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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

PROOF OF EVIDENCE

of

Chris Carolan

of WSP

On behalf of Cambridgeshire County Council

31 July 2025

Planning Inspectorate Reference: DPI/E0535/25/1

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1. INTRODUCTION

1.1 Qualifications and Experience

Academic qualification

1.1.1 My name is Chris Carolan. I am an Associate Landscape Architect at WSP. I hold a BSc(Honours) in Spatial Planning from Dublin Institute of Technology and a MArchSc (Honours) in Urban Design from University College Dublin.

Professional career

1.1.2 I have over 10 years' of specialised experience in Landscape and Visual Impact Assessment (LVIA) in the UK as well as internationally. I have developed a strong expertise in evaluating and managing the effects of a wide range of infrastructure, urban Scheme, and renewable energy projects. I have led landscape and visual inputs for Scheme Consent Orders (DCO) and Environmental Impact Assessments (EIA) for projects across rural, urban and coastal environments, ensuring that all proposals align with planning policies and environmental standards. I have led the landscape and visual input to schemes through key stages of the project lifecycle including strategic route corridor studies, alternative appraisals, Environmental Statement preparation, and examinations.

Key project experience

1.1.3 I have managed the landscape and visual aspects of many EIAs and acted as expert witness in relation to landscape and visual matters for schemes in England. Most recently I acted as expert witness for the Cory Decarbonisation DCO project.

1.1.4 I am providing this evidence in my capacity as a Landscape Architect and Associate at WSP with over 10 years' experience in landscape planning and design, with particular expertise in LVIA for major infrastructure projects. Having undertaken the LVIA for the CtoC project Environmental Statement, I was instructed by the Applicant to prepare and submit evidence for this Inquiry.

1.2 Scope of Evidence

1.2.1 My evidence covers:

- **Assessment Methodology** - An explanation of the accepted approach adopted for the LVIA, including standards followed (such as GLVIA3 – Guidelines for Landscape and Visual Impact Assessment, 3rd Edition) and the criteria used for assessing sensitivity, magnitude of impact, and significance of effect.

- **Mitigation Measures** – A description of embedded mitigation during both construction and operation, with a specific focus on areas where representations were raised by objectors or consultees.

- **Findings of the assessment of Landscape and Visual Effects** – A description of the findings regarding the likely effects of the Proposed Scheme on landscape fabric and character, including its constituent features, elements, and patterns, as well as the likely effects on key views, visual amenity, and the overall experience of the landscape.

- **Response to Third-Party Representations** - Consideration of relevant landscape and visual issues raised by objectors or consultees.

- **Conclusions** - A summary of the overall effects and professional opinion on whether the landscape and visual effects are acceptable in the planning balance.

1.2.2 The purpose of my evidence is to explain the landscape and visual context of the application site, to assess the likely effects of the Proposed Scheme, and to respond to the landscape and visual matters raised by third parties. My evidence is based on my professional judgment, informed by site visits, analysis of published landscape character assessments, review of submitted application documents, and consideration of relevant planning policy and guidance. I confirm that the opinions expressed in this evidence are my true and professional opinions.

1.2.3 With regards to the Statement of Matters [**CD25-01**] the following matters are partially related to my Proof of Evidence but also covered by the Proofs of Evidence of others as set out below.

Table 1.1: Coverage of certain matters in Proofs of Evidence as set out in the Statement of Matters [CD25-01, pages 1 and 2]

Statement of Matters [CD25-01] Reference	Statement of Matters text	Coverage through my Proof of Evidence	Coverage through Proofs of Evidence of Others
4b	The effect on local residents, pedestrians, cyclists, and motorists.	I will describe the visual effects on local residents and pedestrians and cyclists as reported in the ES. (**CD1-11.08.1, Chapter 5)**	Further details on the environmental effects on local residents are provided in the Proofs of Evidence of Toby Lewis (Noise) [**CD26-01-APP-W11-1**] and Andy Saunders (Environmental Effects) [**CD26-01-APP-W3-1**]. Effects on motorists are dealt with in the Proof of Evidence of Jo Baker [**CD26-01-APP-W1-1**].

2. MAIN ISSUES FOR THE INSPECTOR RELEVANT TO MY EVIDENCE

2.1 Introduction

2.1.1 In this section, I identify the key landscape and visual matters that, in my professional opinion, are relevant to the assessment of the Proposed Scheme. These matters have been informed by the issues raised in representations by interested parties.

2.1.2 The main issues of relevance to my evidence are:

- The effect of the Proposed Scheme on the landscape character of the site and its surroundings.
- The effect of the Proposed Scheme on views and visual amenity experienced from surrounding public rights of way, residential areas, and local roads.
- The extent to which any identified landscape and visual effects would result in harm that should weigh against the Proposed Scheme in the planning balance.

2.1.3 I address each of these matters in turn in the following sections of my Proof of Evidence.

3. KEY STAKEHOLDER ENGAGEMENT

3.1.1 As part of the CtoC guided busway project, a comprehensive stakeholder engagement process was undertaken to ensure that the views of key stakeholders were considered

for the landscape and visual impact assessment. The engagement process aimed to identify potential concerns and incorporate relevant feedback into the design and mitigation measures for the project.

3.1.2 The Greater Cambridge Partnership (GCP) Landscape, Ecology and Heritage Working Group, which included representatives from GCP, Cambridge County Council, South Cambridgeshire District Council, Greater Cambridge Planning, Cambridge Past Present and Future, Historic England, National Trust, WSP, and Atkins were consulted on the LVIA study area and visual receptors, and in particular the location of key representative viewpoints.

3.1.3 A meeting was held on 16/03/2022 with Greater Cambridge Shared Planning (GCSP) where the proposed study area and visual receptors/ viewpoints were discussed. Responses received and considered in the LVIA chapter included those from Dinah Foley-Norman, Principal Landscape Architect at GCSP (**CD26-01-APP-W5-2 – Appendix A**). All additional proposed visual receptors/ viewpoints were adopted including six additional visual receptors (R07, R08, R09, R14, R25, and R30 – shown on **CD1-11.08.3 – Figure 8.4 Visual Assessment Plan**) and the suggestion to include views during hours of darkness, particularly for the proposed Travel Hub.

3.1.4 We subsequently issued the proposed visual receptor/ viewpoint locations to the GCP Landscape, Ecology, and Heritage Group, including James Littlewood (Chief Executive) and Sarah Nicholas (Principal Planning Officer) at Cambridge Past, Present & Future (CPPF) on 14/04/2022 for comment and recommendations; along with any landscape or visual sensitivities which would need to be considered in the assessment. Comments were provided by Sarah Nicholas in relation to proposed visual receptor position and directions and additional visual receptor locations were suggested (**CD26-01-APP-W5-2 – Appendix B**). These were all adopted for the LVIA ES chapter including three new receptors; R16, R19, and R32 (shown on **CD1-11.08.3 – Figure 8.4 Visual Assessment Plan**).

3.1.5 On the same date, 14/04/2022, proposed visual receptor locations were issued by WSP to Jess Johnston, East of England Covenant Officer at the National Trust, for comment and recommendations on selected visual receptors; and any landscape or visual sensitivities which would need to be considered. Comments were provided in relation to proposed visual receptors and additional visual receptor locations suggested (R28 and R29 - shown on **CD1-11.08.3 – Figure 8.4 Visual Assessment Plan**) in order to fully understand the impact on National Trust covenanted land (**CD26-01-APP-W5-2 – Appendix C**). These were also adopted and taken into account in Technical Report 08 – Landscape [**CD1-11.08.1 - Table TR8-4-2 and Table TR8-4-5**].

4. LANDSCAPE AND VISUAL

4.1 Introduction

4.1.1 Detailed information about Landscape and Visual effects associated with the Scheme is provided in ES Technical Report 8: Landscape [**CD1-11.08.1 - Table TR8-4-1, Table TR8-4-2, Table TR8-4-3, and Table TR8-4-5**], which is supported by the Landscape and Visual Methodology [**CD1-11.08.2**], Landscape and Visual Figures [**CD1-11.08.3**], and Landscape and Visual Photomontages [**CD1-11.08.4**].

4.2 Assessment methodology

4.2.1 The Landscape and Visual Methodology [**CD1-11.08.2**] outlines the proposed assessment methodology for the LVIA in accordance with current best practice guidance and policy.

4.2.2 In accordance with good practice and the principles outlined in the Guidelines for Landscape and Visual Impact Assessment (GLVIA3), the proposed methodology for the LVIA was included in the EIA Scoping Report [**CD1-10.05 Appendix ES4 – Section 11.4**] at the early stages of the Scheme.

4.2.3 The methodology covered the approach to defining sensitivity and magnitude, and the criteria for determining significance of effects. No objections or concerns were raised by consultees regarding the scope or structure of the assessment in the scoping opinion. The methodology is robust and appropriate for the scale and nature of the proposed CtoC scheme. On this basis, I am satisfied that the assessment was conducted in accordance with agreed and accepted professional practice, and that it forms a reliable foundation for identifying and evaluating the landscape and visual effects of the Proposed Scheme.

4.3 Embedded Mitigation

4.3.1 The Proposed Scheme is a mitigation-led proposal which has been designed from the outset to prioritise the integration of the new transport corridor into its surrounding environment, avoiding and minimising adverse effects. This means that the design has been an iterative process with input from environmental disciplines at various stages of the project, including landscape.

Construction

4.3.2 A Code of Construction Practice (CoCP) [**CD1-26-00**] was prepared for the CtoC Scheme, which sets out the controls and measures that will be implemented to mitigate potential impacts as a result of construction activity and will form part of the TWA Order and deemed planning permission applications.

4.3.3 **Chapter 9, Section 9.4, Page 41** of the CoCP outlines the appropriate controls proposed to be put in place to limit potentially significant landscape and visual effects from construction activities.

4.3.4 Controls include, as appropriate:

- Protection of existing areas of planting;
- Inspection, maintenance and management of existing planting;
- Prevention of damage to the landscape and landscape features adjacent to the construction site by movement of construction vehicles and machinery;
- Use of appropriate lighting design to avoid excessive lighting levels and to reduce negative impact on the surrounding environment; and
- Use of appropriate, well-maintained hoardings or fencing.

Operational Design

4.3.5 The design of the CtoC Scheme includes primary mitigation embedded into the Proposed Scheme design to avoid potential adverse landscape and visual effects. Embedded mitigation refers to the design measures that are integrated into the Scheme from the outset to avoid or reduce potential adverse landscape and visual effects. The mitigation is taken into account before assessing the residual effects, meaning that the LVIA evaluates the impact with the embedded measures already in place.

4.3.6 A Design and Access Statement (DAS) [**CD1-17**] was prepared in support of the CtoC Scheme and describes how the design of the C2C Scheme responds to its wider context including the avoidance of landscape and visual effects [**CD1-17, Section 9 and Section 13**].

<u>Coton Orchard</u>

4.3.7 At Coton Orchard, the landscape design aims to reinforce the presence of the existing orchard and the unique biodiversity habitat it creates, as well as reflecting the historical

landscape feature of the area [**CD1-17, Section 9, Page 35**] and [**CD1-10.01, Section 6**]. The key landscape proposal along this section of the route is formal planting of tree species reflecting the distinct character of the existing orchard as shown on the Proposed Site Plans [**CD1-16.04 – Sheet 13**] and the Proposed Site Sections [**CD1-16.05 – Sheet 4 – Section 10**].

Land South of Madingley Road

4.3.8 The alignment of the guided busway through this section has been designed to be as level as possible across the hill ridgeline using shallow cutting through much of the area to reduce landscape impacts [**CD1-17, Section 13, Page 46**] [**CD1-16.05- Sheet 2-3 – Section 07 and Section 08**]. Additional landscape features are also proposed where the route runs through land south of Madingley Road to better integrate the infrastructure into the rural field patterns [**CD1-17, Section 9, Page 36**] [**CD1-16.05 – Sheet 3 – Section 09**]. The proposals retain the existing open character and views, enhance green corridors, and safeguard countryside frontages. The aim is 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. Planted low earth mounds are proposed to screen views of the new route from surrounding public routes.

4.3.9 The Proposed Site Plans [**CD1-16.04**] and the Proposed Site Sections [**CD1-16.05**] illustrate the indicative landscaping design which will be provided along the alignment at all locations. The location, layout and high-level planting types proposed as part of the hard and soft landscaping are shown on **Sheets 1 to 17** of the Proposed Site Plans.

4.4 Findings of predicted impacts and likely significant effects

4.4.1 This section summarises the findings of the ES of the likely landscape and visual effects resulting from the proposed CtoC Scheme, based on the baseline assessment, fieldwork, and the application of the methodology. The full assessment of landscape and visual effects are described in Technical Report 8: Landscape of the ES [**CD1-11.08.1, Chapter 5, Page 27-59**]. Effects are considered both in terms of their temporary occurrence during construction and as longer term and permanent effects, with specific reference to Year 1 (on opening) and Year 15 (post-mitigation maturity).

Temporary Construction Effects

Landscape Effects - [**CD1-11.08.1, Table TR8-4-1**]

4.4.2 The construction of the CtoC Scheme will include the temporary (up to 24 months) introduction of additional construction related features and intrusive elements into the landscape that will have an impact on landscape fabric and character, along with views and visual amenity. The construction activities include several construction compounds across the CtoC Scheme, along with the presence of plant, cranes, increased road use from construction traffic, and temporary lighting. However, controls and measures embedded in the CtoC Scheme help mitigate the potential impacts as a result of construction activities (see the CoCP [**CD1-26**] for full construction phase details. **Chapter 9, Section 9.4, Page 41** outlines the embedded mitigation measures).

4.4.3 At construction, the CtoC Scheme will introduce construction related activities into the landscape including a notable change in the character of existing agricultural fields where construction compounds are located. It will also result in a notable change to the landscape character of the fields the alignment of the scheme runs through. Where the alignment follows existing road infrastructure, construction activity will have limited effects. The temporary nature of construction activities, along with embedded mitigation, results in a short-term effect. When considered alongside the sensitivity of landscape receptors, only LCA 4B Lolworth to Longstowe Wooded Claylands is assessed to have a significant adverse effect (moderate adverse significant).

4.4.4 No significant effects are predicted on any national, regional, or local designated landscapes, and no LCAs are judged to experience effects of greater than moderate significance.

Visual Effects - [**CD1-11.08.1, Table TR8-4-2**]

4.4.5 Visually, at construction, effects of the Scheme are anticipated to range from neutral to large adverse with moderate adverse effects assessed for receptors R5, R6, R15, R21, R24, R26, R30, R31 and R32, and large adverse effects assessed for receptors R16 and R19 (representing users of Public Right of Way (Coton 55/2)). The large adverse effects are due to short distance views of construction activities introduced into open agricultural fields to the north of Coton.

Permanent and Operational Effects

Landscape Effects - [**CD1-11.08.1, Table TR8-4-3**]

4.4.6 During operation the alignment of the CtoC guided busway will run through various character areas as defined in the DAS [**CD1-17, Section 9, Page 29**] including a city edge landscape at west Cambridge, urban, suburban, and roadside landscapes, and an off-road landscape to the south of Madingley Wood.

4.4.7 Where the route runs through the off-road landscape it will result in the partial loss of areas of agricultural land by introducing built elements, lighting and vehicles into the landscape. It is assessed that only landscape receptor LCA 4B Lolworth to Longstowe Wooded Claylands will have an effect of moderate adverse (significant) at year 1, however following the establishment of embedded mitigation at year 15 this will reduce to slight-moderate adverse (not significant).

Visual Effects - [**CD1-11.08.1, Table TR8-4-4**]

4.4.8 Visually, long term effects are assessed to range from neutral to large adverse at Year 1, with moderate adverse effects identified for R5 (representing residents on Scotland Road), R6 (representing users of PRoW (Dry Drayton 66/17), R16 (representing users of PRoW (Coton 55/2), R21 (representing residents on Cambridge Road), R24 (representing users of Rectory Farm), and R31 (representing users of PRoW (Cambridge 39/30).

4.4.9 Large adverse effects are assessed for receptor R19 (representing users of PRoW (Coton 55/2). This is due to short distance views of the CtoC Scheme on previously open agricultural fields.

4.4.10 As the new planting establishes throughout the operational period, it will enhance visual amenity and further screen the CtoC Scheme from the receptors. In this instance following establishment of embedded mitigation planting, adverse effects are not anticipated to be significant in any of the visual receptors apart from R19 PRoW (Coton 55/2).

Conclusions

4.4.11 No likely significant effects on landscape are predicted at year 15. For views and visual amenity, no likely significant residual effects are predicted beyond R19 which represents users of PRoW (Coton 55/2) and has short distance views of the CtoC Scheme on previously open agricultural fields. The effect on users of the PRoW has been mitigated as far as possible and represents a local harm to a short route (approximately 700m).

5. REPRESENTATIONS MADE RELEVANT TO MY EVIDENCE

5.1 Introduction

5.1.1 This section addresses the representations and objections made by third parties and statutory consultees that are relevant to landscape and visual matters. I have reviewed the consultation responses submitted during the statutory public consultation periods, as well as those presented in written representations, hearing statements, and local authority reports.

5.1.2 Where representations relate specifically to landscape character, visual amenity, design integration, or the adequacy of the proposed mitigation strategy, I have assessed their substance in the context of my professional judgement and the methodology adopted in the LVIA.

5.1.3 The comments reviewed include those from:

- Statutory consultees, including National Trust;
- Planning Authorities including South Cambridgeshire District and Cambridge City Councils; and
- Local residents and community groups, including Cambridge Past, Present & Future (CPPF).

5.1.4 The following subsections set out the main themes raised in relation to landscape and visual issues, alongside my response to each, based on the findings of the assessment and my professional evaluation of the likely effects of the proposed scheme.

5.2 Representations by National Trust (NT) (CD2-0bj-250)

The Main issues raised

- **Paragraph 8** - the NT's Senior National Consultant - Landscape Planner has reviewed the proposals in terms of the landscape and visual impact and concluded that the proposals would amount to a slight adverse impact on the character of the covenanted land.
- **Paragraph 21** - With regard to the deemed planning permission condition on hard and soft landscaping, the NT consider the details required as part of this condition are of particular relevance to the NT's interests and consider that consultation should take place with the NT to ensure that the design of the hard and soft landscaping scheme is acceptable in respect of the covenanted land.
- **Paragraphs 35-41** - The NT have concerns regarding the potential negative impact of the Scheme on the landscape within the National Trust's covenanted land at Coton. The NT's concern is rooted in whether the Scheme would erode the rural, agricultural character of the area south of Madingley Road and that the visual presence of the busway, though less severe, would diminish the quality of views from Red Meadow Hill. They also suggest that it will have the effect of subdividing and fragmenting Coton Orchard into two sections.
- The National Trust agrees with the methodology and overall conclusions of the LVIA, which they believe follows best practice. However, they consider the LVIA to slightly underestimate the magnitude of change and sensitivity of the landscape. Despite these concerns, they do not believe these issues would elevate the environmental effects to a significant level under Environmental Impact Assessment (EIA) criteria. The NT finds the overall landscape and visual effects to be noticeable but manageable, and largely in line with the

LVIA's conclusions, rating them as slight to moderate adverse, which they believe can be accommodated without too much harm.

- Despite this the NT suggest a more rural design for earth bunds near Madingley Road to reduce agricultural land loss and visual impact and recommend that the impact on Coton Orchard is best addressed by restoring the areas of Coton Orchard that have previously fallen out of production.

- **Paragraphs 42-45** – The NT present concerns over the judgement of the scale of effect for the Bourne Tributaries Lowland Farmlands landscape character area, notably the value, susceptibility and magnitude of change.

My Responses

- The NT suggestion that consultation should take place with the NT to ensure that the design of the hard and soft landscaping scheme is acceptable in respect of the covenanted land and there will be opportunity for consultation during the detailed design stage.

- I disagree with the points raised by NT on the impact of the Scheme particularly on land south of Madingley Road and on views from Red Meadow Hill.

5.2.1 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**].

- Whilst the Scheme does bisect Coton Orchard from west to east, the route through the orchard minimises the required land take and aims to reinforce the presence of the existing orchard and the unique biodiversity habitat it creates, as well as reflecting the historical landscape feature of the area [**CD1-17, Section 09, Page 35**].

- It is my professional opinion that, through these measures, the Proposed Scheme minimises the landscape impact on the land south of Madingley Road and Coton Orchard.

- It is noted the NT does not feel that any adjustments to the assessment would result in a scale of effect on receptors considered to be significant in terms of Environmental Impact Assessment, that the conclusions of the LVIA are therefore largely agreed, and that the level of effect is judged to be something that could be accommodated without too much harm.

- In the NT assertion that the scale of effect for Bourne Tributaries Lowland Farmlands LCA is underrated (**CD2-0bj-250 - Paragraph 43**) they have misinterpreted the assessment of effects within the LVIA which does not, as presented in its objection, assess the effect of the Proposed Scheme on covenanted landscape within the various LCA receptors. The assessment, in line with its methodology, considers the likely effect of the Proposed Scheme on the whole of the Landscape Character Area.

- I draw on the meeting and subsequent correspondence with Paul Bryan on behalf of NT on 10 June 2024 (**CD26-01-APP-W5-2 – Appendix D**). I note that Paul Bryan considered the assessment methods to accord with accepted practice and also note that the overall conclusion, vis identification of likely significant effects, was endorsed.

- The LVIA accommodates the orchard's landscape sensitivity within its assessment of the LCA sensitivity. The assessment recognises the importance of the orchard attributing overall value, susceptibility and sensitivity to the Bourn Tributaries Lowland Farmlands LCA. The medium sensitivity we describe recognises landscapes of local or regional recognition of importance, able to accommodate some change (i.e. features worthy of conservation, some sense of place or value through use/perception).

- 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.

Conclusions on Representations by NT on covenanted land

5.2.2 It is my professional opinion that the embedded mitigation has considered the sensitivity of landscape features, character and views, and that the assessment of sensitivity (value and susceptibility) and magnitude of impact and subsequent significance of effect has been carried out in accordance with best practice and the Proposed Scheme would not result in a significant effect on the Bourn Tributaries Lowland Farmlands landscape character area.

5.3 Representations by CPPF (CD2-OBJ 251)

The Main issues raised

- **paragraph 39-40** –CPPF recognise that the LVIA is on the whole is competent and thorough but argue the assessment is unconvincing in its appreciation of the sensitivities of the landscape character and visual amenity of the area to the west of Cambridge as well as the value that area has to the city and as such has underestimated the sensitivity of two local landscape areas 1) to the north and east of Coton and, 2) the narrow farm access off Grange Road (Rifle Range Lane) and its adjoining landscape immediately to the west of Bin Brook (West Fields);

- **SoC paragraph 36** - CPPF argue the LVIA does not sufficiently recognise the value of the openness of the countryside with its long and open views. It is additionally said to be unconvincing in its appreciation of the sensitivities of the landscape character to the west of Cambridge.

My Responses

- I do not agree that the assessment has not appreciated the sensitivity and value of the landscape to the west of Cambridge and underestimated the sensitivity of two local landscape areas. The LVIA's assessment of landscape sensitivity [**CD1-11.08.1-Table TR8-1-1**], particularly TCA2 West Cambridge and LCA 3B Bourn Tributaries Lowland Farmlands, has been conducted in accordance with the methodology underpinned by GLVIA3 guidelines on landscape effects [**Chapter 5, Section 5.38-5.47, Page 88-90**] and assesses the value, susceptibility, and sensitivity of the landscape in a suitable manner.

- The methodology included extensive site surveys during winter and summer across the landscapes and townscapes likely to be affected by the Proposed Scheme to fully appreciate their sensitivities along with a review of published landscape character assessments [**CD1-11.08.2- Section 2.1.2**]. The area to

the north and east of Coton cover two published landscape character areas (LCAs), LCA 3B Bourn Tributaries Lowland Farmlands [**CD18-02 – Page 78-80**], and LCA 4B Lolworth to Longstowe Wooded Claylands [**CD18-02– Page 97-99**], both of which were assessed with a medium value, medium susceptibility to change, and a medium resultant sensitivity.

- I disagree that the assessment has not fully appreciated the sensitivities of the LCAs which are acknowledged to have distinctive local features and characteristics such as historic parkland, open views, Coton Countryside Reserve, and the green corridor which contributes to the setting of the city, along with some detracting elements including existing road infrastructure that conclude in a medium sensitivity for the landscape character areas. This is consistent with the methodology, which recognises that undesignated areas with locally valued landscapes or distinguishing features worthy of conservation, albeit with evidence of some degradation or some detracting elements fall are typically of medium sensitivity [**CD1-11.08.2- Table TR8.1-2-1**].

- With regard to Rifle Range Lane and its adjoining landscape immediately west of Bin Brook (West Fields), it is not reasonable to assume that effects on views and visual amenity, including embedded mitigation, from specific receptors correlate to a similar assessment of effect on landscape character. Assessment of effects on landscape receptors include the physical impact on the landscape fabric along with the elements, or combinations of elements, which make a particular contribution to landscape character, while the visual receptor assessment evaluates the impact of change on what people can see and experience visually. As set out in GLVIA3 [**Section 2.20-2.22 – Page 21**] they are related but separate assessments, using distinct approaches and may result in different judgments of significance. Assumptions that judgements of impact on visual receptors equate to a similar judgement of impact on landscape character are not applicable.

- I also do not agree that the LVIA does not sufficiently recognise the value of the openness of the countryside. The LVIA gives appropriate and proportionate recognition to the openness of the countryside along the proposed route, particularly in relation to visual connectivity, expansive rural views, and topographical context when assessing the susceptibility of the landscape receptors to the Proposed Scheme [see **CD1-11.08.1, Table TR8-1-1**]. The assessment of landscape sensitivity identifies key locations where openness is a defining landscape feature, notably in LCA 3B and LCA 4B of **CD1-11.08.1, Table TR8-1-1**, and from the Coton Countryside Reserve, and incorporates these into its analysis of landscape and visual sensitivity. Fieldwork, Zone of Theoretical Visibility (ZTV) analysis, and photomontages were used to assess both short and long-range views, ensuring that openness and visual exposure were key considerations to judgments on landscape sensitivity, magnitude of impact, and subsequent significance of effect.

- The LVIA also explicitly acknowledges the distinctive character of the west of Cambridge including TCA 2, where a corridor of rural land penetrates the urban form of Cambridge [see **CD1-11.08.1, Table TR8-1-1**]. This area, while of high value due to its townscape quality and proximity to heritage assets, is also identified as having low susceptibility to change due to its existing urban fabric and infrastructure context. The assessment recognises that while the area includes a transitional landscape edge, it is capable of accommodating well-designed change with minimal disruption to its landscape character. For LCA 3B, the LVIA identifies a moderately sensitive rural landscape shaped by shallow valleys, open arable fields, and key features such as Coton village and Coton Orchard. The assessment recognises localised areas of heightened sensitivity, especially in the Bin Brook valley and the Coton Countryside Reserve, where openness, tranquillity, and views towards Cambridge contribute to a strong sense of place.

Conclusions on Representations by CPPF

5.3.1 I disagree with the CPPF representations that the assessment has underestimated the sensitivity of two local landscape areas. It my professional opinion that the assessment was carried out in accordance with best practice and assesses the value, susceptibility, and sensitivity of the landscape in a suitable manner.

5.4 Representations by CCC and SCDC

The Main issues raised

5.4.1 The councils do not raise any issues of contention but note the ongoing design Scheme required to deliver a high quality and integrated landscape design.

My Responses

- The council's position regarding further landscape design Scheme and specific areas of sensitivity noted for attention at the condition release stage are noted and will be considered at the detailed design stage.

Conclusions on Representations by CCC and SCDC

5.4.2 The representations made by CCC and SCDC are noted and will be brought forward to the detailed landscape design stage.

6. OTHER ISSUES RAISED BY THIRD PARTIES

6.1 Introduction

6.1.1 Coverage of general landscape criticism in various objection letters

6.2 Objection by J Sadler (landowner) (CD2-OBJ 102)

The Main issues raised

- Mr. Sadler objects to the Proposed Scheme siting the erosion of *'the unique character of Madingley Hill and surrounding area'*.

My Responses

- I disagree with Mr. Sadler's position regarding the erosion of the unique character of Madingley Hill and surrounding area. Madingley Hill is located within one published landscape character area, Greater Cambridge Landscape Character Assessment, LCA 4B Lolworth to Longstowe Wooded Claylands [**Page 97**]. The assessment recognises the area's distinctive parkland features including Madingley Hall, its rectilinear arable fields and wide, open views towards Cambridge contributing to a unified, peaceful character with a diverse rural landscape and a strong sense of place. There is, however, no national or regionally designated landscapes present, occasional vertical features interrupting the skyline include telegraph poles, distant pylons and turbines, and the area is influenced by existing infrastructure which erodes tranquillity. As the published landscape character assessment makes no reference to, nor implies, Madingley Hill possessing a unique character, any claims to its distinctiveness are unsubstantiated and lack evidential support.

- It is my professional opinion that the assessment of sensitivity (value and susceptibility) and magnitude of impact and subsequent significance of effect has been carried out in accordance with best practice and the Proposed Scheme would not result in a significant effect on the LCA 4B Lolworth to Longstowe Wooded Claylands, including Madingley Hill and surrounding areas.

Conclusions on Representations by J Sadler

6.2.1 I disagree with Mr. Sadler's suggestion that the area around Madingley Hill has a unique character and that the Proposed Scheme threatens to cause irreversible harm to the unique and valuable natural environment. It is my professional opinion that the LVIA has been carried out in accordance with best practice and that the Proposed Scheme is unlikely to cause irreversible harm to Madingley Hill and the surrounding areas.

6.3 Objection by N Maguire (PX FARMS) (CD2-OBJ 252)

The Main issues raised

- Mr. Maguire objects to the Proposed Scheme citing the present plans fail to incorporate adequate provision to reduce the visual intrusion of the Travel Hub on the adjoining residential properties.

My Responses

- I disagree with Mr. Maguire's assertion that the Proposed Scheme lacks adequate provision to reduce visual intrusion on adjoining residential receptors. The proposed travel hub is located directly south of the residential properties on Scotland Road. The Design and Access Statement [**CD1-17, Section 12, Page 43-44**] outlines a site specific design approach that incorporates a range of visual mitigation measures. The Proposed Site Plans [**CD1-16.04 – Sheet 7**] and the Proposed Site Section [**CD1-16.05 - Sheet 5 - Section 18**] illustrate the soft landscaping proposals at the Travel Hub.

- Specifically, the proposals include boundary woodland planting surrounding the Travel Hub. This planting scheme is intentionally designed to screen the site from surrounding views and includes a mix of tree species selected to create a compact canopy. Fast-growing species such as *Populus alba* and *Populus tremula* (white poplar and trembling aspen) have been included to provide early height and structure, thereby enhancing the screening effect in the short to medium term.

- In addition to the perimeter planting, the soft landscaping strategy within the Travel Hub includes a network of planted 'green fingers' comprising trees and shrubs. These landscape elements serve to break up and soften the visual impact of the internal grid layout of the car park, further reducing the overall visual prominence of the scheme from nearby residential viewpoints.

- In my professional opinion, the proposals set out in the submitted documentation adequately and proportionately reflect a mitigation strategy appropriate for a development of this nature and scale. The combination of site-specific landscaping, screening measures, and internal softening of the hardstanding has been carefully designed to minimise adverse visual effects on surrounding residential properties.

Conclusions on Representations by N Maguire

- I disagree with Mr. Maguire's suggestion that the present plans fail to incorporate adequate provision to reduce the visual intrusion of the Travel Hub on the adjoining residential properties. It is my professional opinion that the Proposed Scheme incorporates a proportionate and well-considered package of mitigation measures appropriate to its scale, nature, and context. The combination of strategic planting, screening, and internal soft landscaping will reduce the visual presence of the Travel Hub from adjacent residential properties.

7. CONCLUSIONS

7.1.1 In conclusion, it is my professional opinion that the proposed CtoC scheme has been subject to a robust and proportionate landscape and visual assessment, carried out in accordance with recognised guidance, including GLVIA3. The methodology was provided during EIA Scoping, and no concerns were raised regarding its scope or approach. It is my opinion that the LVIA assesses the value, susceptibility, and sensitivity of the landscape in a suitable manner, including Coton Orchard.

7.1.2 While some adverse landscape and visual effects are predicted, particularly in the short term and in close proximity to sensitive visual receptors, these are generally localised and have been addressed through careful alignment, integrated design, and a comprehensive mitigation strategy. As the new planting establishes throughout the operational period, it will enhance visual amenity and further screen the CtoC Scheme from the receptors. In this instance following establishment of embedded mitigation planting, adverse effects are not anticipated to be significant for any of the visual receptors apart from R19 PRoW (Coton 55/2).

7.1.3 No nationally or locally designated landscapes would be significantly affected, and no landscape or visual effects are considered unacceptable in planning terms. Furthermore, the scheme offers opportunities for landscape enhancement, including new green infrastructure and long-term improvements to visual containment and character along parts of the route. I therefore consider the scheme to be acceptable in landscape and visual terms, and that it does not present a barrier to the grant of consent.

8. STATEMENT OF TRUTH

The evidence which I have prepared and provide 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.