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The Cambourne to Cambridge Order

Cambridgeshire County Council

Transport and Works Act 1992

Transport and Works (Inquiries Procedure) Rules 2004

Inquiry into:

THE CAMBOURNE TO CAMBRIDGE ORDER

REBUTTAL IN RELATION TO LANDSCAPE AND VISUAL

of

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of WSP

On behalf of Cambridgeshire County Council

09th September 2025

Planning Inspectorate Reference: DPI/E0535/25/1

CONTENTS

Section	Page
1. INTRODUCTION.....	3
2. SCOPE OF REBUTTAL.....	3
3. REBUTTAL.....	3
Rebuttal in Relation to underestimated landscape value.	3
Rebuttal in Relation to underestimated landscape impacts	4
4. STATEMENT OF TRUTH	7

1. INTRODUCTION

- 1.1.1 This rebuttal has been prepared in response to the Proof of Evidence of James Littlewood on behalf of Cambridge Past, Present and Future (CPPF) **[CD2-OBJ-251]** in relation to landscape and visual impact for the Cambourne to Cambridge Order (CtoC).
- 1.1.2 My name is Chris Carolan. I am an Associate in the Landscape and Urban Design Team at WSP. Details of my qualifications, professional career and key project experience are contained in my Proof of Evidence **[CD26-01-APP-W5-1]**.

2. SCOPE OF REBUTTAL

- 2.1.1 The scope of my rebuttal is specifically in response to matters raised in the Proof of Evidence of James Littlewood **[CD2-OBJ-251]** entitled Proof of Evidence on Planning Matters - James Littlewood, Chief Executive of Cambridge Past, Present & Future On behalf of Cambridge Past, Present & Future and Coton Parish Council.
- 2.1.2 James Littlewood's Proof of Evidence does not challenge the LVIA methodology or the analysis of the LVIA findings presented in the Environmental Statement **[CD1-10.01 being the Main Report]** and in Technical Report TR8: Landscape **[CD1-11.08.1]** in any detail but contends that it has not fully appreciated the sensitivities and the landscape character and visual amenity of the areas through which the TWAO scheme would travel.
- 2.1.3 The fact that I do not respond to a particular point should not be taken as a concession in any respect. I have sought to focus my rebuttal evidence on the matters that I consider most likely to assist the Inspectors and Secretary of State by being addressed in writing.

3. REBUTTAL

Rebuttal in Relation to underestimated landscape value.

- 3.1.1 The following presents my rebuttal in relation to paragraph 7.7 - 7.14 of James Littlewood's Proof of Evidence **[CD2-OBJ-251, pdf page 18 and 19, paragraph 7.7 - 7.14]** where it is stated that:
- 3.1.2 *"7.7. In particular the assessment has underestimated the sensitivity of the local landscape in the vicinity of Coton and the surrounding area.*
- 3.1.3 *7.8. I believe that the assessment also gives too much weight to the influence the existing transport corridors have on landscape character given that the major roads, the A428 and the M11, are generally very well integrated into the landscape, with mature vegetation and set in road cuttings."*
- 3.1.4 Mr Littlewood does not challenge the methodology or the analysis of the LVIA findings in any detail but contends that it has not fully appreciated the sensitivities of the landscape. In his Proof of Evidence **[CD2-OBJ-251, pdf page 18 and 19, paragraph 7.9 - 7.14]** Mr. Littlewood's description of the local landscape west of Cambridge includes land within two of the landscape receptors, LCA 3B: Bourne tributaries lowland farmlands and LCA 4B: Lolworth to Longstowe Wooded Claylands. The qualities and characteristics of the landscape described by Mr. Littlewood, including the relationship between the city and the landscape, the open views, specific landscape features worthy of conservation, along with any detracting features, were fully appreciated in the assessment of landscape sensitivity for the landscape receptors **[CD1-11.08.1 - Table TR8-1-1]** and as such no change to the assessment is required.
- 3.1.5 Mr, Littlewood has also contended that the LVIA puts too much emphasis on the influence of the transport corridors within the landscape. The road corridors are well

integrated into the landscape setting; however, they nonetheless exert an adverse impact on the landscape that must be taken into account in the assessment of landscape receptor value. Where there is visibility, their linear form introduces visual lines that cut across the natural grain of the land, interrupting views and diminishing the sense of rural tranquillity within the LCA. Even where softened by vegetation, the transport routes bring with them movement, noise, and light, which extend their influence beyond the physical corridor itself and erode the perception of remoteness and intactness of the landscape. The assessment appropriately balances the landscape qualities and detracting features in determining landscape sensitivity.

- 3.1.6 In summary, the methodology used is aligned with industry best practice guidelines and the application of the methodology in the assessment of landscape sensitivity has been carried out in accordance with that standard. I therefore disagree that the *“the assessment has underestimated the sensitivity of the local landscape”* as no issue has been raised with the methodology or the application of the methodology and to use any other means of assessing landscape sensitivity aside from industry standards could not be supported.

Rebuttal in Relation to underestimated landscape impacts

LCA 3B: Bourne tributaries lowland farmlands

- 3.1.7 The following presents my rebuttal in relation to paragraph 7.15 – 7.19 of James Littlewood's Proof of Evidence **[CD2-OBJ-251, pdf page 19 and 20, paragraph 7.15 – 7.19]** where it is stated that:
- 3.1.8 *“7.15 The CtoC scheme would introduce of a piece of major transport infrastructure, with its moving vehicles, bus stops, junction structures including traffic lights and road lighting. Below I describe how I consider that the LVIA underestimates the impact it would have on this landscape character.”*
- 3.1.9 *7.17. It is my opinion that since the scheme would bisect the area of trees adjacent to the M11 and bisect the mature orchard at Coton as well as remove veteran orchard trees, it would have more of an impact on landscape character than given in the LVIA.*
- 3.1.10 *7.18 Mitigation in the area is reliant on replacement trees, but although trees can be replaced with saplings, the landscape value of mature and veteran trees cannot be replaced. It takes over 50 years of healthy growth to achieve the stature and landscape value of an orchard like Coton Orchard.*
- 3.1.11 *7.19. Views of the scheme in this area would be from domestic and commercial businesses and through the substantial gap created in the hedge along Cambridge Road. These views are at close quarter, and some cannot be screened at all, such as the views from Cambridge Road looking along the new busway. The moving vehicles would be difficult or impossible to screen particularly considering the limited height of mitigation planting.”*
- 3.1.12 Mr. Littlewood's assertion that the Proposed Scheme would have more of an impact on the landscape character than given in the LVIA is not evidenced against the magnitude of change methodology **[CD1-11.08.2 - Table TR8.1-3-1]**.
- 3.1.13 The LVIA evaluated the magnitude of impact the Proposed Scheme would have on the landscape receptor (LCA 3B: Bourne tributaries lowland farmlands), taking into account the local features highlighted by Mr. Littlewood, such as the loss of trees alongside the M11 and veteran trees within Coton Orchard. It acknowledges that these changes would be visible to certain receptors, leading to a localised medium change to localised landscape features **[CD1-11.08.1, Table TR8-4-3]**.
- 3.1.14 The assessment of magnitude of impact was carried out in accordance with the methodology, assessing the size, scale and nature of the Proposed Scheme within the

landscape receptor, the geographical extent to which it is experienced, and the duration of the impact [CD1-11.08.2 - Table TR8.1-3-1]. The assessment identifies that changes are localised to a very small portion of the north of the landscape receptor (LCA 3B: Bourne tributaries lowland farmlands). It recognises the Proposed Scheme will result in a discernible change to existing local landscape features and have some intervisibility with nearby receptors including some from elevated PRow on Red Meadow Hill, however, including embedded mitigation, the landscape character of the LCA as a whole will be impacted such that its baseline is altered to minimal extent [CD1-11.08.2 - Table TR8-4-3].

- 3.1.15 With regard to the mitigation planting Mr. Littlewood is correct that veteran and mature trees have a value that cannot be replaced. The Design and Access Statement [CD1-17, Section 09, Page 35] demonstrates that the scheme has sought to minimise direct impacts on sensitive landscape features wherever possible, and that a comprehensive planting and management strategy will deliver meaningful long-term benefits. While new planting cannot instantly replace the maturity of existing trees, it is designed to ensure continuity of green infrastructure, strengthen ecological networks, and provide for the next generation of landscape character.
- 3.1.16 The LVIA has also fully considered the visual impact of the Proposed Scheme from the various visual receptors within the Study Area including domestic (Receptor 23) and commercial premises (Receptors 22 and 24) near Coton Orchard, and users of Cambridge Road (Receptor 21) where there would be direct views of the Proposed Scheme [CD1-11.08.1 - Table TR8-4-5]. The assessment of visual receptor sensitivity (value and susceptibility) [CD1-11.08.1- TR8-1-2] and magnitude of impact and subsequent significance of effect [CD1-11.08.1-Table TR8-4-5] for visual receptors has been carried out in accordance with best practice and does not downgrade the impact, and as such there is no merit in change to the assessment.

Area 4B: Lolworth to Longstowe Wooded Claylands

- 3.1.1 The following presents my rebuttal in relation to paragraph 7.20 - 7.24 of James Littlewood's Proof of Evidence [CD2-OBJ-251, pdf page 20 and 21, paragraph 7.20 - 7.24] where it is stated that:
- 3.1.2 *"7.20 Area 4B: Lolworth to Longstowe Wooded Claylands (west of Cambridge Road, Coton). The LVIA finds that predicted impact on landscape character would be moderate adverse (significant) at Year 1 after opening and lessening to slight-moderate adverse (not significant) at year 15. [CD1-11.08.1 Table TR8-4-3]."*
- 3.1.3 *7.21. This area of countryside north of Coton village rises up Madingley Hill and is open farmland. It is between the properties along Madingley Road to the north and village properties and the village school to the south. Given the openness of the farmland and the fact that the scheme is traversing a hillside, it is my opinion that the impact on the landscape character would be substantial. The LVIA recognises that the predicted impact would be adverse but downgrades the impact.*
- 3.1.4 *7.22 As for views, there would be nearby views from Cambridge Road looking west, to the rear of private properties and the school as the scheme rises up Madingley Hill. There would be a significant impact on views from the popular public footpath that runs between Coton Village and Madingley Road, as this footpath would be bisected by the busway, introducing a large urban feature into the countryside. There would also be longer views from surrounding footpaths and particularly from Red Meadow Hill (Coton Countryside Reserve) on the opposite side of Bin Brook valley. In all these views the busway would appear very obvious and discordant in the landscape as the scheme cuts across field boundaries and traverses Madingley Hill. This discordancy will be emphasised when picked out by the moving vehicles.*
- 3.1.5 *7.24. In conclusion, the Scheme would create a large linear, engineered feature in an undeveloped pastoral and intimate landscape, including hard surfacing, bus stops,*

junction structures, traffic lights, signage and moving vehicles. I do not believe that the LVIA has been able to fully capture the impact that the CtoC scheme would impose on this landscape of visual, heritage/culture and natural significance which, through landownership and legal agreements, CPPF and the National Trust has sought to protect. The CPPF alternative scheme would avoid the harm to this landscape and enable it to continue to be enjoyed and valued by future generations.

- 3.1.6 I disagree with Mr. Littlewood's opinion that the impact on the landscape character would be substantial solely due to the openness of the landscape north of Coton and the fact the Proposed Scheme traverses a hillside. This is an overly simplistic assessment of the Proposed Scheme in a small part of the landscape receptor (LCA 4B: Lolworth to Longstowe Wooded Claylands). It is not grounded in the methodology for assessment of magnitude of impact on landscape receptors [**CD1-11.08.2 - Table TR8.1-3-1**] and fails to consider the receptor as whole along with the embedded mitigation.
- 3.1.7 My Proof of Evidence [**CD26-01-APP-W5-1, pdf page 10, Section 5.2.1**] includes the following:
- 3.1.8 *"The area to the south of Madingley Road is primarily agricultural fields with little intrinsic quality. In accordance with GLVIA3 guidelines for assessing landscape effects [**CD18-22 - Chapter 5, Section 5.38-5.47, Page 88-90**] the assessment recognises the area's specific landscape sensitivity along with the existing influence of linear infrastructure [**CD1-11.08.1-Table TR8-1-1**]. The route is designed with low earth bunds to better integrate the infrastructure into rural field patterns in order to retain the existing open character and views, enhance green corridors, and safeguard countryside frontages. The design aims to move away from a new horizontal linear feature across the fields by introducing north-south planting along the lines of old field boundaries, whilst taking careful consideration of maintaining views [**CD1-17, Section 09, Page 36**]. This is illustrated in the Landscape and Visual Photomontages [**CD1-11.08.4 – Page 14-15 - View 22**].*
- 3.1.9 *It is my professional opinion that, through these measures, the Proposed Scheme minimises the landscape impact on the land south of Madingley Road.*
- 3.1.10 *The assessment of magnitude of impact considers the scale and nature of the Proposed Scheme within the LCA, along with the geographical extent within which the Proposed Scheme is experienced, and duration and reversibility including the embedded mitigation measures."*
- 3.1.11 Mr Littlewood is incorrect in his assertion that the views of the busway from Red Meadow Hill *"would appear very obvious and discordant in the landscape as the scheme cuts across field boundaries and traverses Madingley Hill"*. This view is illustrated in the Landscape and Visual Photomontages [**CD1-11.08.4 – Page 14-15 - View 22**] and confirms the Proposed Scheme would have minimal intervisibility with the receptor due to the distance, topography changes, and the new earth bunds which would block views of the highway alignment. Buses may be seen moving through the landscape but would be a minor feature in the receptor views.
- 3.1.12 The LVIA has fully considered the visual impact of the Proposed Scheme from the various visual receptors within the Study Area including those identified by Mr. Littlewood [**CD1-11.08.1 - Table TR8-4-5**]. The assessment of visual receptor sensitivity (value and susceptibility) [**CD1-11.08.1- TR8-1-2**] and magnitude of impact and subsequent significance of effect [**CD1-11.08.1-Table TR8-4-5**] for visual receptors has been carried out in accordance with best practice and no change in assessment is merited.

4. STATEMENT OF TRUTH

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