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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

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

of WSP

On behalf of Cambridgeshire County Council

15th August 2025

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1. INTRODUCTION

1.1 Qualifications and experience

Academic qualifications

- 1.1.1 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.

Professional career

- 1.1.2 I have over 28 years of professional experience in the heritage sector, encompassing contrasting roles as a contractor and consultant. I have also worked as heritage advisor within government organisations (e.g. Historic England; HS2) or working with them as part of an Integrated Delivery Team (e.g. Network Rail; Environment Agency).
- 1.1.3 I started working with historic buildings in 2002. I was a freelance heritage consultant from 2011 to 2023, during which time I was concerned principally with assessing impacts on historic buildings to inform applications for planning consent. This included work on Nationally Significant Infrastructure Schemes, and also projects on smaller sites: refurbishing historic buildings and constructing sensitively designed new structures in conservation areas or the settings of listed buildings.
- 1.1.4 I have demonstrated an innovative approach to setting, including bespoke methods for appraisal of setting-related effects on large numbers of heritage assets, and for recording setting to mitigate harm to groups of associated assets. I conducted a research project into the legal context that protects the setting of listed buildings, findings of which were published in an international journal in 2016. I have taught heritage modules on setting and significance at Kingston University. I have also provided evidence as an expert witness to planning appeals and Public Inquiries for which the setting of listed buildings was a key issue.

Key experience

- 1.1.5 I have extensive experience in assessment, design, consenting and delivery of projects. I have produced numerous Heritage Statements and Environmental Impact Assessments, and managed the creation of many more. My technical expertise relevant to the matters examined in this appeal is based on extensive project experience within the transport sector. Recent transport projects I have worked on include five Greenways projects for Greater Cambridge Partnership, input to the Outline Business Case for A10 Ely to A14 Improvements, and Coventry Very Light Rail scheme.
- 1.1.6 Currently, I am managing the heritage input to several large infrastructure projects, including a Client Partner role for Dublin MetroLink, which is the biggest investment in transport infrastructure in Irish history and will involve construction of new stations within historic areas.

1.2 The Scheme

- 1.2.1 The Cambourne to Cambridge (CtoC) Scheme is a proposed new busway that would extend approximately 13km from west to east across Highfields, Hardwick and Coton to Grange Road on the edge of Cambridge City. An emergency / maintenance access track, to be used as a path for active travel cyclists and pedestrians, would run alongside the busway. A detailed description of the Scheme is provided in the Environmental Statement **[CD1-10.01, pp. 24-37, Chapter 3]**.
- 1.2.2 The proposed route passes along Rifle Range Road to the rear of 'Clare Hall, University of Cambridge', which is a Grade II* listed building **[CD9-39 and CD26-01-APP-W2-2, pp. 33-43]**. For clarity, 'Clare Hall, University of Cambridge' listed building is referred to in this Proof of Evidence as 'Clare Hall' and the educational institution of Clare Hall is referred to as 'the College'.

1.3 Purpose of my evidence

Clare Hall

- 1.3.1 The first purpose of my evidence is to demonstrate that proper consideration has been given to the significance (in heritage terms) of Clare Hall. This accords with the legal requirements relating to listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990 **[CD5-28]**, in addition to the requirements of the National Planning Policy Framework (NPPF) **[CD8-01]** and local planning policy **[CD6-01, CD6-02 and CD6-04]**. The evidence also demonstrates that the Environmental Impact Assessment (EIA) has been carried out in accordance with the relevant regulations and standards in relation to listed buildings. I describe the assessment methodology and the assessment conclusions. This includes my professional expert opinion on the predicted level of environmental effect arising from the CtoC Scheme on Clare Hall and also the degree of harm to the significance of that Grade II* listed building in NPPF terms.
- 1.3.2 This evidence also describes the heritage-related issues identified in the consideration that was given to a route proposed by the College along Adams Road, rather than Rifle Range Road.

Cambridge Past Present and Future (CPPF) - CPPF Alternative

- 1.3.3 The second purpose of my evidence is to provide an expert opinion regarding the effects on the historic environment that would result from adoption of an alternative scheme proposed by Cambridge Past Present and Future (CPPF) and defined as "the CPPF Alternative". The CPPF Alternative proposes that buses are routed along Madingley Road, with an inbound bus lane to provide bus priority for eastbound buses, rather than the CtoC Scheme's segregated route to the south of Madingley Road. The evidence addresses likely effects of both schemes on the following assets¹:
- 'Church of St Peter' Grade I listed building
 - 'American Military Cemetery' Grade I registered park and garden

¹ List descriptions are supplied in the appendix **[CD26-01-APP-W2-2]**.

- ‘Memorial and Attached Walls, Steps and Pool Surround at American Military Cemetery’ Grade II* listed building
- ‘Madingley Mill, at Mill Farm, Madingley Hill’ Grade II* listed building
- Coton Conservation Area.

Cambridge City Council and South Cambridgeshire District Council

- 1.3.4 The third purpose of my evidence is to respond to representations by Cambridge City Council and South Cambridgeshire District Council regarding effects on Robinson College Grade II* listed building [CD26-01-APP-W2-2, pp. 88-103] and a group of other listed buildings and locally listed buildings [CD26-01-APP-W2-2].

Historic England

- 1.3.5 The fourth purpose of my evidence is to address comments made in a letter to the Inspectors from Historic England dated 8th August 2025, which was offered as an addendum to their response to the Transport and Works Act Order Application, dated 8th January 2025.

1.4 My evidence

- 1.4.1 The topics I address in this proof of evidence are set out below and in Table 1.1.

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

Statement of Matters [CD25-01] Reference	Statement of Matters text	Coverage through my Proof of Evidence	Coverage through Proofs of Evidence of Others
2.	Whether all statutory procedural requirements have been complied with.	I will describe the statutory and policy framework governing assessment and decision-making with respect to built heritage (Section 2), and how that framework has been addressed when conducting an assessment for the heritage assets and issues raised by objectors (Section 6).	
4.	The effect of the implementation, operation and maintenance of the scheme.		

Statement of Matters [CD25-01] Reference	Statement of Matters text	Coverage through my Proof of Evidence	Coverage through Proofs of Evidence of Others
4.e.	The effect of the scheme on heritage assets, with particular reference to the Grade I registered park and garden of the American Military Cemetery at Madingley, Cambridge.	I will describe the effects of the scheme on Clare Hall, Cambridge, Grade II* listed building (Section 4), and on American Military Cemetery, Grade I registered park and garden, as well as other heritage assets (Section 5) that are salient to my responses to objectors' comments (Section 6).	<p>How the ES has reported the effects of the scheme on heritage assets is provided in the Proof of Evidence of Andy Saunders (EIA) [CD26-01-APP-W3-1].</p> <p>Further details on noise effects are provided in the Proof of Evidence of Toby Lewis (Noise) [CD26-01-APP-W11-1].</p> <p>Details on adoption of the preferred route are provided in the Proof of Evidence of Jo Baker [CD26-01-APP-W1-1].</p>

Limits of my evidence

- 1.4.2 In this proof, I refer to the legal principles on which I have based my judgement, but it should be noted that I am not putting myself forward as any expert in law.

1.5 Structure of this Proof of Evidence

- 1.5.1 In Section 2 below, I explain the statutory and policy context in which those aspects of the Inquiry relating to listed buildings and conservation areas must be determined.
- 1.5.2 Section 3 describes the agreed method that was used for assessment and how it complies with statutory and non-statutory requirements.
- 1.5.3 Section 4 provides a description of Clare Hall and its significance, including an assessment of the contribution of setting to that significance, and reports the effects that the CtoC Scheme would have.
- 1.5.4 Section 5 provides a description of other designated heritage assets that are salient to representations raised with respect to heritage, including those assets' setting and significance, and reports the effects that the CtoC Scheme would have on them.

- 1.5.5 Section 6 provides a response to the objections and representations that are relevant to this Proof of Evidence.
- 1.5.6 In Section 7, I provide an overall conclusion on the matters covered by my Proof of Evidence.
- 1.5.7 Section 8 contains my Statement of Truth.
- 1.5.8 This Proof of Evidence is supported by an Appendix [CD26-01-APP-W2-2], which contains details of the designated heritage assets discussed below (where available), a series of historic maps depicting the location of Clare Hall, and plans of the salient part of the curtilage of Clare Hall.

2. STATUTORY AND POLICY CONTEXT

- 2.1.1 The legislative and planning framework pertaining to built heritage is described in the Environmental Statement Appendix TR7.1: Heritage Statement [CD1-11.07.02, pp. 9-12, Section 2], where extracts of the salient policies are provided.

2.2 Statutory context

- 2.2.1 Matters relating to planning consent for developments that affect listed buildings and conservation areas are controlled by the **Planning (Listed Buildings and Conservation Areas) Act 1990**, as amended ([CD5-28], hereafter, 'The 1990 Act').

- 2.2.2 The following definition of a listed building is provided, which includes objects or structures that are to be treated as part of the building:

"1 (5) In this Act "listed building" means a building which is for the time being included in a list compiled or approved by the Secretary of State under this section; and for the purposes of this Act—

(a) any object or structure fixed to the building;

(b) any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948,

shall be treated as part of the building." [CD5-28, p. 3, Section 1(5)]

- 2.2.3 The 1990 Act stipulates the following general duties in exercise of planning functions:

"66 (1) In considering whether to grant planning permission or permission in principle for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

72(1) [...] with respect to any buildings or other land in a conservation area, [...] special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." [CD5-28, pp. 89 & 93, Sections 66(1) and 72(1)]

- 2.2.4 The 1990 Act provides restriction on works affecting listed buildings as follows:

“7(1) Subject to the following provisions of this Act, no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised under section 8.” [CD5-28, p. 10, Section 7(1)]

- 2.2.5 Listed Building Consent is the mechanism by which works for the alteration, extension or demolition of a listed building are authorised, following written consent by the local planning authority or the Secretary of State [CD5-28, p. 11, Sections 8(1) and 8(2)].

2.3 Clarifications in case law

Harm in planning balance

- 2.3.1 The assessment of the degree of harm is a matter of planning judgment.² However, if harm to a listed building or its setting, or to a conservation area, has been identified, decision-makers must give considerable importance and weight to the desirability of preserving the listed building or its setting, and to the desirability of preserving or enhancing the character or appearance of a conservation area, and ask whether the advantages of the proposal sufficiently outweigh the harm to rebut the “*strong presumption*” against the grant of planning permission.³
- 2.3.2 The law intends a high priority to be given to the objective of preserving or enhancing the character or appearance of a conservation area or preserving a listed building or its setting⁴ and considers that ‘preserving’ is synonymous with “*doing no harm*”⁵.

Setting

- 2.3.3 The Court of Appeal has confirmed that the effect on setting of heritage assets, “*is not necessarily confined to visual or physical impact*” but that other considerations such as noise and smell are potentially relevant⁶.

Curtilage

- 2.3.4 Ascertaining curtilage is a question of fact and degree depending on the circumstances. In ***R (Hampshire CC) v. Secretary of State for the Environment, Food and Rural Affairs***⁷ Andrews LJ pointed out that the approach of Buckley LJ in ***Methuen-Campbell v. Walters***⁸ has been followed in all the different statutory contexts. Buckley LJ’s approach was as follows:

“In my judgment, for one corporeal hereditament to fall within the curtilage of another, the former must be so intimately associated with the latter as to

² ***East Northamptonshire DC v Secretary of State*** [2014] EWCA Civ 137 at paragraph 22

³ In the language of the NPPF: great weight should be given to the conservation of a designated heritage asset.

⁴ ***South Lakeland District Council v. Secretary of State for the Environment*** [1992] 2 AC 141 at page 146F

⁵ ***South Lakeland*** at page 150E-F

⁶ ***Catesby Estates Ltd and SSCLG v Steer*** [2018] EWCA Civ 1697 at paragraph 27

⁷ [2021] 3 WLR 567 at paragraph 116

⁸ [1979] 1 QB 525 at pages 543-544

lead to the conclusion that the former in truth forms part and parcel of the latter.”

- 2.3.5 In ***Attorney General ex rel Sutcliffe v Calderdale MBC***⁹ Stephenson LJ identified the factors to be considered when considering curtilage:

“Three factors have to be taken into account in deciding whether a structure (or object) is within the curtilage of a listed building ... whatever may be the strict conveyancing interpretation of the ancient and somewhat obscure word ‘curtilage’. They are (1) the physical ‘layout’ of the listed building and the structure, (2) their ownership, past and present, (3) their use or function, past and present. Where they are in common ownership and one is used in connection with the other, there is little difficulty in putting a structure near a building or even some distance from it into its curtilage.”

- 2.3.6 The following propositions set out by Lieven J in ***Challenge Fencing Limited v. Secretary of State for the Housing, Communities and Local Government***¹⁰ (albeit not in a case relating to listed buildings) provide helpful guidance:

“i) The extent of the curtilage of a building is a question of fact and degree, and therefore it must be a matter for the decision-maker, subject to normal principles of public law;

ii) The three Stephenson factors must be taken into account;

a) Physical layout;

b) The ownership past and present;

c) The use or function of the land or buildings, past and present.

iii) A curtilage does not have to be small, but that does not mean that the relative size between the building and its claimed curtilage is not a relevant consideration. Skerritts p.67;

iv) Whether the building or land within the claimed curtilage is ancillary to the main building will be a relevant consideration, but it is not a legal requirement that the claimed curtilage should be ancillary; Skerritts p.67C;

v) The degree to which the building and the claimed curtilage fall within one enclosure is relevant, Sumption at para 17 and the quotation from the OED of curtilage as “A small court, yard or piece of ground attached to a dwelling house and forming one enclosure with it”. In my view this will be one aspect of the physical layout, being the first of the Calderdale factors.

vi) The relevant date on which to determine the extent of the curtilage is the date of the application; but this will involve considering both the past history of the site, and how it is laid out and used at the time of the application itself; Sumption at [27]. It appears from Sumption that the Judge considered future intended use of the land or buildings may be relevant, but in my view

⁹ [1983] 46 P & CR 399 at page 407

¹⁰ [2019] EWHC 553 (Admin) at paragraph 18

some care would be needed in applying this proposition to the facts of a particular case. A developer cannot change the curtilage simply by asserting that s/he intends to use the site in a particular way in the future.”

Structures

- 2.3.7 The definition of a structure was addressed in ***Debenhams Plc v Westminster City Council***¹¹ as follows:

“In my opinion to construe the word ‘structure’ here as embracing a complete building not subordinate to the building of which it is to be treated as forming part, would...indeed produce an unreasonable result...” and “...the word ‘structure’ is intended to convey a limitation to such structures as are ancillary to the listed building itself, for example the stable block of a mansion house, or the steading of a farmhouse, either fixed to the main building or within its curtilage. In my opinion the concept envisaged is that of principal and accessory.”

2.4 Planning policy context

National Planning Policy Framework

- 2.4.1 Planning Policy is provided at the national level by the National Planning Policy Framework (NPPF), in particular Section 16: ‘Conserving and enhancing the historic environment’ [CD8-01, pages 59-62, paragraphs 202 to 221].
- 2.4.2 The Environmental Statement was produced with reference to the iteration of the NPPF published in December 2023, since which time revisions have been made in December 2024 and February 2025. The paragraph numbers referred to in the Environmental Statement have changed, but the policy referred to is otherwise unaltered [CD1-11.07.01, pp. 14-15].

Planning Practice Guidance

- 2.4.3 Planning Practice Guidance (PPG, [CD8-35]) is national guidance that can reinforce the NPPF, and which is basically of the same legal status¹². The PPG provides additional information regarding the need to describe the degree of harm.

“Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework (paragraphs 194 to 196) apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly

¹¹ [1987] 1 AC 396, at page 403D

¹² ***Mead Realisations Ltd v Secretary of State for Housing, Communities and Local Government*** [2025] WLR(D) 76, [2025] EWCA Civ 32 at paragraph 33

articulated.” [CD8-35, pp. 11-12, paragraph: 018, Reference ID: 18a-018-20190723]¹³

- 2.4.4 The PPG provides useful guidance regarding the level of impact that would be considered substantial harm:

“[...] In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. [...]” [CD8-35, p. 12, paragraph 018, Reference ID: 18a-018-20190723]

- 2.4.5 The appropriateness of this approach was endorsed in the ***Holocaust Memorial*** case of 2022¹⁴.

Cambridge Local Plan 2018

- 2.4.6 Local planning policy is provided in the following documents:

- Cambridge Local Plan 2018, in particular Policy 61 (Conservation and enhancement of Cambridge’s historic environment) and Policy 62 (Local heritage assets) [CD6-01, pp. 188-192]
- South Cambridgeshire Local Plan 2018, in particular Policy NH/14 (Heritage Assets) [CD6-02, pp. 138-140]
- Greater Cambridge Local Plan First Proposals 2021, in particular Draft Policy GP/HA (Conservation and enhancement of heritage assets) [CD6-04, pp. 220-221].

2.5 Technical advice

Setting

- 2.5.1 Historic England has provided a framework for assessing setting issues, which sets out a broad approach to aid a, *“proportionate assessment of the particular significance of any heritage asset that may be affected by proposal, including by development affecting the setting of a heritage asset”* [CD9-42, p. 12, paragraph 19].
- 2.5.2 Setting is defined by Historic England as, *“the surroundings from which the heritage asset is experienced”* [CD9-42, p. 6]. A setting is not a heritage asset in itself; its importance lies in what it contributes to the significance of an asset. The degree to which the setting of an asset contributes to the significance of that asset is dependent on the reasons why the asset is significant. Historic England notes the policy objectives in the NPPF that establish that setting has ‘twin roles’, which are that *“it can*

¹³ NB: paragraph numbers 194-196 referred to in the PPG have been replaced by paragraphs 212-214 in the current NPPF.

¹⁴ ***London Historic Parks And Gardens Trust v Minister of State for Housing & Anor*** [2022] EWHC 829 (Admin) at paragraph 45

contribute to the significance of a heritage asset, and it can allow that significance to be appreciated” [CD9-42, p. 5, paragraph 5].

- 2.5.3 Historic England recommends a staged approach to assessment in relation to setting, which is as follows:
- Step 1: Identify which heritage assets and their settings are affected
 - Step 2: Assess the degree to which these settings contribute to the significance of the heritage asset(s) or allow significance to be appreciated
 - Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it
 - Step 4: Explore ways to maximise enhancement and avoid or minimise harm
 - Step 5: Make and document the decision and monitor outcomes [CD9-42, p. 12, paragraph 19].
- 2.5.4 The guidance notes that only certain “*attributes of setting*” may be relevant to whether, and to what degree, setting affects a heritage asset’s significance. Consideration of the attributes that contribute to setting is an important factor in assessing a heritage asset’s capacity to withstand change to its setting without a loss of significance. Similarly, certain characteristics or “*attributes of development*” may have the capacity to alter a setting in such a way as to affect the asset’s significance, while other changes may not be relevant to the interests that give it significance.
- 2.5.5 The guidance discusses the contribution of views to setting. Views may be attributes of a setting of varying importance, but are not the only contributors. Certain views may contribute more to understanding significance of a heritage asset, for example views including relationships with related heritage assets, places or natural features, or whose composition was a fundamental aspect of the asset’s design or function.

Curtilage

- 2.5.6 Historic England have issued guidance on curtilage listing [CD9-41]. The guidance cites the criteria for curtilage listing, identified in *Calderdale*, as follows:
1. the physical layout of the listed building and the structure
 2. their ownership, both historically and at the date of listing
 3. their use or function of the relevant buildings, both historically and at the date of listing. [CD9-41, pp. 4-5, Section 1.1]
- 2.5.7 The guidance states that not all buildings have a curtilage. For example, a town-centre building with no garden or yard may have no curtilage whatsoever. The guidance further states that it is possible that a curtilage building holds no special interest even if it is within the curtilage, in which case works to it will require no consent.
- 2.5.8 In 2019, the Institute of Historic Building Conservation (IHBC) also issued advice on curtilage [CD9-43], which was in response to the *Egerton v Taunton Deane* case. The advice is in accord with Historic England, noting that ‘curtilage’ is not defined in law and is interpreted by the courts following the test provided by the Court of Appeal in

the *Calderdale* case. The IHBC notes that these criteria should be applied to the facts as they were on the date of listing [CD9-43, p. 2].

3. AGREED METHOD

3.1 Methodology

- 3.1.1 The ES Scoping Report and Opinion includes the proposed assessment methodology for Heritage (entitled Historic Environment) [CD1-10.05, pp. 126-139, Chapter 10]. That document also includes the Secretary of State's opinion (including in relation to responses from Historic England) and the Applicant's response to the opinion.
- 3.1.2 The data sources, site visit, consultations, and assessment methods that were used to assess the level of harm that would accrue to heritage assets as a result of the CtoC Scheme are described in the Environmental Statement Technical Report 7: Heritage and Archaeology (including Historic Environment Desk Based Assessment) [CD1-11.07.01, pp. 19-26, Section 3] and the Heritage Statement [CD1-11.07.02, pp. 13-15, Section 3]. This includes the methodology for assessing 'magnitude of change' (impact) and 'significance of effect' in EIA terms, as well as harm to heritage assets in the terms used in planning policy and the 1990 Act [CD5-28]. A description of the method used to assess setting-related effects in accordance with Historic England's guidance [CD9-42] is also provided [CD1-11.07.01, pp. 25-26, Section 3.6].

3.2 Consultation

- 3.2.1 The Scheme conducted continuous engagement with statutory stakeholders, including a Landscape, Heritage and Ecology working group, which included Cambridge Past Present and Future, Historic England and others, and met typically every two months to provide an opportunity for stakeholders to influence the design, and for the project team to inform stakeholders about environmental effects and potential mitigation [CD1-06.01, pp. 20-21, paragraphs 3.3.6 to 3.3.11].
- 3.2.2 Historic England commented on the Transport and Work Act Order application for the CtoC Scheme [CD2 REP-08.1] as follows:

"Historic England's remit in commenting on the Cambourne to Cambridge Busway TWO application lies principally with regard to the potential impact of the proposed development on designated heritage assets (in this instance – scheduled monuments, listed buildings, registered parks & gardens, and conservation areas) [...]"

Historic England has reviewed the information submitted in support of the TWO application. We are in agreement with the scope and methodology used to assess the potential impact of the proposed development on the historic environment.

The proposed development would lie within the wider setting of a number of designated heritage assets. The eastern end of the proposed development would lie within the West Cambridge Conservation Area.

Historic England considers that any adverse impact of the proposed development on designated heritage assets would be minimal.

We agree with the conclusions of the heritage assessments submitted with the application that the level of harm to designated heritage assets would be within the range of ‘less than substantial harm’ in NPPF terms.

We consider that the level of harm would be at the lower end of the ‘less than substantial harm’ range and that it could be satisfactorily weighed against the public benefits of the proposals.

Historic England has no objection to the application on heritage grounds. [...]” [CD2 REP-08.1, pp. 1-2]

- 3.2.3 Historic England sent a letter to the Inspectors on 8th August 2025 [CD2 REP-08.2], noting that the deadline for submission of evidence had passed but requesting the letter be considered as an addendum to their initial response. Historic England restated that their previous position is unchanged and that they have no objection to the proposals [CD2 REP-08.2 pp. 1, 3 and 5].

“In our response we stated that ‘we are in agreement with the scope and methodology used to assess the potential impact of the proposed development on the historic environment’, and that we considered ‘that any adverse impact of the proposed development on designated heritage assets would be minimal.’

Broadly, this remains our considered position. It has very recently been brought to our attention, however, that there is a discrepancy between the details shown in some of the submitted drawings, and that the potential impact of the proposals on the significance of the grade II-listed buildings of Clare Hall may have been overlooked. [...]” [CD2 REP-08.2 p. 1].*

- 3.2.4 Historic England also raised the following points with regard to Clare Hall:

- Alleged discrepancies in some submitted drawings
- Alleged physical alteration to the “drainage conduit on the south edge of site”
- Potential “harm to the significance of the listed buildings by altering their setting”
- The need (in Historic England’s view) for detailed design information to inform assessment, and careful design to avoid or mitigate harm
- Proposed treatment of the line of trees on Rifle Range Road.

- 3.2.5 Cambridge City Council provided the following views regarding the heritage effects of the CtoC Scheme in their Statement of Case [CD23-16-02 REP-09 CCC SoC]:

“4.8 [...] the scheme has been carefully designed to follow existing transport corridors where possible, avoid sensitive ecological and heritage sites [...]

8.10 The Council agrees with the Applicant’s assessment that the degree of harm to heritage assets is ‘less than substantial harm’ under Paragraph 215 of the NPPF (2024).

8.13 In line with Paragraph 215 of the NPPF (2024), Policy NH/14 of the South Cambridgeshire Local Plan (2018) and Policy 61 of the Cambridge

Local Plan (2018) provides the framework for the conservation and enhancement of Cambridge's historic environment. The less than substantial harm must be given great weight and weighed against the significant public benefits of the Scheme, including improved sustainable transport connections, reduced congestion and carbon emissions, and enhanced accessibility to key employment and academic centres.

8.14 Given these substantial public benefits, the Council considers that – even giving it the requisite great weight in accordance with paragraph 212 NPPF, the moderate level of harm to the relevant heritage assets is considered justified and outweighed by the significant public benefits, ensuring compliance with heritage policy requirements while incorporating appropriate mitigation measures.” [CD23-16-02, REP-09 CCC SoC, pp. 13, 21 and 22, paragraphs 4.8, 8.10, 8.13 and 8.14]

- 3.2.6 South Cambridgeshire District Council provided broadly the same views as Cambridge City Council in their Statement of Case (cf. the above with [CD23-16-01 REP-09 SCDC SoC, pp. 13 and 33, paragraphs 4.7, 14.12, 14.15 and 15]).

4. CLARE HALL

4.1 Introduction

- 4.1.1 The Heritage Statement provides a description of Clare Hall and its significance [CD1-11.07.02, p. 24, paragraphs 5.3.1 to 5.3.4]. The Environmental Statement and its appendices have sought to provide an explanation of the baseline conditions and effects of the CtoC Scheme that is as robust and detailed as is necessary to meet the requirements of the Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006 [CD5-18, p. 20, Rule 11], but which does not slow down the process by providing excessively onerous description. As this Proof of Evidence responds to specific questions about the assessment, it is appropriate that greater detail on which the assessment was based is provided here.

4.2 Historic background

Ralph Erskine

- 4.2.1 The architect of Clare Hall, Ralph Erskine (b. 24th February 1914, d. 16th March 2005) was a British-born architect of international importance. He was a recipient of the Wolf Prize for Art (1984) and the Royal Gold Medal of the Royal Institute of British Architects (1987) in recognition of his substantial contribution to international architecture.
- 4.2.2 Erskine graduated in architecture from Regent Street Polytechnic in London [CD9-44, p. 1]. His earliest employment, from 1936, was building houses and factories in Welwyn Garden City. He moved to Sweden in May 1939, where he opened his own practice. In the years following the Second World War, Erskine created new rural settlements for the timber industry, and some factories. From the late 1950s, Erskine earned international recognition for his designs for Arctic settlements, two of which (Svappavaara in northern Sweden, 1963, and Resolute Bay in Canada, 1973) were partly constructed but not completed. He also designed office blocks in Sweden during the 1960s. In 1962, he produced a town planning study for Cambridge, which

was followed by the commission to design Clare Hall in 1964. He also designed housing projects in several towns, most notably Byker, Newcastle, in 1969 and 1982. Later works included further housing and university projects in Sweden, the Lilla Bommen office building in Gothenburg (1990), The Ark office in Hammersmith (1991), and part of the Millennium Village in Greenwich (1998).

- 4.2.3 Erskine was first influenced by the Quaker, socialist beliefs of his parents, and the needs of his buildings' inhabitants was a principal design concern throughout his life's work. He studied with Gordon Cullen, a well-known architectural illustrator, urban designer and theorist, who had a profound influence on Erskine [CD9-44, p. 1]. One reason for his move to Sweden was his approval of the country's social welfare model. There, he developed an admiration for the work of Swedish Functionalist architects. He was also an associate of Team 10, a loosely organized international group of modernists who experimented with designs that depended on user participation and environmental compatibility. However, Erskine found their meetings' discussion to be of little relevance to the people who would use the buildings, in contrast to the humane approach he admired in Scandinavian architecture [CD9-44, p.2].
- 4.2.4 Erskine's housing designs were typified by groups of dwellings, often steeply pitched, within high walls that were set around communal open spaces. His early rural settlements were modest in scale but experimental in design. Following this, he developed a style for his Arctic towns that was characterised by a 'wall' of apartments, with few windows to the north elevation but extensive glazing and balconies to the south, which sheltered lower housing on its leeward side from the north wind. The buildings' roofs and porches were also designed to keep out the snow. The design for Clare Hall was inspired by this early work, and by Scandinavian design in general. The design and layout of Clare Hall also reflected Erskine's preoccupation with creating spaces for people, as well as the changing social dynamics of the period.
- 4.2.5 Clare Hall is part of a continuum of Erskine's design sensibility. From the late 1970s, he designed several buildings at Stockholm University including Allhuset (1981), which comprises an expressive and organic design reminiscent of Clare Hall, with sloped roofs and a triangular shape, and received the Kaspar Salin Prize in 1980. Clare Hall also anticipates his design for the dramatic Grade II* listed Byker Estate and Tom Collins House (1969-1982), part of the Byker Wall: a long, unbroken block of 620 flats intended to shield the Byker Estate from a new motorway that was planned alongside it, and which is also effective as a climatic barrier. This considerable piece of modernist architecture includes the dramatic use of brick, red-stained timber and a mono roof, which is reminiscent of Clare Hall. The wider Byker Estate became an exemplar of humane social housing development, and included churches, a public house, a swimming pool, and landscaping.

Clare Hall's construction and development

- 4.2.6 Clare Hall was completed in 1969, and serves as an academic institution for researchers and postgraduate students, including visiting scholars, Fellows, and postdoctoral affiliates. Described as, "*radical both socially and academically*" [CD9-38, p. 6], at the time of its inception the design was architecturally distinct from the Brutalist style that prevailed in the UK at that time, especially with regard to educational facilities.

- 4.2.7 Clare Hall is representative of the expansion of tertiary education during the post-war period. In the years following the Second World War, Cambridge University and colleges engaged in discussions to determine the appropriate distribution of authority and resources between them. Historically, academic support and supervision had been provided by the colleges who, due to the growing number of research students, had increasingly depended on University teaching officers (UTOs) that were neither associated with, or a fellow of, a college. In addition, a strategic approach to state-funded research brought more funding opportunities but also increased pressure on existing resources. At the same time, considerable efforts were being made to advance the dissemination of knowledge and promote educational development through collaborative interactions among various universities, both domestically and internationally, facilitated by visiting fellowships.
- 4.2.8 Discussions around these circumstances resulted in the formation of the Bridges Committee in 1960, and subsequent Bridges Report in 1962 [CD26-01-APP-W2-2, p. 36]. In 1964, after extensive discussions, Clare College's Director of Studies in Mathematics Professor Richard Eden submitted a proposal for the establishment of an Institute of Advanced Study, modelled after the one at Princeton. This institute would include a permanent fellowship, provide positions for graduates, and eventually accommodate visiting and research fellows. The new proposal was endorsed by the Governing Body, with the new foundation located on Herschel Road, where future expansion could be envisaged.
- 4.2.9 The land for Clare Hall came into Clare College's possession during or after 1963, as a result of a 'triangular exchange' between Clare College, St John's College, and the University of Cambridge [CD9-40, p. 4]. This arrangement involved Clare College selling land at Grange Road to the University of Cambridge to extend the University Library, while the University sold the Divinity School to St John's College, and in return St John's College sold Clare College a parcel of land on Herschel Road that had three large houses on it but would later become the site of Clare Hall.
- 4.2.10 In March 1964, it was formally recommended to locate the new foundation on the Herschel Road land parcel, and to appoint an architect to prepare plans. The original design specification was to include twenty apartments of varying sizes, and study areas for non-resident fellows and students including a reading room, seminar rooms, separate dining rooms for the fellows, and for their families, a kitchen and offices. An architectural brief was produced in February 1964, and by March a working committee was set up to take the proposals forward.
- 4.2.11 Initially, three architectural practices were proposed to the committee: Alan Colquhoun, Howell, Killick, Partridge and Amis (HKPA), and Peter Moro. They also considered Ralph Erskine, Philip Dowson of Ove Arup Associates, David Roberts, Powell and Moya, and Morris and Steedman. The committee recommended that "*the choice should be made from young men or from men of international eminence known to give personal attention*" [CD26-01-APP-W2-2, p. 37]. Erskine was formally appointed by August 1964.
- 4.2.12 The earliest sketches for Clare Hall date from 14th October 1964. Erskine's original design retained the extant house on the north side of the site and built a residential terrace alongside the rugby field to the south [CD26-01-APP-W2-2, p. 37]. When it

was accepted that retaining the extant building brought no cost-savings, the committee resolved to adopt Erskine's 'sketch 5' but with the building moved slightly westwards and the accommodation constructed over two storeys to allow future expansion [CD26-01-APP-W2-2, pp. 37-38]. Plans from April 1965 reveal a scheme closely resembling what was ultimately constructed.

- 4.2.13 In 1966, the Ministry of Public Buildings and Works authorised the College to proceed with the project, provided that construction began before November of the same year. Clare Hall was officially established as an approved Foundation of the University of Cambridge on 7th February 1966, with the Governing Body of Clare College serving as Trustees [CD26-01-APP-W2-2, p. 39]. The newly appointed Fellows used college facilities and convened for a weekly dinner each Tuesday in the Master's Lodge. Construction of the new buildings started in October, with separate contracts for the foundations and the superstructure in order to meet the deadline. The new building was completed in the summer of 1969 and formally opened on 30 September by Sir Eric Ashby (later Lord Ashby), Master of Clare College in his capacity as Vice Chancellor of the University, with the Chancellor in attendance.
- 4.2.14 Richard Eden's history of the College describes the problems around the construction of Clare Hall, centred on, *"continuing attempts to prevent the costs from rising above the level that Clare College could prudently finance"* [CD9-40, p. 5]. This led inevitably to economy measures in the construction of the College itself. The first phase of construction had started on 17th October 1966, but before the second phase began in the spring of 1967, *"economy measures were taken to keep the total cost within affordable limits."* These changes included the reduction in the number of studies from twenty to ten, *"thus allowing all of them to be built on the ground floor"* [CD9-40, pp. 7]. Eden's book does not specifically note whether any of these economies included external surface treatments.
- 4.2.15 The walkways within the campus were always intrinsic to the overall design. Richard Eden's Clare College and the Founding of Clare Hall (1998) quotes Ralph Erskine in this regard:
- "[...] the buildings are grouped around two main walkways – the family walk and the dwellings, and the scholars' walk with the studies, common room and bar. Beyond these, at each extremity of the site is a family garden and a scholar's garden. Breaking right through and across these groups is a cross-walkway ... (following) a varying degree of inter-relationship between scholastic work ... and recreation [...]"* [CD9-40, p. 6]
- 4.2.16 The distinctive, oversized rainwater goods and drainage channel (referred to as a 'canal' in the list description and hereafter in this Proof of Evidence) at the rear of Clare Hall were also original to the design. Historic photographs, including one supplied in the College's Statement of Case [CD23-17 OBJ-213, p. 132, figure 2] and historic maps [CD26-01-APP-W2-2, pp. 147-149, Figures 7 to 9] show that the canal terminated at the southern end of Family Walk. Today, the canal extends further westwards to the Brian Pippard building. It is likely that this extension was built at the same time as that building, in 1997-98.

- 4.2.17 Clare Hall went on to develop its own distinctive academic and intellectual culture. It became recognised for its informality and family-focused nature, and its layout helped keep down noise levels within the areas designated for study.
- 4.2.18 There have been several phases of expansion to the site. In 1985-1987, Erskine constructed the building to the north-west in a similar style with the input of local architect Nicholas Ray from the University. That building was named the Michael Stoker Building after the third President of Clare Hall, who secured funds for the expansion. Nicholas Ray himself added another range to the south-west in 1995, which was named after Brian Pippard, the first President of the newly constructed Clare Hall. In 1984, Clare Hall was granted its Royal Charter and became a constituent college of the University. Clare Hall became fully independent in 1996, following legislation that required the separation of its investment portfolio from that of Clare College.
- 4.2.19 A planning application was approved in 1997 for the erection of two new fences and gates at the entrances to Family Walk and Scholars' Walk on Rifle Range Road. These presumably were the large white metal gates and fences that blocked the entrances to Scholars' Walk and Family Walk, which were present until after 9th May 2025. The entrances to the Walks no longer have gates, and the fences have been replaced by slender black rails inserted into the ground north of the canal with concrete footings.

Land ownership

- 4.2.20 Several records confirm that the land ownership boundary between Clare Hall and the land parcel in which Rifle Range Road is located runs along the south elevation of the College.
- 4.2.21 Jesus College, Cambridge, has owned the land in which Rifle Range Road is located since at least the 19th century. A deed in Jesus College's archive, dated 31st December 1895, between Jesus College and The Trustees of the Cambridge University Football Ground is a contract to purchase over four acres that corresponds with a large part of the land marked CB440555 on the land registry plan to the south of Rifle Range Road **[CD9-47 and CD9-48]**. Subsequent deeds exist from 1896 and 1938.
- 4.2.22 Historic Ordnance Survey maps are provided in the appendix to this Proof of Evidence **[CD26-01-APP-W2-2, pp. 141-151, Figures 1 to 10]**. The Ordnance Survey map dated 1888 **[CD26-01-APP-W2-2, p. 141, Figure 1]** shows that the land on which Clare Hall now stands was separated from the land yet to become Rifle Range Road by a boundary running parallel to Herschel Road. The 1903 map is broadly similar, and also depicts the nascent Rifle Range Road adjacent to that boundary; a villa ('Elmside') had been constructed on the site of the future Clare Hall and its rear (south) boundary was slightly further north than the boundary further east towards Grange Road, as it continues to be today **[CD26-01-APP-W2-2, p. 142, Figure 2]**. The map surveyed in 1925 **[CD26-01-APP-W2-2, p. 143, Figure 3]** also shows also the boundary to Elmside set back further north at the location depicted in all maps up to the present. The southern side of the canal, which is first depicted on the 1976-80 map, along with the rest of Clare Hall **[CD26-01-APP-W2-2, p. 147, Figure 7]**, was built right up to the land ownership boundary as depicted on maps from 1925 onwards.

- 4.2.23 The fact that Clare Hall did not own Rifle Range Road is recorded in a comment explaining that the orientation of the building is not as it was originally intended. Eden's book recounts that Erskine's early design placed terrace houses to the east next to the gardens of Elmside, and Scholars' Garden to the west; however, this planned layout was reversed because Clare Hall did not own the road:

"My recollection is that the change was made because the kitchen and dining room had been located to the south of the common room, with the studies on the north side, but this would have required vehicle access for kitchen deliveries from the rifle range road, on which we had no right of access since it belonged to Jesus College and we could not be certain of its long-term availability for use by Clare Hall. Changes to make kitchen access from Herschel Road, essentially by rotating the plans through 180 degrees led to the present layout." [CD9-40, p. 5]

- 4.2.24 On 30th January 1984, the University of Cambridge entered into a tenancy agreement with Jesus College, Cambridge for a parcel of land including Rifle Range Road. A memorandum of agreement dated 9th May 2001, and supplemental to the 1984 agreement, also includes a deed of surrender dated 13th May 1999, which contains a plan of the land to which that tenancy agreement pertains [CD26-01-APP-W2-2, p. 149, Figure 9]. The plan depicts the verge of the road within that land parcel, with the land boundary abutting the boundary of Clare Hall, described as follows:

"All that part of the access track extending to 0.39 acres or thereabouts as the same is more particularly described in the Agreement and shown for the purpose of identification only coloured pink on the plan annexed."

- 4.2.25 Another document suggests that the boundary might be between Clare Hall and the metalled road, although it may not indicate legal title. In a *"Deed of Grant of easement over Rifle Range land adjacent to Grange Road Cambridge"* between Jesus College, Cambridge, and Clare Hall, dated 26th January 2001, the easement is marked crudely with a double line. The closest of these two lines to Clare Hall crosses the footpaths leading from Clare Hall on to the metalled surface of Rifle Range Road, with a slight gap shown between the land boundary and Clare Hall [CD26-01-APP-W2-2, p. 150, Figure 10].
- 4.2.26 An official copy of the register of title dated January 2018 confirms that, *"The Freehold land shown edged with red on the plan of the above title filed at the Registry and being Land on the west side of Grange Road, Cambridge (CB3 9BN)"* is in the ownership of Jesus College [CD9-47]. The accompanying plan [CD9-48; detail in CD26-01-APP-W2-2, p. 151, Figure 11] shows the outside of the boundary bordering the end walls and garden walls of Clare Hall, and the canal from Family Walk eastwards.
- 4.2.27 The order limits of the CtoC Scheme follows the land ownership boundary as recorded by HM Land Registry. This shows the land ownership boundary running along the south side of the canal structure at the base of Clare Hall's south elevation, with one exception: alongside the end wall of the western block (college apartments) the land ownership boundary follows the wall, on the north side rather than the south side of the canal. This location is the area where the canal is not original (cf. paragraph 4.2.16).

4.3 Description

Introduction

- 4.3.1 Pevsner describes Clare Hall as a “*chunk of some little labyrinthine pedestrian city*” [CD9-38, p. 6]. Clare Hall is domestic in scale, in keeping with its suburban setting. There is little use of exposed concrete, unlike other colleges founded at the same time. Instead, the buildings are constructed predominantly of red bricks laid in a stretcher bond, alongside white painted and red-stained timber.

Plan

- 4.3.2 Clare Hall is formed of three main sections, comprising communal areas, houses for visiting fellows and a block of apartments, which combined form an irregular rectangular plan aligned east to west. It is bounded by Herschel Road to the north, Rifle Range Road to the south and other buildings and gardens within the College complex to the west and east.
- 4.3.3 Within the listed building, space is utilised effectively to create three distinct sets of blocks. To the west is a terrace of apartments that steps down from four storeys to the north to two storeys at the south elevation. Across the centre is a block comprising a two-storey elevation fronting onto Herschel Road in front of single-storey homes arranged around four small private gardens. To the east, the largest section includes dining rooms, kitchens, study areas and other communal spaces, and slopes down the artificial terracing to a single storey on the south elevation. These blocks are arranged around two outdoor paved areas, which are known as Scholars’ Walk and Family Walk to reflect their different functions, with a single narrow crosswalk that spans the site providing the only link between the two ‘Walks’. Gardens are located to the immediate west and east of the listed building.
- 4.3.4 The paving used in the Walks is formed of light grey concrete slabs, with red brick pavers forming a simple yet decorative linear arrangement approximately along a north to south axis. There are some irregularities in the slabs used, Scholars’ Walk being composed partly of higher quality pebble-finish slabs. The differences in fabric may reflect spaces of differing status, or relate to the ‘economy measures’ taken during construction (cf. paragraph 4.2.14), or may indicate areas of resurfacing since the 1960s. The use of slabs and brick pavers is replicated for three short pathways from the metalled surface of Rifle Range Road to short pedestrian bridges over the ‘canal’ (an open drainage channel) that run along the southern extent of the building. The simple and pebble-finish slabs in Scholars’ Walk and Family Walk are repeated for the paths running from the canal to the road.
- 4.3.5 As the College states in its written response, Erskine’s design was, “*deliberately designed by Ralph Erskine to be permeable in stark contrast with other traditional colleges in Cambridge that are private and generally locked overnight*” [CD23-17 OBJ-213, p.128]. This meant that the entrances were designed to connect to the wider landscape to the south and the streets to the north. In common with his earlier designs, Clare Hall created a bulwark against the outside world around a place of shelter, but one which is accessible despite being enclosed. This design creates open relationships with the surroundings only in elevated viewpoints. The irregularity of the spaces within the college and the presence of intervening blocks means that the

experience of the college from most locations within it is one of enclosure and division from the world outside.

North side of Clare Hall

- 4.3.6 The north-facing elevation of Clare Hall forms a discreet frontage and most of the façade is blind, although there are some red-painted timber framed windows playfully placed mainly at first and second floor levels. The upper part of the north block is occupied by the President's House, which has windows to north and south. A car park is located at basement level. This design element creates an impression of varied topography across the site, which contrasts with its actual flat terrain. Additionally, its relationship with the southern parts of the building reflects Erskine's designs for domestic developments in Sweden.
- 4.3.7 The main entrance to the building is accessed via a concrete staircase flanked by railings. The staircase leads through a covered walkway to Scholars' Walk where the Porters' Lodge is situated, along with access to the main communal area and bar, and the dining room.
- 4.3.8 To the west of the main entrance is the end of the central block, the elevation of which is mostly blind. There is a continuation of the windowless fenestration that lights the basement, which are fronted by horizontal bars. At the very west of the northern extent of Clare Hall, the first-floor overhangs to the east and forms a covered walkway that leads to Family Walk. Above this sits an oversize gutter, with an oversized downpipe attached to the accommodation building to the immediate west. The edge of the gutter is prominent along the roofline of the accommodation buildings.
- 4.3.9 The entrance to the accommodation block at the west of the north elevation is by a second concrete stair, which is aligned east to west, turning to the south and beneath the communal balconies that provide access to the flats. At the north elevation, this block is of three storeys on its east side but four storeys on the west side, and it slopes down to two storeys at the south elevation. The block contains four houses and twelve flats or maisonettes.
- 4.3.10 The stepped, cantilevered balconies of the east- and west-facing elevations of the western accommodation block have timber balcony divisions, the height of which partly obscure their views out. On the western side, the balconies have views south-west towards Rifle Range Road, although the Brian Pippard Building would be prominent and would partly screen those views. On the eastern side, the balconies have views east across the rest of Clare Hall and views south-east of the line of trees along Scholars' Walk. For half of the year, those trees are not in leaf, and it is anticipated that views, filtered by their branches, include Rifle Range Road and the rugby ground, with the back of the stand being a prominent element of that view.

South side of Clare Hall

- 4.3.11 Erskine's design steps down to make the south-facing elevation the lowest part of the building. The southern part of the building contains various accommodations including (in blocks from west to east) a probable kitchen within one of the

maisonettes, two rooms in one of the courtyard houses, and Clare Hall's main meeting room and six study rooms.

- 4.3.12 Oversized downpipes are present along the south-facing elevation and are a distinctive feature, described by Pevsner as "*monsoon sized rainwater trunks*" [CD9-38, p. 7]. These were reportedly oversized due to a miscalculation of the amount of rainwater likely to fall, and they have become a part of the distinctive character of the building (*Historic England Advice Report*, 31st August 2018, in [CD23-17 OBJ-213, p. 117]).
- 4.3.13 The south-facing elevation includes three entrances/exits, belonging (from west to east) to Family Walk, a private garden, and Scholars' Walk. Beside the entrances to the Walks are slender black rails, which have been installed recently, replacing the large white fences and gates that probably were constructed during the late 1990s (cf. paragraph 4.2.19). To the immediate west, the south-facing elevation of the western accommodation building is almost blind, except for a single window at the first floor and, on the ground floor, one window at the east end and long, narrow horizontal windows further west.
- 4.3.14 The entrances meet the canal, where small low-profile bridges carry pedestrians across that drainage feature. These connect with paths, apparently constructed of the same slabs and pavers as those inside the College, that cross the grassed area to the metallised surface of Rifle Range Road. This strip of grass is well maintained and includes a line of immature trees at the roadside.

The west facing elevation of the central block

- 4.3.15 The west facing elevation of the central block projects at regular intervals due to the use of bays on the single storey façade. The upper portions of the windows are formed of horizontal timbers that extend down alongside the red-painted timber frames, joining the shallow projecting sill. Shrubbery fronts most of the bay windows.
- 4.3.16 The elevation steps out at the southern end, projecting into Family Walk, and also comprises a bay with glazing on all sides that further projects into the southern extent of the walk, further narrowing the opening into Rifle Range Road and providing a sense of privacy. This sense is further enhanced by the overhang of the balconies of the east facing elevation of the west block (apartments) that cast a shadow across the walk during the day.

The east facing elevation of the western block (apartments)

- 4.3.17 Each flat on the ground floor level projects into Family Walk at regular intervals, with entrances recessed. Unlike the west facing elevation of the central block, which faces it, the glazing does not extend the extent of the projection. Here too, the ceiling level appears to be much lower than that of the central block.
- 4.3.18 At second floor level, the elevation is flush and comprises the red-stained windows with timber frames seen across the elevations of Clare Hall. The balcony projects into and above Family Walk, extending beyond the first floor projection. Drainage channels are also present and extend beyond the balcony into Family Walk.

- 4.3.19 At the elevations, the roof sits flat at the southern end and slopes upwards to the north, although the roof also slopes down from west to east to reflect the change in number of floors.

Family Walk and Scholars' Walk

- 4.3.20 Aligned approximately north to south, Family Walk and Scholars' Walk are linear openings between the blocks of Clare Hall. The Walks are paved with concrete slabs laid lengthways east to west. In some places, these align whilst in other areas they alternate due to differing slab sizes. Red brick pavers provide a bright detail and are laid along the length of the western block (dwellings) and the central block, and east-west across Family Walk and Scholars' Walk, creating a sense of separation between the concrete paving.
- 4.3.21 Small areas of green are pocketed around the outer corners of the walks, and around the entrances to Rifle Range Road. Here, two high steel fences and gates previously separated Clare Hall from the grass verge along the north side of the road, as observed on a site visit on 9th May 2025. The gates and fences have since been removed, as observed on a second site visit on 10th June 2025. To the immediate east of the openings, replacing the fences, a thin black rail has been installed, which extends approximately a meter high and fronts decorative plants and plant pots.
- 4.3.22 Oversized rainwater goods extend from the roof of the western (apartment) block and into a concrete channel that is situated off-centre of Family Walk. This creates a sense of visual obstruction between the walk and Rifle Range Road, which is further heightened by the vegetation between the rainwater goods and the road to the south. The visibility of Rifle Range Road is therefore limited to a small section of the grass verge on the north and south side of the road, along with a view of the timber fence belonging to Cambridge University Rugby Club.

Interior description: Meeting Room

- 4.3.23 The meeting room is located at the south-west corner of the eastern block. Its sloping roof is comprehensible from the interior, as the ceiling follows the slope. The room is well lit naturally through a north-south aligned narrow skylight that runs along the western extent of the room, the remainder of the ceiling being formed of east-west aligned timber slats with suspended lights situated north-south through the middle of the room. A small square casement window lights the room from the north end of the west wall, and the southern wall is lit by a long, low line of windows, which together form a ribbon-window like effect.
- 4.3.24 The west, north, and majority of the east wall are windowless, giving a sense of blindness to the room, with views outside Clare Hall limited to through the length of the low strip of glazing to the south. The view through that glazing is most readily observed only when seated, and contains the trunks and some foliage of the trees, Rifle Range Road, the wooden fence opposite, and the back of the rugby stand.

4.4 Statement of Significance

- 4.4.1 Clare Hall is an important example of the late-20th century development of the University of Cambridge. Clare Hall's significance is derived from its very high architectural and historic interest, and it is one of the highly significant academic

buildings located within the West Cambridge Conservation Area **[CD18-03]**. Its architectural interest relates to its complex form and the interrelationship of its form and social functions. Its historic interest relates to its position in post-war social history, the development of ideas in pedagogy and University life, and the work of an internationally important architect.

4.4.2 The following interests are noted in the list entry text:

“Architectural interest: as a highly sophisticated architectural form which is distinctive, as well as an aesthetically pleasing composition; for the scale and massing of the building, and the use of the car park to create an artificial slope to provide greater interest, also showing a consideration of landscape as well as the form of the building.

Historic interest: as tangible evidence of the social and economic context of the post-war era and as a unique and highly successful example of a response to the needs and challenges facing Cambridge University at the time; as the work one of the acknowledged premier designs by an internationally renowned architect whose buildings already well represented on the List.” **[CD9-39, pp. 2-3; CD26-01-APP-W2-2, pp. 34-35]**

4.4.3 Clare Hall’s high architectural interest is due primarily to its outstanding late-20th century design, which is representative of new colleges of the period when there “*was a great deal of work to go round*” in Cambridge **[CD9-38, p. 5]**. The asset was designed by Ralph Erskine (1914-2005), described in the Architects’ Journal as epitomising “*the pioneer spirit of the post-war generation of Modern architects. He brought people together with a sense of place and enriched that with an original approach to forms and materials*”. Clare Hall’s importance to Erskine’s career was its status as his “*first significant work in Britain*” (*Historic England Advice Report*, 31st August 2018, in **[CD23-17 OBJ-213, p. 117]**). The design is reflective of Erskine’s work in Sweden and Canada, and a precursor of some later accommodation including Byker Wall.

4.4.4 Pevsner writes of Erskine’s design that it was “*Less heroic and more intimate*” than its near contemporaries, New Hall and Fitzwilliam College, and one which “*also went further in its dismissal of Cambridge tradition: no chapel, no showpiece library and unsegregated dining for Fellows and postgraduate students*” **[CD9-38, p. 5]**. The architecture is described as “*both roughness and lightness, with suggestions of improvisation and fantasy: notably the stepped cantilevered balconies facing Family Walk*” **[CD9-38, p. 6]**. The asset’s architectural interest is enhanced by the addition of the Michael Stoker building, which was also designed by Erskine and was built 1985-87. The extension slopes from east to west “*answering Erskine’s N to S incline.*” The building includes a staircase, “*strikingly projected outwards*” **[CD9-38, p. 7]**.

4.4.5 Clare Hall’s architectural interest is enhanced by its contrasting style and group value with Grade II listed ‘Elmside including boundary wall and gate’ **[CD26-01-APP-W2-2, pp. 49-58]**, which dates to c. 1885 and was extended c. 1900. Clare Hall occupies an architectural and social centrality to the life of the college, which includes several other late-20th and 21st century buildings that make up the overall campus. These include the Brian Pippard Building (1997-98), West Court (1963, 1999-2000), and Salje Building (2009-10).

- 4.4.6 Clare Hall has high historic interest as a late-20th century foundation, established in 1966. It is one of the ‘new’ Cambridge colleges (i.e. those founded in the 19th and 20th centuries). It is contemporary, or near contemporary, to a number of colleges in Cambridge, including Murray Edwards College (founded as New Hall in 1954), Churchill College (1960), Darwin College (1964), Wolfson College (1965), and Lucy Cavendish College (1965). Clare Hall was founded at a time of expansion within the University: *“Like the new universities of the period, they reflected a national policy of expanding higher education [...] and a broader optimism concerning innovation and social change”* [CD9-38, p. 5]. Its historic interest is also increased by its relationship with Clare College, and by virtue of being based on the Institute for Advanced Study at Princeton. The founding of Clare Hall in February 1966 was thanks to the initiative of those at Clare College, including its then master, Eric Ashby. Clare College not only gifted land and an endowment to the new institution; it gave the new college its ancient name of Clare Hall (by which Clare College had previously been known).
- 4.4.7 Clare Hall’s historic interest is enhanced by its connection to Eric Ashby, Lord Ashby of Brandon (1904-1992), a renowned plant scientist, who among many academic positions was Professor of Botany at the University of Sydney (1938-1946), Professor of Botany at the University of Manchester (1947-50), President and Vice-Chancellor of Queen’s University, Belfast (1950-59), Master of Clare College, Cambridge (1959-67), and Vice-Chancellor of the University of Cambridge (1967-75). Ashby did much to shape the early history of Clare Hall by virtue of his position at Clare College. Clare Hall’s historic interest is also derived from connections with other leading academic figures, notably its first President (from 1966-73) the physicist Professor Sir Brian Pippard (1920-2008), who worked during the Second World War on a radar device for tracking mortar projectiles and later served as Cavendish Professor of Physics at the University of Cambridge (1971-84).
- 4.4.8 Clare Hall is designated as a Grade II* listed building, which is a category that the Department for Digital, Culture, Media and Sport describe as being, *“particularly important buildings of more than special interest”* [CD8-36, p. 4]. In EIA terms, Clare Hall is assessed as being of very high significance.

4.5 Setting

- 4.5.1 The list entry text for Clare Hall makes no mention of its setting, either to describe it or to indicate ways in which it contributes to significance or the appreciation of that significance. The listing was carried out in 2018, by which time setting had become a high-profile consideration in planning matters related to listed buildings. Views are mentioned once, to state that, *“The houses have projecting bay windows to Family Walk which provide views to north and south”* [CD9-39, p. 8; CD26-01-APP-W2-2, p. 40].
- 4.5.2 A key attribute of Clare Hall’s setting is its location on Herschel Road, and thereby its historic and ongoing connection with Clare College itself, and its role and position within a late-20th century college campus. Clare Hall is surrounded by roads to north and south, and by other buildings and green space within the College campus to the west and east.
- 4.5.3 Clare Hall has visual connections with other Cambridge colleges with which it also has historic relationships. Robinson College (founded 1977) is a conspicuous and highly

contributory attribute of the setting, as the two colleges face each other on Herschel Road and are both very high-quality architectural responses to the educational needs of the later 20th century. Clare Hall is surrounded by other properties owned by Corpus Christi College, King's College, St John's College, and Emmanuel College among others, and to other facilities such as the nearby University rugby ground. The principal entrance on Herschel Road is the main point of movement beyond Clare Hall to these associated institutions. However, the link to Rifle Range Road also provides a linear connection for pedestrians to reach other assets that form part of Clare Hall's setting.

- 4.5.4 Clare Hall also has contextual relationships with other parts of the University in the wider area, notably the University Library on Queens Road/West Road, St John's College, King's College, Trinity College, and Queens' College, located to the north-east, east, and south-east. Clare Hall's primary contextual connection with the University is to Clare College on Trinity Lane, which was instrumental in the creation of Clare Hall as a satellite institution.

- 4.5.5 Clare Hall's setting is characterised by its relationship with West Cambridge Conservation Area. The conservation area appraisal notes the many University campus buildings within its boundary, including those buildings dating from the 20th century. It notes of Fitzwilliam College, Murray Edwards College, Courts at Churchill College, Clare Court Memorial Court, and Clare Hall: *"These tend to turn their backs on the street with enclosed and private green spaces which are largely hidden from public viewpoint"* [CD18-03, p. 23].

- 4.5.6 Clare Hall is also defined by its position within a 20th century campus. Although, as Pevsner notes, the traditional Cambridge college structure is not reflected at Clare Hall, it is still a semi-enclosed academic community, an innovative late-20th century take on a traditional university quad or court. As such, much of the asset's setting is focused inwards on its own campus grounds and away from the bustle of modern-day Cambridge, which is consistent with Erskine's design intention. At the heart of Clare Hall's campus and college life, the asset is experienced through its college grounds, particularly Scholars' Garden and Fellows' Garden as well the enclosing built forms. Clare Hall is also defined by its relationships with the late-20th and 21st century architecture within its campus, which includes the Brian Pippard Building, the Salje Building, and Paul Mellon Building. Finally, Clare Hall has a key relationship and connection with Elmside Grade II listed building, which is used as accommodation for Clare Hall, as are number 9 and 9A Herschel Road.

- 4.5.7 Although the asset's setting is defined primarily by its inward-looking focus on the overall campus, its outward views across Herschel Road and Rifle Range Road also enhance its significance to a lesser degree. The direct, visual relationships with Rifle Range Road comprise narrow openings along the Walks, the views from some balconies and apartments, and the windows on the south-facing elevation. The ground-floor views offer little connection with the wider landscape and are in most cases dominated by the road, the boundary fence, and the rugby stand, which is an original attribute of the setting having been present at that location in some form since the 1920s [CD26-01-APP-W2-2, pp. 143-150, Figures 3 to 10]. The elevated views also include the rugby stand, adjoining terraces and the rugby pitch, as well as a greater experience of Rifle Range Road. The wider setting to the south is

predominately green with broad skies, as it is dominated by the rugby ground, with land plots of more rural character to the south-east, and suburban development further south and south-west.

- 4.5.8 The list description does not identify any significant views, although “*a consideration of landscape*” is part of the architectural interest and “*views to north and south*” are mentioned in reference to Family Walk. Clare Hall’s elevated views, where they are not screened by built form or heavily filtered by vegetation, contribute some architectural interest by virtue of relating to Erskine’s approach to design and how the building relates to the wider landscape. To a lesser extent the views also contribute to the historic interest of Clare Hall in its context as a later 20th century University foundation. There are also views towards Clare Hall from the surrounding landscape that contribute to its significance for the same reasons.
- 4.5.9 Vegetation is a notable attribute of Clare Hall’s campus and wider setting. Within the listed building itself, trees protrude from the central line of private gardens, and the Walks contain scattered shrubs and beds of low-lying foliage. The immediate setting of the gardens surrounding the listed blocks are attractively arranged green spaces with tall mature trees.
- 4.5.10 A line of deciduous trees stands between the metalled surface of Rifle Range Road and Clare Hall. Unlike the vegetation in the gardens, they were not part of the original setting of Clare Hall. They are visible on a Google Earth aerial photograph from 1999 at which time they appear to have been very young. The trees’ presence therefore does not add to the asset’s significance. They stand higher than the south elevation of Clare Hall. When they are in leaf, they provide effective filtering of the view of the rugby stand and activities on the pitch, which is a beneficial effect, but also the wider landscape, which is an adverse effect. They are also apparent in views from the wider landscape towards Clare Hall, and in spring and summer they partially block those views and a viewer’s capacity to experience the building as it was envisaged by Erskine.
- 4.5.11 The auditory setting of Clare Hall is in general tranquil¹⁵. Within the immediate setting of the campus, it appears that for the most part the environment is one of quiet, although designed spaces are available for people to meet both inside and out. The quietness and tranquillity should not be over-stated, particularly with reference to the original setting and context of Clare Hall; the name Family Walk is a reminder that Erskine’s design was for communities including members and everyday activities liable to generate noise levels that may not have been permissible in other colleges.
- 4.5.12 Beyond the campus, Herschel Road and Grange Road are in fairly regular use by pedestrians, cyclists, cars and buses, creating a variable but generally quite low level of background noise. There is also intermittent noise from the outdoor play areas of King’s College School, which stands opposite Elmside on Grange Road. However, as a visitor progresses eastwards along Rifle Range Road to the rear entrances of Clare Hall the noise of the street reduces to the point of usually being imperceptible (with occasional ‘spikes’ of noise). One other intermittent intrusion of noise into the quiet setting is the use of the rugby ground, which introduces noise into the setting when

¹⁵ As defined in the Oxford English Dictionary as, “free from disturbance / calm”.

matches are taking place; this must be assumed always to have been an attribute of the setting.

- 4.5.13 Taken overall, setting makes a high contribution to the asset's significance. This contribution relates primarily to its associations with other colleges and the wider landscape of educational institutions in the conservation area and beyond, and their relationship with the historic interest described above and in the list description. Experiential elements of the setting such as the quiet and green space to the south contribute somewhat to the listed building's architectural interest, but their contribution is reduced by the inwardly focussed nature of the design and the community engendered by it. The positive experiential elements of the setting also allow the significance of Clare Hall to be better appreciated by occupants and visitors (cf. paragraph 2.5.2, in reference to **[CD9-42, p. 5, paragraph 5]**).

4.6 Curtilage along Rifle Range Road

- 4.6.1 The curtilage of the listed building is not defined in the list description or in any plans produced by Historic England. The southern edge of the curtilage of Clare Hall is described below, based on professional judgment, historic and current title plans, the list description, the precedent of case law (cf. paragraphs 2.3.4 to 2.3.7 above), and technical guidance (cf. paragraphs 2.5.1 to 2.5.8 above).
- 4.6.2 The appendix to this Proof of Evidence contains two plans depicting the curtilage along Rifle Range Road, as interpreted below, in relation to the existing conditions and to the proposed development **[CD26-01-APP-W2-2, pp. 152-153, Figures 12 and 13]**. The curtilage is interpreted as running along the south side of the canal from the eastern corner of the property westwards as far as the entrance to Scholars' Walk, at which point it crosses to the north side and runs along the base of the south elevation to the corner before running north, enclosing the small gardens west of the west (accommodation) block.
- 4.6.3 Clare Hall was listed on 6th September 2018. The accompanying map of the listed building outlines the blocks (only) that are included in the designation: Ralph Erskine's original building complex and his later Michael Stoker building. I have assumed that it was not Historic England's intention that the curtilage of the designation be restricted to those blocks, but rather that it would encompass at least some of the land around or between them.
- 4.6.4 The list entry description notes (under 'PLAN' and 'EXTERIOR') the presence of the two Walks within the campus, and that they are paved, but the text makes no mention of their extending south beyond the line of the southern elevation. The two Walks extend south within the campus to the canal, at which point the fabric and pattern of the Walks' surface treatments ceases, and small, low concrete bridges cross the canal. The paths outside the building are of the same fabric as has been used inside (although it is unproven whether or not that is original fabric). However, they are a distinct 'build', repeating what is present inside the campus, rather than being continuous. In addition, the paths are on land not owned by Clare College or Clare Hall, either historically or at the date of listing.

- 4.6.5 The paths are outside the boundary wall of the listed building, which is composed of the end walls of the three main blocks and the garden walls, indicating that the paths are outside the campus, following the Taunton Deane judgment¹⁶.
- 4.6.6 The canal is attached to the building, as part of the rainwater drainage system. It forms an enclosing feature around the building at the edge of the asset. The College refers to this as a “*moat-canal type detail along the southern boundary*” ([CD23-17 OBJ-213 p. 130], my emphasis). The list entry description indicates that the canal is part of the designation, stating (under ‘EXTERIOR’) that, “*There is also a small canal which runs along the length of the southern edge of the site which collects rainwater goods from further oversized goods*” ([CD9-39. p. 9; CD26-01-APP-W2-2, p. 41], my emphasis).
- 4.6.7 The section of the canal from Family Walk to the Brian Pippard Building is outside the land owned by Clare Hall (see paragraphs 4.2.20 to 4.2.27 above). The Brian Pippard Building, which was constructed later than the main phase of Clare Hall (c. 1997-98), was excluded from the listing. Given these two facts, there is no reason to conclude that the section of the canal running along the southern elevation of the western block is part of the listed building, or within its curtilage.
- 4.6.8 The original canal, i.e. from Family Walk eastwards, is part of the listed building, rather than being a curtilage structure or an unrelated feature, because it is attached to the building, thereby conforming to the definition in the 1990 Act [CD5-28, p. 3, Section 1(5)(a)]. The curtilage does not extend beyond the canal because it is an enclosing feature, and is described in the listing text as marking the site’s southern edge. The three paths that cross the grass to the metalled surface of Rifle Range Road are outside the curtilage because they are discontinuous from the physical layout of the internal space and because they have never been within the property boundary.

4.7 Effects on Clare Hall

Alteration near to Clare Hall

- 4.7.1 The west facing elevation of Clare Hall is located immediately adjacent to the CtoC Scheme on Rifle Range Road. A new bus route with an emergency / maintenance access track on its northern side would replace the current metalled road surface. The line of trees next to the current road surface where it passes Clare Hall would be removed. The detailed design would address opportunities for enhancement through new planting, to which end the indicative design for the CtoC Scheme includes a proposed hedgerow between the new route and Clare Hall. The fence between the road and the rugby ground would be replaced with a new fence of similar appearance. There would also be works at the junction of Rifle Range Road and Grange Road.

Physical effects

- 4.7.2 There would be no physical effects on Clare Hall. There would be physical alteration of three paths linking Clare Hall to Rifle Range Road that are not part of the listed building but are associated with it. These would be removed to facilitate the construction works, and it is anticipated that most of the fabric of the paths could be

¹⁶ *R (Egerton) v. Taunton Deane BC* [2008] EWHC 2752 (Admin)

replaced. The paths are between approximately 3.5m and 4.0m in length. Between approximately 1.2m and 1.6m of those paths extend into the footprint of the access track. The current design would involve truncation of these southern sections. This equates to approximately one and a half flagstones in length from each path.

Operational effects of the permanent infrastructure

- 4.7.3 Views south-west from elevated windows and balconies on the west side of the west block would include a section of the new route and access track extending west along Rifle Range Road for a maximum distance of probably no more than 150m **[CD23-17 OBJ-213, p. 134, Figure 06]**; the section of the route that is visible would be shorter the further north along the block each viewpoint is, due to increasing screening by the Brian Pippard Building. A short section of the new route and access track would be visible in close vicinity from windows on the south elevation. A very short section of the new route and access track would be visible in narrow views through the Walk entrances at variable distances along the Walks, and also from two of the President's House windows (located above each of the Walks at their north ends). The new route and access track would be barely visible, if at all, from viewpoints along the elevated walkway or windows along the east elevation of the western block because other parts of the building would block them.
- 4.7.4 The permanent alterations of the CtoC Scheme would not be present in views towards Clare Hall from the south due to the physical barrier of the rugby ground fence. The new route and access track would be visible together with Clare Hall in views along Rifle Range Road from east or west.
- 4.7.5 Removal of the line of trees along Rifle Range Road would create the following changes to Clare Hall's setting. Views of the wider landscape (including the rugby stand and activities on the pitch) from elevated walkways, windows and balconies along the east elevation of the western block and the south-facing windows of the President's House would no longer be partly screened or filtered by intervening branches and foliage. This change would be much more evident during the spring and summer than the seasons when the trees are not in leaf. Removal of the trees' lower boughs near the entrances to the Walks would permit more of the new route and the rugby ground fence to be seen along the Walks and from the President's House windows located above each Walk.
- 4.7.6 The CtoC Scheme indicative design includes a hedgerow at the current location of the line of trees to be removed, alongside the new access track and a few metres from the south elevation of Clare Hall. It is assumed here that the entrances to Clare Hall would not be blocked by a continuous hedge. Although detailed design would confirm the nature of the hedgerow, it is highly likely that it would be perennial and of sufficient thickness to block the views from ground-floor windows effectively. Those views are dominated by Rifle Range Road, the wooden boundary fence, and the rugby stand, and do not add to the significance of Clare Hall. If the landscaping includes a hedgerow, that could reduce the level of light entering the windows on the south elevation at the ground floor, thereby having an adverse effect on the significance of Clare Hall by affecting the interior space.
- 4.7.7 The new access track would offer a means of access to Clare Hall, which currently is accessed via private land belonging to Jesus College.

Operational effects of the buses

- 4.7.8 Single-decker buses would run approximately between 6.00am and midnight, up to approximately ten services an hour in each direction, although service frequency would vary at different times of the day **[CD1-10.01, p. 24, paragraph 3.1.3]**.
- 4.7.9 The buses would result in intermittent and short-lived alterations to setting and views. They would introduce moving elements to a vista that is otherwise quite static (except when rugby matches are playing). The buses would be an intermittent, noticeable element of the setting where it is experienced in those views.
- 4.7.10 The buses would affect the elevated westward views from the western block, and from narrow views through the Walk entrances from the Walks and the President's House windows located above them.
- 4.7.11 The buses are likely to be completely or almost completely screened by built form in elevated views from the east elevation of the western block and the windows of the President's House. Passing bus roofs may be visible, and where sight lines through the Walk entrances are possible the buses would be briefly seen passing.
- 4.7.12 The hedgerow along Rifle Range Road that is included in the indicative design is assumed to be perennial and of sufficient thickness that buses are unlikely to be visible from the ground floor windows of the south elevation, particularly from the low window in the meeting room. However, this assessment assumes that the hedgerow would not affect the degree of noise impact that would occur. If a hedgerow or other form of screening is not built alongside the access track, the buses would be present in views out of the ground floor south elevation windows; these would be in proximity and would be an intermittent noticeable element of those views.
- 4.7.13 Effects on noise and vibration, and mitigation thereof, are dealt with in Mr Toby Lewis' Proof of Evidence **[CD26-01-APP-W11-1]**. That evidence states in paragraphs 3.6.12 and 2.6.13 that predicted daytime sound levels for Clare Hall are significantly below the Lowest Observed Adverse Effect Level (LOAEL), meaning that no adverse effects on health and quality of life could be detected. Predicted night-time sound levels are marginally above the LOAEL, meaning that adverse effects on health and quality of life could be detected, but the predicted sound levels are significantly below the Significant Observed Adverse Effect Level (SOAEL). Night-time noise impacts could be avoided via management controls.
- 4.7.14 As they pass Clare Hall, the noise of the buses would be perceptible in adjacent parts of the listed building, such as the ground-floor rooms of the south elevation, and in the Walks and gardens. This would introduce periodic, short-duration additional noise of a low volume but an incongruous nature to the domestic/academic character within the listed building and its exterior spaces. These effects would be reduced at greater distance and by intervening built forms.
- 4.7.15 The tops of the buses would be visible in views towards Clare Hall from the south, although most of the buses would be screened by the physical barrier of the rugby ground fence. This is likely to be true even from elevated viewpoints such as the south

rugby stand, from which the current view of Clare Hall is partly blocked by the north rugby stand (cf. [CD23-17 OBJ-213, p. 135, Figure 07]).

'Significance of Effect' in EIA terms

- 4.7.16 The Environmental Statement provides a summary of the effects on built heritage that would result from the CtoC Scheme [CD1-10-1, pp. 120-123, Section 9.3]. More detail regarding the impact that the CtoC Scheme would have on Clare Hall's significance is provided in the Heritage Statement [CD1-11.07.02, pp. 31-32, paragraphs 6.2.5 to 6.2.9].
- 4.7.17 The Environmental Statement found that the Scheme would have no physical impact on Clare Hall, but that its setting would experience a **low** adverse magnitude of change (i.e. impact), which is defined as, "*Change to asset significance resulting in a small change in our ability to understand and appreciate the asset and its historical context, character and setting*" [CD1-11.07.01, p. 23, Table TR7-3-3]. The overall change was assessed as equating to a **minor** effect, which is defined as, "...a small, barely noticeable effect" on significance [CD1-11.07.01, p. 24, paragraph 3.5.6]. This is 'not significant' in EIA terms [CD1-11.07.01, p. 114, Table TR7-8-2].
- 4.7.18 Clare Hall's significance is derived from its architectural and historic interest, which may be affected by changes to its physical fabric or its setting. The alterations that would affect those interests (cf. paragraphs 4.7.1 to 4.7.15) are described further in this section in the terms of the Environmental Statement's method for assessing magnitude of change and significance of effect [CD1-11.07.01, pp. 22-25, Section 3.5].
- 4.7.19 The presence of the new route and access track in the views described above (cf. paragraphs 4.7.3-4.7.4) would adversely affect Clare Hall's architectural interest by disrupting, to a small degree, the way in which the views reflect the settings of Erskine's earlier designs from which Clare Hall developed (i.e. high-walled north-facing blocks sheltering a small community, more open to the wider southerly environment). There would also be a similar, but lesser, alteration to Clare Hall's historic interest as the new infrastructure would distract from its contextual associations with institutions in its setting. This would result in a magnitude of change described in the Environmental Statement as **negligible**, or "*No real change in our ability to understand and appreciate the asset and its historical context, character and setting*" [CD1-11.07.01, p. 23, Table TR7-3-3]. The effect would be **minor**.
- 4.7.20 The transit of the buses passing Clare Hall would result in intermittent and short-lived but regular alterations to setting and views (cf. paragraphs 4.7.8 to 4.7.15). The effects on architectural and historic interests of the permanent infrastructure, described in paragraph 4.7.19, would also result from the buses. There would additionally be interruptions of the tranquil character of the immediate setting of the listed building within its campus. These changes would result in a **low** adverse magnitude of change and a **minor** effect.
- 4.7.21 Removal of the line of trees along Rifle Range Road (cf. paragraph 4.7.5) would result in a degree of both benefit and harm to the significance of Clare Hall. The resulting more open views of the wider landscape to the south from parts of the western block and President's House would be slightly beneficial to the listed building's historic interest by allowing contextually associated University institutions to be more easily

experienced in the setting. Removing the trees would also slightly benefit architectural interest because the open views better reflect the settings of Erskine's earlier designs, from which Clare Hall developed. However, the increased exposure to the noise and visual intrusion of the new route and, particularly, the passage of the buses would be an adverse effect for the same reasons as stated above (paragraphs 4.7.19 and 4.7.20). The adverse and the beneficial effects of removing the trees would be of **negligible** impact, resulting in **negligible** effects, and would overall amount to **no change** to significance.

- 4.7.22 Truncation of the south ends of the three paths leading to Clare Hall (cf. paragraph 4.7.2) would not adversely affect its architectural interest or historic interest. The removal of that fabric would not alter Clare Hall's relationship with its wider setting or associated contextual relationships or make them any less comprehensible. Removal of the fabric would not break up any pattern, sever any relationships or affect any proportional relationships between elements of the building. The length of the paths is arbitrary, based on the distance that the metalled surface of Rifle Range Road happens to be from the entrances, and as such embodies no architectural or design value. The fabric that would be lost is not illustrative of any historic interest that Clare Hall possesses. There would be **no change** to the significance of Clare Hall as a result of removing the ends of the paths.
- 4.7.23 The following alterations would also result in **no change** to the significance of Clare Hall. The presence of a new junction at Grange Road would not affect Clare Hall, due to the separation distance and very low degree of intervisibility between the two locations. Removing the extant metalled road would not affect Clare Hall's significance, given that the relationships it enables will be retained by the new route. Removal of the rugby ground fence would not affect the significance as the like-for-like replacement would have the same appearance in the setting. Finally, the securing of permanent public access to Clare Hall would not have an effect on its significance, although the occupants may experience enhanced amenity value that is unrelated to the significance of the listed building.

Harm in terms of legislation and planning policy

- 4.7.24 In NPPF terms, the Environmental Statement concluded that the proposals would result in 'less than substantial' harm to Clare Hall, and that the harm would be toward the lower end of 'less than substantial' [CD1-11.07.02, p. 32, paragraph 6.2.9].
- 4.7.25 The architectural interest inherent in Clare Hall that would be harmed by the CtoC Scheme relates to two aspects, which are: the relationship with the environment as a developing idea within Erskine's designs, and the human-scale spaces of quiet communication and thought within the intimate setting of the campus. The relationship between the design for Clare Hall and the open space to the south is reflective of Erskine's evolving ideas about how to build community nuclei within a challenging environment, and is the CtoC Scheme would result in some loss of the comprehensibility of that relationship. Similarly, the environs of the Walks and other spaces of the campus within which the CtoC Scheme and the passage of its buses would be experienced are harmed by disturbance of the generally quiet character. The harm to architectural interest forms the greater part of the harm that would result from the CtoC Scheme.

- 4.7.26 Clare Hall's historic interest would be harmed because the permanent presence of the CtoC Scheme infrastructure, and the intermittent appearance of buses, would make its contextual relationships with other colleges and University institutions slightly less comprehensible. This represents only a very slight diminution of Clare Hall's historic interest.
- 4.7.27 The harm that would occur to Clare Hall as a result of the CtoC Scheme affect its reasons for designation (cf. paragraph 4.4.2) in relation to the consideration of landscape in its composition (architectural interest) and as evidence of the needs and challenges facing post-war Cambridge University (historic interest). No other stated reasons for designation would be affected. There would be no adverse impact that seriously affects any key elements of those interests, which is the guide for substantial harm provided in the PPG [CD8-35, p. 12, paragraph: 018, Reference ID: 18a-018-20190723]. The harmful impacts are of **negligible** or **low** magnitude of change, overall being assessed as low, and are of **minor** effect. The degree of 'less than substantial' harm would be well below the middle of the range between 'no harm' and 'substantial harm', and towards the bottom of that range.

4.8 Mitigation

Mitigation embedded in design

- 4.8.1 The Environmental Statement sets out the mitigation through design and practice [CD1-10.01, pp. 86-91, Chapter 6].
- 4.8.2 Mitigation embedded in the design that reduce harm to Clare Hall are as follows:
- use of asphalt surfacing rather than concrete, as asphalt is quieter than concrete
 - restriction of speed to 20mph, which reduces the impact of noise
 - restriction of lighting to the junction with Grange Road and solar studs (or similar) to provide wayfinding along the access track
 - no requirement for bright coloured (e.g. red) lanes, which would increase the visual effect of the proposals
 - potential to reduce the hourly number of bus movements during night-time periods in relation to Clare Hall, to reduce the impact of noise
 - option to use any desired vegetation planting to filter/screen views or otherwise enhance the setting of Clare Hall, subject to planning and buildability
 - like for like replacement of the Rifle Range Road south boundary fence, plus the option to employ any colours or treatments that may enhance the setting of Clare Hall
 - option to use electric buses, if desired.

Other forms of mitigation

- 4.8.3 In light of the very low levels of harm and the lack of physical impact on Clare Hall there are no recommendations for additional mitigation.

5. OTHER HERITAGE ASSETS

5.1 Introduction

5.1.1 Objections have been submitted that propose two alternative routes. As those proposed routes would have different impacts than the CtoC Scheme would on a group of assets listed below (paragraphs 5.1.3 to 5.1.7), this Section provides additional detail to that which was required for the Environmental Statement. This Section describes those assets' character and significance, and the effects that would result from the CtoC Scheme. Details of the two Objectors' alternatives, and the impacts that are predicted for them, are provided in paragraphs 6.1.26 to 6.1.43, and in Section 6.2.

5.1.2 Representations have also addressed effects on specific designated heritage assets, which are addressed below. This Section responds to those specific questions by providing a greater level of the information on which the assessment was based.

Heritage assets related to a proposed alternative route along Adams Road

5.1.3 A route proposed by the College along Adams Road, rather than Rifle Range Road, would result in different changes to the settings of nine designated heritage assets, in comparison to the CtoC Scheme. These assets are¹⁷:

- 'Clare Hall, University of Cambridge' Grade II* listed building
- 'Robinson College, Cambridge' Grade II* listed building
- 'Emmanuel College Sports Pavilion, including Groundsman's House and stable' Grade II listed building
- 'Cambridge University Real Tennis Club and Professionals House' Grade II listed building
- 'University Library' Grade II listed building
- 'Elmside including boundary wall and gate' Grade II listed building
- '48 Grange Road' Grade II listed building
- West Cambridge Conservation Area
- No. 4 Adams Road and No. 6 Adams Road locally listed buildings.

5.1.4 The character of Clare Hall, and predicted effects of the CtoC Scheme on it, are described in Section 4. The character of, and predicted effects of the CtoC Scheme on, the other assets listed above are provided below in Sections 5.2 to 5.9. Details of the proposed alternative route along Adams Road, and the impacts that are predicted for it (different to the CtoC Scheme or otherwise), are provided in paragraphs 6.1.26 to 6.1.43.

Heritage assets related to consideration of the CPPF Alternative

¹⁷ List descriptions are supplied in the appendix [CD26-01-APP-W2-2].

- 5.1.5 The CPPF Alternative would result in different changes to the settings of five designated heritage assets, in comparison to the CtoC Scheme. These assets are¹⁸:
- ‘Church of St Peter’ Grade I listed building
 - ‘American Military Cemetery’ Grade I registered park and garden (hereafter referred to as American Military Cemetery)
 - ‘Memorial and Attached Walls, Steps and Pool Surround at American Military Cemetery’ Grade II* listed building (hereafter referred to as the Memorial)
 - ‘Madingley Mill, at Mill Farm, Madingley Hill’ Grade II* listed building (hereafter referred to as Madingley Mill)
 - Coton Conservation Area.

- 5.1.6 A description of these assets’ character and significance, and the predicted effects of the CtoC Scheme on them, are provided in Section 5.10 to 5.12. Details of the CPPF Alternative, and the impacts that are predicted for it (different to the CtoC Scheme or otherwise), are provided in paragraphs 6.2.1 to 6.2.17.

Heritage assets related to representations by Cambridge City Council and South Cambridgeshire District Council

- 5.1.7 An assessment in Section 5.2 of the significance of Robinson College and effect that the CtoC Scheme would have on it addresses comments (see Section 6.3) made by Cambridge City Council [CD23-16-02 REP-09 CCC SoC] and South Cambridgeshire District Council [CD23-16-01 REP-09 SCDC SoC], described in paragraph 6.3.13 and 6.3.14.

Other heritage assets

- 5.1.8 A description of the significance and the effects that would result from the CtoC Scheme on ‘Schlumberger Gould Research Centre and Attached Perimeter Wall to the North’ Grade II* listed building and the ‘former entrance lodges’ to Childerley Hall are reported in Section 5.13 and 5.14.

5.2 Robinson College

- 5.2.1 Robinson College is located approximately 40m to the north-west of the CtoC Scheme’s order limits, and was listed at Grade II* on 10 November 2022 [CD26-01-APP-W2-2, pp. 88-103]. It is within West Cambridge Conservation Area [CD18-03].

Historic background

- 5.2.2 Robinson College is the newest Cambridge college, founded thanks to a donation of £18 million from philanthropist and businessman, Sir David Robinson. This funding was announced by the University of Cambridge in 1974, and a site for the new institution was identified on Grange Road.
- 5.2.3 The college was opened by Queen Elizabeth II in 1981. The college website notes that it now has 100 fellows, around 380 undergraduate students and 300 graduate

¹⁸ List descriptions are supplied in the appendix [CD26-01-APP-W2-2].

students. The college provides accommodation for its undergraduates, and has a library, chapel, dining and conference facilities.

- 5.2.4 The college building was constructed in 1977-80 *“all in one go”*, and *“was for both men and women from the start”* and, unlike other institutions founded in the 1960s, *“includes a full complement of undergraduates”*. The architects were Gillespie, Kidd & Moia, *“leading Glaswegian Modernists, whose entrée to collegiate architecture had come at Wadham, Oxford, a few years before”* [CD9-38, p. 8].

Description

- 5.2.5 Note: the interiors at Robinson College have not been viewed as part of the CtoC scheme. Site visits have only viewed the asset from publicly accessible areas on Adams Road, Grange Road and Herschel Road, and from Robinson College’s cafeteria.
- 5.2.6 Robinson College’s principal entrance is via a ramped entrance at Grange Road, which leads to Porters’ Lodge, part of Front Court, at the south-east angle of the complex. The south return to Herschel Road is Herschel Court, which fronts the road. To the north of Front Court is Long Court which fronts onto, and runs parallel to, Grange Road. At the north end is High Court, which forms the north-west angle of the building. This *“succession of courts”* is located *“between inhabited walls of raked accommodation and connect to the principal communal spaces: the hall, library, chapel, auditoria, common rooms etc”* [CD26-01-APP-W2-2, p. 91]. Long Court and High Court are, for the most part, physically separated from Grange Road by a mature tree belt.
- 5.2.7 The college’s accommodation is arranged around staircases. The whole is of *“rough red Swanage brick with some tile hanging in the upper residential parts”*, complete with tiled pitch roofs. Drainpipes are concealed in *“triangular brick projections”* while circulation in these areas is by walkways *“echoing the so-called streets in the sky of mid-C20 social housing”* [CD9-38, p. 9].
- 5.2.8 The Historic England list entry states that Robinson College is still largely as built. However, there have been some interventions, notably the completion of the Umney Theatre, designed in 1989 by Cambridge Design Architects *“using part of the service yard under the N end”* [CD9-38, p. 10]. The list entry also notes that the original open staircases have been enclosed with glazed doors, and a bridge has been built over the Bin Brook at ground level [CD26-01-APP-W2-2, p. 92].

Statement of Significance

- 5.2.9 The National Heritage List for England describes the asset’s significance as follows:

“Architectural interest:

** For the successful balancing of traditional typological and contextual architectural forms within a modernist megastructure;*

** As the largest work ever undertaken by Metzstein and MacMillan for Gillespie, Kidd & Coia;*

** For the complexity and variety of the building's highly detailed exteriors and external planning;*

** For the exceptional architectural quality of the chapel, featuring the work of Piper, Reyntiens, Steiger and Frobenius;*

** For the more than special interest of the library, which has very fine joinery detail and architectural affiliations to the Glasgow School of Art.*

Historic interest:

** As a progression of nearly eight centuries of college construction within the University of Cambridge;*

** For its place in the highly significant body of post-Second World War university architecture in England.*

Group value:

** For the building's proximity to, and functional affinity with Clare Hall (Grade II*), which stands on the opposite site of Herschel Road." [CD26-01-APP-W2-2, pp. 89-90]*

- 5.2.10 Robinson College is of very high architectural and historic interest. Its architectural interest is in its overall design as a late-20th century Cambridge college, and by virtue of being an example of the work of a notable architectural practice. In the post-war period, Gillespie, Kidd & Coia (which closed in 1986) designed religious and secular buildings across Scotland, with the firm's work characterised by five identifiable themes: deep plan forms, structural integration, sectional articulation, expressive fenestration, and perimeter planning [CD9-46, p. 3]. The third of these themes, sectional articulation, is particularly noted at Robinson College:

"This is clearly evident in the stepped sections of Cumbernauld Technical College, St. Peter's Cardross and Robinson College, Cambridge. In each case an extraordinary variety of very large, or large groupings, of spaces are integrated below the continuous soffits of the concrete superstructure. The articulation also deals with the experience of buildings from a distance, their silhouette and large scale modelling. On approaching them they appear to adjust their scale so that when at close quarters the experience is intimate and of human scale. From inside, the stepped section, either roof or balcony, lessens the sense of being on a precipitous face of a multi-storied building." [CD9-46, p. 4]

- 5.2.11 The final theme of perimeter planning, *"the linear arrangements of large scale, multi-cellular buildings; in effect inhabited walls which clearly differentiate between, and define different spatial domains, public and private"* is also seen at Robinson College, *"albeit with a far more complex programme"*:

"[...] Two continuous, linear walls of accommodation, one nesting in the other, are arranged either side of a sequence of four courts, the whole folded into the perimeter of a suburban block. The larger scaled inner wall facing the garden is highly ordered, its super-structure consisting of levels of student rooms. With the exception of the entry tower, the outer wall is lower and more varied in scale with an ad hoc series of architectural features, all of which tailors the large scale of the college to that of the street. In

following the footprints of the villas which formerly occupied the site the College inherited a mature garden landscape with minimal loss.” [CD9-46, p. 5]

- 5.2.12 In the opinion of the 20th Century Society, “*there can be little doubt that the architecture of Gillespie, Kidd & Coia can be considered to be of international standing*” [CD9-46, p. 6].
- 5.2.13 The asset’s architectural interest is further enhanced by its chapel, which contains interior decoration of the highest quality, notably the stained glass by John Piper (with Patrick Reyntiens) of “*the sun as the Glory of God, shining through tumbling foliage*”. The chapel contains works by other artists, as well as sculpture also by John Piper [CD9-38, p. 10]. Piper (1903-1992) was an acclaimed artist and designer, internationally known for his work portraying war damage to Coventry Cathedral.
- 5.2.14 Robinson College has high historic interest as a late-20th century foundation of the University of Cambridge. It is the newest of the post-war academic institutions founded in the city, others being Murray Edwards College (1954 as New Hall), Churchill College (1960), Darwin College (1964), Wolfson College (1965), Lucy Cavendish College (1965) and Clare Hall (1966). Robinson College’s historic interest is further enhanced by its proximity to the Grade II* listed Clare Hall, another leading post-war foundation: the two colleges together form a striking visual representation of the late-20th century expansion of the University of Cambridge, a period of huge growth within the university sector across the UK.
- 5.2.15 The asset’s historic interest is also in its connection with the philanthropist Sir David Robinson (1904-1987), a successful entrepreneur and businessman, born and educated in Cambridge, and commemorated by the name of the college that his generosity helped to found. The college’s academic status as a home to both undergraduates and postgraduates also adds to its historic interest, as does its connection to leading academics, including its first warden, the chemist, Jack Lewis, Lord Lewis of Newnham (1928-2014).
- 5.2.16 As a Grade II* listed building it is a heritage asset of very high significance.

Setting

- 5.2.17 Robinson College is primarily defined and experienced by its relationship with its campus grounds, its location and connection with Grange Road and Herschel Road, and its visual and historic connections with Clare Hall, located on the other (south) side of Herschel Road.
- 5.2.18 Robinson College is primarily focused inward on its campus grounds, ‘reshaped’ by J.S. Bodfan Gruffydd, using the separate house gardens, and adding a causeway and bridge over the Bin Brook [CD9-38, p. 10]. The surrounding villas, which are characteristic of the development of this part of Cambridge, and the mature trees within the campus grounds, provide a tranquil and calm feel to the college, shielding it from the bustle of modern-day Cambridge. The grounds also contribute to the overall informality of the college, with students allowed to walk on the grass – a different concept to other traditional courts or quads in Cambridge.

- 5.2.19 Traffic impacts are apparent in the asset's setting, particularly along Grange Road. This is noticeable at the college's main entrance, which fronts onto Grange Road itself.
- 5.2.20 Robinson College has connections with other built component parts of its campus, including with the locally listed No. 2 Sylvester Road (built 1939), with Thorneycreek House (built 1895), and with late-20th century and 21st century graduate houses.
- 5.2.21 The asset's setting also has an outward focus, and the college presents a bold and confident external elevation and presence to Grange Road and Herschel Road, albeit one largely shielded by mature trees. The bustle of its college life is readily apparent in this part of the conservation area. The college's position as a one of the late-20th century foundations of the University of Cambridge is reinforced by its relationship with Clare Hall. In common with Clare Hall, its location also allows for visual and historic relationships and connections with the wider University of Cambridge. These connections include the Grade II listed University Library on Queens Road/West Road, nearby individual colleges, as well as with other facilities and institutions connected to Cambridge colleges and the wider University of Cambridge.
- 5.2.22 Robinson College is also defined by its relationship with West Cambridge Conservation Area [CD18-03]. The conservation area appraisal highlights it as one of the notable college buildings within its boundary. Robinson College is described in the appraisal as *"an unusual building which combines teaching and residential accommodation without resorting to the court layout of the earlier historic buildings"* [CD18-03, p. 23].
- 5.2.23 Setting makes a high contribution to the asset's significance.

Effects of the CtoC Scheme on Robinson College

'Significance of Effect' in EIA terms

- 5.2.24 The CtoC Scheme would result in increased levels of public transport traffic in West Cambridge Conservation Area. The proposed intersection at the junctions of Rifle Range Road and Grange Road would introduce a new system of traffic control measures that would change the overall layout of Grange Road slightly.
- 5.2.25 The CtoC Scheme would not affect Robinson College's primary relationships with its campus grounds, the built components within its campus, or its connections with Herschel Road, Grange Road or Adams Road. The asset's relationships and connections with the wider West Cambridge Conservation Area, with Clare Hall, or with other component parts of the university itself, would not be impacted by the proposed CtoC Scheme.
- 5.2.26 The proposed traffic control measures and buses using the route would be perceptible in views out from and views including Robinson College, looking south along Grange Road. However, these changes would not be visually dominant or conspicuous when experienced alongside the level of traffic already present on Grange Road. The scheme would not change how the asset is experienced, particularly to those accessing or leaving the college's Front Court. Increased traffic noise is unlikely to be apparent in the asset's immediate setting.

Harm in terms of legislation and planning policy

- 5.2.27 The CtoC Scheme would result in **no change**, in EIA terms, to Grade II* listed Robinson College, and would result in no harm in NPPF terms.

Mitigation

- 5.2.28 No mitigation of the CtoC Scheme is proposed for Robinson College.

5.3 Emmanuel College Sports Pavilion, Including Groundsman's House And Stable

- 5.3.1 Grade II listed 'Emmanuel College Sports Pavilion, Including Groundsman's House and Stable' [CD26-01-APP-W2-2, pp. 59-67] was constructed in 1910. The pavilion faces north-west over the sports ground and has two angled wings extending, approximately, east and south. A third range extends south-east from the rear of the pavilion. On the south side of the south-west wing is a stable with a rectangular plan. The asset has been altered several times throughout its history. It is of high significance, and its setting makes a high contribution to that significance.
- 5.3.2 The asset's setting is defined by its location on Wilberforce Road, and by its connections with the sports fields, West Cambridge Conservation Area, and other component parts of the University, as well as the nearby Grade II listed 9, Wilberforce Road. Traffic and parked cars are prominent in the asset's immediate setting, although its immediate surroundings are characterised by use of the sports ground and tennis courts, meaning that it retains a relatively tranquil overall setting.
- 5.3.3 This asset was not scoped into the EIA as it is outside the agreed study area. The CtoC Scheme would have no effect on this asset, as it would be outside its setting.

5.4 Cambridge University Real Tennis Club and Professionals House

- 5.4.1 The significance of Grade II listed Cambridge University Real Tennis Club and Professionals House is described in the Heritage Statement [CD1-11.07.02, p. 27, paragraphs 5.3.22 to 5.3.25] and its list description is provided in the appendix [CD26-01-APP-W2-2, pp. 13-23]. It is assessed as being a heritage asset of high significance, with setting making a high contribution to its significance. The anticipated impact of the CtoC Scheme on this asset is also provided in the Heritage Statement [CD1-11.07.02, p. 34, paragraphs 6.2.19 and 6.2.20].
- 5.4.2 The tennis club and professionals house were built in 1866 to designs by William Milner Fawcett, and the attached clubhouse and real tennis court was designed by William Cecil Marshall and added in 1890. The extension to the south of the original court was built in c. 1940.
- 5.4.3 The asset is defined and experienced by its location on Grange Road, which is a key route within the conservation area, and by its primary relationships and connections with the buildings of individual colleges and the wider University. The asset has a particular visual connection with Grade II* listed Robinson College, Cambridge, and Grade II listed University Library. Traffic impacts are apparent in its immediate setting.
- 5.4.4 The C2C Scheme would result in **no change** to this asset in EIA terms and no harm in NPPF terms.

5.5 University Library

- 5.5.1 The significance and setting of Grade II listed University Library [CD26-01-APP-W2-2, pp. 137-140] is described in the Heritage Statement [CD1-11.07.02, p. 21, paragraphs 5.3.26 to 5.3.29]. As a Grade II listed building, it is a heritage asset of high significance. Setting makes a high contribution to the asset's significance. The anticipated impact of the CtoC Scheme is also described in the Heritage Statement [CD1-11.07.02, p. 28-29, paragraphs 6.2.21 to 6.2.23].
- 5.5.2 University Library is arguably the most prominent building within West Cambridge Conservation Area and acts as a key landmark building visible, for example, in long views from Adams Road. It is also an important landmark in the wider city. The library was built in 1931-1934 to designs by acclaimed architect Sir Giles Gilbert Scott. Constructed of red brick, the library building is notable for its strip windows, overhanging eaves, and its dominating feature: the tall tower.
- 5.5.3 The asset is defined and experienced by its prominence as a key landmark building within West Cambridge Conservation Area and the wider city. It is also defined by its location off Grange Road and by its key relationships and connections with both the old Cambridge colleges to its east, notably Clare, Trinity and King's Colleges, and the newer foundations to its west, as exemplified by Clare Hall and Robinson College. The asset also has relationships with other institutions connected to the University, and individual colleges.
- 5.5.4 The CtoC Scheme would result in **no change** to this asset in EIA terms and no harm in NPPF terms.

5.6 Elmside including boundary wall and gate

- 5.6.1 The significance and setting of Grade II listed 'Elmside including boundary wall and gate' [CD26-01-APP-W2-2, pp. 49-58] is described in the Heritage Statement [CD1-11.07.02, p. 19, paragraphs 5.3.5 to 5.3.8]. As a Grade II listed building it is a heritage asset of high significance. Setting makes a high contribution to the asset's significance. The anticipated impact of the CtoC Scheme on this asset is also described in the Heritage Statement [CD1-11.07.02, p. 33, paragraphs 6.2.10 and 6.2.11].
- 5.6.2 The asset is an Arts and Crafts house designed by Edward Schroeder Prior (1852-1932) and built in 1885. It is of two-storeys plus attic and features a single-storey addition, built in c. 1900. It is part of Clare Hall. Its setting is defined by its primary visual and historic connection with Clare Hall. Its position on the corner of Herschel Road is also a key component of its setting, as are its relationships with Grange Road and with West Cambridge Conservation Area. Traffic impacts from Herschel Road and Grange Road are apparent in its setting.
- 5.6.3 The CtoC Scheme would result in a **minor** adverse effect on this asset in EIA terms and 'less than substantial' harm in NPPF terms; harm would be toward the lower end of 'less than substantial'.

5.7 48 Grange Road

- 5.7.1 The significance and setting of Grade II listed 48 Grange Road [CD26-01-APP-W2-2, pp. 3-6] is described in the Heritage Statement [CD1-11.07.02, p. 25-26, paragraphs

5.3.9 to 5.3.12]. It is an asset of high significance, and its setting makes a high contribution to that significance. The anticipated impact of the CtoC Scheme on this asset is also described in the Heritage Statement in **[CD1-11.07.02, p. 33, paragraphs 6.2.12 and 6.2.13].**

- 5.7.2 The asset is an Arts and Crafts house, constructed in c. 1880 and was probably designed by Basil Champneys (1842-1935). The asset is of two storeys plus attic, and was converted into student residences in the late-1940s, when it seems the asset was extended. The asset's setting is defined by its location on Grange Road: a key axial route of West Cambridge Conservation Area, as well as by the surrounding residential building complex and its connections with the wider conservation area and University. Traffic impacts from Grange Road are also apparent in its setting.
- 5.7.3 The CtoC Scheme would result in a **minor** adverse effect in EIA terms and 'less than substantial' harm in NPPF terms; the harm would be toward the lower end of 'less than substantial.'

5.8 West Cambridge Conservation Area

- 5.8.1 The significance of West Cambridge Conservation Area **[CD18-03]** is described in the Heritage Statement **[CD1-11.07.02, pp. 23-24, paragraphs 5.1.1 to 5.1.4 and 5.2.1 to 5.2.2].** It is assessed as being a heritage asset of high significance, with setting making a high contribution to the asset's significance. The anticipated impact of the CtoC Scheme on this asset is also described in the Heritage Statement **[CD1-11.07.02, p. 30, paragraphs 6.2.2 to 6.2.4].**
- 5.8.2 West Cambridge Conservation Area is located between rural Cambridgeshire to the west and the city centre to the east. It is less built up than the historic city core and is characterised primarily by buildings connected to the university, surviving late-19th century residential buildings and gardens, and green spaces. The conservation area is home to both individual Cambridge colleges and institutions linked to the wider University of Cambridge, including Grade II* listed Clare Hall, University of Cambridge, Grade II* listed Robinson College, Cambridge, Grade II listed History Faculty Building, Grade II listed University Library, Grade II listed Clare College, Gateway to the University Library, and Grade II listed Cambridge University Real Tennis Club and Professionals House. The prominent green spaces within the conservation area are also linked to university colleges or the wider university.
- 5.8.3 The setting of the conservation area is defined and experienced by its position as a suburb of Cambridge. The visual and historic relationships with multiple heritage assets connected to Cambridge colleges and University are key attributes of the setting, and reinforce the conservation area's links to the historic city core. The conservation area has maintained a residential character due to the survival of many of its villas, and its appearance benefits from the large green open spaces of the colleges and adjacent green belt. In term time, the conservation area is noticeably characterised by students and staff of the many University institutions located within its boundary. Traffic impacts are also apparent throughout the conservation area, particularly on its main routes including Grange Road.
- 5.8.4 The CtoC Scheme would result in harm to West Cambridge Conservation Area due to alterations to its character and appearance, and also due to a low degree of physical

alteration required for construction of a new junction, changes to the carriageway, installation of new signage, etc. This was assessed as a **minor** adverse effect in EIA terms and 'less than substantial' harm in NPPF terms, which would be toward the lower end of the range of 'less than substantial harm.'

5.9 No. 4 Adams Road and No. 6 Adams Road

- 5.9.1 No. 4 Adams Road and No. 6 Adams Road are two locally listed buildings. No. 6 Adams Road was built in the 1890s, while No. 4 Adams Road, also called Redcourt, is an early-20th century house constructed on land that was once part of St John's College. Both assets are examples of the substantial villas that characterise the earlier buildings in this part of Cambridge. The assets are owned by Robinson College and used for student accommodation. They are of medium significance, to which their setting makes a high contribution.
- 5.9.2 These assets are defined by their location on Adams Road and their relationship with West Cambridge Conservation Area and Robinson College. They are also defined by their historic connections with other similar villas. Views of Grade II listed University Library are also apparent along this part of Adams Road, while car parking and traffic impacts affect the assets' immediate setting.
- 5.9.3 These assets were not scoped into the EIA as they are outside the agreed study area. The CtoC Scheme would have no effect on these assets, as it would be outside their settings.

5.10 American Military Cemetery And Memorial, And Madingley Mill

Historic background

- 5.10.1 American Military Cemetery, the Memorial and Madingley Mill [**CD26-01-APP-W2-2, pp. 7-12, 83-87, 79-82**] are described in the Environmental Statement Technical Report 7 [**CD1-11.07.01, pp. 75-78, paragraphs 6.3.10 to 6.3.19**]. Due to their proximity, further description is provided here as a group.
- 5.10.2 The American Military Cemetery at Cambridge is one of only 24 permanent American Second World War cemeteries located on foreign soil and erected by the American Battle Monuments Commission. It was established in 1943 as a temporary military cemetery on land donated by the University of Cambridge. It later became the only permanent American Second World War military cemetery in the British Isles. It holds the remains of 3,812 American servicemen.
- 5.10.3 The American Battle Monuments Commission describes the cemetery as a lasting permanent memorial to American service personnel who lost their lives in the Second World War in the European theatre. The Commission writes¹⁹:

"By the time of the Normandy landings, 1.6 million American troops were stationed in Britain, with 1.2 million joining the battle on the continent within three months. More than 3 million Americans passed through the British Isles during the war, forging lasting bonds between the two nations."

¹⁹ <https://www.abmc.gov/cemeteries-memorials/about-cambridge-american-cemetery/#> accessed 29/07/2025

The Cambridge American Cemetery stands as a lasting tribute to the sacrifices made and the enduring partnership between the U.S. and the UK."

- 5.10.4 The built elements of the complex were designed by the Boston architectural firm, Perry, Shaw, Hepburn and Dean, and the landscape was designed Olmsted Brothers, from Brookline, Massachusetts. The cemetery was dedicated in July 1956.
- 5.10.5 Madingley Mill is a post mill located at Mill Farm, which is north of Madingley Road and immediately east of American Military Cemetery. It was moved to its present location from Ellington, Huntingdonshire, in 1936.

Description

- 5.10.6 The cemetery complex is located to the west of Cambridge. The site comprises an area of c. 12.5ha in total, bounded to the north by Cambridge Road, to the west by a track beside Madingley Wood, to the east by farmland, and to the south by the A1303 Madingley Road. The cemetery is on the north slope of a hill, which affords extensive views to the north over the surrounding rural landscape.
- 5.10.7 The principal building of the Memorial is a high rectangular chapel and museum room of Portland stone. It stands at the eastern end of a processional mall with a sequence of three long reflecting pools. At the western end is a stepped platform occupied by a large flagpole. On the southern side of this mall are the Walls of the Missing, upon which the names of American servicemen are inscribed. To the north, graves are arranged in long curving rows that occupy the sloping lawn.
- 5.10.8 Madingley Mill is a timber-framed post mill. It sits on a brick plinth and is weatherboarded. It retains a bat cap and four patent sails. An inscription inside the mill records that it replaced an earlier mill on this site, which fell down in July 1909.

Curtilage along Madingley Road

- 5.10.9 The curtilage of American Military Cemetery extends southwards to the highway boundary. The southern extent of the curtilage of the Memorial is defined by the memorial wall. The curtilage of Madingley Mill is unclear, but is expected to be bounded by the access roads into Mill Farm.

Statement of Significance

- 5.10.10 American Military Cemetery is of 'exceptional interest'. Only 8.5% of registered parks and gardens are registered at Grade I. The asset is of national and international importance, and as such it is an asset of very high heritage significance. The Grade II* listed Memorial and Madingley Mill are also of very high significance.
- 5.10.11 The list entry for American Military Cemetery records that the asset was registered at Grade I for the following reasons:

" A unique example of a Post-War Military Cemetery (mid-1950s) of the highest design quality and social importance. * It commemorates the lives of all US servicemen who perished in Britain in World War II and contains the remains of over 3800 war dead. * The landscape design was by Olmsted Brothers, an internationally renowned landscape firm which created a striking and moving formal design applied to a commemorative landscape,*

*dominated by monumental architecture including a chapel, wall of remembrance and flagpole. * The uniformity of the individual headstones and their formal arrangement in a regular pattern across a large area set on lawn contributes an exceptional character, equalled in England by the military cemetery at Brookwood. * The cemetery survives in excellent condition with components including a variety of high quality structures and a memorial chapel.” [CD26-01-APP-W2-2, p. 10]*

- 5.10.12 The list entry for the Memorial records the following reasons for its designation:

“The Memorial is a remarkable building of extremely high quality which is historically important as a war memorial.” [CD26-01-APP-W2-2, p. 85]

- 5.10.13 All three assets are located on an elevated position with long views to the north. These views are significant to the Memorial and American Military Cemetery as part of the planned landscape and memorialisation of fallen servicemen, and significant to Madingley Mill due to the elevated position’s relationship with its function. Taken overall, setting makes a high contribution to the significance of these assets.

Setting

- 5.10.14 American Military Cemetery is defined and experienced primarily by its relationships and connections with the architecture and monuments located within it. This includes the Memorial and the structures that comprise it, as well as other monumental elements of the cemetery, the Visitors’ Centre, and especially with the individual monuments to fallen service personnel of the Second World War. The primary relationship of the park and garden is with the individual component parts of the cemetery, and how those individual elements complement and form a whole with the overall designed landscape.
- 5.10.15 The cemetery’s and memorial’s settings are also marked by an overall atmosphere of tranquillity, which is very apparent when walking around the cemetery. This is reinforced by the presence of Madingley Wood to the west of the cemetery, which also contributes to the rural setting of the asset. The nearby presence of the A1303 Madingley Road means that visual and noise impacts from traffic are apparent from the approach road (and coach parking area) to the cemetery and when looking out from the main gates, although the presence of the memorial wall, and the boundary hedge and tree belt mitigates these overall impacts at these locations. The approach to the cemetery via Madingley Road has retained some rural qualities, including vegetation (Madingley Wood and the hedging and trees) and views across the landscape. The verge that separates the cemetery from the road itself contributes to the overall setting by providing a green boundary from the road to the cemetery and facilitating a transition from built environment to the park and garden.
- 5.10.16 Visual impacts from traffic are further screened by built form when walking within the cemetery grounds, so these impacts do not detract from the monumental group. This overall atmosphere of tranquillity and rural surroundings is reinforced by the immediate and wider rural landscape, particularly noticeable, for example, in views looking north beyond Cambridge Road. The Visitors Centre, to the side of the main entrance, is of a sympathetic design and scale and contributes to the overall whole of the military cemetery.

- 5.10.17 The setting of Madingley Mill shares some of the qualities of the cemetery, including rural character, green space and long views. Its setting is similarly affected by the presence of traffic on Madingley Road, although it has less screening by built form or filtering by vegetation than the cemetery. The primary relationships of the mill to its setting are the farmyard in its immediate surroundings, the elevated long views to the north, and the winds that are associated with its function.

Effects of the CtoC Scheme on American Military Cemetery and Memorial, and Madingley Mill

'Significance of Effect' in EIA terms

- 5.10.18 The Environmental Statement found that there would be **no change** in EIA terms to American Military Cemetery and Memorial, or Madingley Mill, as a result of the CtoC Scheme [CD1-11.07.01, pp. 96-97, paragraphs 7.4.8 to 7.4.19].

Harm in terms of legislation and planning policy

- 5.10.19 In NPPF terms, the CtoC Scheme would result in no harm to American Military Cemetery and Memorial, or Madingley Mill.

Mitigation

- 5.10.20 No mitigation of the CtoC Scheme is proposed for American Military Cemetery, the Memorial or Madingley Mill.

5.11 Church of St Peter

- 5.11.1 The Environmental Statement Technical Report 7: Heritage Impact Assessment describes Grade I listed Church of St Peter [CD26-01-APP-W2-2, pp. 24-28] in terms of its significance [CD1-11.07.01, p. 79, paragraphs 6.3.25 to 6.3.27] and the anticipated impact that the CtoC Scheme would have on it [CD1-11.07.01, pp. 98 and 113, paragraphs 7.4.25 to 7.4.28 and Table TR78-2].
- 5.11.2 The nave and chancel of the Church of St Peter date to the 12th century, its west tower dates to the 14th century, and its south and north aisles date to the 14th and 15th centuries respectively. The church was restored during the 1860s and 1880s. The church environs contain two individual Grade II listed buildings: 'Water Pump in Street North of Chancel of Church of St Peter' and 'Coton War Memorial'. The church is located 215m south of the CtoC Scheme boundary.
- 5.11.3 As a Grade I listed building, the Church of St Peter is a heritage asset of very high significance. It has very high architectural and historic interest as a surviving medieval parish church with fabric dating from several construction phases. Its late-19th century restoration was carried out sympathetically. Its historic interest is enhanced by its location at the heart of historic Coton and its connection with nearby designated heritage assets.
- 5.11.4 The Church of St Peter is defined and experienced by its location within the historic core of the village of Coton. The church has been central to the village for centuries, and is still the focal point within the conservation area. It is also defined by its connections with Coton Conservation Area and with nearby individual heritage assets. Setting makes a high contribution to the asset's significance.

- 5.11.5 The CtoC Scheme would cross Cambridge Road and introduce a new built form in the wider rural landscape. The CtoC Scheme would not be visible in views out from the church, and the scheme would not change how the High Street, on which the church is located, is currently experienced. The church's primary relationships would also not be impacted. Although the spire of the church would be co-visible with the CtoC Scheme from some viewpoints, the proposed Scheme would not challenge its position as a landmark due to its already lower-lying position in the landscape.
- 5.11.6 The CtoC Scheme would result in no harm to the asset in NPPF terms and result in **no change** in EIA terms.

5.12 Coton Conservation Area

- 5.12.1 Technical Report 7: Heritage Impact Assessment describes the significance of Coton Conservation Area [CD1-11.07.01, pp. 78-79, paragraphs 6.3.20 to 6.3.23], and the impact that the CtoC Scheme would have on it [CD1-11.07.01, pp. 97 and 113, paragraphs 7.4.20 to 7.4.24 and Table TR78-2].
- 5.12.2 Coton Conservation Area is a heritage asset of high significance [CD26-01-APP-W2-2; p. 48, map only]. It is centred on the historic core of the village, which is dominated by the medieval Grade I listed Church of St Peter. The conservation area contains a high number of Grade II listed buildings, dating mainly from the 17th to the 19th centuries.
- 5.12.3 The setting of Coton Conservation Area is defined and experienced primarily by its relationships and connections with the individual heritage assets located within its boundary, particularly with the Church of St Peter, which is the focal point of the historic and wider village. The asset is also set within a surrounding rural landscape, which preserves much of its tranquil character, and although modern traffic impacts are part of the conservation area's setting, these are not so intrusive as to detract from its significance. Setting makes a high contribution to the asset's significance.
- 5.12.4 At its closest point, Coton Conservation Area is located 100m south of the CtoC Scheme boundary. The CtoC Scheme would cut across Cambridge Road at a new signalised junction, changing one of the key approaches to the conservation area. The CtoC Scheme would introduce a new built form into the wider surrounding landscape, which contributes to the asset's setting, changing how the asset is experienced. Increased traffic impacts would be apparent in the asset's setting. The conservation area's primary relationships and connections would not be impacted by the CtoC Scheme.
- 5.12.5 The CtoC Scheme would result in a **minor** adverse effect on the conservation area in EIA terms, and to 'less than substantial' harm in NPPF terms. Given that the effect will be peripheral to the core of the conservation area, the degree of 'less than substantial' harm would be well below the middle of the range between 'no harm' and 'substantial harm'.

5.13 Schlumberger Gould Research Centre and Attached Perimeter Wall to the North

- 5.13.1 The significance of Grade II* listed 'Schlumberger Gould Research Centre and Attached Perimeter Wall to the North' [CD26-01-APP-W2-2, p. 104-112] is described in the Technical Report 7: Heritage Impact Assessment [CD1-11.07.01, p. 85,

paragraphs 6.3.64 to 6.3.66]. The impact that the CtoC Scheme would have on this asset is in the same document **[CD1-11.07.01, pp. 103-104, paragraphs 7.4.77 to 7.4.80].**

- 5.13.2 'Schlumberger Gould Research Centre and Attached Perimeter Wall to the North' was designed by Sir Michael Hopkins and built in 1985. The asset is of innovative design, including a tubular steel frame and Teflon-coated fibreglass roof covering, which was the first of its type in the country. It is located 130m north of the CtoC Scheme.
- 5.13.3 As a Grade II* listed building, this asset is of very high significance. It has very high architectural interest as a groundbreaking work designed by Sir Michael Hopkins (1935-2023), one of the leading post-war figures of architectural design. The asset's architectural interest is further enhanced by its pioneering roof design, while its historic interest lies in its construction for the firm Schlumberger Research Ltd, established in 1927.
- 5.13.4 The asset is defined and experienced by its location within the open space of its own grounds, juxtaposed between rural Cambridgeshire and urban Cambridge, reached by a private access from Charles Babbage Road. It is also defined by the surrounding built development to the other side of High Cross, while traffic impacts are present in its setting. Setting makes a high contribution to the asset's significance.
- 5.13.5 The CtoC Scheme would be visible in views out from the asset towards the site, slightly changing how it is experienced. Increased traffic impacts may also be noticeable in the asset's immediate setting.
- 5.13.6 The CtoC Scheme would result in a **minor** adverse effect in EIA terms and result in 'less than substantial' harm to the asset in NPPF terms. Given that the proposed scheme would be within the existing highway, and the building is set back from the road behind vegetation and parking space, the degree of 'less than substantial' harm would be towards the bottom of the range between 'no harm' and 'substantial harm'.

5.14 'Former entrance lodges to Childerley Hall'

- 5.14.1 Technical Report 7: Heritage Impact Assessment describes the significance of 'Former Entrance Lodges to Childerley Hall' **[CD1-11.07.01, p. 88, paragraphs 6.4.1 to 6.4.3],** and the impact that the CtoC Scheme would have on them **[CD1-11.07.01, pp. 106-107 and 115, paragraphs 7.4.94 to 7.4.96 and Table TR78-2].** These buildings were described incorrectly in the Environmental Statement; however, the discrepancies in their description make no overall difference to the assessment of harm that has been reported.
- 5.14.2 These buildings were described incorrectly in the Environmental Statement as, *"a pair of mid-20th century non-designated lodge cottages designated as being of local interest"* **[CD1-10.01, p. 121, paragraph 9.3.6].** They are also described as being 'timber-framed' **[CD1-11.07.01, p. 88, paragraph 6.4.1].** The west building is 19th century. The east building may be late 19th or early 20th century but did not originate as a lodge. Neither are timber framed. They have been discussed as a pair based on

their contemporary character rather than their origins. They do not appear on Greater Cambridge Shared Planning's list of Buildings of Local Interest²⁰.

- 5.14.3 'Former Entrance Lodges to Childerley Hall' are two single-storey non-designated dwellings, which are located between the A428 and St Neots Road, 50m south of the CtoC Scheme. They are on either side of the south end of the main approach to Childerley Hall, a 16th century Grade II* listed building nearly 2km to the north, and the Grade II* registered park and garden that surrounds it, 1.3km to the north. The building to the west appears on Ordnance Survey maps from 1886 apparently as a lodge (named 'Childerley Gate'), but outwardly appears to have been altered during the mid-20th century: having decorative timber battens, etc. The building to the east, which is first depicted on the 1902 Ordnance Survey map, originated as a Methodist chapel and possesses buttresses, high windows, etc., but was also converted during the 20th century. The buildings have a degree of historic interest, both in their own right and by association with the Childerley Hall estate and/or the local community. They also have architectural interest as (respectively) a purpose-built element of a wider high-status landscape and an example of a revivalist ecclesiastical building. Together, they comprise a non-designated heritage asset of low significance.
- 5.14.4 Their setting is a narrow, green strip of land, which is all that still can be experienced of the entrance from St Neots Road to the Childerley Hall estate. The landscape connection and views towards Childerley Hall park are already severed by the presence of the A428 and a broad hedgerow. Their roadside location and the presence of traffic are prominent in the setting. The buildings' position, opposing each other on either side of the entrance, and the short section of road that survives to the south of the A428 are nonetheless sufficient to retain some comprehensibility of the former landscape. As a result, the setting makes a medium contribution to significance.
- 5.14.5 The CtoC Scheme would pass to the north of these buildings, where the new busway would run alongside the existing A428, partly screened by retaining features and earthwork embankments. The proposed permanent infrastructure and the passage of the buses may be visible in views out from the buildings and elsewhere within their settings. Considering the proximity of the CtoC Scheme there would be visual impacts that are assessed as a **low** adverse magnitude of change and a **minor** ('not significant') effect. In NPPF terms, the CtoC Scheme would result in an impact towards the bottom of the range of 'less than substantial' harm to 'former entrance lodges to Childerley Hall'.
- 5.14.6 These two buildings possess architectural and historic interest appropriate to their assessment as a non-designated asset of low significance. The impact that the CtoC Scheme would have on their significance is unchanged by the differences in their character addressed in paragraphs 5.14.2 and 5.14.3. As a consequence, the assessment of harm provided in paragraph 5.14.5 is also unchanged.

²⁰ <https://www.greatercambridgeplanning.org/design-heritage-and-environment/historic-environment/buildings-of-local-interest/> accessed 11th August 2025

6. REPRESENTATIONS THAT ARE RELEVANT TO MY EVIDENCE

6.1 Objections raised by the College

Proper consideration to the listing and architectural and historical importance

- 6.1.1 This matter is referred to in the College's Statement of Case [CD23-17 OBJ-213] as follows:

"Shortcomings in the Applicant's assessment – [...] The Applicant has failed to undertake an adequate assessment of the significance of this Grade II Listed Building to provide the essential starting point for an assessment of the potential impact."* [CD23-17 OBJ-213, p. 16, paragraph 7.12(a)]

- 6.1.2 The Applicant has carried out an assessment of the impact of the CtoC Scheme on the significance of Clare Hall. The method used is referred to in Section 3.1 above. Following the NPPF [CD8-01, p. 60, paragraph 207], the significance of Clare Hall has been described to a level of detail that is proportionate to its importance, but is also no more than is sufficient to understand the potential impact of the proposal on that significance [CD1-11.07.02, p. 24, paragraphs 5.3.1 to 5.3.4].
- 6.1.3 The Environmental Statement does not provide every detail of every aspect of the deliberation process that went into the assessment. As required, the Environmental Statement assesses and describes the likely significant effects of the proposed works on the environment.
- 6.1.4 In response to the College's objection, further details of the assessment of Clare Hall have been provided in this Proof of Evidence (Section 4).

Justification for assessment of harm

- 6.1.5 This matter is referred to in the College's Statement of Case, summarised as follows:

"Shortcomings in the Applicant's assessment - There is no justification for the Applicant's assessment that the level of harm to the above-ground heritage assets at Clare Hall will be minor [...]" [CD23-17 OBJ-213, p. 16, paragraph 7.12 (a)]

- 6.1.6 The Environmental Statement follows a well-established method of EIA that has been tested in a great many Inquiries and Appeals. In addition to reporting effects in relation to significance in EIA terms, the method explains that professional judgement is used to determine whether an effect is 'significant' [CD1-11.07.01, pp. 24-25, paragraphs 3.5.8 to 3.5.10] and also what degree of harm in NPPF terms [CD8-01, p. 60, paragraph 212] would result from the proposals. An explanation for the assessed level of harm was provided in the Environmental Statement [CD1-11.07.02, pp. 31-32, paragraphs 6.2.5 to 6.2.9] and further justification for the assessment of harm has been provided in Section 4.7 of this Proof of Evidence, in response to the College's objections.
- 6.1.7 The assessment in the Environmental Statement is sufficient to inform the decision-making authority's judgement, within the bounds of proportionality and the degree to which an excess of detail would hamper the progress of the decision-maker. However,

in response to the College's comments, additional information has been provided in Section 4 above that explains how the judgement was reached for Clare Hall.

- 6.1.8 The **minor** effect identified in the Environmental Statement and referred to in the College's statement above is an assessment in EIA terms. Neither Historic England nor the Local Planning Authorities have raised any discrepancy with this assessment (Section 3.2). The Applicant and the College agree that there would be 'less than substantial' harm in the terms of the NPPF, although the two parties differ in their view on what degree of harm would accrue within the broad range that 'less than substantial' covers. It is salient to note that any degree of harm to a listed building would trigger the requirement for "*special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses*" [CD5-28, p. 20, Section 16(2)].

Assessment of any requirement for Listed Building Consent

- 6.1.9 This matter is referred to in the College's Statement of Case [CD23-17 OBJ-213] as follows:

"Listed Building Consent - The Scheme extends right up to the southern boundary of Clare Hall and will result in a significant impact/loss of important detail (including to the linear moat-type drainage system and connecting paths extending from the bridges leaving the college) and present a significant barrier to the pedestrian routes that currently permeate out of Clare Hall along this boundary (further exaggerated by the intention to plant hedgerows along this boundary). No assessment appears to have been undertaken as to whether separate Listed Building Consent would be required for any of the works. The removal of these paths would be considered harmful due to the loss of original fabric and the fact that these paths connect with the southern end of the family and scholars' walks which are fundamental to the organization of the campus plan." [CD23-17 OBJ-213, p. 16, paragraph 7.12 (b)]

- 6.1.10 The Environmental Statement did not identify that any Listed Building Consent would be required because no work within the curtilage of a listed building is envisaged. Historic England did not raise the matter of Listed Building Consent at any point during the consultation that took place throughout the scheme's ongoing assessment, and have not done so in their response to the Transport and Work Act Order application [CD2 REP-08.1] or their subsequent letter in which they discuss their perceived risk of physical alterations [CD2 REP-08.2, p. 3]. Similarly, the Local Planning Authorities have not raised any such concerns.
- 6.1.11 Listed Building Consent would only be required if the CtoC Scheme necessitated any alteration, extension or demolition of Clare Hall, or any object or structure fixed to the building, or any object or structure within its curtilage that forms part of the land [CD5-28, pp. 3, 10 and 11, Sections 1(5), 7, 8(1)(a) and 8(2)(a)]. A specific assessment of whether or not Listed Building Consent is required is not carried out, typically, as part of an EIA. This is because any such requirement would become evident during the normal course of assessment. I have responded to the College's comments regarding Listed Building Consent in paragraphs 6.1.12 to 6.1.18, specifically in

relation to the canal, paths out of Clare Hall, barriers to pedestrian routes, and hedgerows.

- 6.1.12 The CtoC Scheme design would not involve physical alteration of the canal fabric. However, there would be a physical interaction between the canal and the new landscaping material (e.g. topsoil and turf) placed adjacent to the canal as part of the reinstatement. Control measures to ensure that no physical harm takes place could be embedded in the detailed design, and could be ensured by means of a condition imposed on the deemed planning permission. The Code of Construction Practice **[CD1-26]** contains the following controls:

“3.10 HOARDINGS, FENCING AND SCREENING

3.10.1 The following measures will be implemented as appropriated: Fencing erected will be required for both site security and protection of environmentally sensitive features;” [CD1-26, pp. 13-14]

“6.1.7 General cultural heritage procedures will include: Provision of locations and descriptions of all known heritage assets within and adjacent to construction works, including restrictions to construction methods to protect heritage assets, where these have been identified for preservation in the ES, undertakings and assurances, subsequent consultation and through the development of the detailed design;” [CD1-26, p. 29]

“6.1.8 The LEMP will specify the following: The Principal Contractor will carry out works in such a way as to ensure that disturbance to all heritage assets is managed in accordance with accepted historic environment practice and, where disturbance cannot reasonably be avoided, is controlled and limited as far as reasonably practicable;” [CD1-26, p. 30]

- 6.1.13 There would be reconstruction of the paths and landscaping/regrading of the grassed area between the new access track and the canal. I have considered the following questions:
- (a) Are the paths an object or structure fixed to the building?
 - (b) Do the paths lie within the curtilage of the listed building, and if so, do they form part of the land?
 - (c) If the paths do constitute objects or structures lying within the curtilage of the listed building would the proposed works constitute:
 - (i) works for the demolition of a listed building; or
 - (ii) works for its alteration or extension in a manner which would affect its character as a building of special architectural or historic interest?
- 6.1.14 Regarding question (a), the three paths are not objects or structures fixed to the building. Rather than being an ‘object’ or ‘structure’, the paths comprise merely a surface treatment of the ground. In addition, they abut the low concrete ‘bridges’ that cross the canal, so are not fixed to the building.
- 6.1.15 Regarding question (b), the three paths do not lie within the curtilage of the listed building. The extent of the curtilage along Rifle Range Road is discussed in Section 4.6

and depicted in the appendix to this Proof of Evidence [CD26-01-APP-W2-2, pp. 152-153, Figure 12 and 13]. I have considered the Calderdale²¹ factors regarding whether a structure or object is within the curtilage of a listed building as follows. The paths replicate the material, design and pattern of the material covering exterior surfaces within the listed building; however, they are separated from those spaces by a boundary wall and an enclosing structure (the canal) that the College themselves refer to as being “*along the southern boundary*” [CD23-17 OBJ-213 pp. 16, 130 and 131]. Therefore, the paths do not form part of the ‘layout’ of the listed building because they are discontinuous from it. The paths are not, and never have been, within the land ownership boundary of Clare Hall, as explained in paragraphs 4.2.20 to 4.2.27. The paths do retain their original function, and also did when they were listed in 2018. I conclude therefore that, following Calderdale, the paths in question are not curtilage listed because they are not part of the listed building’s layout and are outside the property.

- 6.1.16 Regarding question (c), the works would not require demolition, alteration or extension of a listed building. However, if the works were considered to be alteration or extension of the listed fabric of Clare Hall, that would not affect its character as a building of special architectural or historic interest because the ends of the paths do not embody any such interests, as discussed in paragraph 4.7.22.
- 6.1.17 If the paths were found to be objects or structures lying within the curtilage of the listed building, the alteration of which would affect Clare Hall’s character as a building of special architectural or historic interest, Listed Building Consent would be required for such work. 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, for example by incorporating their southern ends into the access track.
- 6.1.18 The indicative design CtoC Scheme includes a hedgerow along Rifle Range Road between the access track and Clare Hall [CD1-16.04, p. 19, Sheet 17]. The hedgerow would not require Listed Building Consent as it would be outside the curtilage of Clare Hall and the works would not involve demolition, alteration or extension of Clare Hall, including such in any manner that would affect its character as a building of special architectural or historic interest. A condition could be imposed on the deemed planning permission to ensure that any hedgerow does not create a barrier to the pedestrian routes out of Clare Hall.

Significance of noise and vibration effects and their mitigation

- 6.1.19 These matters are referred to in the College’s objection letter [CD2-OBJ-213] and in their Statement of Case [CD23-17 OBJ-213] as follows:

“The Applicant has also failed to demonstrate how significant adverse effects of noise and vibrations, resulting from traffic noise, will be mitigated. The Applicant has not considered the nature of activities undertaken at Clare Hall, which is the only dedicated research college at Cambridge University, housing dozens of professors, post-graduates, visiting Fellows and other academics - all of whom require peace and quiet to undertake their work.

²¹ Attorney General ex rel Sutcliffe v Calderdale MBC (1983) 46 P & CR 399 at page 407

The relative tranquillity is one of the distinguishing features of Clare Hall and is of vital importance to the college's existence, setting, and its heritage designation. Many of the windows overlooking Rifle Range Road are only single glazed." [CD2-OBJ-213, p. 4, paragraph 2.4.5]

"Privacy and Noise - The Scheme will have a significant impact on the privacy of the residents whose rooms face onto Rifle Road and will create noise disturbance at the college. Clare Hall provides study space and residential accommodation for graduates and their families on site, some of which overlooks Rifle Range Road. As discussed, these rooms were deliberately placed to the south of the college grounds by Erskine to exploit the quiet and tranquil outlook. These rooms will all therefore be adversely affected by the proposed Scheme - limiting their use due to reduced privacy and increased noise disturbance." [CD23-17 OBJ-213, pp. 16-17, paragraph 7.12 (c)]

- 6.1.20 The degree to which Erskine intended to provide the rooms at the ground floor south elevation with a 'quiet and tranquil outlook' is unclear. Clare Hall has residential rooms on three external elevations, and study rooms on two elevations, which suggests that a degree of disturbance from outside would have been anticipated. The arguably most tranquil elevation, to the east, is the only elevation to have no residential rooms. In addition, Erskine's original design was for study rooms on the north side, and the orientation was changed to ensure delivery access to the kitchens (cf. paragraph 4.2.23), which indicates that the location of the study spaces may not result from deliberate placement to ensure a quiet and tranquil outlook.
- 6.1.21 Effects on noise and vibration, and mitigation thereof, are dealt with in Mr Toby Lewis' Proof of Evidence [CD26-01-APP-W11-1]. That document explains that significant adverse noise impacts from the operational phase can be avoided via management controls, and therefore the operation of the busway would not result in any adverse effects in the specific terms of the methodology used for the noise and vibration discipline.
- 6.1.22 There would be a degree of noise when buses pass, which would be perceptible in some parts of Clare Hall and would therefore alter its setting to a small degree. The speed limit at Camborne and Clare Hall would be limited to 20mph due to the constrained width of the road, and in addition the level of noise could be further reduced by using electric buses.
- 6.1.23 There would be a low degree of adverse impact on Clare Hall's architectural and historic interest due to noise creating a new and negative attribute of the setting (cf. paragraphs 4.7.13 and 4.7.20). The degree of harm would be raised due to the regular and intermittent nature of the noise, and the usually quiet, but not silent, conditions along Rifle Range Road. However, the degree of harm would be lowered by the low volume of the buses, increasing distance from Rifle Range Road within the Clare Hall complex, and the presence of intervening structures. This effect is accounted for in the overall assessment that a low degree of 'less than substantial' harm would occur.

The nature of activities undertaken at Clare Hall

- 6.1.24 This matter is referred to in the College's Statement of Case **[CD23-17 OBJ-213]**, summarised in paragraph 7.12 (c), which is provided in paragraph 6.1.19 of this Proof of Evidence. The College also state that:

"The setting and tranquillity of Clare Hall is a unique attribute of the College and is in keeping with it being a place of research, and a particular attraction to visiting academics and Fellows. The proposed Scheme will have a significant impact on the amenity of the college and its ability to provide an environment conducive to research. The proposed Scheme will also adversely impact the amenity of occupants of residential accommodation at the college." **[CD23-17 OBJ-213, p. 9, paragraph 3.8 (c)]**

- 6.1.25 For the most part, effects on the occupants of Clare Hall are social impacts and/or questions of amenity that are unrelated to the harm to the significance of a listed building, and therefore fall outside the scope of this Proof of Evidence. However, there would be a degree of harm as a result of disturbance of the setting's generally tranquil conditions (cf. paragraphs 4.7.14 and 4.7.15). This is accounted for in the Environmental Statement's overall finding that 'less than substantial' harm would occur.

Alternative route via Adams Road

- 6.1.26 This matter is referred to in the College's Statement of Case **[CD23-17 OBJ-213, pp. 22-24, Section 11]** and in their objection letter **[CD2-OBJ-213, p. 4, paragraphs 2.5.1 to 2.5.5]**, summarised as follows:

"Work commissioned by Clare Hall has confirmed that the original option of an on-road route via Adams Road presents a less environmentally damaging (by utilising existing highway), cheaper, and less operationally difficult route for the Scheme to follow in its final phase." **[CD2-OBJ-213, p. 4, paragraph 2.5.5]**

- 6.1.27 An alternative route taking the CtoC Scheme along Adams Road to the junction with Grange Road was considered, as described in the Proof of Evidence of Mr Jo Baker **[CD26-01-APP-W1-1, pp. 20-21, paragraphs 4.7.3 to 4.7.6; CD26-01-APP-W1-2, pp. 7-8, Appendix 2]**.
- 6.1.28 The College has provided plans for two Adams Road alternative route options (Option 1: Shared Corridor, and Option 2: Segregated Corridor) and modification to the Adams Road / Grange Road Junction **[CD23-17 OBJ-213, pp. 177-178]**. The existing ~5.7m wide bicycle route and footpath leading north-west from the Wilberforce Road / Adams Road junction would be widened to 10m (Option 1) or 12m (Option 2) by utilising land south of the extant route, within West Cambridge Conservation Area **[CD18-03]**. Both options would also require remodelling of the Wilberforce Road / Adams Road junction. An assessment of likely effects that is based on these design drawings only is provided below.
- 6.1.29 An Adams Road alternative would entail removal of on-street parking from Adams Road, thereby reducing visual clutter, but would also require alterations at the junction of Adams Road/Grange Road. This would require alteration of fabric of the

highway, kerbs, and installation of traffic control measures, as well as change to character and appearance as a result of road markings etc. There would be an increase in noise and traffic levels along Grange Road and Adams Road.

- 6.1.30 An Adams Road alternative would not require a junction at Rifle Range Road, or construction of a new bus route and access track / haul road along Rifle Range Road for approximately 250m within West Cambridge Conservation Area, both of which would be required for the CtoC Scheme.
- 6.1.31 The character and significance of the assets that would be affected by the proposed Adams Road alternative route, and the effects that the CtoC Scheme would have on them, are reported in Sections 5.2 to 5.9.
- 6.1.32 Clare Hall (cf. Section 4) is located approximately 55m west of Grange Road at its closest point. There be no visual impact apart from the occasional presence of buses in oblique views east along Rifle Range Road and Herschel Road. These would not affect how Clare Hall is experienced. Grange Road is already characterised by traffic noise, and any increase generated by the proposed new buses is unlikely to change Clare Hall's setting. An Adams Road alternative route is likely to result in **no change** to Clare Hall in EIA terms, and no harm in NPPF terms, whereas the CtoC Scheme would result in a **minor** adverse effect, or a very low degree of 'less than substantial' harm (cf. paragraphs 4.7.16 to 4.7.27).
- 6.1.33 Robinson College's (cf. Section 5.2) setting would be harmfully altered by the presence of a larger junction at its impressive north-east corner and an increase in the already present noise and traffic movement of buses, but would benefit slightly from the removal of parked cars along Adams Road. The increase in traffic would be slightly noticeable at or near the main entrance, which would be harmful to this asset. The college building is less than 10m from Adams Road, although views out are filtered by a mature tree belt. An Adams Road alternative route is likely to result in a **minor** adverse effect on Robinson College in EIA terms and 'less than substantial' harm in NPPF terms, although the harm would be toward the bottom of the range of 'less than substantial.' The CtoC Scheme was assessed as resulting in **no change**, or no harm (cf. paragraphs 5.2.24 to 5.2.27).
- 6.1.34 From the immediate setting of Emmanuel College Sports Pavilion (cf. Section 5.3), the passage of buses may be present in views towards an Adams Road alternative route. These views would be oblique and to the rear of the asset, at least 60m distant and effectively filtered by extant hedgerow. This is unlikely to affect the character of the asset or how it is experienced, and as such an Adams Road alternative route is likely to result in no impact and no harm, which is the same as the predicted effect of the CtoC Scheme.
- 6.1.35 Cambridge University Real Tennis Club and Professionals House (cf. Section 5.4) would be affected by an increase in the already present noise and movement of buses along Grange Road and, to a much lesser degree, the presence of a new larger junction with Adams Road in oblique views northwards. An Adams Road alternative is likely to therefore result in a **negligible** adverse effect in EIA terms and towards the bottom of the range of 'less than substantial' harm in NPPF terms. The CtoC Scheme was assessed as resulting in no impact and no harm.

- 6.1.36 University Library (cf. Section 5.5) would experience an increase in the already present noise and movement of buses along Grange Road, although at greater distance than the Tennis Club. There would also be regular interruptions to views towards the library tower from some viewpoints along Adams Road, competing with this asset's role as a prominent landmark in the conservation area. This is likely to result in a **minor** adverse effect in EIA terms, which would be towards the bottom of the range of 'less than substantial' harm in NPPF terms. In comparison, the CtoC Scheme would result in **no change** and no harm.
- 6.1.37 Elmside including boundary wall and gate (cf. Section 5.6) would be affected by an increase in noise and movement of buses running past the building entrance and along its east elevation; in contrast, for the CtoC scheme the impact of the buses would be lower as they would pass approximately 20m away from and to the rear of the building, but the presence of the junction on Rifle Range Road would also be intrusive to the setting. An Adams Road alternative route is likely to result in a **minor** adverse effect in EIA terms and towards the lower end of 'less than substantial' harm in NPPF terms, which would be equal to that of the CtoC Scheme.
- 6.1.38 48 Grange Road (cf. Section 5.7) would be affected by an increase in noise and movement of buses running along Grange Road; however, this effect would be reduced by the sheltered intimate setting of this asset within its academic / residential complex. In contrast, the CtoC Scheme would also alter the setting by the presence of a new junction with Rifle Range Road. An Adams Road alternative route is likely to result in a **minor** adverse effect in EIA terms, and towards the bottom of the range of 'less than substantial' harm, whereas the CtoC scheme would also equate to a **minor** adverse effect but a slightly higher degree of harm, although still towards the lower end of 'less than substantial'.
- 6.1.39 West Cambridge Conservation Area (cf. Section 5.8) would benefit from removal of the clutter of parked cars along Adams Road as a result of an Adams Road alternative route. However, other alterations would be adverse. The quiet, green space on the western side of the conservation area would be diminished by creation of a new motorised thoroughfare along its edge, and construction of a new, larger junction at Wilberforce Road. The character of Adams Road would be harmfully altered by the movement and noise of buses, and presence of a new junction at Grange Road. These alterations would change the experience of Trinity Open Fields, which is one of the *"principal open spaces or sports fields"* within the conservation area [CD18-03], p. 21], and relationships between heritage assets that contribute to the conservation area's character and appearance, such as listed buildings, would be disrupted periodically. An Adams Road alternative would have a greater effect on West Cambridge Conservation Area than the CtoC Scheme, because it would physically affect approximately 1km of the asset, in comparison with approximately 250m for the CtoC Scheme. The impact of the noise and movement of buses would be more widespread, as a greater distance would be affected, although with the exception of the cycle path to the west the Adams Road alternative already experiences traffic, which reduces the degree of change that would occur. Alteration of the fabric of the highway would also be more widespread than for the CtoC Scheme. An Adams Road alternative route is likely to result in a **minor** adverse effect on West Cambridge Conservation Area in EIA terms and 'less than substantial' harm in NPPF terms, which is equal to the CtoC

Scheme. The harm would be toward the lower end of 'less than substantial' for both; however, the more widespread effects of an Adams Road alternative mean that the level of harm would be higher than for the CtoC Scheme.

- 6.1.40 No. 4 Adams Road and No. 6 Adams Road (cf. Section 5.9) would both experience the visual intrusion and noise of buses in their settings, and also changes to the streetscape due to removal of parked cars. The overall change is likely to be a **minor** adverse effect in EIA terms to these two locally listed buildings, which would be toward the lower end of 'less than substantial' harm in NPPF terms. They would be unaffected by the CtoC Scheme.
- 6.1.41 A proposed Adams Road Alternative route is therefore likely to result in:
- Harm to one Grade II* listed building (Robinson College), two Grade II listed buildings (Cambridge University Real Tennis Club and University Library) and two locally listed buildings (Nos. 4 and 6 Adams Road) that would not be harmed by the CtoC Scheme
 - Slightly higher degree of harm and much more widespread effects than the CtoC Scheme to one conservation area (West Cambridge Conservation Area)
 - Approximately the same degree of harm as the CtoC Scheme to two Grade II listed buildings (Emmanuel College Sports Pavilion and Elmside)
 - Lower harm to one Grade II listed building (48 Grange Road) than the CtoC Scheme
 - No harm to one Grade II* listed building (Clare Hall) that would be harmed by the CtoC Scheme.
- 6.1.42 There would be no difference in effect between Option 1 and Option 2 proposed by the College.
- 6.1.43 In all cases, the harm would be 'less than substantial' and towards the lower end of that range, to differing degrees. Overall, the harm to heritage would be broadly similar whether the CtoC Scheme or a proposed Adams Road route were adopted.

Removal of existing trees

- 6.1.44 This matter is referred to in the College's Statement of Case, summarised as follows:
- "Removal of Existing Trees - The proposed removal of existing trees and lawn running along the southern boundary of Clare Hall will sacrifice the soft green edge of the college and the framing of views. The proposed Scheme envisages replacing these features with hedgerow which will block views out of the ground floor rooms and views back towards the college's south elevation."* [CD23-17 OBJ-213, p. 17, paragraph 7.12 (d)]
- 6.1.45 The grassed area of approximately four metres between the drainage channel of Clare Hall and the metalled surface of Rifle Range Road would be removed and then reinstated by the CtoC Scheme; however, it would be narrower because the access track would extend further north than the existing road surface. This reduction in width would not alter a viewer's perception of Clare Hall in such a way as to alter its

significance or people's ability to appreciate that significance because a 'soft green edge' would be retained.

- 6.1.46 The CtoC Scheme would involve removal of the line of trees along Rifle Range Road. The mixed (beneficial and adverse) contribution of those trees to Clare Hall's setting is discussed in paragraph 4.5.10, and the mixed effects of their removal are discussed in paragraphs 4.7.5 and 4.7.21. Replacement of the line of trees with a hedgerow is discussed in paragraph 4.7.6 and 4.7.12. If hedgerow planting is not considered to be desirable, it could be removed from the CtoC Scheme at detailed design stage, assured by a condition to that effect on the deemed planning permission.

Significant views

- 6.1.47 This matter is referred to in the College's Statement of Case, summarised as follows:

"Significant Views - The proposed Scheme will present a significant barrier to both views in and out of the college, therefore having a significant impact on the listed heritage asset. Erskine deliberately designed the college buildings to provide views to the south and allow daylight to enter into the rooms, inner courtyards and external spaces. The proposed Scheme will present an intermittent barrier to both views in and out of the college as the buses pass Clare Hall, resulting in a notional divide between the campus site and the landscape beyond, and therefore have a significant impact on the listed asset." [CD23-17 OBJ-213, p. 17, paragraph 7.12 (e)]

- 6.1.48 The contribution of elevated views from and views towards Clare Hall to its significance are addressed in paragraphs 4.5.1, 4.5.7 and 4.5.8. The effects on views are described in paragraphs 4.7.4, 4.7.9 to 4.7.12, and 4.7.19 to 4.7.21. In most views where buses are visible, they would be present as small elements of a wider panorama, albeit moving elements that are more eye-catching as a result. There would be a **minor** adverse effect as a result, which does not equate to a significant effect in planning terms, and is a contributory factor in the finding of 'less than substantial' harm.
- 6.1.49 Views from ground floor windows on the south elevation, where the intermittent presence of buses would be more dominant, contribute little if anything to the significance of the asset. Daylight into inner courtyards and external spaces would not be impeded by the CtoC Scheme. The two rooms of the central block that have windows onto Rifle Range Road also have side windows, and the meeting room has a substantial skylight and side window, all of which add to the light levels in those rooms. The passage of buses will not cause any reduction in light levels in those or other rooms to the extent that Clare Hall's character as a building of special architectural and historic interest would be affected. Any concerns regarding the effect on light of a hedgerow could be addressed in the detailed design, secured by means of a condition imposed on the deemed planning permission.

Errors in the existing environmental information

- 6.1.50 This matter is referred to in a note to the Inspectors dated 2nd July 2025 as follows:

"2.3.1. The Heritage Statement states the windows on the southern facades of Clare Hall contain "small windows with frosted glass with limited views

south towards the scheme”. However, the windows on this facade do not contain frosted glass. The windows on this façade also include a long horizontal window in Clare Hall’s main meeting room. As Clare Hall’s Statement of Case explains, the college buildings were deliberately designed to provide views to the south and to allow daylight to enter. This error therefore illustrates the fundamental importance of a thorough and reliable assessment of significance as the starting point to assessing impact.” [CD9-52, pp.1-2 paragraph 2.3.1]

- 6.1.51 The College are correct that the Environmental Statement identifies frosted glass windows (plural) [CD1-11.07.02, p. 31, paragraph 6.2.6], whereas it appears that there is only one frosted glass window, on the first floor of the western block. The other windows in general are of mirrored glass, and those to the small study rooms in the eastern block are of clear glass with blinds. I disagree with the College’s statement that the ground-floor windows were designed to provide views to the south, because the original design was oriented differently (cf. paragraph 4.2.23) and because they do not provide significant views (cf. paragraph 4.5.7 and 6.1.49). The fact that the only first-floor window on the south elevation is frosted also supports the interpretation that southern views are not as important to Erskine’s design as the College suggests. The long horizontal window in the meeting room is set at a low height, indicating that it is intended to provide light rather than to present a view. This interpretation of Erskine’s intention is supported by the fact that the view makes little contribution to the architectural or historic interest of the asset, as the view is, and always was, of the fence around the rugby ground and the stand within it. With these considerations in mind, the fact that not all windows are frosted does not affect the outcome of the assessment.

Removal of building fabric

- 6.1.52 This matter is referred to in a note to the Inspectors dated 2nd July 2025 [as follows:

“2.3.2. The Heritage Statement states that the Clare Hall “would not be physically impacted by the works”. However, the Scheme will require the removal of part of the fabric of the building, including the removal of original connecting paths and the placing of hedgerows along the boundary.” [CD9-52, p. 2 paragraph 2.3.2]

- 6.1.53 There would be no requirement for removal of any part of the listed building. The curtilage of the listed building along the southern boundary is described in paragraphs 4.6.1 to 4.6.8, and depicted in plans in the appendix to this Proof of Evidence [CD26-01-APP-W2-2, pp. 152-153, Figure 12 and 13]. Physical effects on the paths referred to by the College are discussed in paragraph 4.7.2. The indicative design would require removal of the southern ends of the paths, but as I have explained in paragraph 6.1.17, if retention of the paths is required, they could be reinstated extending into the access track.
- 6.1.54 The location of a hedgerow in the indicative design is outside Clare Hall’s curtilage. Planting would not affect any fabric of the listed building. The Applicant would agree to discuss removal of the hedgerow from the design.

6.2 Objections raised by Cambridge Past Present and Future (CPPF)

Description of the CPPF Alternative

- 6.2.1 CPPF have proposed [CD23-18-1 OBJ-251 SoC, pp. 1-2, paragraph 3] that an alternative scheme ("the CPPF Alternative") could be delivered within the existing highway boundary, which includes the verge areas adjacent to Madingley Wood and American Military Cemetery registered park and garden. In response, WSP have developed a concept design for required widening, to accommodate an inbound bus lane.
- 6.2.2 In the environs of American Military Cemetery, the CPPF Alternative would comprise:
- Crome Lea Business Park to American Military Cemetery: option for smart traffic signals to control the inbound flow of general traffic and prevent blocking back to the Madingley Mulch roundabout. Optional additional inbound traffic lane.
 - American Military Cemetery to existing bus lane, inbound central bus lane is proposed and signal control of the Cambridge Road junction.
- 6.2.3 Several design assumptions have been made by WSP when developing a design for the CPPF Alternative:
- The kerb line on the northern side of Madingley Road has been retained to minimise impacts to Grade I listed American Military Cemetery registered park and garden, Grade II* listed Memorial and Attached Walls, Steps and Pool Surround at American Military Cemetery, as well as to the Madingley Wood SSSI.
 - Vehicles turning right from the mainline into the various existing accesses where there is currently no turning lane provision would have to wait within the general traffic lanes as per the existing arrangement.
 - Existing ghost island junctions e.g. at Crome-lea Business Park would be re-provided.
 - Cyclists would not be prohibited from using a nearside bus lane on safety grounds so a standard 4m wide lane has been provided.
 - A 3m shared use path with 1.5m separation from the edge of the carriageway (inclusive of the 1m hard strip) on the south side is appropriate.
 - A traditional kerb and gully drainage system would be used.
- 6.2.4 The land acquisition required to widen the road at the southern kerb line includes arable farmland, commercial and residential properties. There would also be a loss of mature trees and hedge line. If physical impacts on the existing buildings at The Coton Court Lodge are avoided, there is unlikely to be sufficient space available to provide replacement screening.

Likely effects on designated heritage assets

- 6.2.5 Avoiding widening the northern side of Madingley Road would minimise overall potential impacts to American Military Cemetery and to Madingley Wood SSSI, which

is an important part of the asset's setting. However, works to the southern side of Madingley Road would still result in a degree of harm through changes to setting.

- 6.2.6 The loss of a small area of land on the southern kerb side to the west and east of the cemetery complex, with the resulting loss of mature trees and hedging, would remove vegetation that currently contributes to the asset's overall rural setting, and change how the asset is experienced in immediate journeys to and from the cemetery along Madingley Road. The loss of vegetation and hedging immediately opposite the main entrance gates to the cemetery would also change how the asset is experienced, again impacting the asset's overall rural setting. This would be particularly noticeable in views out from the cemetery gates towards Madingley Road and at the main approach road and car parking area.
- 6.2.7 The changes to the road markings and layout would also lead to a further, slight change as to how the asset is experienced in journeys along Madingley Road. However, any potential additional traffic along this busy road would not change how the asset is experienced.
- 6.2.8 The proposed CPPF Alternative would also impact the Memorial and associated structures through changes to views out from the asset looking south across Madingley Road through the main entrance. Similarly, the removal of vegetation to the southern kerb side of Madingley Road would change how the asset is experienced in terms of immediate journeys to and from the cemetery along this route.
- 6.2.9 Loss of land to the south side of Madingley Road would also result in a slight change as to how the Madingley Mill is experienced in immediate journeys to and from the asset along this road. The surrounding rural landscape and vegetation contribute to the asset's significance, and the removal of aspects of this setting would result in a minor overall visual impact to the asset.

'Significance of Effect' and harm

- 6.2.10 The CPPF Alternative would result in an impact of **low** adverse magnitude of change and a **minor** ('not significant') effect to the following assets:
- American Military Cemetery Grade I registered park and garden
 - Grade II* listed Memorial and Attached Walls, Steps and Pool Surround at American Military Cemetery
 - Grade II* listed Madingley Mill, at Mill Farm, Madingley Hill.
- 6.2.11 The harm to the heritage assets listed above would be 'less than substantial' in NPPF terms. Given that the experience of green space within the setting would be largely unaltered, and the addition of noise and movement would be additional to and already quite busy highway, the degree of 'less than substantial' harm would be towards the low end of that range.
- 6.2.12 This assessment assumes a 'best-case' that any land take is only on the southern side of Madingley Road, and that no land outside the highway boundary (which includes the verge) would be required. However, if land take on the northern side of Madingley Road was required, the assessment would need to be reviewed, particularly in the

case of American Military Cemetery and the Memorial, as land within their curtilage may be physically affected.

Possible mitigation of the alternative design

- 6.2.13 If physical impacts on the existing buildings at The Coton Court Lodge are avoided, there is unlikely to be sufficient space available to provide replacement screening.
- 6.2.14 The WSP concept design for the CPPF Alternative demonstrates that in order to minimise, as far as is possible, impacts to American Military Cemetery (including any potential direct physical impacts) as well as avoid direct impacts to the Madingley Wood SSSI, which forms part of its setting, it would not be possible to deliver either a nearside or central inbound bus lane along Madingley Road without acquiring additional land outside of the existing Highway Boundary to the south of Madingley Road.

Comparison with the effects of the CtoC Scheme

- 6.2.15 In comparison, the effects of the proposed CtoC Scheme would result in **no change** to American Military Cemetery, the Memorial and associated structures or Madingley Mill, and would result in no harm in NPPF terms.
- 6.2.16 However, the CtoC Scheme would result in a **minor** adverse effect on Coton Conservation Area, which would be 'less than substantial' harm in NPPF terms.
- 6.2.17 The CPPF Alternative would route the CtoC within the existing highway boundary of Madingley Road. Although there would be loss of vegetation and a land take at Madingley Road, this would not change how Coton Conservation Area is currently experienced. The CPPF Alternative would not cross Cambridge Road, one of the key routes into and out of the conservation area, nor would it introduce a new built form into the wider rural landscape that forms part of the asset's setting. Increased traffic impacts are unlikely. The CPPF Alternative would result in **no change** to Coton Conservation Area, which would equate to no harm in NPPF terms.

6.3 Representations from Cambridge City Council and South Cambridgeshire District Council

- 6.3.1 In their Statements of Case, Cambridge City Council [CD23-16-02 REP-09 CCC SoC] and South Cambridgeshire District Council [CD23-16-01 REP-09 SCDC SoC] made comments regarding effects on specific designated heritage assets, which are addressed below.

Designated heritage assets affected by the CtoC Scheme

- 6.3.2 This matter is referred to in Cambridge City Council's Statement of Case [CD23-16-02 REP-09 CCC SoC, pp. 20-21, paragraph 8.7], which is replicated in South Cambridgeshire District Council's Statement of Case [CD23-16-01 REP-09 SCDC SoC, pp. 31-32, paragraphs 14.8 to 14.10].

"8.7 Several designated heritage assets within and near the West Cambridge Conservation Area have been identified as being affected by the Scheme

*a. Grade II Listed Buildings**

– *Clare Hall, University of Cambridge* – A post-war college designed by Ralph Erskine, of high architectural significance.

– *History Faculty Building* – A modernist landmark designed by James Stirling.

b. Grade II Listed Buildings

– *Elmside (including boundary wall and gate)* – An Arts and Crafts-style house with historic links to Cambridge academia.

– *48 Grange Road* – A late-19th-century bespoke house, likely designed by Basil Champneys.

– *Selwyn College Buildings* – A series of historic college buildings, forming a group of high architectural and historic importance.

– *Corpus Christi College, George Thomson Building* – A modernist graduate residence.

– *Cambridge University Real Tennis Club and Professionals House* – A rare surviving 19th-century real tennis facility.

– *Cambridge University Library* – A prominent city landmark designed by Sir Giles Gilbert Scott.

– *Clare College, Gateway to University Library* – A key townscape feature, likely designed by Sir Giles Gilbert Scott.

c. Locally Listed Buildings (Buildings of Local Interest - BLI)

– *5A & 5B Herschel Road* – A 19th-century house in the Kentish vernacular style by Ernest Newton.” [CD23-16-02 REP-09 CCC SoC, pp. 20-21, paragraph 8.7]

- 6.3.3 The significance of Grade II* listed ‘Clare Hall, University of Cambridge’ [CD9-39 and CD26-01-APP-W2-2, pp. 33-43] is described in the Heritage Statement [CD1-11.07.02, p. 24, paragraphs 5.3.1 to 5.3.4]. The impacts of the CtoC Scheme on this asset are reported as ‘less than substantial’ harm (in planning terms) or **minor** adverse effect (in EIA terms) in the Heritage Statement [CD1-11.07.02, p. 31-32, paragraphs 6.2.5 to 6.2.9]. Section 4 above provides further details that were considered during the assessment.
- 6.3.4 The significance of Grade II* listed History Faculty Building [CD26-01-APP-W2-2, pp. 68-78] is described in the Heritage Statement [CD1-11.07.02, p. 28, paragraphs 5.3.34 to 5.3.37]. The impacts of the CtoC Scheme on this asset are reported as no harm [CD1-11.07.02, p. 35, paragraphs 6.2.27 to 6.2.29].
- 6.3.5 The significance of Grade II listed Elmside (including boundary wall and gate) [CD26-01-APP-W2-2, pp. 49-58] is described in the Heritage Statement [CD1-11.07.02, p. 25, paragraphs 5.3.5 to 5.3.8]. The impacts of the CtoC Scheme on this asset are reported as ‘less than substantial’ harm/**minor** adverse effect in the Heritage Statement [CD1-11.07.02, p. 33, paragraphs 6.2.10 to 6.2.11]. Section 5.6 above provides further details that were considered during the assessment.

- 6.3.6 The significance of Grade II listed 48 Grange Road **[CD26-01-APP-W2-2, pp. 3-6]** is described in the Heritage Statement **[CD1-11.07.02, pp. 25-26, paragraphs 5.3.9 to 5.3.12]**. The impacts of the CtoC Scheme on this asset are reported as ‘less than substantial’ harm/**minor** adverse effect in the Heritage Statement **[CD1-11.07.02, p. 33, paragraphs 6.2.12 to 6.2.13]**. Section 5.7 above provides further details that were considered during the assessment.
- 6.3.7 The significance of the six Grade II listed buildings that form a group at Selwyn College **[CD26-01-APP-W2-2, pp. 113-136]** are described in the Heritage Statement **[CD1-11.07.02, p. 26, paragraphs 5.3.13 to 5.3.17]**. The impacts of the CtoC Scheme on this group of assets are reported as no harm in the Heritage Statement **[CD1-11.07.02, pp. 33-34, paragraphs 6.2.14 to 6.2.16]**.
- 6.3.8 The significance of Grade II listed Corpus Christi College, George Thomson Building **[CD26-01-APP-W2-2, pp. 44-47]** is described in the Heritage Statement **[CD1-11.07.02, pp. 26-27, paragraphs 5.3.18 to 5.3.21]**. The impacts of the CtoC Scheme on this asset are reported as no harm in the Heritage Statement **[CD1-11.07.02, p. 34, paragraphs 6.2.17 to 6.2.18]**.
- 6.3.9 The significance of Grade II listed Cambridge University Real Tennis Club and Professionals House **[CD26-01-APP-W2-2, pp. 13-23]** is described in the Heritage Statement **[CD1-11.07.02, p. 27, paragraphs 5.3.22 to 5.3.25]**. The impacts of the CtoC Scheme on this asset are reported as no harm in the Heritage Statement **[CD1-11.07.02, p. 34, paragraphs 6.2.19 to 6.2.20]**. Section 5.4 above provides further details that were considered during the assessment.
- 6.3.10 The significance of Grade II listed University Library **[CD26-01-APP-W2-2, pp. 137-140]** is described in the Heritage Statement **[CD1-11.07.02, p. 27, paragraphs 5.3.26 to 5.3.29]**. The impacts of the CtoC Scheme on this asset are reported as no harm in the Heritage Statement **[CD1-11.07.02, pp. 34-35, paragraphs 6.2.21 to 6.2.23]**. Section 5.5 above provides further details that were considered during the assessment.
- 6.3.11 The significance of Grade II listed Clare College, Gateway to University Library **[CD26-01-APP-W2-2, pp. 29-32]** is described in the Heritage Statement **[CD1-11.07.02, p. 28, paragraphs 5.3.30 to 5.3.33]**. The impacts of the CtoC Scheme on this asset are reported as no harm in the Heritage Statement **[CD1-11.07.02, p. 35, paragraphs 6.2.24 to 6.2.26]**.
- 6.3.12 The significance of locally listed buildings 5A and 5B Herschel Road is described in the Heritage Statement **[CD1-11.07.02, pp. 28-29, paragraphs 5.3.38 to 5.3.41]**, and in Section 4 above. The impacts of the CtoC Scheme on this asset are reported as ‘less than substantial’ harm/**minor** adverse effect in the Heritage Statement **[CD1-11.07.02, p. 35, paragraphs 6.2.30 to 6.2.31]**.

Consideration of effects on Robinson College

- 6.3.13 This matter is referred to in Cambridge City Council’s Statement of Case **[CD23-16-02 CCC SoC REP-09, p. 21, paragraph 8.8]**, which is replicated in South Cambridgeshire District Council’s Statement of Case **[CD23-16-01 REP-09 SCDC SoC, p. 32, paragraph 14.11]**.

“8.8 The proposal includes a proposed intersection at the junctions of the private right of way (Rifle Range Path) and Grange Road that would introduce a new system of traffic control measures. This is assessed as slightly changing the setting of Grange Road but would not detract from long views down the road itself, or the conservation area as a whole. The potential impact of this new intersection on Grade II listed Robinson College which sits on the junction of Grange Road and Herschel Road has not been included in this assessment and consideration should be given to this heritage asset.” [CD23-16-02 CCC SoC REP-09, p. 21, paragraph 8.8]*

- 6.3.14 This asset was not included in the Environmental Statement because no likely significant effect is assessed. It is included in the gazetteer in Technical Report 7: Heritage Impact Assessment [CD1-11.07.01, p. 142, Table TR7-A1-1] and in the Heritage Statement under West Cambridge Conservation Area [CD1-11.07.02, pp. 22 and 23, paragraphs 4.4.4 and 5.1.3]. In response to these representations, and also to the College’s Objection, a more detailed description of this asset’s significance and the impacts of the CtoC Scheme are provided in Section 5.2 above.

6.4 Comments from Historic England

- 6.4.1 Historic England have reiterated in their letter to the Inspectors dated 8th August 2025 that the CtoC Scheme would result in ‘less than substantial’ harm to designated heritage assets, that the harm could be weighed satisfactorily against the public benefits of the proposals, and that they have no objection to the proposals on heritage grounds [CD2 REP-08.2, p. 3].

- 6.4.2 That letter also provides additional comments regarding Clare Hall, which are addressed below.

Significance

- 6.4.3 Historic England have provided their views on the significance of Clare Hall with reference to ‘planning (topography and permeability)’ and to ‘detail (drainage and water features)’ [CD2 REP-08.2, pp. 2-3]. I am broadly in agreement with the comments made by Historic England, with the following exception.

“A particularly important aspect of the planning is the way in the which the college buildings address the roads to the north and south.” [CD2 REP-08.2, p. 2]

- 6.4.4 I do not agree that the relationship with the roads, specifically, is ‘particularly important’. In support of this assertion, Historic England refers to the use of the sunken car park to create a slope, the arrangement of building blocks, and the pedestrian routes within the campus, all of which are internal features of the architectural design that do not relate to the roads. Historic England also refer to the ‘permeability’ of the southern accesses, which I have explained is unusual only in comparison to the very impermeable character more typical of historic colleges and is not reflected in the experience of the setting, which is in general enclosed (cf. paragraphs 4.3.5 and 4.5.6). The relationship with the roads is not included in the reasons for designation (cf. paragraph 4.4.2 and [CD9-39, pp. 2-3 or CD26-01-APP-W2-2, pp. 34-35]), although “a consideration of landscape” is noted. While the roads are

elements of the setting from which some of Clare Hall's significance is derived, there is no justification for attributing a 'particular' degree of importance to them.

Submitted drawings

- 6.4.5 The CtoC Scheme plans are referred to in Historic England's letter of 8th August as follows.

"It has been brought to our attention that the deemed planning drawings are potentially misleading at this point in the proposed route. The proposed site plan (sheet 17 of 17) shows that the boundary of the CtoC order limits almost abuts the southern elevation of the college buildings, but is of insufficient detail to determine whether physical works to the drainage conduit would be necessary. [...]" [CD2 REP-08.2, p. 4]

- 6.4.6 Historic England appear to be referring to Sheet 17 of the Works Plans and Order Plans **[CD1-12.01, p. 19]** or to Sheet 17 of the Rights of Way Plans **[CD1-12.05, p. 19]**, or to both. These plans are printable at an appropriate scale of 1:1,250 at A1. The digital versions of these plans are sufficiently high resolution that the relationship between Clare Hall and the CtoC order limits can be viewed clearly by zooming in.

- 6.4.7 The CtoC Scheme sections are referred to in Historic England's letter of 8th August as follows.

The existing and proposed section 17 must be considered inaccurate: it shows a large expanse of open space between the edge of the CtoC order limits and the buildings to the north, which does not exist in this location. The proposed section also suggests that the busway here might be fenced on either side. In this context we note that any works which would compromise the physical and visual permeability of the Clare Hall site on its south side, through the introduction of level changes, barriers, insensitive surfacing materials, road furniture or other clutter, would cause harm to the significance of the listed college buildings by altering the character of their setting." [CD2 REP-08.2, p. 4]

- 6.4.8 Historic England are mistaken in their statement that "section 17 must be considered inaccurate". The Existing Site Sections **[CD1-16.03, p. 7, Section 17]** and Proposed Site Sections **[CD1-16.05, p. 7, Section 17]** both depict a Section 17 that is also shown on plans on page 1 of those documents. Section 17 does not intersect with Clare Hall, the listed building. It is located to the east of the listed building. The buildings depicted on Section 17 (both versions) are the rugby stand to the south of Rifle Range Road and the Anthony Low Building to the north, the latter which is within Clare Hall's campus but is not part of the listed building. Therefore, Historic England's comments regarding the implications of the design depicted on the section have no basis in fact.

Physical impacts to the listed building

- 6.4.9 This matter is referred to in Historic England's letter of 8th August as follows.

"It has recently been brought to our attention that this remodelling might necessitate physical alterations to the drainage conduit on the south edge of the site, with associated changes to the access routes to the college from

Rifle-range Road. Any such alterations would have a direct physical impact on an important aspect of the college buildings, and have the potential to cause harm to their significance.” [CD2 REP-08.2, p. 3]

“[...] As stated above, any works which would physically compromise the drainage conduit would cause harm to the significance of the listed buildings by affecting a key element of their functional and aesthetic design.” [CD2 REP-08.2, p. 3]

- 6.4.10 The CtoC Scheme would not affect the physical fabric of the canal (or ‘drainage conduit on the south edge’), including both the original part that is outside the order limits and the later part that is inside the order limits by virtue of being within the land parcel occupied by Rifle Range Road (cf. paragraphs 4.2.16, 4.2.26 and 4.2.27, and Section 4.6). Although the latter section, which is alongside the west (accommodation) block is within the limit of land to be acquired, the canal could be excluded from the works area. There would be a physical interaction between the canal and the new landscaping material placed during reinstatement. Control measures to avoid physical harm could be embedded in the detailed design, and these could be ensured by means of a condition imposed on the deemed planning permission (cf. paragraph 6.1.12).
- 6.4.11 Historic England’s comments are focussed on the canal, rather than the paths at Rifle Range Road, although they mention ‘associated changes’ to the ‘access routes’. I have described above (cf. 6.1.13 to 6.1.15) the reasons why I do not regard the paths on Rifle Range Road to be part of the listed building. Physical alteration to them therefore could not be a physical impact on the listed building.

Harm to the significance of Clare Hall by altering its setting

- 6.4.12 This matter is referred to in Historic England’s letter of 8th August as follows.

“Further, even if the proposed remodelling of Rifle-range Road would avoid such physical impacts, changes in this location have the potential to cause harm to the significance of the listed buildings by altering their setting.”

- 6.4.13 The Applicant and Historic England agree that ‘less than substantial’ harm would occur to Clare Hall as a result of the CtoC Scheme. This was reported in the Environmental Statement [CD1-11.07.02, p. 32, paragraph 6.2.9]. I have provided further information regarding how the setting would be affected (paragraphs 4.7.3 to 4.7.27).

Design information submitted

- 6.4.14 This matter is referred to in Historic England’s letter of 8th August as follows.

“The harm to the significance of the listed buildings at Clare Hall that would be caused by the proposed works cannot be fully assessed until detailed designs are brought forward. Historic England considers, however, that there is potential for some harm in this location, and that this could fruitfully be addressed at this stage in the planning process.” [CD2 REP-08.2, pp. 3-4]

“Historic England considers that the potential harm to the significance of designated heritage assets described above could probably be avoided or

mitigated through careful design. As the application stands, however, there is not sufficient clarity about the details of the intended works to judge their impact. We therefore suggest that the Examining Authority considers asking the applicant to seek to address the issues raised here by providing more detailed design drawings for the relevant part of the route.” [CD2 REP-08.2, p. 4]

- 6.4.15 A degree of harm to Clare Hall has been acknowledged and agreed with Historic England (paragraph 6.4.27), and can be assessed at this stage.
- 6.4.16 For Transport and Works Act Order applications that include “deemed planning permission” under Section 90(2A) of the Town and Country Planning Act 1990 [CD5-08, pp. 186-188, Section 90(2A)], the level of detail required in planning drawings must be sufficient to allow the Secretary of State to assess the environmental and planning impacts of the proposed development properly. The set of drawings submitted for the CtoC Scheme application [CD1-16.01 to CD1-16.07] meet the expected level of detail and are of sufficient standard to inform a decision by the Inspectors.
- 6.4.17 Careful design during the detailed design stage to avoid or reduce harm would be carried out and could be secured by means of a condition on the deemed planning permission.

Effect on the line of trees on Rifle Range Road

- 6.4.18 This matter is referred to in Historic England’s letter of 8th August as follows.
- “The proposed treatment of the semi-mature lime trees is also unclear at this stage; if they were to be felled, some harm could also be caused to the significance of the college through the alteration of its setting.” [CD2 REP-08.2, p. 4]*
- 6.4.19 The CtoC Scheme would involve removal of the line of trees along Rifle Range Road. The mixed (beneficial and adverse) contribution of those trees to Clare Hall’s setting is discussed in paragraph 4.5.10, and the mixed effects of their removal are discussed in paragraphs 4.7.5 and 4.7.21. Replacement of the line of trees with a hedgerow is discussed in paragraph 4.7.6 and 4.7.12. If hedgerow planting is not considered to be desirable, it could be removed from the CtoC Scheme at detailed design stage, assured by a condition to that effect imposed on the deemed planning permission.

7. CONCLUSIONS

7.1 Clare Hall: conclusions

- 7.1.1 The CtoC Scheme would result in a **minor** adverse 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 well below the middle of the range between ‘no harm’ and ‘substantial harm’, and towards the bottom of that range.
- 7.1.2 A route along Adams Road instead of Rifle Range Road has been considered during the ongoing assessment of the CtoC Scheme. Such a route would be harmful to the

historic environment including some listed buildings and one conservation area. The overall degree of harm would be towards the low end of 'less than substantial' and broadly similar to that of the CtoC Scheme.

7.2 CPPF Alternative: conclusions

- 7.2.1 The CPPF Alternative would result in a **minor** adverse effect, or 'less than substantial' harm in NPPF terms, to three designated heritage assets that would be unaffected by the CtoC Scheme. These assets are 'American Military Cemetery' Grade I registered park and garden, and Grade II* listed buildings 'Memorial and Attached Walls, Steps and Pool Surround at American Military Cemetery' and 'Madingley Mill, at Mill Farm, Madingley Hill'. These three assets would be unaffected by the CtoC Scheme.
- 7.2.2 The CtoC Scheme would result in a **minor** adverse effect, or 'less than substantial' harm in NPPF terms, to Coton Conservation Area, which would be unaffected by the CPPF Alternative.

7.3 Representations from Cambridge City Council and South Cambridgeshire District Council: conclusions

- 7.3.1 The effects of the CtoC Scheme on heritage assets listed in the representations from Cambridge City Council and South Cambridgeshire District Council have been addressed with reference to the information already provided in the Environmental Statement and further details that were considered during the assessment but not included in the Environmental Statement text.

7.4 Comments from Historic England: conclusions

- 7.4.1 The Applicant and Historic England are in broad agreement regarding the effects of the CtoC Scheme, both in general and on Clare Hall. Historic England's queries regarding submitted drawings have been answered. Their concerns in relation to physical and setting-related impacts have been addressed. The requirements for design information to be submitted have been clarified.

8. STATEMENT OF TRUTH

- 8.1.1 The evidence that I have prepared and provided 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.