DfT Ref: TWA/25/APP/01

Document Ref: CD27-01 APP-W5-01

The Cambridge South East Transport Order

Cambridgeshire County Council

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBRIDGE SOUTH EAST TRANSPORT ORDER

PROOF OF EVIDENCE of

Alex Watson

of AtkinsRéalis

In respect of Ecology

On behalf of Cambridgeshire County Council

10th November 2026

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1. INTRODUCTION

1.1 Qualifications

1.1.1 My name is Alex Watson. I am an Associate Director in the Ecology Practice at AtkinsRéalis. I have a BSc (Hons) in Applied Biology from Liverpool John Moores University. I am a full Member of the Chartered Institute of Ecology and Environmental Management.

1.2 Experience

1.2.1 I have 30 years of experience in the private sector in ecology consultancy work. This work includes co-ordination of Environmental Impact Assessment, Ecological Impact Assessment and Habitats Regulations Assessment for sectors including transport, energy, water and cities and development.

1.2.2 In my current role at AtkinsRéalis I am a Technical Lead with a particular emphasis on Transport and Habitat Regulations Expert for numerous projects across a wide spectrum of public and private sector clients.

1.3 Experience of the Scheme

1.3.1 I am the biodiversity lead for the Scheme. In this role I was responsible for the drafting of the Biodiversity chapter of the Environmental Statement **[CD1-10.02, pages 148-190]** and accompanying appendices **[CD1-10.03 to CD1-10.58]** and the Habitats Regulations Assessment **[CD1-10.41]**, which included the production of the supporting information.

1.3.2 In this capacity I have provided advice to the design team on the Biodiversity implications for aspects of the design and inputted into stakeholder consultation including both statutory and non-statutory stakeholders.

1.4 Scope of Evidence

1.4.1 The scope of my evidence is on the overall approach of the assessments undertaken and reported within the Biodiversity chapter of the Environmental Statement **[CD1-10.02, pages 148-190]** and accompanying appendices **[CD1-10.03 to CD1-10.58]** and the Habitats Regulations Assessment **[CD1-10.41]**.

Aquatic Ecology

1.4.2 Attached to my proof is Mr Ian Morrissey written statement which explains the sensitivity of the aquatic habitats and effects of Scheme wide crossing structures and associated drainage elements and Scheme effects on the aquatic ecology of the watercourses and waterbodies.

1.4.3 The assessment was undertaken using appropriate methodology, desk study data and relevant professional guidance. The assessment concluded that there would be limited adverse effects and that with embedded design and mitigation measures that would be only a slight adverse and not significant effect on the watercourses.

Statement of Matters

1.4.4 With regards to the Statement of Matters dated 19 October 2026 the following matters are either wholly related to my Proof of Evidence or partially related to my Proof of Evidence and also covered by the Proofs of Evidence of others as set out below.

Statement of Matters dated 19 October Reference	Statement of Matters dated 19 October Text	Coverage through my Proof of Evidence	Coverage through the Proofs of Evidence of Others
4.	The effect of the implementation, operation and maintenance of the Scheme.		
4. a)	The potential environmental impact of the proposed activities, including but not limited to the impact on drainage, Green Belt land, air pollution, material use, biodiversity, habitats and wildlife, with particular reference to the Granta Chalk Stream, Hobson's Conduit chalk stream, Gog Magog Hills landscape, Nine Wells Local Nature Reserve.	I will describe how the ES has reported the potential environmental impact on biodiversity, habitats and wildlife and the Nine Wells Local Nature Reserve. The effects of the Scheme on biodiversity, habitats and wildlife, including the biodiversity effects on the River Granta, Hobson's Conduit, and the Nine Wells Local Nature Reserve are covered in my Proof of Evidence **[CD27-01 APP-W5-01]**	The effects of the Scheme on the potential environmental impact on drainage, material use, the non-biodiversity impacts on the River Granta, Hobson's Conduit, and the Nine Wells Local Nature Reserve is covered by Mr Parsons' Proof of Evidence **[CD27-01 APP-W7-01]**. The effects of the Scheme on Green Belt land is covered in Ms McDade's Proof of Evidence **[CD27-01 APP-W10-01]**.
4. b)	Habitats Regulations Assessment (HRA): Any matters relating to the HRA for the proposed Cambridge South East Transport scheme, including the effects of the scheme on relevant protected habitats and species	This issue is covered entirely within my Proof of Evidence at Section 3.	

1.5 Summary of Evidence

1.5.1 My evidence is structured as follows:

1. Section 2 –Biodiversity Assessment;
2. Section 3 - The Habitats Regulations Assessment (HRA);
3. Section 4 – Representations made relevant to my evidence;

4. Section 5 – Conclusions
5. Section 6 - Statement of truth.

2. BIODIVERSITY CHAPTER OF THE ENVIRONMENTAL STATEMENT

2.1 Introduction

2.1.1 This section of my evidence sets out the process for how the Biodiversity assessment was undertaken and how the ES was produced in accordance with the requirements described in the TWA Rules **[CD4-08]**.

2.1.2 The Biodiversity impacts of the Scheme are set out in Chapter 10 of the ES **[CD1-10.02, pages 148-190],** and Appendices **[CD1-10.03 – CD1-10.58]**. This section provides the following:

1. Scope of the assessment;
2. Methodology for assessment;
3. Summary of baseline conditions and constraints;
4. Relevant impacts;
5. Appropriate Mitigation;
6. Summary of residual significant effects.

2.2 Scope

2.2.1 The scope of the Biodiversity assessment included potential impacts during construction caused by construction activities within the Scheme boundary. For the operational phase, the scope of the Biodiversity assessment included impacts caused by the operation of the Scheme.

2.3 Method

2.3.1 The method for assessing impacts on Biodiversity from construction activities within the Scheme boundary was undertaken in accordance with the following:

1. Chartered Institute for Ecology and Environmental Management (CIEEM) 2018 Guidelines for Ecological Impact Assessment in the UK **[CD11-31]**;
2. National Highways Design Manual for Roads and Bridges (DMRB):
3. DMRB LA 104 Environmental assessment and monitoring **[CD17-09]**;
4. DMRB LA 108 Biodiversity **[CD17-11]**;
5. DMRB LD 118 Biodiversity design **[CD17-18]**.

2.3.2 The Scheme has been considered for a number of years and therefore data has been collected since 2019 as summarised below.

Desk Study

2.3.3 Baseline data has been gathered from a range of sources through data requests, consultation, and using online resources as outlined below. This included data gathering in relation to statutory and non-statutory designated sites for nature conservation, protected and priority species, and priority habitats. The following data sources have been used to inform the biodiversity assessment:

1. Cambridgeshire and Peterborough Environmental Records Centre (data received: 06/10/2022) for recent (within the last 10 years) biological records as summarised in the ES **[CD1-10.02, pages 152-153]**;
2. Magic website as summarised in the ES **[CD1-10.02, pages 152-153]**;

3. Environment Agency Statutory Main Rivers Map as summarised in the ES **[CD1-10.02, pages 152-153]**;
4. Environment Agency biological survey records for fish, macroinvertebrates, and macrophytes on the Environment Agency's Ecology and Fish Data Explorer website as summarised in the ES **[CD1-10.02, pages 152-153]**;
5. Environment Agency River Habitat Survey (RHS) records as summarised in the ES **[CD10-02, pages 152-153]**;
6. Environment Agency Water Framework Directive (WFD) classification data on the Environment Agency's Catchment Data Explorer website for the Granta Water Body; and the Hobson's Brook Water Body as summarised in the ES **[CD1-10.02, pages 152-153]**;
7. Aerial imagery from Google Earth.

Habitats [CD1-10.31]

1. Phase 1 habitat survey 2021;
2. Hedgerow survey 2020;
3. UKHab Survey 2024.

Bats [CD1-10.32]

1. Bat activity surveys 2019;
2. Bat roost and activity surveys 2020;
3. Preliminary roost assessment and emergence surveys 2021;
4. Winter bat survey 2021;
5. Summer bat surveys 2022;
6. Bat tree surveys 2025.

Birds [CD1-10.33]

1. Wintering bird surveys 2019/2020;
2. Breeding birds surveys 2020;
3. Barn owl surveys 2020;
4. Kingfisher surveys 2020;
5. Barn owl surveys 2022;
6. Kingfisher surveys 2022;
7. Wintering bird surveys 2022/2023.

Badgers [CD1-10.34]

1. Badger survey 2020/2021;
2. Badger survey 2022.

Otters and water voles [CD1-10.35]

1. Otter surveys 2020;
2. Water vole surveys 2020;
3. Water vole and otter surveys 2022.

Hedgehog surveys 2020 [CD1-10.36]

Reptiles [CD1-10.37]

1. Reptile surveys 2020;
2. Reptile surveys at North Farm 2021.

Terrestrial invertebrate surveys 2020 [CD1-10.38]

White-clawed crayfish [CD1-10.39]

1. White-clawed crayfish 2020;
2. White-clawed crayfish eDNA surveys 2022.

Great crested newts [CD1-10.40]

1. Habitat Suitability Index (HSI) assessments surveys 2019;
2. HSI and environmental DNA (eDNA) surveys 2020;
3. HSI, eDNA, and presence or likely absence surveys 2021.

2.4 Baseline

Designated Sites

2.4.1 The assessment identified eight statutory designated sites of nature conservation importance within the study area comprising one Special Area of Conservation, four Sites of Special Scientific Interest (SSSI) and three Local Nature Reserves (LNR). Of these all four SSSI and two LNR were screened out of further assessment owing to an absence of impact pathways relative to the qualifying interests for each site.

2.4.2 A total of 13 County Wildlife Sites (CWS) and 11 City Wildlife Sites (CiWS) were recorded within the study areas of which 11 CWS and 9 CiWS were screened out of further assessment owing to an absence of impact pathways relative to the qualifying interests for each site.

Habitats

2.4.3 The area of the Scheme is primarily cereal crops comprising of over 85% of the Site with other habitats including but not limited to modified grassland, developed land; sealed surface, other neutral grassland, other woodland; broadleaved, arable field margins, lowland mixed deciduous woodland, ponds, hedgerows, watercourses and ditches.

2.4.4 The following watercourses have been identified within the aquatic habitat and species study area:

1. The River Granta
2. Hobson's Brook

2.4.5 There are four ditches within the Site, two at the north western end of the Site, a drainage ditch that runs along the toe of the Addenbrooke's Road embankment, and a ditch approximately 60 m further south and is a tributary ditch to Hobson's Brook.

2.4.6 There are ten ponds within 50 m of the Site boundary, two of which are located within the Site boundary, all of which are highly modified ponds and of low value.

Protected Species

2.4.7 Table 2-1 below provides a summary of the status of protected species within the study area and their conservation value.

Table 2-1 Protected Species Baseline Summary

Species	Conservation Value
Badgers	Local
Bats	National
Breeding birds	Local
Wintering birds	Local
Barn owls	County
Kingfishers	Local
Terrestrial invertebrates	Local
Reptiles	Local
Polecats, hedgehogs, brown hares, and harvest mice	Local
Amphibians	Local
Otters	Local
Water voles	County
Fish	County

2.5 Ecology Impacts

2.5.1 Potential ecological impacts during construction identified are listed below:

1. Potential effects on the barbastelle bats due to severance of commuting/ foraging routes;
2. Potential for loss of habitat connectivity;
3. Potential for indirect impacts from construction dust and construction runoff;
4. Disturbance to, and loss of riparian zone habitats;
5. Risk of pollutants or fine sediment ingress associated with works;
6. Loss of habitats.

2.5.2 Potential ecological impacts during operations identified are listed below:

1. Risk of collisions with animals;
2. Increased artificial lighting;
3. Noise and vibration disturbances;
4. Localised deposits of pollutants including nitrogen;
5. Vibration disturbances due to vehicle movements;
6. Some loss of river continuity due to shading from structures;
7. Changes to flow volume and quantity and potential for pollution from surface run-off from the busway;

8. Potential for pollution from surface run-off from the busway;
9. Some loss of river continuity due to shading from structures;
10. Potential for local redistribution of aquatic species in consequence;
11. Changes to flow volume quantity;
12. potential for pollution from surface run-off from busway.

2.6 Mitigation

2.6.1 The following mitigation measures as set out in the Chapter 10 of the ES [CD1-10.02, pages 148-190] will be implemented:

1. Provision of temporary commuting route features;
2. Pre-construction surveys for bats to be undertaken;
3. Retention and protection of existing vegetation using protective barriers;
4. Implement measures to protect trees set out in BS 3998:2010 **[CD25-03]**;
5. Translocation of important hedgerow sections;
6. New ecological ponds;
7. Tree planting in accordance with BS 8545:2014 **[CD25-04]**;
8. Provision of bat boxes;
9. Provision of new bat hop-overs;
10. Obtain Protected Species Mitigation Licences from Natural England;
11. Obtain a District Level Licence for great crested newts;
12. Covering of temporary excavations or provision of ramps;
13. Protection of badger setts;
14. Pre-construction surveys for badgers to be undertaken;
15. Creation of new habitat areas specifically for water voles;
16. Displace water voles from the River Granta crossings;
17. Use of non-percussive piles for River Granta bridge piles;
18. Establish a water vole exclusion zone;
19. Pre-construction surveys for water voles to be undertaken;
20. Box culvert with mammal ledges for Structure 5;
21. Pre-construction surveys for otters to be undertaken;
22. Provision of new reptile and amphibian hibernacula;
23. Implementation of a Reptile Mitigation Strategy;
24. Removal of all other natural refugia by hand where safe to do so, or otherwise;
25. Programming of vegetation clearance to avoid bird breeding season;
26. Creation of new habitat areas specifically for breeding and wintering birds;
27. Creation of new habitat areas specifically for barn owls;
28. The landscape design includes significant new lengths of hedgerow planted;
29. Programming of works to avoid impacts to kingfishers;
30. Pre-construction surveys for kingfishers to be undertaken;
31. Implementation of a Great Crested Newt Mitigation Strategy;

32. Creation of new habitat for invertebrates;
33. Hand searching for harvest mice and brown hares prior to vegetation clearance;
34. Hand searching for polecats prior to vegetation clearance;
35. Appropriate design of culverts to protect aquatic habitats/ species;
36. Permanent amphibian exclusion fencing;
37. Purchase of Biodiversity Net Gain (BNG) credits for rivers and streams metric;
38. New wet ditch features;
39. Bridge parapets topped with wire mesh fences;
40. Addition of specific seeds to the wildflower meadow mix;
41. Watercourse buffer zone;
42. Production of a Construction Environmental Management Plan (CEMP) and Code of Construction Practice (CoCP);
43. Water quality mitigation;
44. Implementation of good practice measures outlined in the draft CoCP and draft CEMP;
45. Adherence to pollution prevention guidance;
46. Safe storage of fuel and oil on Site, and measures to minimise leaks and drips;
47. Concrete washout procedure and other concrete mitigation;
48. Temporary drainage and surface water management;
49. Safe storage of chemicals and hazardous substances;
50. Dust mitigation;
51. Implementation of the general mitigation measures specified in the IAQM guidance for all construction activities **[CD18-01]**;
52. Implementation of the mitigation measures specified in the IAQM guidance for high-risk earthworks activities **[CD18-01]**;
53. Implementation of the mitigation measures specified in the IAQM guidance for high-risk construction activities **[CD18-01]**;
54. Implementation of the mitigation measures specified in the IAQM guidance for low risk track out activities **[CD18-01]**;
55. Construction Lighting Plan;
56. Details for mitigation measure LV1 Construction Lighting Plan can be found in Chapter 11 Landscape and visual **[CD1-10.02, pages 191 - 236].**

2.7 Impact Significance

2.7.1 The impact significance following the implementation of the mitigation measures is summarised in Table 2-2 below.

Table 2-2 Impact Magnitude and Significance Summary

Feature	Construction Phase	Operation Phase
	Residual Effect	**Residual Effect**
Eversden and Wimpole Woods Special Area of Conservation (SAC)	Neutral - Not significant	Neutral - Not significant
Nine Wells LNR	Neutral - Not significant	Neutral - Not significant
Shelford – Haverhill Disused Railway (Pampisford) CWS	Neutral - Not significant	Neutral - Not significant
River Granta CWS	Slight adverse - Not significant	Slight adverse - Not significant
Hobson's Brook CiWS	Neutral - Not significant	Slight adverse - Not significant
Hedgerows	Slight adverse - Not significant	Slight beneficial - Not significant
Grassland communities	Slight adverse - Not significant	Slight beneficial - Not significant
Lowland mixed deciduous woodland and other broadleaved woodland	Slight adverse - Not significant	Slight beneficial - Not significant
Flora	Slight adverse - Not significant	N/A
Arable field margins	Slight adverse - Not significant	Neutral - Not significant
	N/A	Slight beneficial - Not significant
Ponds	Slight adverse - Not significant	Neutral - Not significant
	N/A	Slight beneficial - Not significant
Hobson's Brook	Slight adverse - Not significant	Slight adverse - Not significant
Ditches	Slight adverse -Not significant	Slight adverse - Not significant
Bats	Slight adverse -Not significant	Slight beneficial - Not significant
	Slight adverse -Not significant	Slight adverse - Not significant
	N/A	Slight adverse - Not significant
Badgers	Neutral - Not significant	Slight beneficial - Not significant
	Neutral - Not significant	Slight adverse - Not significant
	N/A	Neutral - Not significant
Water voles	Slight adverse - Not significant	Slight beneficial - Not significant

Feature	Construction Phase	Operation Phase
	Residual Effect	**Residual Effect**
	N/A	Neutral - Not significant
	N/A	Neutral -Not significant
Otters	Neutral - Not significant	Slight beneficial - Not significant
	N/A	Neutral - Not significant
	N/A	Neutral - Not significant
Reptiles	Neutral - Not significant	Slight beneficial - Not significant
	N/A	Neutral - Not significant
Breeding birds and over-wintering birds	Neutral - Not significant	Neutral - Not significant
Barn owl	Slight adverse -Not significant	Slight adverse - Not significant
Kingfishers	Neutral - Not significant	Neutral - Not significant
Great crested newts and other amphibians	Neutral - Not significant	Slight adverse -Not significant
Terrestrial invertebrates	Neutral - Not significant	Slight beneficial - Not significant
	N/A	Neutral - Not significant
Polecats, common toads, hedgehogs, brown hares, and harvest mice	Neutral - Not significant	Slight adverse - Not significant
	N/A	Neutral - Not significant
Fish	Neutral - Not significant	Neutral - Not significant

2.8 Conclusion

2.8.1 The assessment concluded that with the implementation of the mitigation measures summarised above (section 2,6) that there would be no significant effects on designated sites for nature conservation, protected and priority habitats, or protected or priority species during either the construction or the operation of the Scheme.

2.8.2 These conclusions are further supported by Natural England in their response **[CD2-REP-05]** which states that the Applicant proactively engaged with Natural England and that they have no outstanding matters to be addressed.

2.9 Survey Validity (Updated Surveys Post Submission)

2.9.1 As the Scheme took some time to progress to submission of the Application, Greater Cambridge Shared Planning (GCSP) **[CD3-20.01]** raised questions as to the validity of the survey data supporting the assessment. The Chartered Institute of Ecology and Environmental Management (CIEEM) Advice Note on the Lifespan of Ecological Reports and Surveys (April 2019) **[CD11-33]**; provides guidance on the validity of data in respect of its age. In accordance with this guidance, the data collected since 2020 has been reviewed and assessed throughout the project to

determine when and if the data needs updating. Table 2-3 below summarises how the data was updated following the initial surveys undertaken in 2020/21.

2.9.2 A suitably experienced ecologist undertook an updated walkover survey of the Site in 2024. The information gathered was used to ascertain which surveys would require updating in 2025.

2.9.3 Table 2-3 below summarises how the data was updated following the initial surveys undertaken in 2020/21 and again in 2024, 2025 and 2026.

Note: Despite extensive efforts surveys undertaken post 2022 were significantly constrained by a lack of landowner access which resulted in some surveys not being possible or limited in their extent and timing. However, as habitats along the route of the Scheme have not changed significantly since 2022 this is not considered to be a significant limitation. Indeed, those surveys which have been updated have not shown any significant changes since the previous surveys.

Table 2-3 – Ecology Surveys and Updates

Survey		Original Survey Date	Survey Updates Required			
			2022 Reasoning	**2024 Reasoning**	**2025 Reasoning**	**2026 Reasoning**
Extended Phase 1		2019 updated in 2021	**NO** - no significant changes in habitat composition.	**YES** – survey was updated to map changes using Habitat Assessment (UKHab) mapping	**NO** – existing data considered appropriate	**NO** – existing data considered appropriate
Hedgerows		2020	**YES** – as part of UKHab	**NO** – updated in 2022	**NO** – habitats had not changed on Site	**NO** – habitats had not changed on Site
NVC		2020	**NO** – no change in habitats, therefore not considered there would be change	**NO** – no change in habitats, therefore not considered there would be change	**NO** – no change in habitats, therefore not considered there would be change	**NO** – no change in habitats, therefore not considered there would be change
Bats	GLTA Transect Survey Static Survey	2020	**YES** – GLTA PBRA Transects Statics	**NO** – survey data was updated in 2022 and there were no changes to habitats to suggest a significant change	**YES** – tree roost inspections completed August/ September 2025. No changes in habitats recorded since 2020 therefore further updated surveys not considered necessary.	**YES** – static survey updates completed Crossing point survey on the A1307.
	Aerial Inspections Static Activity	2021				
	GLTA, Tree emergence Static Activity	2021				

Survey		Original Survey Date	Survey Updates Required			
			2022 Reasoning	**2024 Reasoning**	**2025 Reasoning**	**2026 Reasoning**
Badgers	Walkover	2020/21	**YES** - as a mobile species the surveys were updated	**NO** – no significant changes in data between 2020 and 2022	**NO** – no change in habitats, therefore not considered there would be change	**NO** – pre-construction surveys to be undertaken
	Bait Marking	2020				
	Walkover	2021				
Breeding Birds		2020	**NO** – survey window missed due to no access	**NO** – survey window missed due to no access	**NO** – survey window missed due to no access	**YES** – survey updated where access was granted
Wintering Birds		2019/20	**YES** - updated	**NO** – no significant changes in data between 2020 and 2022	**NO** – survey window missed due to no access	**NO** – survey window missed due to no access
Barn Owls		2020	**YES** - updated	**NO** – updated in 2022	**NO** – survey window missed due to access restrictions	**NO** – pre-construction surveys to be undertaken
Kingfisher		2020	**YES** – updated	**NO** – updated in 2022	**NO** – survey window missed due to access restrictions	**YES** – survey updated where access was granted as part of breeding bird survey
Great Crested Newt	HSI	2019	**NO** – survey window missed due to no access	**YES** – attempt made to repeat eDNA but major access restraints	**NO** – district licensing to be used so no need to survey	**NO** – district licensing to be used so no need to survey
	eDNA	2020 & 2021				
Reptiles	Presence/ Absence	2020	**NO** - reptiles were not found in 2020/21 and habitats had not changed, therefore	**NO** – existing survey data was considered valid.	**YES** – updated in August/ September 2025 where access granted.	**YES** – updated where access granted
	Extra site	2021				

Survey	Original Survey Date	Survey Updates Required			
		2022 Reasoning	**2024 Reasoning**	**2025 Reasoning**	**2026 Reasoning**
		not considered that surveys would provide additional information			
Terrestrial Invertebrates	2020	**NO** - habitats are common and widespread so important assemblages not anticipated	No change to habitats so no change to potential (as informed by the 2024 UKHab survey) as summarised in the ES **[CD10-02]**;		
Water Voles	2020	**YES** – updated	**NO** – no significant changes in data between 2020 and 2022	**YES** – one survey undertaken in autumn 2025	**YES** – second survey updated where access granted
Otters	2020	**YES** – updated	**NO** – no significant changes in data between 2020 and 2022	**YES** – one survey undertaken in autumn 2025	**YES** – second survey updated where access granted
White-clawed Crayfish	2020	**YES** – updated	**NO** – survey data was considered valid.	**YES** – survey undertaken in 2025	**NO** – existing data considered appropriate

2.10 2025/ 2026 Updated Survey Results Summary

Bats

2.10.1 An update bat roost survey of trees **[CD1-28.05]** was undertaken in 2025. The survey comprised a combination of climbed surveys and emergence surveys. No evidence of roosting bats was recorded as per previous surveys undertaken in 2021 **[CD1-28.05]**.

2.10.2 Further surveys to update bat activity at selected points along the Schemes route haves been undertaken in 2026, this report will be available no later than 27 November 2026.

Breeding birds

2.10.3 An updated breeding bird survey **[CD1-28.06]** was undertaken in 2026, however, access restrictions did not allow full access to the Site. In summary the survey results suggest that the bird assemblage associated with the Site has remained broadly similar since 2020.

Otters

2.10.4 An updated otter survey **[CD1-28.03]** undertaken in 2025 recorded evidence of otter on the River Granta in line with previous surveys undertaken.

2.10.5 A second survey is being undertaken in 2026, this report will be available no later than 27 November 2026.

Water voles

2.10.6 An updated water vole survey **[CD1-28.03]** undertaken in 2025 recorded evidence of water vole at one location on the River Granta, however, it is considered likely based on previous survey results and the nature of the Site that the population of water voles and the use of the watercourse and ditches may vary through the Scheme.

2.10.7 A second survey is being undertaken in 2026, this report will be available no later than 27 November 2026.

Reptiles

2.10.8 Reptile surveys including field boundaries **[CD1-28.02]** were undertaken in September and October 2025 and found no evidence of reptiles.

2.10.9 As October is a sub-optimal month further surveys have been undertaken in 2026, however, owing to excessive temperatures experienced in the summer of 2026 these were delayed and are therefore still ongoing at the date of preparing this proof of evidence. This report will be available no later than 27 November 2026.

White-clawed Crayfish

2.10.10 An updated white-clawed crayfish eDNA survey **[CD1-28.04]** was undertaken in 2025 and returned negative results for white-clawed crayfish (WCC) eDNA at the River Granta sampling location and at the pond at Babraham. Therefore, WCC are likely absent at these locations. The River Granta tested positive for signal crayfish and for crayfish plague which is a disease that affects WCC and has contributed to significant WCC population declines which further reduces the likelihood of WCC being present in the surrounding environment.

3. HABITATS REGULATIONS ASSESSMENT

3.1 Eversden and Wimpole Woods SAC

3.1.1 A Habitats Regulations Assessment (HRA) is required by Regulation 63 of the Habitats Regulations **[CD4-21]** for all plans and projects which may have a Likely Significant Effect (LSE) on and are not directly connected with, or necessary to, the nature conservation management of a European Site. The Scheme is not directly connected with, or necessary to, the nature conservation management of any European Site.

3.1.2 The Secretary of State for Transport is the Competent Authority for the works in accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations **[CD4-21]**) in relation to all highways works that do not require external permission. Therefore, Greater Cambridge Partnership undertook a Shadow HRA **[CD1-10.41]**; to ascertain if the proposed works are likely to give rise to an LSE on any European Sites.

3.1.3 As such a Stage 1 Screening assessment of the Scheme was undertaken in accordance with the Design Manual for Roads and Briges, LA 115 Habitats Regulations Assessment **[CD17-19]**. The Stage 1 Screening identified the following European sites within the search parameters set in LA 115:

1. Eversden and Wimpole Woods SAC is located approximately 11 km to the west of the Scheme and includes barbastelle bats as a qualifying feature;
2. The Wash Ramsar site is hydrologically linked to the Scheme and is located approximately 70 km downstream (direct line);
3. The Wash & North Norfolk Coast SAC is hydrologically linked to the Scheme and is located approximately 70 km downstream (direct line);
4. The Wash SPA is hydrologically linked to the Scheme and is located approximately 70 km downstream (direct line).

3.1.4 Owing to the distance between The Wash Ramsar site, The Wash & North Norfolk Coast SAC, and The Wash SPA and the Scheme there is considered to be no potential impact pathway therefore these European Sites were not taken forward for Stage 1 – Screening.

3.1.5 The Eversden and Wimpole Woods SAC is designated for its population of barbastelle bat and was taken forward for screening. Owing to its distance from the Scheme the key risk was in relation to functionally linked land, i.e. land outside of the SAC boundary which is integral in supporting the qualifying feature. In order to assess the potential risk of the Scheme a suite of bat activity surveys were undertaken to assess how barbastelle bats are using the land within the Scheme boundary and if the Scheme would have a likely significant effect on the SAC.

3.1.6 Bat activity surveys coupled with the deployment of static bat detectors were undertaken between 2019 and 2022 **[CD1-10.32]**. Barbastelle passes were recorded in every month surveyed (May to October). The results indicate that barbastelle are widespread in the local area and are present throughout the active season and generally the number of bats is low.

3.1.7 The winter surveys undertaken in 2021/22 recorded varying levels of barbastelle activity. The highest level of activity (126 passes) was recorded in November 2021 indicating that hibernation had not commenced. Activity in December 2021 – March 2022 was generally low (less than nine passes per month) with the exception of Transect 7 where 22 passes were recorded in March 2022.

3.1.8 No barbastelle roosts were identified during tree climb and emergence surveys.

3.1.9 Impacts on Annex II bat species have been determined using guidance produced by the Bat Conservation Trust (BCT). BCT provide details of Core Sustenance Zone (CSZ) **[CD21-23]**, which include the area required from a roost to sustain the population. Any impacts within these zones could have a significant impact on bats. The CSZ for barbastelle bats is considered to be 6

km[1]. In addition, the South Cambridgeshire District Council's Biodiversity Supplementary Planning Document (SPD) **[CD10-07]**; maps a Barbastelle Area of Importance for Eversden and Wimpole Woods SAC. This area is located approximately 2.1 km west of the Scheme at its closest point. Furthermore, barbastelle bats utilise woodland and the Scheme will result in only minor impacts on this habitat type.

3.1.10 The assessment concluded that it is feasible that barbastelle bats associated with the Eversden and Wimpole Woods SAC could utilise habitats within the Scheme boundary, but use would be de minimis.

3.1.11 These conclusions are further supported by Natural England in their response **[CD2-REP-05]** which states that the Applicant proactively engaged with Natural England and that they have no outstanding matters to be addressed.

4. REPRESENTATIONS MADE RELEVANT TO MY EVIDENCE

4.1 Representations by Greater Cambridge Shared Planning (GCSP) [CD2-REP-04, CD3-20.01]

Summary of points made and impact of the Scheme

4.1.1 In their combined response the GCSP Statement of Case **[CD3-20.01]** made comments that are relevant to my Proof of Evidence as follows:

1. Validity of survey data;
2. Bat survey data is long and complicated;
3. Reptile surveys – survey data is from 2020;
4. Amphibian surveys - survey data is from 2020;
5. Otter surveys – survey data is from is from 2020 and 2022 and had limitations;
6. Water vole - survey data is from is from 2020 and 2022 and had limitations;
7. Fish – data is from 2022 and there is no corresponding report;
8. Great crested newts - the proposed mitigation does not align with the survey findings.
9. Due to the identified survey limitations, the Landscape and Environmental Management Plan (LEMP) not considered to be appropriately justified;
10. Lighting design;
11. Hobson's Park to the west of the railway line and including land to the south of Addenbrooke's Road is a City Wildlife Site (CWS) since 2023 and was not included within the assessment;
12. Proximity of the construction compound to Nine Wells Local Nature Reserve (LNR);
13. Attenuation Pond 1 and Ecology Pond to the south of Hobsons' Brook would be in close proximity to the Nine Wells springhead;
14. GCSP had not received a copy of the BNG Metric.

My Responses

Validity of survey data

4.1.2 Reference should be made to section 2.9 of my evidence in respect of survey data validity which provides background and reasoning.

[1] https://cdn.bats.org.uk/uploads/pdf/Bat-Species-Core-Sustenance-Zones-and-Habitats-for-Biodiversity-Net-Gain.pdf?v=1596874016#:~:text=What%20is%20a%20core%20sustenance%20zone%20core%20sustenance,conservation%20status%20of%20the%20colony%20using%20the%20roost

4.1.3 Bats – following receipt of the GCSP comments the bat appendices supporting the ES were summarised to simplify the data, and this revised text was sent to the councils.

4.1.4 Reptiles – as discussed and agreed with the councils[4] additional reptile surveys (including field boundaries) **[CD1-28.02]** were undertaken in September and October 2025. Although October is a sub-optimal month for reptile surveys, owing to weather conditions experienced this was not considered a significant constraint. Further surveys have been undertaken in 2026, however, owing to excessive temperatures experienced in the summer of 2026 these were delayed and are therefore still ongoing at the date of preparing this proof of evidence. This report will be available no later than 27 November 2026.

4.1.5 Otters and water voles – as discussed at the meeting with the council, updated otter and water vole surveys were undertaken in October 2025 **[CD1-28.03]** and a second set of surveys is currently ongoing in 2026.

4.1.6 Great crested newts – as set out in the ES **[CD1-10.02, page 183]** and as agreed at the meeting with the councils[4] a great crested newt district level licence will be applied for, and therefore the need for any further surveys has been discounted.

Fish

4.1.7 The information on fish was obtained from the Environment Agency Ecology and Fish Data Explorer which provides locations of sampling points and a spreadsheet of survey results. As such a report is not provided.

LEMP

4.1.8 LEMP – following the completion of the proposed updated surveys the LEMP will be updated prior to construction to reflect any changes.

Lighting Design

4.1.9 An updated review of the lighting design has been undertaken, and it has been concluded that lighting will have slight adverse not significant effect on bats, validating the conclusions set out in the ES **[CD1-10.02, page 188, para 10.6.48].** However, additional potential opportunities to further reduce potential effects in the form of amendments to screening planting have been identified and the landscape design is currently being updated to reflect this and will be confirmed at the detailed design stage.

Hobsons Park CWS

4.1.10 Following identification of the Hobsons Park CWS, a separate assessment was undertaken to address the omission from the ES **[CD1-10.02, pages 148-190]**.

4.1.11 The assessment **[CD1-28.01, page 4]** concluded that with the implementation of the pollution control mitigation measures identified in the ES **[CD1-10.02]**. There would be no indirect or direct effects on the Hobsons Park CWS and that any residual impact would be neutral.

Nine Wells LNR

4.1.12 Since submission of the ES **[CD1-10.02]** further design has been undertaken and the construction compound that was originally located adjacent to the Nine Wells LNR has been moved so that it is approximately 40 m from each feature, thus removing potential concerns raised.

Attenuation Pond and Ecology Pond

4.1.13 The creation of Ecology Pond 3 was to increase and provide additional water vole habitats within close proximity to Hobsons Conduit.

4.1.14 During the surveys undertaken in 2020 (June, July & August), water vole burrows, droppings, and latrines were recorded along Hobson's Conduit. In 2022 (September), water vole burrows and a live water vole sighting were recorded albeit in less numbers. In 2025 no evidence of water voles was recorded, however, although the survey was undertaken in early October which is considered a sub-optimal month for surveys (although the absence of signs and the previous evidence of mink presence could indicate that water voles are no longer present). Although less evidence of water vole was recorded in 2022 and 2025 **[CD1-10.35 and CD1-28.03]** the timing and number of surveys undertaken was different to those undertaken in 2020 when the most field signs were recorded.

4.1.15 As the Scheme will result in the temporary disturbance/ shading of a small section of Hobson's Conduit (circa 25 m^2), a review of appropriate mitigation that addresses the concerns raised by the Hobson's Conduit Trust was undertaken by AtkinsRéalis. This review has concluded that an alternative way to mitigate for the loss and disturbance of the bankside habitat due to shading by the bridge is to undertake habitat enhancements and management of the Hobson's Conduit banks. This would negate the need for Ecology Pond 3, thus addressing Hobson's Conduit Trust's concern, whilst still providing the required mitigation. The extent of this habitat enhancement would significantly exceed the 25 m^2 of habitat impacted by the shading created by the Scheme. This is addressed through the change request **[CD24-01]** and at detailed design.

4.1.16 As set out in the Water Vole Mitigation Handbook[2], the mitigation for habitat loss can be undertaken through the creation of new habitat or the enhancement of existing habitat. Therefore, in accordance with the Wate Vole Mitigation Handbook[3], the enhancement of existing habitat of Hobson's Conduit is suitable mitigation as an alternative to the creation of a new pond.

BNG Metric

4.1.17 As per the GCSP comment the metric spreadsheet was subsequently provided to GCSP. However, it should be noted that following changes to the Order limits as a result of the Change Request **[CD1-10.42]** that the BNG assessment has been updated and included as an addendum to the ES **[CD24-04].**

Conclusions on Representations by Greater Cambridge Shared Planning

4.1.18 In conclusion I believe that the questions raised by GCSP have been fully addressed within the ES and by my evidence given above.

4.2 Representations by the Environment Agency [CD2-OBJ-465]

Summary of points made and impact of the Scheme

4.2.1 In their response the Environment Agency **[CD2-OBJ-465]** with respect to biodiversity raised the following points:

4.2.2 Within the CEMP (condition 10) the Environment Agency would expect to see the following addressed:

1. Riparian planting adjacent to culverts;

[2] The Water Vole Mitigation Handbook, The Mammal Society Mitigation Guidance Series, 2013

2. Where culverts are used it should be ensured that planting of both banks of the ditch/ watercourse is properly established on both sides of the culvert. This is because water voles need cover to move along water courses and if the banks are not appropriately vegetated, the culverts may pose a barrier to water vole movement. The use of pre-planted coir rolls or mats will ensure appropriate levels of cover quickly.
3. Mammal ledges within culverts – ramps:
4. The mammal ledges within box culverts should have ramps down to the ground level on either side to allow wildlife access at varying water levels.

4.2.3 When details are submitted under the protective provisions listed in Schedule 12 Part 7 and/ or the discharge of condition 11 the Environment Agency would expect to see the following addressed:

1. Proposed temporary bridge crossings
2. Proposed temporary bridge crossings will be in place for many months. They should provide access to the river bank on both sides for mammals to pass along, i.e. the abutments should be set back. Otherwise please provide mammal ledges and ramps. This is to reduce the impact on mammal commuting routes along the river corridor and reduce potential mortalities from animals leaving the river corridor as a result of the temporary bridges.
3. Mink trapping contribution - The project could additionally benefit local water vole populations by contributing to a local mink trapping project e.g. linking in with the Water Life Recovery Trust.
4. Water vole displacements - Additional water vole surveys are required to establish whether sufficient habitat is available for displaced water voles in close proximity to the working area (as per Appendix 10.5 Otter and Water vole surveys **[CD1-10.35, pages 28-31]**).
5. Water vole habitat creation - Creation of new water vole habitat should take place prior to works on the water courses commencing, so that it has time to mature.
6. Post construction monitoring - Include post-construction monitoring of water vole populations either side of new culverts to establish whether water voles are moving through culverts. If water voles are not found to be moving through culverts, additional mitigation measures may be required.
7. Further survey work - Water vole and otter surveys should be updated well in advance of construction starting. This is because water voles are a mobile species and as previous surveys have shown, populations are dynamic and may be found in previously unoccupied habitat. Otters may have established new resting sites or holts since the previous surveys.
8. Biodiversity Net Gain Appendix 10.12 (BNG assessment) **[CD1-10.42]** and 10.13 BNG (scenario modelling for BNG assessment) **[CD1-10.43]** indicate that 14% BNG is achievable on site for the rivers. It is understood that the option of weir removal is still being investigated, as this would allow a 20% BNG to be achieved. However, if it is not feasible to remove the weir, it may be preferable to achieve 14% BNG on site and purchase the additional 6% of required BNG river units, rather than purchase 20% BNG river units off site so that any benefit is not local.
9. Fisheries - The river is inhabited by both salmonid and rheophilic coarse species and as such works should take place outside of salmonid and coarse fish spawning times. Disturbance to spawning fish is an offence under the Salmon and Freshwater Fisheries Act. The river will be susceptible to sediment loading because of the salmonid and rheophilic coarse fish dependence on clean gravels for successful spawning. As such care must be taken to ensure no sediment through run off or ground works enters the channel. Future concerns of pollution on this sensitive river have been minimised through the use of SuDs and other settlement ponds although these will require regular maintenance to ensure they are working effectively at all times.

My Responses

Planting adjacent to culverts

4.2.4 The current landscape design **[CD1-12.04-06]** shows planting along the entire route including the culverts. The final design will be confirmed at the detailed design stage.

Mammal ledges within culverts

4.2.5 As set out in the ES **[CD-1-10.02, page 187]** mammal ledges will be provided within an oversize culvert to allow mammals to pass under the Scheme.

Temporary bridge crossings

4.2.6 It can be confirmed **[CD1-10.08, page 41, para 11.3.2]** that where temporary bridge crossings are required access beneath the bridge will be provided by either having a clear span or providing mammal ledges beneath the route.

Mink trapping contribution

4.2.7 Whilst this would provide benefits it is currently not known if mink trapping is being undertaken within the immediate vicinity of the Scheme and therefore whether or not this is feasible will be explored at detailed design. However, the Scheme is not reliant on trapping for mitigation or as a benefit.

Water vole displacements

4.2.8 As set out in the ES **[CD1-10.02, page 186]** water vole displacement will be implemented.

Water vole habitat creation

4.2.9 As set out in the ES **[CD1-10.02, pages 185-186]** ponds including features for water voles will be created to compensate for the loss of a ditch. Furthermore, as set out in section 4.1 above the design and mitigation has been amended to enhance Hobson's Conduit for water voles.

Post construction monitoring

4.2.10 As set out in the ES **[CD1-10.02]** post construction monitoring will be undertaken for protected species.

Further Survey Work (Otters and Water Voles)

4.2.11 As set out in the ES **[CD1-10.02, pages 186-187]** pre-construction surveys for water voles and otters will be implemented.

BNG

4.2.12 Following submission of the Environment Agency response **[CD2-OBJ-465]** further assessment has been undertaken and owing to landowner abstraction requirements it has been concluded that the weir cannot be removed. Based on the latest design the BNG for watercourses is returning an increase of 3.88 units in respect of watercourses. As such off-site watercourse BNG units is being explored.

Fisheries

4.2.13 As set out in the ES **[CD1-10.02, pages 189]** a suite of water quality and pollution prevention methods will be implemented through construction.

4.3 Representations by The Cambridgeshire and Peterborough branch of the Campaign to Protect Rural England (CPRE) [CD2-OBJ-382]

Summary of points made and impact of the Scheme

4.3.1 In their response, CPRE **[CD2-OBJ-382]** raised a number of concerns with respect to biodiversity:

1. The extremely rare barbastelle bat is an IUCN red list species, a UK Biodiversity Action Plan species, and a conservation priority both locally and nationally. This is just one example of the rare wildlife that are going to be permanently affected by this unnecessary project.

   The UK Government has signed an international biodiversity treaty which is committed to addressing biodiversity loss and restore ecosystems. In 2019, Cambridge City Council pledged *'to provide leadership and to ensure that we work with partners and our communities to reverse the decline in biodiversity and deliver measurable biodiversity net gain within Cambridge and the wider region'.*

My Responses

4.3.2 All bats in the UK are afforded legal protection, however, the bat population is considered to be representative of the land within the Scheme and the wider environment. Using the precautionary principle the construction of the Scheme would result in the loss of some potential foraging and commuting habitats, however, no roosts will be lost and the proposed landscape design will provide a significant increase in suitable habitats and any adverse impacts would be slight and not significant **[CD1-10.02, Table 10.7 and Table 10.8, pages 168-184]**.

4.4 Representations by John Meed [CD2-REP-02, CD3-02 REP-02]

4.4.1 Mr Meed raised the following concerns in relation to the two fields to the north of Granham's Road:

1. The construction phase;
2. The hedgerow;
3. The rabbit fence;
4. The planting mix for the enhanced grass margin.

Summary of points made and impact of the Scheme

The construction phase

4.4.2 Mr Meed raised concerns that the length of the construction period and that the field nearest to Nine Wells Local Nature Reserve will be used as a compound for an unknown duration. This raises the following concerns:

1. If construction in either field were to begin after the start of the breeding season this would put skylark nests at risk, and also possibly nests of grey partridge, corn bunting and yellow wagtail. All four species are ground-nesting birds;
2. Even if construction begins outside the breeding season it will reduce the number of nesting sites available;
3. These problems would be exacerbated if construction covered two breeding seasons;
4. Outside the breeding season construction will reduce the land available, notably for autumn/ winter family groups of grey partridge as well as skylark and finch flocks;
5. Is it necessary to use the whole of the small field close to Nine Wells for Compound 7. In addition to a loss of habitat for farmland wildlife there is a risk of impacts on the Nine Wells LNR and Hobson's Brook.

The hedgerow

4.4.3 It is noted that hedgerow planting with trees is proposed at Francis Crick Avenue and Granham's Road. It would be preferential to plant hedgerows without trees.

The rabbit fence

4.4.4 Concern was raised regarding the use of rabbit fencing along the route of the busway and its potential impact on movement of mammals.

The planting mix for the enhanced grass margin

4.4.5 Whilst welcoming the proposed enhanced grass margin the question was raised as to whether an alternative grass seed mix could be used for the two fields to the north of Granham's Road.

My Responses

The construction phase

4.4.6 Whilst the construction phase would result in a small, localised decrease in breeding habitat for the likes of skylark, grey partridge, corn bunting and yellow wagtail, this would only be for one or possibly two breeding seasons and owing to the nature of the local and wider environment there is extensive alternative nesting habitat available in the local area.

4.4.7 Reduction in number of nesting sites – as outlined above any loss of nesting habitat would be short term and there is extensive alternative nesting habitat available in the local area.

4.4.8 Two breeding seasons – whilst the construction phase may result in the loss of two breeding seasons this would be restricted to the specific location raised and there is extensive alternative nesting habitat available in the local area.

4.4.9 Construction will reduce the land available – construction will temporarily reduce the land available for breeding, however, there is extensive alternative breeding sites available in the local and wider environment and also the operational phase will provide a more diverse range of habitats for a wider assemblage of birds.

4.4.10 In relation to the small field close to Nine Wells for Compound 7, following submission of Mr Meed's representation it has been confirmed that Compound 7 does not need to occupy the entire field and that a margin of at least 40 m between the compound boundary and Nine Wells and Hobson's Conduit can be maintained. Mr Mark Connelly proof of evidence provides further detail on Compound 7 **[CD24-09]**.

The hedgerow

4.4.11 Hedgerow planting with trees is proposed at Francis Crick Avenue and Granham's Road – This proposal was discussed with Mr Meed and trees will be removed from this section of hedgerow at the detailed design stage.

The rabbit fence

4.4.12 Rabbit fencing along the route of the busway – we recognise this request and currently have no major concerns regarding this and will therefore seek to amend the design at detailed design subject to any other factors that may arise.

The planting mix for the enhanced grass margin

4.4.13 Mr Meed's representation whilst welcoming the grassland suggests that an alternative seed mix of better value to birds could be used, namely AB9: Winter Bird Food. However, this seed mix is

an annual seed mix and would therefore need spreading on an annual basis which is not feasible for a scheme of this nature. The grassland mix proposed will still provide a seed bank that will be more sustainable than the alternative suggested.

Representations by Hobson's Conduit Trust [CD2-OBJ-435, CD3-23 OBJ-440]

Summary of points made and impact of the Scheme

4.4.14 Hobson's Conduit Trust **[CD3-23 OBJ-440]** raised a number of concerns with the Scheme with respect to biodiversity:

1. The excavations of Ecology Pond 3 and Attenuation Pond 1 in their present locations as shown in the TWAO could have a serious adverse impact on flow from Nine Wells springs into Hobson's Brook.
2. HCT is of the opinion that some aspects of the design of the busway and its ancillary features would cause serious ecological harm.

My Responses

4.4.15 The creation of Ecology Pond 3 was to increase and provide additional water vole habitats within close proximity to Hobson's Conduit. As set out in section 4.1 above the design and mitigation has been amended to take account of these concerns.

4.4.16 It is my professional opinion that the busway and its ancillary features have been fully assessed and set out in Chapter 10 of the ES **[CD1-10.02, pages 148-190],** and Appendices **[CD1-10.03 – CD1-10.58].**

Summary

4.4.17 In summary I consider that all of the issues raised in the representations have been addressed within Chapter 10 of the ES **[CD1-10.02, pages 148-190],** and Appendices **[CD1-10.03– CD1-10.58]** and my written proof.

5. CONCLUSION

5.1 The effects on Biodiversity of the scheme as reported in the ES **[CD1.10-02, pages 148-190]** and the HRA **[CD1-10.41]** are considered typical of a linear project within a largely agricultural setting. Where environmental effects have been identified, these have been mitigated as far as reasonably practicable and in accordance with the mitigation hierarchy. Where effects remain, these are all minor and not significant. Furthermore, owing to the agricultural setting of the Scheme and the nature of the mitigation measures being created there will in several instances be slight benefits (not significant) for biodiversity.

6. STATEMENT OF TRUTH

6.1 The evidence which I have prepared and provided in this Proof of Evidence is true and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

1. APPENDIX 1 – IAN MORRISSEYS' WRITTEN STATEMENT ON AQUATIC ECOLOGY