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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

SUMMARY OF THE PROOF OF EVIDENCE

of

Thomas Wilson BSc (Hons), MA, MSc, MCIfA, FSA

of WSP

On behalf of Cambridgeshire County Council

15th August 2025

Planning Inspectorate Reference: DPI/E0535/25/1

1. INTRODUCTION

1.1 My name is Thomas Wilson. I am an Associate Director in the Cultural Heritage and Archaeology Team at WSP. I hold a BSc(Hons) in Applied Ecology and Archaeological Science from the University of Sheffield, an MA in Archaeology from Birkbeck College, and an MSc in Historic Building Conservation from Kingston University. I am a Member of the Chartered Institute for Archaeologists, and a Fellow of the Society of Antiquaries. I have over 28 years of professional experience in the heritage sector, and I have provided evidence as an expert witness to planning appeals and Public Inquiries for which the setting of listed buildings was a key issue.

1.2 This document is my summary Proof of Evidence on behalf of Cambridgeshire County Council, focusing on built heritage for the Cambourne to Cambridge Scheme. It addresses the built heritage considerations, methodology, findings, mitigation measures, and responses to objections related to the scheme, which proposes a new 13.6 km public transport route including a dedicated busway, active travel paths, and a travel hub.

2. SCOPE

2.1 The evidence covers the approach and findings of the EIA with respect to the built heritage discipline, as reported in the Environmental Statement [CD1-10.01], Technical Report 7: Heritage Impact Assessment [CD1-11071], and Appendix TR7.1 Heritage Statement [CD1-11072]. The evidence focuses on likely significant effects and responds to objections and representations from statutory and non-statutory objectors, including Clare Hall, Cambridge Past Present and Future (CPPF), Cambridge City Council (CCC) and South Cambridgeshire District Council (SDCC).

2.2 The evidence describes the legal and policy framework, the assessment methodology that was employed for the EIA, and salient consultation responses.

2.3 The evidence addresses objections made by Clare Hall ('the College') regarding 'Clare Hall, University of Cambridge' Grade II* listed building and a proposed alternative route.

2.4 The evidence describes the effects on built heritage that would result from adoption of an alternative scheme proposed by CPPF, which would take an on-line route along the A1303 Madingley Road, rather than the off-line route further south that is part of the CtoC Scheme.

2.5 The evidence addresses representations by CCC and SDCC regarding the anticipated effects on specific built heritage assets within West Cambridge Conservation Area.

2.6 The evidence answers comments made by Historic England in a letter dated 8th August 2025 regarding the submitted drawings, physical and setting-related impacts, and requirements for design information to be submitted.

3. STATUTORY AND POLICY CONTEXT

3.1 The evidence describes the legislative and planning context that provided the framework for assessment of effects on built heritage assets. The principal statutory instrument is the *Planning (Listed Buildings and Conservation Areas) Act 1990*, as amended ([CD5-15]. The principal planning policies are contained within the *National Planning Policy Framework* and accompanying *Planning*

Practice Guidance, and the *Cambridge Local Plan*. Key sections of the legislation and specific policies are cited in the evidence.

3.2 Although my evidence concerns points of fact relating to built heritage only, rather than points of law, I also indicate clarifications that have been made in Case Law regarding key issues, including harm, setting, curtilage, and structures.

3.3 My evidence also provides details of relevant technical advice published by Historic England, the government's statutory advisor for heritage.

4. AGREED METHOD

4.1 The evidence indicates the sections of the Environmental Statement that describe the data sources, site visits, consultations, and assessment methods that were used to assess harm in policy terms and Significance of Effect in EIA terms.

4.2 The evidence describes the stakeholder engagement process that took place throughout the EIA process, and provides key comments from statutory consultees.

5. KEY FINDINGS

5.1 The evidence addresses potential effects that would result from the CtoC Scheme and/or Objectors' alternative routes on the following heritage assets:

- 'Church of St Peter' Grade I listed building
- 'American Military Cemetery' Grade I registered park and garden
- 'Clare Hall, University of Cambridge' Grade II* listed building
- 'Madingley Mill, at Mill Farm, Madingley Hill' Grade II* listed building
- 'Memorial and Attached Walls, Steps and Pool Surround at American Military Cemetery' Grade II* listed building
- 'Robinson College, Cambridge' Grade II* listed building
- 'Schlumberger Gould Research Centre and Attached Perimeter Wall to the North' Grade II* listed building
- '48 Grange Road' Grade II listed building
- 'Cambridge University Real Tennis Club and Professionals House' Grade II listed building
- 'Elmside including boundary wall and gate' Grade II listed building
- 'Emmanuel College Sports Pavilion, including Groundsman's House and stable' Grade II listed building
- 'University Library' Grade II listed building
- West Cambridge Conservation Area
- Coton Conservation Area
- No. 4 Adams Road locally listed building
- No. 6 Adams Road locally listed building
- Two non-designated 'Former entrance lodges to Childerley Hall'

5.2 Where appropriate, a comparison of the relative effects of CtoC Scheme and Objectors' alternative routes is provided.

6. RESPONSES TO REPRESENTATIONS

Objections raised by Clare Hall [CD23-17 OBJ-213]

Proper consideration to the listing and architectural and historical importance

6.1 The evidence indicates the methodology and impact assessment of the CtoC Scheme. While noting that Clare Hall was described in the Environmental Statement to a level of detail that was both proportionate to its importance and sufficient to understand the potential impacts, the evidence provides further details of the assessment in response to the College's objections.

Justification for assessment of harm

6.2 The evidence notes that the EIA method used is well-established, and the assessment is sufficient to inform the decision-making authority; however, further detail has been provided in response to the College's objections.

6.3 The evidence notes that the Applicant and the College agree that there would be 'less than substantial' harm, although they differ in their view as to where within the broad range of 'less than substantial' the harm would fall. I also note that Historic England and the Local Planning Authorities have not queried the assessment of a minor Significance of Effect and 'less than substantial' harm.

Assessment of requirement for Listed Building Consent

6.4 The evidence demonstrates the reasons why Listed Building Consent would not be required. This is by reference to the fact that the paths discussed by the College as possibly requiring Listed Building Consent are not structures, are discontinuous from the listed building's layout, are outside the property boundary, and are (by a combination of the aforementioned factors) not curtilage listed.

6.5 Furthermore, even if the paths were found to be listed fabric, Listed Building Consent would not be required because the proposed work would not affect Grade II* listed Clare Hall, University of Cambridge's character as a building of special architectural or historic interest, because the ends of the paths do not embody any such interests.

6.6 Finally, if the proposed works were found to require Listed Building Consent, a condition could be imposed on the deemed planning permission to either obtain Listed Building Consent or, if that is not possible, to ensure the paths are retained in the detailed design.

6.7 The evidence also demonstrates that planting of a hedgerow would not require Listed Building Consent.

Significance of noise and vibration effects and their mitigation

6.8 The evidence addresses the level of noise by reference to Mr Toby Lewis' Proof of Evidence [CD26-01-APP-W11-1], and describes the likely impact that has been considered as part of the overall impact assessment, noting that there would be harm as a result, which has been taken into consideration in the overall impact assessment.

The nature of activities undertaken at Clare Hall

6.9 The evidence identifies that effects on the occupants of Clare Hall are social impacts and/or questions of amenity that fall outside the scope of this Proof of Evidence. However, the evidence notes that a degree of harm as a result of disturbance of the setting has been accounted for in the Environmental Statement's overall finding that harm would occur.

Alternative route option via Adams Road

6.10 The evidence notes that the consideration that was given to this proposed alternative route is described in the Proof of Evidence of Mr Jo Baker [CD26-01-APP-W1-1].

6.11 The evidence identifies that if an Adams Road alternative route were to be adopted, a degree of 'less than substantial' harm to heritage would occur, which would be broadly similar to that of the CtoC Scheme.

Removal of existing trees

6.12 The evidence describes how removal of the line of trees along Rifle Range Road would result in a mix of beneficial and adverse impacts, which was assessed as resulting in no overall change but considered in the overall impact assessment.

Significant views

6.13 The evidence describes the changes to views from and views towards Clare Hall that would result from the CtoC Scheme, and reports that these would contribute to the overall minor adverse Significance of Effect, or less than substantial harm

Errors in the existing environmental information

6.14 The evidence addresses the Objector's comments regarding the nature of window glass to the rear of Clare Hall, and why this does not affect the outcome of the assessment.

Removal of building fabric

6.15 The evidence explains why there would be no requirement for removal of any part of the listed building's fabric.

Objections raised by Cambridge Past Present and Future (CPPF) [CD23-18-1 OBJ-251 SoC]

6.16 The evidence describes the likely effects on heritage assets of a concept design by WSP for an alternative route proposed by CPPF, which would occupy the existing highway boundary along Madingley Road rather than the off-line route further south proposed by the CtoC Scheme.

6.17 The evidence reports that CPPF Alternative would result in a minor adverse effect, or less than substantial harm, to a Grade I registered park and garden and two Grade II* listed buildings that would be unaffected by the CtoC Scheme. However, the CPPF Alternative would not affect Coton Conservation Area, which would experience a minor adverse Significance of Effect, or less than substantial harm, as a result of the CtoC Scheme.

Representations by CCC [CD23-16-2 REP-09] and SCDC [CD23-16-2 REP-09]

6.18 The evidence explains the effects that the CtoC Scheme would have on 'Robinson College, Cambridge' Grade II* listed building and a number of other heritage assets within West Cambridge Conservation Area, which were raised in representations by Cambridge City Council and South Cambridgeshire District Council.

Comments by Historic England [CD2 REP-08.2]

6.19 The evidence demonstrates that there is no discrepancy in the submitted drawings. Specific queries regarding the effects on Clare Hall are clarified or explained further. The requirements for design information to be submitted at this stage are also explained.

7. CONCLUSIONS

General conclusions

7.1 The EIA demonstrates that the likely effects of the CtoC Scheme on built heritage have been assessed in accordance with legal and best practice standards. No significant adverse effects (in EIA terms) are identified. There would be 'less than substantial' harm to several listed buildings through changes to their settings, and to the character and appearance of two conservation areas.

7.2 The objections raised have been addressed with appropriate evidence and mitigation commitments.

Clare Hall: conclusions

7.3 The CtoC Scheme would result in a minor adverse Significance of Effect, or less than substantial harm in NPPF terms, to 'Clare Hall, University of Cambridge', which is a Grade II* listed building. The harm would be related to alteration of its setting and views. There would be no physical harm to this asset. The degree of harm would be toward the lower end of 'less than substantial' harm.

CPPF Alternative: conclusions

7.4 The evidence demonstrates that the CPPF Alternative would result in harm to an additional three assets of very high significance, but would avoid harm to one asset of high significance that would be harmed by the CtoC Scheme. All instances of harm would be less than substantial.

Representations by CCC and SCDC: conclusions

7.5 The evidence provides details of the effects that would occur with respect to assets referred to in CCC and SCDC's representations.

Comments from Historic England: conclusions

7.6 The Applicant and Historic England are in broad agreement regarding the effects of the CtoC Scheme. The evidence addresses Historic England's concerns in relation to physical and setting-related impacts and the submitted drawings. The requirements for design information have been clarified.