

DfT Reference: TWA/24/APP/03

Document Reference: CD26-01-APP-W13-3

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

SUMMARY OF PROOF OF EVIDENCE

of

Ian Ellis BSc(Hons), MRES, MCIEEM

of WSP

On behalf of Cambridgeshire County Council

31st July 2025

Planning Inspectorate Reference: DPI/E0535/25/1

1. INTRODUCTION

- 1.1 My name is Ian Ellis. I am a Technical Director in the Nature Services Team at WSP. I hold a Masters in Research from the University of York and a BSc (Honours) in Zoology from the University of Newcastle-upon-Tyne. I am a full Member of the Chartered Institute of Ecology and Environmental Management.
- 1.2 I have over 25 years' experience in private sector consultancy work on ecological matters. This has included the oversight of the EIAs for multiple large infrastructure projects in many sectors including renewables, highways, residential and nuclear. I have been the lead author of a substantial number of Environmental Statement chapters in addition to Habitat Regulations Assessment (HRA) reports. I have provided expert witness evidence at several previous Issue Specific Hearings and public inquiries.
- 1.3 This document is my summary Proof of Evidence on behalf of Cambridgeshire County Council, focusing on ecological matters for the Cambourne to Cambridge Scheme. It addresses the methodology, findings, mitigation measures, and responses to certain aspects raised through objections to the Scheme.

2. SCOPE

- 2.1 The scope of my evidence is in relation to the approach and findings of the EIA for the Scheme as reported in the ES in respect to ecological matters. The evidence focuses on the likely significant effects predicted and adherence to EIA/biodiversity legislation and standards. Specifically, Matter 4c detailed in the Statement of Matters, is covered in respect to the effect of the Scheme on biodiversity, habitats and wildlife including Coton Orchard County Wildlife Site.
- 2.2 It also responds to certain matters raised in objections from statutory and non-statutory objectors, comprising the National Trust, the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire, Coton Busway Action Group and the Woodland Trust.

3. ENVIRONMENTAL STATEMENT DEVELOPMENT

- 3.1 The ES is structured to provide a clear, accessible summary of the ecological impacts and mitigation measures. This is supported by an Ecological Impact Assessment (EclA) which is further underpinned by a series of technical reports providing details on specific ecological surveys undertaken. It is further informed by a Statement to inform Habitat Regulations Assessment (HRA) and a preliminary Biodiversity Statement and Biodiversity Net Gain Assessment.
- 3.2 The EclA is informed by appropriate legislation and policy and follows guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM). The assessment focuses on defining Important Ecological Features that could be impacted by the Scheme and defines study areas relevant to each of these features.
- 3.3 A significant effect was defined as an effect that could have an impact upon the structure, form, function and conservation status of a designated site, or species population where these are defined as Important Ecological Features. Where effects require mitigation; the mitigation hierarchy was adopted. That is: preference is first given to avoiding effects, then reducing remaining effects, before applying targeted mitigation where necessary. Where residual effects remain after application of targeted mitigation measures, compensation is considered.
- 3.4 The approach applied in the EclA (in following CIEEM) differs to that found in the ES. An effective translation of terminology between the two approaches provided.

3.5 The design of the Scheme has evolved considering ecological factors, with embedded mitigation and monitoring plans secured through planning conditions and a draft Code of Construction Practice (CoCP).

4. KEY ECOLOGICAL FINDINGS

4.1 The key findings for Important Ecological Features can be summarised as follows:

Designated Sites

- There are no predicted impacts upon any other statutory designated sites, including Madingley Wood SSSI, Caldecote Meadows SSSI and Hardwick Wood SSSI as a result of construction or operation of the Scheme
- Four non-statutory designated sites are located within the Scheme boundary, namely Coton Orchard County Wildlife Site (CWS), Scrubland east of the M11 City Wildlife Site (CiWS), Coton Path Hedgerow CWS and Bin Brook CiWS.
- Habitat loss will occur at each of these sites during the construction of the Scheme. Following implementation of mitigation measures, effects on all sites with the exception of Coton Orchard CWS are considered no significant.
- With respect to Coton Orchard, the effect is considered to remain significant at a County scale.

Habitats

- Most of the open land crossed by the Scheme is noted to be arable farmland, including the footprint of the travel hub. This is considered to be of little importance for biodiversity
- Habitat types within the Scheme boundary that are considered Important Ecological Features include hedgerows, lowland mixed deciduous woodland and traditional orchard.
- It is predicted that the construction of the Scheme will lead to the loss of HPI involving 3.9 hectares of broadleaved woodland, 1.82 hectares of lowland mixed deciduous woodland, 0.42 hectares of traditional orchard (within Coton Orchard CWS) and 4,870m of hedgerow.
- Proposals for habitat compensation within wider landscape plans have been conceived with regard to the impacts on HPis, primarily regarding hedgerows and woodland.
- When the new trees reach a level of maturity essential to HPI qualification (c10 years), the impact on woodland will not be considered a significant effect.
- The loss of traditional orchard will not be compensated for within the draft Order Limits while a net loss of 1.29km hedgerow will not be mitigated within the draft Order Limits. The loss of both of these habitats represents a significant effect at a County scale.

Badger

- A total of five Badger setts are located within the Scheme boundary with involving one main sett.
- Without mitigation an adverse effect on Badgers is considered likely through sett loss and disturbance during construction and through collision mortality during operation.
- It is considered possible that impacts to setts can be avoided through detailed design. Where impacts upon Badgers and their setts cannot be avoided, a Natural England Badger Mitigation licence may be required. This will enable Badgers to be excluded from active setts to enable construction works to proceed legally.
- Areas of the Scheme that require mitigation for road traffic collisions will be determined at detailed design stage. However, core design measures to reduce the risk will include a combination of badger proof fencing and underpasses.
- There are considered to be no significant effects on Badger following implementation of these measures.

Water Vole

- Water Vole presence was confirmed within Callow Brook and Bin Brook during Scheme surveys.
- In the absence of mitigation, significant effects are likely. A commitment is made that no works will take place within 5m of either Callow Brook or Bin Brook until updated baseline surveys and application of mitigation measures. If avoidance of impacts is not possible, a Natural England Mitigation licence may be required to displace water voles temporarily to avoid impacts. Mitigation to be specified in a licence application would include displacement of voles into retained, unaffected and connected habitat.
- There are considered to be no significant effects on Water Vole following implementation of these measures.

Reptiles

- No reptiles have been recorded within the Scheme boundary. Low populations of both Grass Snake and Common Lizard have however been found in adjacent areas.
- Mitigation is proposed involving an Ecological Method Statement that will dictate vegetation clearance in areas that could support reptiles to minimise the risk of individual reptiles being killed or injured.
- There are considered to be no significant effects on reptiles following implementation of these measures.

Amphibians

- Great Crested Newts have been recorded within two ponds adjacent to the draft Order Limits but not within it. However, vegetation clearance associated with the construction of the Scheme could result in the removal of terrestrial habitat suitable for this species.
- Vegetation clearance will be undertaken under licence from Natural England and impacts following prescribed methods would therefore not be significant.

Birds

- No active Barn Owl breeding sites were recorded within the Scheme boundary or within 500m of the Scheme at the time of the surveys. Surveys of the Scheme and Coton Orchard specifically found breeding birds present to be of local importance.
- All suitable areas of habitat to be retained will be protected through fencing and all vegetation clearance will take place outside of the breeding period (March – August) where practicable.
- Reinstated and compensatory habitat will support breeding and wintering birds including core habitats such as woodland, hedgerows, scrub, orchard and grassland. Once compensatory habitat has matured, there are considered to be no long-term significant impacts on breeding and wintering birds.

Terrestrial Invertebrates

- Surveys of invertebrates found that Coton Orchard in addition to three additional areas can be considered of County importance.
- Although the majority of the habitat resource for invertebrates will remain at each area, in the absence of mitigation, significant effects are likely. Mitigation includes habitat creation throughout the Scheme and provision of dead wood features through log piles. Species that specialise on standing dead wood will not be promoted by this mitigation, however. It is considered that the habitat suitable for this species will still be widespread in Coton Orchard.
- Following the consideration of mitigation, significant effects on terrestrial invertebrates are likely to remain in the short – medium term. In the longer term, the maturing habitat compensation would lead to a conclusion of no significant effects.

Aquatic Ecology

- Baseline surveys determined that aquatic macroinvertebrates, macrophytes and fish to be of local importance within the Scheme while White-clawed Crayfish are absent.
- Adverse effects are considered likely through vegetation clearance and pollution during construction. Vegetation removal will however be limited to what is essential and habitat reinstated while pollution controls will significantly reduce the risk to aquatic features. These mitigation measures ensure that there are no residual significant effects.
- During operation, surface water run-off entering Bin Brook and Callow Brook has the potential to increase levels of suspended sediment and pollutants within the watercourses. The proposed drainage strategy will utilise sustainable drainage systems components to manage the surface run-off, ensuring that water quality treatment and pollution control requirements are met.

Biodiversity Net Gain

- BNG is not mandatory for the Scheme. Nevertheless, the Applicant is committed to achieving no less than 10% BNG.
- Although there will be opportunities to increase the onsite delivery of biodiversity through the detailed design of the Scheme, offsite compensation will likely be a step in achieving the wider ambition of BNG. The Statutory Biodiversity Metric will be used to ensure that the area and type of habitat to be created or enhanced will be sufficient to compensate for those habitats that are impacted by the Scheme, and to support the delivering of additional habitat in line with the overall BNG target. This means the development will result in more or better-quality natural habitat than there was before development.
- Compensation of orchard habitat for example, could be made elsewhere within the Order Limits or, with the landowner's agreement, in other parts of Coton Orchard. GCP has an extensive programme of works and elements of BNG may be provided in this wider portfolio. In addition, 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. Lower Valley Farm is registered with Natural England as an approved habitat bank.

5. RESPONSES TO OBJECTIONS

5.1 I have dealt with certain ecological matters raised in relation to objections from Coton Busway Action Group (biodiversity and habitat loss), the National Trust (fragmentation of Coton Orchard), the Woodland Trust (veteran trees) and the Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (wildlife sites, biodiversity loss, BNG, birds, Great Crested Newts).

Coton Busway Action Group (OBJ143)

- The claim that the Scheme will result in significant biodiversity loss is responded to with context of the impacts after consideration of mitigation. The commitment to BNG and compensation for habitat loss during detailed design is highlighted.
- The relevance of 'wildlife corridors' bisected by the Scheme is contested, these are considered indicative.

National Trust (OBJ250)

- The National Trust state that land outside of the Order Limits may not be suitable for relocation and that further consideration should be given to the proposed and required tree mitigation in an alternative appropriate open space.
- This issue is addressed in the Tree Mitigation Strategy where it is noted that planting could be made elsewhere within the Order Limits or, with the landowner's agreement, in other parts of Coton Orchard reflecting the existing grid pattern.

The Woodland Trust (OBJ294)

- The Woodland Trust seek to demonstrate the exceptional biodiversity value of deadwood features in the Orchard including of veteran apple trees.
- It is demonstrated that the Orchard has been valued and assessed appropriately including for terrestrial invertebrates. It is highlighted that of 12 veteran trees, six are within the Schemes Order Limits and three can be retained. The remaining three trees would be relocated.

Wildlife Trust for Bedfordshire, Cambridgeshire and Northamptonshire (OBJ46)

- It is contested that four Wildlife sites are significantly impacted. It is determined that after application of mitigation that a single site, Coton Orchard CWS, would be significantly impacted.
- The loss of biodiversity as a result of the Scheme is appropriately assessed in the Environmental Statement. This details mitigation and a commitment to BNG and compensation for habitats through detailed design.
- BNG is not mandatory for the Scheme. Nevertheless, a preliminary BNG assessment was provided with a commitment to no less than 10% BNG to be determined through detailed design.
- Impacts on birds and Great Crested Newts are considered appropriately assessed. Mitigation is proposed for both birds and newts, which impacts not significant as a result.

6. CONCLUSIONS

6.1 The EIA as reported in the ES and ES Addendums demonstrates that the Cambourne to Cambridge Scheme has been assessed in accordance with legal and best practice standards with respect to ecology. The Scheme will result not result in significant impacts on Important Ecological Features with the exception of:

- Coton Orchard CWS
- HPI habitats (traditional orchard and hedgerows)
- Terrestrial invertebrates.

6.2 These are mitigated through design, management, and compensation measures. The Applicant has committed to opportunities to increase onsite value for biodiversity including the use of the Statutory Biodiversity Metric to ensure appropriate compensation. Habitat creation through the Scheme that aims to achieve over 10% and up to 20% net gain that will contribute to the Cambridge Nature Network.