



THE TRANSPORT AND WORKS ACT 1992
THE TRANSPORT AND WORKS (APPLICATIONS AND OBJECTIONS PROCEDURE) (ENGLAND
AND WALES) RULES 2006
THE TRANSPORT AND WORKS (INQUIRIES PROCEDURE) RULES 2004
ACQUISITION OF LAND ACT 1981
THE COMPULSORY PURCHASE (INQUIRIES PROCEDURE) RULES 2007

GREATER CAMBRIDGE PARTNERSHIP
(ON BEHALF OF CAMBRIDGESHIRE COUNTY COUNCIL)
THE CAMBOURNE TO CAMBRIDGE (PROPOSED ORDER) INQUIRY
Commencing 16th September 2025

Summary Proof of Evidence
on
Ecology & Nature Conservation Matters

Dominic M G Woodfield CEcol CEnv MCIEEM
For
Cambridge Past Present and Future
&
Coton Parish Council
(OBJ-251)

1 WITNESS BACKGROUND AND QUALIFICATIONS

- 1.1 My name is Dominic Macsen Geraint Woodfield. I am the Managing Director of Bioscan (UK) Limited, a leading ecological consultancy established in 1984. I hold an honours degree in Environmental Studies with Geography from Manchester Metropolitan University and I am a registered Chartered Ecologist (CEcol), Chartered Environmentalist (CEnv) and a full member of the Chartered Institute of Ecology and Environmental Management (MCIEEM).
- 1.2 I have worked as a professional ecologist and environmental consultant since 1994 and have extensive expertise and experience presenting expert evidence both for and against the granting of consent at numerous public inquiries covering large residential schemes, Transport and Works Act Projects, Nationally Significant Infrastructure Projects and various other projects involving CPO elements.
- 1.3 In February 2025, I was asked by Richard Buxton Solicitors, on behalf of Cambridge Past Present and Future ("CPPF") and Coton Parish Council ("CPC"), to consider the relative performance, in environmental impact terms, of the guided busway route proposed by Greater Cambridge Partnership ("GCP") as against an 'in-highway' alternative being advanced by CPPF/CPC.

2 SCOPE AND STRUCTURE OF EVIDENCE

- 2.1 My evidence follows from that of my colleagues Steve Johnstone, Edward Leigh and Louise Hirst who demonstrate that the in-highway alternative is deliverable and either better, or at least comparable in achieving the desired traffic and transport, carbon saving and related policy objectives.
- 2.2 I then focus on the relative performance of the GCP and CPPF schemes from the perspective of environmental impacts, and specifically nature conservation and ecology/biodiversity matters.

3 CPPF SCHEME – BASELINE

- 3.1 Over three visits spanning May to July 2025, I and colleagues conducted habitat classification and condition surveys of the highways land either side of the A1303 Madingley Road to classify the habitats that may be affected by the CPPF scheme and establish their baseline value.
- 3.2 In general, the habitats present within the highways land are representations of common types of grassland and hedgerow vegetation found in association with trunk road verges up and down the country and typical of that of the wider locality. The most sensitive area is undoubtedly the land adjacent to Madingley Wood SSSI, where the development of secondary woodland contiguous to that site offers an extension of woodland cover and a degree of visual/acoustic and air pollution buffer between the A1303 and the SSSI proper.

- 3.3 Detailed surveys of fauna using the Madingley Road highways land were outside the scope of Bioscan's commission, however, incidental observations of fauna along the highways land corridor during the surveys carried out.
- 3.4 Fauna recorded on the three survey visits were mainly confined to birds, with a range of common species noted, albeit at low density but this is not surprising as traffic noise is a known suppressant of breeding bird density and diversity and I consider them likely representative of the true picture.
- 3.5 A limited number of trees also were identified as having features capable of supporting roosting bats.
- 3.6 The rather limited intrinsic value of the existing roadside habitats will be further affected and, to a greater or lesser extent suppressed, by the close proximity of the existing busy A1303. Comparisons of habitat quality to the land affected by the GCP scheme are somewhat hindered as while the stretch of highways land I have surveyed has some plant species of note, it is difficult to contextualise this against the land falling within the GCP scheme, as there is evidence of a lower standard of survey and botanical rigour having been applied in the GCP studies.

4 HABITAT LOSSES ARISING FROM THE CPPF SCHEME

- 4.1 The CPPF scheme involves adjustments to carriageway width and alignment within the highways land to accommodate an inbound bus lane and retain and improve the extant active travel provision alongside.
- 4.2 Excluding loss/re-use of existing unvegetated (i.e. paved/tarmac) surfaces, habitat losses are limited to just under a hectare in total of land adjoining the current A1303 carriageway, this being mostly species-poor grassland verge. The equivalent land-take (not including existing hard surface) required in order to deliver the offroad section of the GCP scheme from St Neots Road to Grange Road is 6.68ha. This is approaching six times the land-take required by the CPPF scheme.
- 4.3 The CPPF scheme avoids any direct impact on the Madingley Wood SSSI and accordingly its population of barbastelle bats. Some very slight and localised trimming back of overhanging woody vegetation (which in places currently extends right to the carriageway edge) may be required locally to accommodate the active travel path and thus impact the buffer to the SSSI however any land-take here affects existing narrow grassed verge oversailed by canopy, rather than woodland *per se*.
- 4.4 As such, I assess the indirect effect of the CPPF scheme on Madingley Wood SSSI and its designated interest features will be at worst neutral (no effect) and potentially even slight net beneficial.

- 4.5 When considering the BNG calculations of the respective schemes using the Statutory Biodiversity Metric, the CPPF scheme will result in a net loss of 5.96 area-based Habitat Units, in the absence of any compensatory enhancement or habitat creation. This is a very much-reduced level of impact and imposes a much lower mitigation and compensation burden than the GCP scheme as next explained.

5 HABITAT LOSSES ARISING FROM THE GCP SCHEME

- 5.1 There are four non-statutory designated sites within the proposed Order Limits that will be directly impacted by the GCP scheme: Coton Orchard, the Coton Path hedgerow, 'Scrub east of the M11 verge' and 'Bin Brook'.
- 5.2 I have significant concerns about how the Coton Orchard has been classified and valued quantitatively in GCP's BNG assessment, and how the true magnitude of impact has been masked and suppressed. In my opinion, there is no scientific or other basis not to classify most of this c2.5ha as the Priority Habitat.
- 5.3 In terms of the other three sites I disagree with the suggestion made in the Environmental Statement [CD1-10.01] that there will be no significant effects on these sites for reasons detailed in my main proof.
- 5.4 To consider the BNG calculations, I also note that the applicant's BNG calculation for the scheme (i.e. the completed metric calculation tool) was not submitted with the TWA application and only received by myself on 9th June.
- 5.5 My review of the BNG calculations exposed a number of methodological errors and omissions, all of which have the effect of significantly suppressing the baseline value of the affected habitats. Additionally, the calculation as a whole is based on very optimistic to the point of questionable assumptions about the future condition of the habitats likely to develop alongside the GCP scheme.
- 5.6 Therefore, I conclude that the applicant's metric calculation is so infected with error as to be rendered completely unreliable and potentially highly misleading.
- 5.7 However, even if one disregards these errors and takes the BNG calculations as given, the CPPF scheme performs around five times better by this measure in terms of reduced ecological impact.

6 IMPLICATIONS OF BOTH SCHEMES FOR BARBASTELLE AND OTHER FAUNA

- 6.1 The most important species in comparing the CPPF and GCP schemes is the barbastelle bat, which is known to have maternity (breeding) roosts in Madingley Wood. In my opinion the CPPF

scheme should be preferred on the basis of its lower inherent risk to barbastelle for reasons detailed in my proof.

- 6.2 In summary however, the impacts on bats arising from only minor-scale improvements to an extant busy highway corridor, the CPPF scheme introduces at worst a minor uplift and at best a near-neutral change to prevailing noise, vibration, air quality and lighting effects within an existing zone of influence from such effects. By contrast, the GCP scheme involves a much higher magnitude of change due to introducing these potential impacts as wholly new factors into a landscape where they do not currently or otherwise exist.

7 GPC's CONSIDERATION OF IN-HIGHWAY ALTERNATIVES

- 7.1 In this section I deal with the claim made in the recent report for GCP [[CD9-31](#)] which states

“the Madingley Road options are far from environmentally benign, with potential impacts to some of the most highly protected heritage and ecological categories of designation in the UK, and/or for the property and amenity of people living along the southern boundary of this road. These are considered to make this proposal no better and potentially inferior in environmental terms to that proposed under the TWA Order application” (para 3.10.10).

- 7.2 This conclusion differs from the results presented in my evidence that the CPPF is in fact far superior to that proposed under the TWA Order application, as regards impact on ecology and designated sites.
- 7.3 Additionally, while the evidence I have reviewed shows that GCP has at points considered an in-highway scheme along Madingley Road, it also shows that it has not done so to the level of detail required to determine if the risk of direct or indirect impacts on the Madingley Wood SSSI and other relevant environmental constraints can be avoided, designed-out or otherwise made acceptable. When coupled together with a flawed assessment of the GCP-favoured off-road route, which has the result of downplaying the environmental impacts of that option, the optioneering process followed by GCP has been flawed and has likely led to misdirection.

8 NATIONAL AND LOCAL PLANNING POLICY COMPLIANCE

- 8.1 Taking account of the evidence discussed in Section 7 of my proof, it appears GCP prematurely decided an in-highway option was not viable and so determined the county-significant adverse ecological impacts were unavoidable and thus acceptable in policy terms. I believe this to be a misguided conclusion.
- 8.2 The potential impacts of the CPPF and GCP schemes engage with paragraphs 187 and 193 of the NPPF and potentially paragraph 195. My evidence demonstrates that the CPPF scheme performs better in terms of paragraph 187 and 193 and argues that paragraph 195 should not be considered to apply to the GCP scheme.
- 8.3 My evidence also considers local policies engaged across South Cambridgeshire and Cambridge City's Local Plans to show that again, the CPPF scheme outperforms the GCP scheme.

9 OVERALL CONCLUSIONS

- 9.1** GCP's case that their scheme meets policy and public interest tests hinges on an assertion that impacts on biodiversity are unavoidable if the congestion-easing and other benefits of the scheme are to be realised.
- 9.2** However, as my and my colleague's evidence demonstrates the CPPF alternative is at least comparable in terms of benefits but also gives rise to vastly lesser ecological impacts.
- 9.3** I consider that GCP's consideration of an in-highway option was insufficient and puts the GCP scheme out of alignment with national and local policy.
- 9.4** I have found GCP's assessment of ecological impacts to be flawed and as a consequence the true ecological impact of the GCP scheme has been underplayed.
- 9.5** If the Order were not made, this would afford GCP the opportunity to revisit less ecologically harmful alternatives so the scheme can be delivered to a higher standard of environmental responsibility.



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