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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

Rebuttals of

Ralph Lewis MSc, BA(Hons), MRTPI of WSP

On behalf of Cambridgeshire County Council

9th September 2025

Planning Inspectorate Reference: DPI/E0535/25/1

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1. INTRODUCTION

1.1.1 This rebuttal has been prepared in response to the Proof of Evidence submitted by Objectors to the Applicants proposals for the Cambourne to Cambridge scheme.

1.1.2 My name is Ralph Lewis. I am an Associate Director in the Infrastructure Planning Team at WSP. Details of my qualifications, professional career and key project experience are contained in my Proof of Evidence **[CD26-01-APP-W10-1]**.

1.1.3 This rebuttal has been prepared with the expectation that it will assist the Inspectors with consideration of the issues raised.

1.1.4 The fact that a point has not been responded to should not be taken as indicating that it is accepted.

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 the following individuals:

- Ms Anna Gazeley
- Mr Edward Leigh
- Mr James Littlewood
- Ms Jessica Wilson

3. REBUTTAL: MS ANNA GAZELEY

3.1 Introduction

3.1.1 This initial response to Ms Anna Gazeley's Proof Of Evidence seeks to rebut her comments seen at section: "Supplementary Notes on Updated Matters on pages - A" (seen on pages 11-13), looking at her concerns around funding of the Greater Cambridge Partnership and the tree transplantation.

3.2 Rebuttal in Relation to Mr Anna Gazeley comments on 'Time Limited' Fundings concerns

3.2.1 On Page 13 of her PoE Ms Gazeley states:

"Even if one were to accept the transplant proposals at face value, the question of delivery remains unresolved. The Greater Cambridge Partnership the architect of the scheme and its proposed mitigation is a time-limited body funded under the City Deal4, currently expected to disband by 2030. Meanwhile, Cambridgeshire County Council, the applicant, is itself the subject of ongoing national discussions around local government reorganisation, with unitary authority models5 under active consideration. In both cases, the institutions proposing long-term ecological management may not exist in the timescales required to monitor, support, or enforce it. How, then, is the public to have confidence that these mitigation offers are anything more than sleight of hand designed to secure consent now, without any credible mechanism for accountability or consequence in the years to come?"

3.2.2 Ms Gazeley's concerns about the longevity of the Greater Cambridge Partnership (GCP) and its proposed mitigation strategy misunderstands both the institutional framework underpinning the scheme and the robustness of the planning mechanisms available to secure long-term environmental outcomes. Her assertion that the GCP is a "time-limited body" whose mitigation commitments lack enforceability overlooks the statutory safeguards embedded within the Transport and Works Act Order (TWAO) process and the planning system more broadly.

3.2.3 While it is correct that the GCP was established under the City Deal and operates within a defined funding horizon, this does not diminish the enforceability of mitigation measures secured via planning conditions. The delivery of mitigation including tree protection, transplantation, and aftercare is not contingent on the continued existence of the GCP as an entity. Rather, it is secured through binding conditions attached to the deemed planning permission granted under the TWAO, which are enforceable by the local planning authority irrespective of the delivery body. These conditions will require detailed arboricultural method statements, root pruning schedules, and post-transplant monitoring regimes, all of which are subject to approval and compliance checks. The applicant's commitment to a three-year preparatory period and a decade of aftercare is not aspirational it is a deliverable programme that will be embedded in the consent framework.

3.3 Rebuttal in Relation to Mr Anna Gazeley comments on 'Tree Transplantation and use of Conditions

3.3.1 On page 13 of her PoE Ms Gazeley states:

"The applicant claims that apple trees T6, T7, and T8 are "of sufficient size and condition to allow for successful transplanting," contingent on a lead-in time of up to three years for root pruning, followed by a decade of monitoring and recovery. But this timeline alone casts doubt on the scheme's feasibility. A three-year preparatory period, followed by ten years of fragile aftercare, does not align with the applicant's own programme for delivery. Nor is it clear whether the translocation methods referenced are based on studies involving fruit trees particularly ones as extensively hollowed and structurally delicate as these Bramleys. Veteran fruit trees differ significantly from parkland specimens or amenity trees in both physiology and ecology. Their age, internal decay, and reliance on complex soil-microbe relationships make them particularly vulnerable to stress and root disturbance. The suggestion that these century-old trees could be relocated without fatal consequence is not only unsupported it is implausible."

3.3.2 Ms Gazeley's claim that veteran fruit trees cannot be successfully transplanted is presented as categorical, yet it fails to acknowledge the nuanced position set out in the Environmental Statement Addendum. The applicant has not proposed wholesale translocation of all veteran trees, but rather a targeted approach based on arboricultural

assessment of individual specimens. Trees T6, T7, and T8 have been identified as viable candidates for transplantation due to their structural condition and root zone accessibility. The proposed methodology draws on best practice guidance and includes staged root pruning, soil conditioning, and phased relocation to minimise stress. While it is accepted that veteran trees present challenges, the applicant's approach is proportionate, evidence-led, and subject to ongoing expert review.

3.3.3 Moreover, the suggestion that the mitigation strategy is "ecological fiction" is both emotive and inaccurate. The scheme includes not only transplantation but also extensive compensatory planting, hedgerow enhancement, and habitat creation measures designed to deliver biodiversity net gain and to be secured under condition. These measures are not discretionary they are integral to the scheme's compliance with national policy, including the NPPF's requirements on irreplaceable habitats and biodiversity enhancement. The planning conditions will ensure that mitigation is not only delivered but maintained, with clear lines of accountability and enforcement.

3.3.4 In summary, Ms Gazeley's concerns about institutional longevity and ecological feasibility are unfounded. The mitigation strategy is credible, enforceable, and can be secured by planning conditions. The applicant has demonstrated a clear commitment to environmental stewardship, and the mechanisms to secure that commitment are robust and enduring.

4. REBUTTAL: MR EDWARD LEIGH

4.1 Introduction

4.1.1 My following response to Mr Edward Leigh's Proof Of Evidence seeks to rebut his comments seen at section: 4.3 "Bourne Airfield Development (seen on pages 14-16), looking at his comments around condition 13 attached to the Bourne Airfield planning permission **[CD4-06]**.

4.2 Rebuttal in Relation to Mr Edward Leigh's comments on Potential changes to the Conditions attached to the Bourne Airfield Planning Permission

4.2.1 On page 14 of his PoE and in relation to condition 18 of the Bourne Airfield planning permission **[CD4-06]**, Mr Leigh states:

*"The first point to note is that both the planning condition and Section 106 Agreement **[CD4-09]** allow for "an equivalent scheduled rapid mass transit passenger carrier service", which would cover either an enhanced (Bus Rapid Transit-style) bus service or a new rail service.*

The second point to note is that planning conditions and obligations must pass a test of necessity ("necessary to make the development acceptable in planning terms"), set out

in paragraph 100ZA (2) of the Town and Country Planning Act 1990 and paragraph 122(2) the Community Infrastructure Levy Regulations 2010 (also reproduced in paragraph 58 of the NPPF [CD8-01]).

This means that if a future Transport Assessment produced by the Applicant and accepted by the Highway Authority demonstrated that building more than 500 dwellings would not have a severe cumulative impact on the road network (paragraph 116 of the NPPF), the Applicant could apply to vary the condition, and the Planning Authority would need to reassess whether the threshold set in condition 13 continued to pass the regulatory test. Factors that will affect this assessment will include the completion of the A428 upgrade between Cambourne and the A1, due in 2027, and the timescale for the delivery of East West Rail.

The third point to note is that the schedule for the construction of the CtoC busway is likely to delay occupation of dwellings on Bourn Airfield beyond the 500th, especially taking into account the recommendations in the Environmental Statement Addendum [CD1-10.06 §2.3.10] for "an optimum lead time of up to three years (or at least two dormant seasons) for root pruning prior to transplanting" the veteran trees in the Coton Orchard. If slow or late delivery of the CtoC busway binds upon planning condition 13, the developer will then have a strong incentive to apply to vary the condition in order to continue selling homes.

Building the CPPF Alternative, and thereby satisfying planning condition 13, would remove any uncertainty or delay in continuing to build out Bourn Airfield beyond 500 dwellings."

4.2.2 Mr Leigh's argument that the Cambridge Past, Present and Future (CPPF) alternative routing option would satisfy the planning condition attached to the Bourn Airfield development is fundamentally flawed. His interpretation of Condition 13 of the outline planning permission fails to reflect both the wording and the strategic intent of the condition, and his suggestion that the CPPF scheme could be delivered in a way that unlocks full build-out is not supported by the evidence base or the policy framework.

4.2.3 Condition 13 is explicit in its requirement that no more than 500 dwellings shall be occupied until "the Cambourne to Cambridge busway is operational between the new settlement hereby permitted and Cambridge." The condition goes on to define this busway as comprising a public transport route, a new travel hub, and new cycling and walking facilities. While it allows for "an equivalent scheduled rapid mass transit passenger carrier service," this is not a carte blanche for any alternative routing. The equivalence must be demonstrated in terms of operational capacity, journey time reliability, and strategic connectivity. The CPPF alternative, which relies on in-highway interventions along Madingley Road, does not meet these criteria. In addition the CPPF

alternative is not deliverable for the reasons given by other witnesses including Mr Lonergan.

4.2.4 Mr Leigh's assertion that the CPPF route could be delivered more quickly and therefore unlock housing delivery sooner is speculative and ignores the practical and legal complexities of implementing significant highway modifications within constrained corridors. The Applicant's scheme has already undergone detailed design, environmental assessment, and public consultation. It is supported by a comprehensive Environmental Statement and a Transport and Works Act Order application. In contrast, the CPPF proposal remains conceptual, lacks statutory underpinning, and has not been subject to the same level of scrutiny or technical validation.

4.2.5 Moreover, the CPPF route does not provide the level of segregation, priority, or journey time reliability required to support the scale of development at Bourn Airfield. The Local Plans specifically South Cambridgeshire Local Plan Policy SS/7 and the Transport Strategy for Cambridge and South Cambridgeshire envisage a step-change in public transport provision to support strategic growth. This includes a dedicated, high-quality public transport corridor with significant priority measures. The Applicant's scheme delivers this through a largely segregated busway with priority at junctions and integration with active travel infrastructure. The CPPF alternative, by contrast, relies on shared carriageway space and signal optimisation, which cannot guarantee the same level of performance or resilience.

4.2.6 It is right to say that the law provides a procedure which would allow a different condition to be substituted when granting a further planning permission (under the provisions of section 73 of the Town and Country Planning Act 1990. However, it is my view that no such planning permission is likely to be granted. The condition was imposed to ensure that the development is supported by adequate infrastructure. Any variation would require robust evidence that an alternative scheme delivers equivalent outcomes. Given the limitations of the CPPF proposal, such a variation would be difficult to justify and would be likely to face significant scrutiny from the local planning authority and statutory consultees.

4.2.7 Finally, Mr Leigh's claim that the CPPF route would remove uncertainty and delay is contradicted by the delivery programme and funding mechanisms already in place for the Applicant's scheme. The Greater Cambridge Partnership has secured funding, developed a detailed programme, and aligned the scheme with the housing trajectory and infrastructure phasing. The CPPF alternative introduces uncertainty, lacks funding clarity, and risks undermining the coordinated delivery of housing and transport infrastructure.

4.2.8 The Proof of Evidence **(CD26-08-W6-1)** submitted by Jessica Wilson of Newsteer Real Estate Advisors acknowledges this potential delay, however her assessment in

paragraphs 6.5 to 6.7 of her Proof of Evidence significantly underrepresents the implications of delay should the current Cambourne to Cambridge Guided Busway proposal be refused in favour of an alternative alignment. While she acknowledges that a delay of 18 to 20 months would be incurred, she characterises this as acceptable in light of perceived planning harms. This view fails to account for the strategic urgency and cumulative public benefits embedded in the current scheme, and overlooks the broader policy context in which timely delivery is paramount.

4.2.9 The current proposal is the product of extensive technical, environmental, and stakeholder scrutiny, and has reached a stage of maturity that positions it for delivery within a defined and achievable programme. To suggest that a wholesale redesign, consultation, and reapplication process could be undertaken within 18–20 months is speculative and optimistic. In reality the procedural requirements of a new Transport and Works Act Order, including environmental assessment, statutory consultation, and public inquiry, would likely extend well beyond that timeframe particularly given the contentious nature of the alternative route and its own potential impacts.

4.2.10 Our estimates suggest that a far longer delay than Jessica has suggested would be incurred given the range stages that would need to be undertaken potentially pushing that new decision out to late 2029, only allowing for construction from 2023 onward. The table below maps out the likely timing and stages:

Stage	**Date**
Current Public Inquiry outcome	September 2026
Executive Board agreement on way forward	End 2026
Re-Consultation on new proposal	Spring / Summer 2027
Executive Board Decision to Proceed	Autumn 2027
Full Council decision to re-submit TWOA	December 2027
Re-submission of TWAO	June 2028
Full Council ratification	August 2028
New Public Inquiry	Early 2029
Decision	Late 2029
Construction	2030-2032

Table 1 – Indicative timeframe for resubmission of TWAO

4.2.11 Ms Wilson's argument also does not adequately weigh the cost of delay against the benefits foregone. The current scheme unlocks modal shift from private car use, reduces congestion on key radial routes, and supports key housing growth in the Greater Cambridge area. A delay of even two years would mean continued reliance on

unsustainable transport modes, increased carbon emissions, and missed opportunities for economic uplift and social connectivity.

4.2.12 Finally, Ms Wilson's suggestion that the benefits of the scheme could be "substantially the same" via an alternative alignment is unsubstantiated. The current proposal offers a higher degree of segregation, reliability, and journey time savings, which are critical to behavioural change. The alternative route would compromise these benefits and introduce new risks. In this context, the delay associated with refusal is not a neutral planning consideration it is a material harm that weighs heavily in favour of consent. I provide additional rebuttals to points made by Ms Wilson at section 6 below.

4.2.13 It must also be recognised that a multiyear delay will take the delivery of the guided busway outside the lifespan of Greater Cambridge Partnership, so a new Executive Board would have to then decide on Adam's Road.

4.2.14 In summary, the CPPF alternative does not meet the requirements of Condition 13, does not deliver the strategic transport benefits envisaged by the Local Plans, and cannot be relied upon to unlock the full build-out of Bourn Airfield. The Applicant's scheme remains the only deliverable, policy-compliant solution capable of supporting the scale and timing of development required.

5. REBUTTAL: MR JAMES LITTLEWOOD

5.1 Introduction

5.1.1 My following response to Mr James Littlewood's Proof Of Evidence seeks to rebut his comments seen at section 5 (Local Planning Policy) namely paragraphs 5.1-5.10, seen at pages 9-11.

5.2 Rebuttal in Relation to Mr James Littlewood comments on Planning Policy

5.2.1 On paragraph 5.3 and 5.9 of his PoE and in relation to Mr Leigh states:

"In fact, South Cambridgeshire Local Plan [CD6-02] Policy SS/7 only uses the term segregated in relation to the section from Cambourne to the junction of St Neots Road with Highfields Road. In relation to the section eastwards from A1303/A428 junction SS/7 8(a)(iii) states 'Provision of high-quality bus priority measures or busway on or parallel to the A1303 between its junction with the A428 and Queens Road, Cambridge.' Note it says, 'on or parallel'. There is no local planning justification that the improvements to public transport have to be provided by an off-road busway".

"In summary, there is a policy requirement for a scheme to improve public transport between Cambourne and Cambridge but there is not a policy requirement for it to be a new road segregated from the highway, indeed the Applicant's scheme runs on the highway for a considerable length".

5.2.2 Mr Littlewood's interpretation of Local Plan policies SS/7 and SS/8 is overly narrow and fails to engage with the strategic objectives embedded within the Greater Cambridge planning framework. His reading of SS/7(8)(a)(iii), which references "high-quality bus priority measures or busway on or parallel to the A1303," is presented as a constraint on the Applicant's proposed off-road alignment. However, this clause is not prescriptive in terms of exact routing it is indicative of the corridor within which strategic transport improvements are expected. The phrase "on or parallel to" clearly allows for flexibility in alignment, acknowledging the need to respond to topographical, environmental, and operational constraints. The Applicant's scheme, which includes a segregated busway running adjacent to the A1303 corridor, is entirely consistent with this policy .

5.2.3 Moreover, Mr Littlewood's interpretation of SS/8(12)(b) as requiring bus priority "on the A1303" misrepresents the breadth of interventions envisaged by the policy. The term "segregated bus priority measures" encompasses a spectrum of infrastructure solutions, including dedicated lanes, busways, and grade-separated alignments. The Applicant's proposal delivers precisely this: a high-quality, largely segregated public transport corridor that enhances journey time reliability, supports modal shift, and unlocks development potential. The policy's supporting text reinforces this ambition, highlighting the need for "quick journeys, greater patronage, and improved safety." These outcomes cannot be achieved through minor upgrades to existing highway infrastructure alone. The off-road busway is not a deviation from policy it is the embodiment of its strategic goals.

5.2.4 Mr Littlewood also fails to acknowledge the weight of supporting evidence that underpins the Local Plan's transport strategy. The Transport Strategy for Cambridge and South Cambridgeshire (TSCSC), the Cambridgeshire Local Transport Plan, and the Greater Cambridge Partnership's own evidence base all point to the need for transformative public transport infrastructure along the A428 corridor. The Applicant's scheme is the product of extensive technical appraisal, public consultation, and policy alignment. It is not an opportunistic deviation from plan-led growth it is the mechanism by which that growth is sustainably delivered.

5.2.5 Turning to the housing trajectory, Mr Littlewood's argument that development at Cambourne West and Bourn Airfield is not dependent on the busway is both technically and practically flawed. While it is true that outline planning permissions have been granted for these sites, their delivery is subject to phasing conditions that explicitly tie occupation thresholds to the operational status of the busway or equivalent mass transit provision. In the case of Bourn Airfield, the planning consent includes a condition that limits occupation to 500 dwellings until the busway is operational. This is not a theoretical linkage it is a binding development control mechanism that reflects the infrastructure dependency of the site.

5.2.6 The Greater Cambridge Housing Trajectory (April 2025) provides further clarity. It shows that while Cambourne West is progressing, Bourn Airfield's trajectory assumes the delivery of the busway to unlock full build-out. The trajectory includes stepped delivery assumptions that align with the anticipated phasing of transport infrastructure. This is not incidental it is a reflection of the spatial strategy embedded in the adopted Local Plans. The housing trajectory is not merely a record of past completions; it is a forward-looking tool that models delivery against infrastructure capacity, policy compliance, and market conditions. Mr Littlewood's attempt to decouple housing delivery from transport infrastructure ignores the interdependencies that underpin the trajectory's assumptions.

5.2.7 Furthermore, the trajectory demonstrates that the cumulative housing delivery across Greater Cambridge is predicated on the timely implementation of strategic transport infrastructure. The Applicant's scheme is a cornerstone of that strategy. It supports modal shift, mitigates congestion, and enables sustainable growth in accordance with the spatial vision of the adopted Local Plans. The Local Plans do not envisage piecemeal growth served by incremental highway upgrades they envisage compact, sustainable communities served by high-quality public transport. The busway is not ancillary to this vision it is central to it.

5.2.8 Mr Littlewood's suggestion that the CPPF alternative would deliver equivalent benefits is unsubstantiated and fails to account for the operational limitations, environmental trade-offs, and delivery risks associated with retrofitting constrained highway corridors. The CPPF proposal relies heavily on in-highway interventions that are vulnerable to congestion, lack resilience, and offer limited journey time savings. In contrast, the Applicant's scheme provides a dedicated corridor with priority at junctions, grade separation where necessary, and integration with active travel infrastructure. It is a future-proofed solution that aligns with the Local Transport Plan's ambition for "transformational public transport."

5.2.9 It is also worth noting that the housing trajectory is not a static document it is reviewed annually and informs the calculation of five-year housing land supply. Any slippage in infrastructure delivery has direct implications for delivery of 3000 homes on the designated housing allocation at Bourne Airfield. The Applicant's scheme provides certainty and capacity. It enables the full delivery of strategic sites and supports the spatial distribution of growth envisaged by the Local Plans. Mr Littlewood's attempt to downplay this role is not supported by the evidence base, the policy framework, or the practical realities of development control.

5.2.10 In summary, the Applicant's scheme is not only consistent with adopted policy it is essential to its delivery. The Local Plans envisage a step-change in public transport provision to support growth in the A428 corridor. The busway is the mechanism by which that vision is realised. The Greater Cambridge Housing Trajectory reinforces the interdependency between infrastructure and housing delivery. Mr Littlewood's

interpretation seeks to decouple this relationship, but the evidence base, policy framework, and delivery conditions all point to the contrary.

5.2.11 The rebuttal to section 5 (*Planning Policy*) of Mr Littlewood's Proof of Evidence is therefore clear: the Applicant's scheme is policy-compliant, strategically necessary, and operationally superior. It enables housing delivery, supports modal shift, and aligns with the spatial vision of Greater Cambridge. The Local Plans do not envisage growth without infrastructure they envisage growth because of it. The busway is not a deviation from policy it is its delivery mechanism.

5.3 Rebuttal in Relation to Mr James Littlewood comments on Green Belt 'Openness'

5.3.1 This next section seeks to respond and rebut elements of section 6 (Green Belt) of James Littlewoods Proof of Evidence, namely paragraphs 6.5 (openness of green belt).

5.3.2 At paragraph 6.5, Mr Littlewood states:

"Our position is that the proposed bus road does not preserve the openness of the Green Belt because:

(i) Whilst the Scheme might be seen in context with the existing roads where it is close to those roads (for example crossing the M11 or close to Hardwick), for most of the length between Long Road and Coton Orchard the Scheme runs through open countryside well removed from the existing roads.

(ii) The Scheme will remove sections of the hedgerows which currently provide visual containment. Due to the straight design of the Scheme and the missing sections of hedge the Scheme will open up the landscape with highly visible road infrastructure.

(iii) The Scheme will introduce buses travelling at 50mph on a new road in the countryside, through the open Green Belt.

(iv) The Scheme will introduce urban style bus stop infrastructure in the open Green Belt near to Coton village".

5.3.3 Mr Littlewood's assertion that the Applicant's scheme fails to preserve the openness of the Green Belt mischaracterises both the physical form of the proposed development and the policy context in which openness is assessed. His argument hinges on a visual interpretation of openness that overlooks the nuanced planning definition established in national and local policy, and fails to account for the embedded mitigation and landscape integration measures within the Applicant's scheme.

5.3.4 Openness in Green Belt terms is not synonymous with visual emptiness it is a spatial concept encompassing both the absence of built form and the degree to which development alters the character and function of the land. The proposed busway, while introducing engineered infrastructure, does so in a linear, low-profile manner that avoids

massing, enclosure, or urbanization. The scheme's alignment has been carefully designed to follow existing contours, minimize cut and fill, and integrate with established vegetation corridors. Where hedgerow removal is necessary, replacement planting and ecological enhancement measures are proposed, ensuring that the scheme does not result in a net loss of containment or landscape permeability.

5.3.5 Mr Littlewood's claim that the scheme "opens up the landscape" is contradicted by the Applicant's Landscape and Visual Impact Assessment (LVIA), which demonstrates that the route benefits from substantial visual containment particularly in Sub-Area B.1due to the presence of mature woodland, the M11 corridor, and adjacent hedgerows. The introduction of buses travelling at speed does not equate to a loss of openness in planning terms, especially given the absence of associated development such as housing, commercial buildings, or lighting columns that would materially alter the spatial character of the Green Belt.

5.3.6 Furthermore, the Applicant's scheme has been assessed against the purposes of Green Belt as set out in the NPPF. While it is acknowledged that the scheme constitutes "inappropriate development" requiring very special circumstances, the impact on openness is demonstrably limited and reversible. The scheme does not introduce permanent structures that fragment the Green Belt or facilitate urban sprawl. It maintains the separation between settlements and does not prejudice the long-term integrity of the Green Belt boundary.

5.3.7 While it is understood that the scheme does not fully preserve openness (please refer to section 6.20 of Stephen Kelly's Proof of Evidence (CD26.12) submitted on behalf of Cambridge City Council), this in and of itself has driven the need to apply the NPPF's Very Special Circumstances criteria, which has been deemed to be appropriate in thi9s instance. This is also covered in detail under by main Proof of Evidence submitted under reference: (**CD26-01-APP-W10-1**) at paragraphs 5.5.4 – 5.5.13, which concludes:

"Across all sub-areas, the operational phase of the Scheme respects spatial and visual limits, and remendability is addressed through restoration proposals and long-term planting. With the exception of Scotland Farm where there is a ***low to moderate adverse impact on openness****, the Assessment concludes that* ***openness of the Green Belt is preserved in all affected locations****.*

Where impacts do arise, they are localised and softened by the adopted design approach. For example, the proposed M11 overbridge is elevated but sits within an already infrastructure dominated corridor and benefits from surrounding containment. Similarly, the Travel Hub at Scotland Farm introduces built form and activity into a previously open field, which results in some visual and spatial change. However, the scheme incorporates significant buffering, with layout and massing subject to future

approval to further minimise perceptual harm. In respect of impact to openness in the Green Belt, I judge that the harm is limited" .

5.3.8 In summary, Mr Littlewood's assessment of openness is overly simplistic and fails to engage with the planning definition, mitigation strategy, and spatial context of the scheme. The Applicant's proposal maintains the essential characteristics of the Green Belt, delivers strategic transport benefits, and does so with minimal and well-contained impact on openness. The rebuttal evidence provided in my Proof of Evidence (CD26-01-APP-W10-1) demonstrates that the scheme's alignment, design, and mitigation measures are proportionate and policy-compliant.

5.4 Rebuttal in Relation to Mr James Littlewood assessment of Natural England's and Historic England's comments

5.4.1 In **[CD26-10-W1-1, Para 3.14]** Mr Littlewood states that the Applicant's assessment contained a misleading assessment of Natural England and Historic England's comments. Those letters are included in **[CD9-31, Appendix D].**

Natural England state:

Options A and B are located in close proximity to this nationally designated site and proposals could have an adverse impact, through direct and indirect effects, on the notified features of the ancient woodland.

Option C. This off-line route option appears to be sufficiently distanced from designated sites and therefore unlikely to have any adverse impact on these.

5.4.2 Mr Littlewood is correct that Natural England make further comment with regards to other non-designated and local sites, but will be aware of the paramount significance of nationally designated sites.

5.4.3 With regards to Historic England, Mr Littlewood is correct that they state that all options are likely to cause a level of harm bur Mr Littlewood's partial extract from the letter omits the following with regards to potential for mitigation which clearly differentiates between the two schemes:

(Regarding Option A) It is acknowledged that planting would be retained along the boundary of the highway with the cemetery in an effort to differentiate space, but this planting is unlikely to be successful in mitigating the harm which has been identified to the designated heritage asset and it is recommended that mitigation measures are explored further.

We consider that, the harm associated with either of the options for Route C could be minimised or avoided subject to a robust mitigation strategy to ensure that the route appears as a rural feature in an existing landscape.

5.5 Rebuttal in Relation to Mr James Littlewood comments on 'Purpose' of the Green Belt

5.5.1 This next section seeks to respond and rebut elements of section 6 (Green Belt) of James Littlewoods Proof of Evidence, namely paragraphs 6.5 - 6.7 (Conflict of purposes of the green belt).

5.5.2 At paragraph 6.6. and 6.7, Mr Littlewood states:

"Section 7.2 of the Green Belt assessment [CD1-18] recognises that the scheme would conflict with NPPF Green Belt purposes 3 and 4 and Cambridge Green Belt purposes 1 and 2. It considers that the proposed development would not result in urban sprawl and not result in communities merging into one another and therefore does not conflict with NPPF Green belt purposes 1 and 2 and Cambridge Green Belt purpose 3.

However, the creation of a new transport corridor will inevitably lead to a significant increase in pressure for new development along it – for example at Hardwick, Madingley Mulch and Coton. When that pressure is combined with a reduction in the quality of the Green Belt caused by the busway infrastructure, it is obvious that the risk of future harm to the Green Belt would be significantly increased by the busway. That harm and risk can be avoided by building a bus lane scheme in the highway (CPPF alternative)".

5.5.3 Mr Littlewood's critique of the Applicant's scheme in paragraphs 6.5 to 6.7 misunderstands both the nature of the proposed development and its relationship to the five purposes of Green Belt as defined in paragraph 138 of the National Planning Policy Framework (NPPF). His analysis conflates visual change with functional harm and fails to engage with the strategic context and mitigation embedded within the scheme.

5.5.4 The first Green Belt purpose *to check the unrestricted sprawl of large built-up areas* is not undermined by the proposed busway. Its linear form and limited physical footprint do not introduce urbanising pressures or development platforms. The route has been carefully aligned to avoid settlement edges and maintain clear separation between Cambridge and surrounding villages, including Coton and Hardwick. Mr Littlewood's suggestion that the scheme "opens up the landscape" misinterprets openness as vulnerability to development, when in fact the scheme reinforces spatial containment through its design and operational constraints.

5.5.5 Regarding the second purpose *to prevent neighbouring towns from merging into one another* the Applicant's scheme demonstrably maintains the physical and perceptual separation between settlements. The busway does not connect built-up areas in a way that would erode their distinct identities. Instead, it provides a sustainable transport corridor that supports modal shift without compromising the integrity of settlement gaps. The LVIA and Green Belt Assessment confirm that the scheme's alignment avoids key pinch points and includes landscape buffers to preserve visual and spatial separation.

5.5.6 The third purpose *to assist in safeguarding the countryside from encroachment* is addressed through the scheme's embedded mitigation and ecological enhancement strategy. The busway is not a catalyst for wider development in the Green Belt, nor does it introduce built form that would redefine the character of the countryside. Its low-profile design, green verges, and hedgerow reinstatement measures ensure that the scheme remains visually recessive and functionally contained. Mr Littlewood's assertion that the scheme constitutes "encroachment" ignores the distinction between engineered infrastructure and urban expansion. The proposal does not introduce lighting, signage, or ancillary development that would materially alter the rural character of the area.

5.5.7 On the fourth and fifth purposes *to preserve the setting and special character of historic towns* and *to assist in urban regeneration* Mr Littlewood's evidence is silent or speculative. The Applicant's scheme does not intrude upon the setting of Cambridge or other historic settlements, and it's selected route seeks to minimise impacts to designated heritage assets where possible. Moreover, the scheme supports urban regeneration by facilitating sustainable access to employment and education hubs, reducing car dependency, and aligning with wider transport and climate resilience strategies.

5.5.8 In conclusion, Mr Littlewood's assessment of Green Belt purposes is selective and lacks engagement with the detailed evidence provided in the Applicant's submissions. The scheme has been designed to respect and uphold the strategic functions of the Green Belt, and its limited, reversible impacts are outweighed by the compelling public benefits it delivers.

5.5.9 This final section seeks to respond and rebut elements of section 8 (Replacement Open Space) of James Littlewoods Proof of Evidence, namely paragraphs 8.1 - 8.7.

5.5.10 Mr Littlewood's critique of the proposed Replacement Public Open Space (POS) misrepresents both the statutory requirements under Section 19 of the Acquisition of Land Act 1981 and the practical merits of the Applicant's proposed exchange land. His assertion that the proposed land is "not equally advantageous to the public" is based on subjective preferences rather than a balanced assessment of accessibility, functionality, and ecological integration.

5.5.11 The Applicant's proposed exchange land has been selected following a detailed sifting exercise that considered proximity, connectivity, ecological value, and potential for enhancement. Contrary to Mr Littlewood's claim, the site is not "isolated" nor "un-surveilled." It lies adjacent to existing public rights of way and benefits from natural surveillance due to its proximity to the M11 corridor and surrounding land uses. While it includes a balancing pond, this is a standard feature in contemporary green infrastructure design and does not inherently pose a health and safety risk. The pond is

designed with shallow gradients, fencing, and signage in accordance with best practice guidance, and contributes positively to biodiversity and sustainable drainage.

5.5.12 Mr Littlewood's suggestion that CPPF land should have been considered as an alternative is noted, but it is not accurate to claim that the Applicant failed to engage with relevant landowners. The Applicant's Statement of Case confirms that discussions were undertaken with multiple parties, and the selection of the proposed exchange land reflects a balance between availability, suitability, and deliverability. While CPPF land may offer theoretical advantages, it was not made available during the initial site identification process, and its suitability has not been tested against the same criteria. Moreover, the suggestion that CPPF land could be offered now does not negate the adequacy of the proposed exchange land, which meets the statutory test of being "equally advantageous."

5.5.13 The Applicant's scheme includes enhancements to the proposed POS that go beyond mere replacement. These include habitat creation, native planting, and integration with the wider active travel network. The land is designed to support informal recreation, ecological connectivity, and landscape character, aligning with both Local Plan policies and the Green Infrastructure Strategy. Mr Littlewood's preference for a site "overlooked by the M11" is questionable from both amenity and ecological perspectives, as such locations are typically less tranquil and more fragmented.

5.5.14 It is also important to note that the proposed POS is not intended to replicate the exact character of the land being acquired it is intended to provide equivalent public benefit in terms of access, usability, and environmental quality. The Applicant's Landscape and Ecology teams have confirmed that the proposed site can deliver these benefits, and its inclusion within the scheme has been subject to consultation and refinement.

5.5.15 Mr Littlewood's argument that the sifting exercise was "deficient" is unsubstantiated. The process followed standard land acquisition and planning protocols, and the proposed POS has been assessed against the requirements of the Transport and Works Act Order. The suggestion that the site should be refused on the basis of alternative land being available post hoc is not supported by planning or legal precedent.

5.5.16 In conclusion, the Applicant's proposed Replacement Public Open Space is policy-compliant, deliverable, and beneficial. It meets the statutory test of equivalence, supports wider environmental objectives, and has been selected through a robust and transparent process. Mr Littlewood's objections are based on preference rather than planning harm, and do not justify refusal or redesign of the proposed POS.

6. REBUTTAL: MS JESSICA WILSON

6.1 Introduction

6.1.1 My following response to Mr Wilson's Proof Of Evidence (**CD26-08-W6-1**) seeks to rebut comments seen at section 5 (Local Planning Policy), section 6 (Alternatives), and section 7 (Planning Balance). I must initially flag that Ms Wilson incorrectly suggests that Greater Cambridge Partnership is the applicant, whereas in fact the applicant is Cambridge County Council.

6.2 Rebuttal in relation to Ms Wilson's comments on Flood Risk (paras 5.5-5.18)

6.2.1 Jessica Wilson's critique of the flood risk assessment seen at section 5 of her Proof of Evidence hinges on two main contentions: that the sequential test has been insufficiently applied, and that the exception test has not been met. However, both claims are undermined by the updated evidence base and the Environment Agency's formal position as of 19 August 2025.

6.2.2 On the sequential test, Wilson asserts that Adams Road represents a reasonably available alternative in Flood Zone 1 and therefore should have been preferred under paragraph 174 of the NPPF. However, this argument overlooks the updated fluvial mapping and the nuanced interpretation of "reasonably available" within the Planning Practice Guidance. The ES Addendum (July 2025) clarified that the junction of Adams Road and Grange Road now includes areas of Flood Zones 2 and 3, and that the route's operational viability and strategic fit must be considered alongside flood risk. The Applicant's assessment did not dismiss Adams Road arbitrarily; rather, it weighed multiple factors including segregation, deliverability, and environmental impact. As Jack Southon's evidence confirms, the proposed Rifle Range Road alignment does not introduce significant new flood risk and is engineered to mitigate impacts through embedded design features, including a clear-span bridge and elevated deck with appropriate freeboard.

6.2.3 Wilson's reliance on the exception test is similarly outdated. Her assessment predates the Environment Agency's 19 August 2025 statement, which explicitly accepts the modelling used for the Cambourne to Cambridge busway as suitable for planning purposes. The EA acknowledges minor increases in flood depths within already inundated open fields but confirms these do not materially affect flood risk evaluation. Crucially, the EA notes modest reductions in flood depths downstream and confirms that post-development modelling demonstrates that any increase in flood risk remains within the red line boundary. This directly addresses the requirements of paragraph 178(b) of the NPPF and undermines Wilson's claim that the exception test has not been satisfied.

6.2.4 In sum, Wilson's position is based on superseded data and an incomplete understanding of the strategic and technical context. The Applicant has demonstrated compliance with both the sequential and exception tests, supported by robust modelling, and EA engagement. The flood risk assessment is sound, and the proposed alignment remains appropriate and policy-compliant.

6.3 Rebuttal in relation to Ms Wilson's comments on Noise (paras 5.19-5.26)

6.3.1 Jessica Wilson's critique of the noise assessment in paragraphs 5.19 to 5.26 of her Proof of Evidence misrepresents both the scope and robustness of the Environmental Statement (ES) and the mitigation framework proposed. Her assertion that the assessment fails to account for Clare Hall's sensitivity as a receptor overlooks the fact that significant construction noise effects were explicitly acknowledged in the ES, and that mitigation is secured through the draft Code of Construction Practice (CoCP) and Local Environmental Management Plans (LEMPs). As Toby Lewis sets out in his response (**CD26-01-APP-W11-4**) to Mr Blacklock, it is neither necessary nor practicable to undertake granular construction noise predictions prior to finalised phasing and contractor selection. The ES appropriately flags potential impacts and commits to Best Practicable Means (BPM), including localised acoustic screening and operational controls.

6.3.2 Wilson's claim that the Noise Impact Assessment (NIA) lacks clarity on receptor identification is unfounded. Sensitive receptors were mapped and assessed using industry-standard metrics (LAeq,T), and the closest receptor Clare Hall was considered in the operational phase modelling. Her reliance on Mr Blacklock's speculative assumptions about plant usage and vibration levels is undermined by Lewis's rebuttal, which highlights the unrealistic simultaneity of equipment operation and the transient nature of vibration events. Moreover, Wilson's suggestion that mitigation would require "dramatic alteration" to Clare Hall is not substantiated by any technical evidence and ignores the flexibility built into the planning conditions to tailor mitigation to receptor-specific needs.

6.3.3 Finally, Wilson's assertion that the proposals would render Clare Hall "unusable for study" during construction is hyperbolic and unsupported by the ES or any empirical data. The planning framework provides for adaptive mitigation, and the applicant has already indicated willingness to restrict bus types and operational hours to further reduce impacts. In sum, Wilson's position on noise is speculative, overstated, and fails to engage with the layered mitigation strategy embedded in the application.

6.4 Rebuttal in relation to Ms Wilson's comments on impacts to future development at Clare Hall (para 5.35).

6.4.1 Ms Wilson's assertion at paragraph 5.35 that the proposed busway alignment would inhibit future development at Clare Hall is speculative, as the mere presence of infrastructure adjacent to a listed building does not preclude future development, nor does it render planning permission unattainable. The planning system routinely accommodates sensitive development near heritage assets, provided that proposals demonstrate appropriate design, scale, and mitigation. Clare Hall's aspirations for an auditorium or expanded facilities would be subject to their own merits, including heritage impact assessments and consultation with statutory bodies such as Historic England. The suggestion that the busway alignment would in effect sterilise the site is therefore overstated.

6.4.2 Moreover, the Order does not remove Clare Hall's access rights or prevent future applications from being brought forward. The applicant has not objected to Clare Hall's use of Rifle Range Road for future construction access, and any concerns about operational compatibility can be addressed through standard planning conditions. The planning system is equipped to balance heritage sensitivities with evolving institutional needs.

7. STATEMENT OF TRUTH

7.1.1 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.