Development (paragraph 7.2.4 of the HRA Report). The landscaping proposals will be reviewed by a competent ecologist at the detailed design stage to ensure there are no adverse effects on the local bat population (paragraph 7.2.6 of the HRA Report). Additionally, landscape mitigation features are proposed at each

habitat severance point where bat crossing surveys conducted by the Applicant reached the threshold for mitigation installation (paragraph 7.2.9 of the HRA Report).

- 4.13 The landscaping proposals also include mitigation / buffering for increased levels of lighting; a landscape strategy implemented (paragraph 7.2.6 of the HRA Report) and secured through a planning condition (paragraph 7.2.9).
- 4.14 Following the implementation of the proposed mitigation measures, the Applicant concluded that there would be no AEol of the Eversden and Wimpole SAC (paragraph 7.2.11).
- 4.15 The Secretary of State notes that in 8 January 2025, Natural England provided a written representation raising concerns around barbastelle bats (*Barbastella barbastellus*) and the loss of potentially important foraging habitat and food sources, maintaining connectivity of bat habitat. They advised that the Applicant's HRA Report was not robust enough to provide sufficient certainty that there would be no AEol to the Eversden and Wimpole SAC.
- 4.16 Natural England also raised that not enough consideration was given to foraging habitat, and that Coton Orchard, potentially one of the most valuable foraging habitats impacted by the Proposed Development, had not been surveyed. Natural England requested that a bat activity survey for Coton Orchard and adjoining scrub and woodland be undertaken.
- 4.17 Additionally, Natural England requested that they see and approve detailed lighting plans and strategies for both construction and operation phases. They also requested to see the Ecology Site Management Plan to ensure lighting and illuminated compounds are sensibly located and to make sure there will be no overlap between bat activity and artificial lighting for works. A strict 'no night working allowed' commitment was recommended by Natural England and that more information on how the proposed dark corridors will be maintained and monitored.
- 4.18 The Consultation Record provided by the Applicant sets out that following this written representation, the Applicant and Natural England continued to engage until a Statement of Common Ground was agreed in September 2025.
- 4.19 Natural England subsequently provided a Position Statement in September 2025. This contained a draft of planning conditions agreed with the Applicant which set out a requirement for consultation with Natural England once the final design of the bat mitigation has been produced, particularly in relation to lighting, noise and landscape treatments as well as the adoption of an appropriate Bat Monitoring Strategy. Natural England confirmed that following the receipt of further information from the Applicant, they are satisfied that sufficient regard has been given to the identification of foraging areas and the potential for Coton Orchard CWS to be a valuable foraging habitat. Natural England therefore concluded that, provided the necessary mitigation measures are implemented, there would be no AEol on the Eversden and Wimpole SAC as a result of the Proposed Development.

- 4.20 The Secretary of State has carried out consultation with Natural England as part of this HRA. Natural England confirmed in their written response of 15 July 2026, that their position has not changed since the Inquiry and that they are satisfied with the conclusions from the Applicant's HRA that, subject to mitigation, there will be no AEol on the Eversden and Wimpole SAC as a result of fragmentation impacts of qualifying features.
- 4.21 It is noted that the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire objected to the Proposed Development in part because of the potential indirect impacts to Barbastelle bats in Madingley Wood SSSI. The Secretary of State is not aware of any further correspondence between the Applicant and the Wildlife Trust for Bedfordshire, Cambridgeshire & Northamptonshire. The Inspector's Report acknowledged that there is the potential for the busway to disrupt flight paths of bats but concluded that the Proposed Development would not harm the favourable conservation status of barbastelle bats in the SAC and that the proposal would not be materially harmful to the continued presence of barbastelle bats in the SSSI (paragraph 20.159 of the IR). The Secretary of State agrees with the Inspector's Report conclusions,
- 4.22 The Secretary of State is satisfied that the landscape design and control measures secured in the planning conditions are such that there would be no AEol on the Eversden and Wimpole SAC arising as a result of fragmentation impacts of qualifying features.

Fragmentation impacts of qualifying features during construction and / or operation: in-combination

- 4.23 The Applicant's HRA conducted an Appropriate Assessment for the Proposed Development in-combination with other committed developments.
- 4.24 The Bourn Airfield project was the only project identified as having the potential for in-combination effects. The Bourn Airfield HRA identified that there was the potential LSE to the Eversden and Wimpole SAC as a result of: a reduction in available foraging for the male barbastelle bats in the Site (construction and operation); and females deterred from visiting the Site (construction and operation). The Bourn Airfield HRA concluded that, subject to artificial lighting mitigation, there would be no AEol to the Eversden and Wimpole SAC.
- 4.25 The Secretary of State is satisfied that there will be no in-combination effect as a result of the Proposed Development and Bourn Airfield, subject to the mitigation for both projects being implemented.

Killing and injury of interest features/species during operation: alone

- 4.26 The Applicant's HRA Report concludes in Table 5-1 that due to the nature of the Proposed Development during operation there is the potential for LSE to Barbastelle bats as a result of mortality from road traffic collisions.
- 4.27 The Proposed Development will involve the use of 3m high buses travelling 30 times an hour in both directions operating between 6am and approximately midnight. The

Applicant's HRA Report identifies that juvenile bats learning to fly (August-September) are most at risk, and that Barbastelle bats fly between 2m to 10m which would create a collision risk with the buses.

- 4.28 Measures to mitigate the risk of bat mortality are outlined within the Applicant's HRA. These included measures to limit the speed of buses (50mph, with 30mph at junctions); limiting bus movements to 20 bus movements per hour during the juvenile bat risk period (dusk emergence and midnight); embedded landscape mitigation features; extensive replacement woodland planting to occur at Highfield roundabout (crossing point 9) as well as an increased embankment height to ensure planting reduces light spill; a dark corridor will be maintained at crossing point 10, including the incorporation of a new drainage pond and habitat planting with woodland and trees to the north of the new junction layout to ensure the dark corridor can be maintained; the planting of new woodland at crossing point 19; landscaping designing to maintain connectivity at crossing point 19, including the creation of a bund with mature tree planting atop that will be 4m above the made ground level, which will be further developed at the detailed design stage; a sensitive lighting strategy; willow fencing or similar to be used as a temporary mitigation measure if tree planting cannot establish the 4m height instantly; the requirement for a bund at crossing point 5 is currently not needed, but will be re-evaluated at the detailed design stage; as a general rule, the gap between canopy heights either side of the new road will be no more than 20m wide to encourage bats to maintain their flight height over the road.
- 4.29 Additionally, the Applicant's HRA set out that annual monitoring for 5 years until establishment shall be undertaken and then every 3 years thereafter (paragraph 7.2.33).
- 4.30 Following the implementation of the mitigation and monitoring measures, the Applicant concluded that there would be no AEoI of the SAC as a result of bat mortality (paragraph 7.2.37).
- 4.31 In their correspondence from January 2025, Natural England disagreed with the Applicant's conclusion that there would be no AEoI as a result of mortality from collisions. Given the low number of bats per colony, Natural England noted that even a handful of collisions may significantly reduce the population size of a colony.
- 4.32 Additionally, they stated that a 20m gap between canopies, as proposed by the Applicant, is likely to be a barrier until later in the evening, or result in bats flying lower, therefore putting bats at greater risk of collision. Natural England advised that the timings of first and last bat pass registrations, particularly for Barbastelle bats, should be analysed to inform which crossing points should be prioritised for the highest quality mitigation measures to prevent bats flying closer to the roadway at dusk and dawn.
- 4.33 Natural England also advised that further investigation into the current road crossing behaviour of bats in the area should be undertaken. This would give more confidence in the likely effectiveness of crossing features, as well as highlighting where compensatory landscape enhancements could be most valuable.

- 4.34 In September 2025, the Applicant produced Technical Note 3: Thermal Imaging Report in response to Natural England's suggestions for further survey information. This report provided additional information on how Barbastelle bats interact with the existing road and neighbouring vegetation in the local context. Bats were recorded crossing single carriage A-roads, and dual carriage A-roads where gaps between canopies ranged from 5m and 38m. All but one bat were recorded as flying at a safe height (above 3-6m). The report concluded that the bats recorded did not appear to find the existing road a barrier to movement or dispersal.
- 4.35 In September 2025, the Applicant and Natural England agreed draft planning conditions related to bats. It is set out in the draft conditions, that the Applicant must consult with Natural England on the final design of bat mitigation to be applied, particularly in regard to lighting, noise, and landscape treatments, as well as the adoption of the Bat Monitoring Strategy.
- 4.36 As set out in paragraph 4.10 of this report, Natural England and the Applicant have agreed a Statement of Common Ground following continued engagement. In Natural England's Position Statement from September 2025, Natural England confirmed that they were satisfied that the Proposed Development '*should not materially add to existing levels of natural and anthropogenic mortality or compromise the Favourable Conservation Status of the Eversden & Wimpole Woods SAC*'. Natural England therefore concluded that, subject to mitigation being implemented, there would be no AEoI of the Eversden & Wimpole SAC as a result of the Proposed Development.
- 4.37 The Secretary of State has carried out consultation with Natural England as part of this HRA. Natural England confirmed that their position has not changed since the Inquiry and that they are satisfied with the conclusions from the Applicant's HRA that, subject to mitigation, there will be no AEoI on the Eversden and Wimpole SAC as a result of the killing and injury of interest features/species during operation.
- 4.38 The Inspector's Report noted that it is not certain that only single deck buses may use the route as a result of the Proposed Development. It was noted, however, that the frequency of vehicle movements is likely to be less on the busway than on roads used by all vehicles, and services on the busway are planned to operate between 6am and midnight, with reduced frequency during juvenile bat risk times, which should reduce the potential for collisions to occur. During operation, lighting will be restricted to areas where safety issues have been identified, leaving large unlit areas. Following the securing of appropriate mitigation, the Inspector's Report concluded that the Proposed Development would '*not harm the favourable conservation status of Barbastelle bat in the SAC, and that it would not pose a threat to the integrity of the Eversden & Wimpole SAC*'.
- 4.39 Based on the information before her, and subject to the mitigation measures secured in the planning conditions, the Secretary of State is satisfied that the Proposed Development will not adversely affect the integrity of the qualifying features of the Eversden & Wimpole SAC from the killing and injury of interest features/species during operation.

Killing and injury of interest features/species during operation: in-combination

- 4.40 The Bourn Airfield project was the only project identified as having the potential for in-combination effects to the Eversden and Wimpole SAC. Due to the nature of the Bourn Airfield project being a residential development, there is no potential for the killing or injury of barbastelle bats from the Bourn Airfield project. As such, no in-combination effects are anticipated.

Conclusion of the appropriate assessment

- 4.41 The Secretary of State has undertaken an appropriate assessment under regulation 63 of the Habitats Regulations for the Eversden & Wimpole SAC. Likely significant effects were ruled out for the Ouse Wash SAC and Ramsar site, and the Fenland SAC.
- 4.42 The Secretary of State is satisfied that given the relative scale and magnitude of the identified effects on the qualifying features of this European site and where relevant, the measures in place to avoid and reduce the potential harmful effects, there would not be any implications for the achievement of the conservation objectives for the Eversden & Wimpole SAC.
- 4.43 Based on the submissions in the Inquiry as summarised in the Inspector's Report, together with further consultation undertaken by the Secretary of State with Natural England after the close of the Inquiry, the Secretary of State is satisfied that the views of Natural England, as the appropriate nature conservation body have been considered and that they are in agreement with the scope and conclusions of the Applicant's HRA Report.

5. SUMMARY OF CONCLUSIONS

- 5.1 The Secretary of State has carefully considered all the information presented within the application, during the Inquiry and proceeding it. The Development is not directly connected with, or necessary to, the management of a European site, and is likely to have a significant effect on the following European sites:
- Eversden & Wimpole SAC
- 5.2 The Secretary of State therefore carried out an appropriate assessment to determine any adverse effects on the integrity of the above European sites. In conducting the appropriate assessment, the Secretary of State has applied the precautionary principle. The Secretary of State is satisfied that no reasonable doubt remains as to the absence of such effects. Having carried out the appropriate assessment, the Secretary of State is satisfied that, when mitigation measures are taken into account, the Proposed Development will not adversely affect the integrity of the Eversden & Wimpole SAC.
- 5.3 The Secretary of state has therefore concluded that taking into account the mitigation measures it is permissible for her to give consent for the Proposed Development.

Annex 1 Documents used to inform this HRA Report

NB. This list is not exhaustive. The HRA Report is informed by the application and submissions to the Examination, together with submissions after the close of Examination.

Application Documents

- CtoC-10-ES0: Environmental Statement (including supporting figures and appendices)
- Appendix TR5.11: Statement to Inform Habitats Regulations Assessment

Documents produced during the Inquiry

- Natural England's response to the Secretary of State consultation
- Technical Note 3: Thermal Imaging Report
- Draft Planning Conditions: Edited by Natural England – 15 September 2025
- Statement of Common Ground Between Cambridge City Council and Cambridgeshire County Council
- Record of Engagement with Natural England

Inspector's Report

- Inspector's Report

NB. This list is not exhaustive. The HRA Report is informed by the application and submissions to the Secretary of State, together with submissions after the close of the Inquiry.

Annex 2 Full list of qualifying features screened for LSE

Site name	Qualifying features
Eversden and Wimpole SAC	S1308 Barbastelle bat, <i>Barbastella barbastellus</i>

Annex 3: Conservation objectives for sites considered in the appropriate assessment

The conservation objectives reproduced below are available from:

<https://designatedsites.naturalengland.org.uk/TerrestrialAdvicePDFs/UK0030331.pdf>

NB. In the case of all European sites identified below, the Conservation Objectives are to be read in conjunction with the accompanying Supplementary Advice documents, which provides more detailed advice and information to enable the application and achievement of the Objectives set out.

Eversden and Wimpole SAC (Site Code UK0030331)

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring:

- The extent and distribution of the qualifying natural habitats and habitats of qualifying species;
- The structure and function (including typical species) of qualifying natural habitats;
- The structure and function of the habitats of the qualifying species;
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
- The populations of qualifying species; and
- The distribution of qualifying species within the site.

Qualifying Features:

- S1308 Barbastelle bat, *Barbastella barbastellus*