



Transport and Works Act 1992

Inquiry into The Cambourne to Cambridge Order

Supplemental Proof of Evidence of Paul Whitby

For: Cambridge County Council

7th November 2025

Paul Whitby BSc (Hons) MCIEEM, CEcol
Managing Director
The Ecology Co-op



Table of Contents

INTRODUCTION	3
STATEMENT OF TRUTH	3
SCOPE OF EVIDENCE	3
SITE AND CONTEXT	4
BACKGROUND.....	4
POTENTIAL IMPACTS AND EFFECTS	4
BIODIVERSITY NET GAIN ASSESSMENT	5



INTRODUCTION

- 1 My name is Paul Whitby and I am the Managing Director at the Ecology Co-op. I have a Bachelor of Science degree in Environment, Economics and Ecology, I am a full member of the Chartered Institute for Ecology and Environmental Management (CIEEM), and further, I am a Chartered Ecologist through CIEEM. I have 19 years' experience as an ecologist, including the production of Ecological Impact Assessments, Biodiversity Impact Calculations, designing mitigation schemes for developments and producing and implementing protected species licenses. I have experience as an expert witness on ecology matters, having appeared at several planning appeals for clients from both the public and private sectors. For the last 3 years I have served on the governing board of CIEEM.
- 2 I am appearing at this Inquiry on behalf of Cambridgeshire County Council (the Council), whilst I understand the Council to be the applicant on behalf of the Greater Cambridgeshire Partnership (GCP).
- 3 My appearance at this Inquiry has been necessitated at a late stage in the process, having been approached by WSP in the middle of October to enquire if I would be able to appear at this enquiry in consideration of the evidence and all supporting information produced to date by Mr Ian Ellis of WSP. I have taken the time to review the evidence presented to the Inquiry and am content to appear as a witness in place of Mr Ellis for this scheme.

STATEMENT OF TRUTH

- 4 I am instructed to appear at this Inquiry to give evidence on matters relating to ecology, with a focus upon the matters covered under the Proof of Evidence produced by Mr Ellis. My own evidence has and will be in line with my requirements as a member of CIEEM to abide by their Code of Professional conduct. I can confirm that all opinions expressed are my own and are both true and based upon my professional experience. Overall, I agree with Mr Ellis's conclusions on the key issues, although I may have come to conclusions in a different way or expressed the reasoning in different words in some instances.

SCOPE OF EVIDENCE

- 5 In giving evidence at the Inquiry, I will draw on the Proof of Evidence produced by Mr Ellis (**CD26-01-APP-W13-1**) and supporting appendix (**CD26-01-APP-W13-2**) as well as his rebuttals to Coton Orchard (**CD26-01-APP-W13-5**) and the CPPF (**CD26-01-APP-W13-5**).
- 6 All specialist evidence pertaining to bats and Habitat Regulations Assessment has been detailed in the Proof of Evidence produced by Paula Reason (**CD26-01-APP-W12-1**), whilst all evidence pertaining to veteran trees and arboricultural matters has been provided within the Proof of Evidence produced by Chris Alder (**CD26-01-APP-W4-1**).
- 7 My Evidence will relate only to coverage of matter 4c of the Statement of Matters (**CD25-01**), which concerns the effect of the scheme on the environment, including biodiversity, habitats, and wildlife, with particular reference to the Coton Orchard and Coton Orchard County Wildlife Site.



SITE AND CONTEXT

- 8 At the time of producing this evidence my understanding of the site has been informed by the material submitted at the application stage and to this Inquiry and this has provided me with sufficient detail to support the Inquiry in the capacity I have set out above. I have focussed on the descriptions of the ecological features present within the likely impact zone of the development as set out in Technical Report 5 of the ES (**CD1-11.05, Page 18, Section 4.6**). I was able to make a visit to the site on the 7th of November 2025 in order to ensure I was satisfied with the material submitted and the habitat contexts provided. Whilst I can confirm that I am satisfied with the habitat descriptions given, this must be in consideration of some habitat changes between the date that some data has been captured and the present day.

BACKGROUND

- 9 Within Mr Ellis's proof, the scope of Legislation and Policy, details for the Study Areas and Best Practice and the Assessment Methodology used are all detailed in Section 4 of Mr Ellis's Proof of Evidence. I am satisfied that the background information used to inform all of the survey designs, impact assessment and conclusions to inform the Ecological Impact Assessment and Biodiversity Impact Calculations that have been submitted to support the application are adequate and acceptable.

POTENTIAL IMPACTS AND EFFECTS

- 10 As already indicated, in general terms I agree with Mr Ellis's assessment of potential impacts and effects. These are matters which I will expand on and explain in my oral evidence. Without prejudice to this general position, I record the following points of specific agreement below.

Traditional Orchard

- 11 Technical Report 5 sets out the extent of traditional orchard habitat present at Coton Orchard, measuring this to extend to a total of 0.42ha, with the majority of the orchard (and the area within the order limits) comprising of 'other orchard' habitat, totalling 1.33ha (**CD1-11.05, page 54, table TR5-6-2**).
- 12 The document referenced in concluding the extent of traditional orchard habitat is '*UK Biodiversity Action Plan Priority Habitat Descriptions: Traditional Orchards*', produced by the Joint Nature Conservation Committee (JNCC), which is correct. Disagreement remains between Mr Ellis and Mr Woodfield in the interpretation of the interpretation of this document. Overall, I prefer and agree with the assessment of Mr Ellis.
- 13 Notwithstanding this conclusion, it is important to put this dispute in context. The identification of a priority habitat (and the extent of the priority habitat) is particularly significant in terms of biodiversity offsetting. However, notwithstanding the dispute over this point, it should be noted that the Environmental Statement appropriately considered ecological impacts regardless of this issue and has already correctly determined that the impacts to the Coton Orchard are significant at a County scale (which Mr Woodfield did not disagree with in his written and oral evidence).



Designated Sites

- 14 No impacts are anticipated to Statutory Designated sites – Madingley Wood SSSI, Caldecote Meadows SSSI and Hardwick Wood SSSI as a result of the construction or operational phase of the scheme as detailed in Technical Report 5, CD1-11.05, page 54. I am in agreement with this assessment and note that Natural England have raised no concerns of impact risks to these sites.
- 15 At paragraph 1.1.88 of Mr Ellis's Proof of Evidence he confirms that impacts to the Coton Orchard CWS remain significant and at a County scale as set out in Technical Report 5, due to the extent of habitat lost and the effect this would have. I agree with this conclusion and note that this impact is agreed by Mr Woodfield in his Proof of Evidence (CD26-10-W4-1, para 5.2.3).
- 16 The process of identifying harm followed within Technical Report 5 and the ES is correct for other non-statutory sites; Coton Path Hedgerow, Bin Brook and Scrub East of the M11. It considers impact risks in the absence of mitigation and compensation measures and concludes that this would result in a significant adverse effect, before mitigation or compensation measures are applied. I am therefore in agreement fully with Mr Ellis's rebuttal (**CD-01-APP-W13-5, section 3.2**) in this regard.

BIODIVERSITY NET GAIN ASSESSMENT

- 17 Whilst BNG is not a mandatory statutory requirement for this scheme, I understand that the Greater Cambridge Partnership has committed to delivering at least 10% BNG, which would be discharged under Planning Condition 15.
- 18 Clearly the scheme has evolved over a protracted timeframe necessary to design and assess a scheme of this nature. This has clearly led to the complication of versions of biodiversity Metric's provided by Natural England and the supporting guidance for recording and evaluating biodiversity data, having changed during this time. This has particularly created an issue with how the habitats at Coton Orchard have been recorded and evaluated since the first assessment of the orchard in 2022 using the Biodiversity Metric 3.1. This is a matter that I will explain further in my oral evidence.
- 19 The current metric calculations do presently omit individual trees within the orchard, as at the time of recording habitat data to inform the biodiversity Metric 3.1, the guidelines did not require individual trees to be recorded. This is accepted by the applicant and a detailed survey of the orchard will be required to condition assess individual trees and record their size. Most trees would be expected to be classed as 'small', which is a tree with a trunk diameter between 7.5 and 30cm, given, as already discussed, that few trees have been planted on vigorous rootstocks, the majority, are therefore small in size.
- 20 I have reviewed the availability of resources to deliver off-site BNG hedgerow, watercourse and habitat units necessary for this scheme. I understand Lower Valley Farm is the preferred option for the delivery of off-site habitat unit shortfalls for hedgerow and habitat units. This was the same basis identified by Mr Ellis. At 140ha in size, it sits within the Cambridge Nature Network Project and lies adjacent to the Roman Road SSSI, thus creating opportunities for wider ecological connectedness. The site is understood to be creating a surplus of more than 1000 biodiversity units, with habitat creation already



underway to create species-rich native hedgerows with trees, Other neutral grassland, mixed scrub and other woodland: broadleaved, though bespoke provisions will undoubtedly be possible.

- 21 The impacts to watercourses by the scheme appear clearly restricted in scope, noting a definitive calculation may only be possible subject to some final details (such as bridge size/design). Watercourses found within the project catchment include Bin Brook, Callow Brook and Cotton Stream. The interaction of this scheme with watercourses, considering its scale, is quite limited and is unlikely to create large watercourse unit losses.
- 22 It is important that BNG is not considered as a tool to deliver species-specific mitigation. Different species have their own specific habitat requirements, which should be considered as a priority for the scheme, at least initially in the isolation of any BNG requirements. This also means that any gains or losses in habitat, hedgerow or watercourse units, should not be considered as a key indicator of the ability of a scheme to deliver species-specific mitigation for example for water voles, bats, common reptiles or any other species. It would be incorrect for example to therefore suggest that a loss in hedgerow units within this scheme illustrates a net loss in foraging habitat value for bats.