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The Cambourne to Cambridge Order

Cambridgeshire County Council

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBOURNE TO CAMBRIDGE ORDER

REBUTTAL IN RELATION TO COTON ORCHARD

of

Ian Ellis Bsc(Hons), MRes, MCIEEM

of WSP

On behalf of Cambridgeshire County Council

5 August 2025

Planning Inspectorate Reference: DPI/E0535/25/1

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1. INTRODUCTION

- 1.1.1 This rebuttal has been prepared in response to the Proof of Evidence of Anna Gazeley of Coton Orchard Limited, Houston Crest Properties Limited **[CD26-10-W5-1]** in relation to the effects on Coton Orchard.
- 1.1.2 My name is Ian Ellis. I am a Technical Director in Nature Services at WSP. Details of my qualifications, professional career and key project experience are contained in my Proof of Evidence **[CD26-01-APP-W3-13]**.

2. SCOPE OF REBUTTAL

- 2.1.1 The scope of my rebuttal is specifically in response to matters raised in the Proof of Evidence of Anna Gazeley **[CD26-10-xxx]** entitled Corton Orchard Limited Proof of Evidence. Anna Gazeley's Proof of Evidence seeks to establish that Coton Orchard will be 'irreversibly damaged' in maintaining an objection set out in a Statement of Case **[CD-xxx]**.
- 2.1.2 The fact that I do not respond to a particular point should not be taken as a concession in any respect. I have sought to focus my rebuttal evidence on the matters that I consider most likely to assist the Inspectors and Secretary of State by being addressed in writing.

3. REBUTTAL

3.1 Rebuttal in Relation to implications of County Wildlife Site designation

- 3.1.1 The following presents my rebuttal in relation to the implications of the designation of Coton Orchard as a County Wildlife Site in Anna Gazeley's' Proof of Evidence **[CD26-10-xxx, pdf page 7, section 4, paragraph 1]** where it is stated that:
- 'The orchard's formal status as a County Wildlife Site confirms its irreplaceability'*
- 3.1.2 The designation of the orchard as a County Wildlife Site does not infer any particular irreplaceability. Indeed, the criteria for designation County Wildlife Sites in Cambridgeshire **[CD xx]** makes no reference to this concept.
- 3.1.3 My Proof of Evidence **[CD26-01-APP-W3-13, pdf pages 8, 13]** provides an overview of relevant designated sites and the predicted impacts upon them including Coton Orchard.

3.2 Rebuttal in Relation to biodiversity loss

- 3.2.1 The following presents my rebuttal in relation to the statement made on biodiversity loss in Anna Gazeley's Proof of Evidence **[CD26-10-xxx, pdf page 12, paragraph 2]** where it is stated that:
- 'Far from compensating for biodiversity loss, the applicant's proposals subtract from an existing success story and offer nothing substantive in return.'*
- 3.2.2 It is my consideration that the Applicant's proposals have considered the loss of biodiversity through outline design and will be fully refined in detailed design. My Proof of Evidence provides an overview of Important Ecological Features predicted to be lost or impacted **[CD26-01-APP-W3-13, Section 5, pdf page 13]**. Furthermore, under Biodiversity Net Gain it is outlined that although it is not mandatory for the Scheme, the Applicant is committed to achieving no less than 10% BNG. There will be opportunities to increase the onsite delivery of biodiversity value through the detailed design of the Scheme. It is also considered that offsite compensation measures will be a step in achieving the wider ambition of BNG **[CD26-01-APP-W3-13, pdf page 21]**.

- 3.2.3 In respect to orchard habitat in particular, compensation is noted that it could be made elsewhere within the Order Limits or, with the landowner's agreement, in other parts of Coton Orchard. The Applicants position throughout has been to work with the landowner in order to agree optimal outcomes.
- 3.2.4 Furthermore, Cambridgeshire County Council has designated land at Lower Valley Farm to the south of Fulbourn which has significant potential for biodiversity uplift and is within the Cambridge Nature Network. In summary, the Applicants proposals include extensive provision for habitat compensation that will contribute to regional networks.

4. STATEMENT OF TRUTH

- 4.1.1 The rebuttal which I have prepared and provide is true and is given in accordance with the guidance of my professional institutions. I confirm that the opinions expressed are my true and professional opinions.