

**Network Rail (Cambridge South Infrastructure Enhancement) Order**

**Proof of Evidence of Charlotte Burton**

**BA (hons), MA (Cantab), MSc (Spatial Planning), MRTPI**

**Principal Planning Officer, Greater Cambridge Shared Planning**

**On behalf of Cambridge City Council (OBJ-23)**

**Relating to Statement of Matters (211027) items 3. (i) The effect of the proposal on biodiversity including biodiversity net gain; 4. Impact on Hobson's Park Nine Wells Local Nature Reserve; 7. The adequacy of the Environmental Statement: the impacts on trees; and 10. The conditions proposed to be attached to the deemed planning permission for the scheme.**

**07 January 2022**

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Appendix A – Comments on draft planning conditions

Appendix B – Letter from Council to applicant dated 07 December 2021

Appendix C – Response from applicant to Council dated 10 December 2021

Appendix D - Cambridge City Council Air Quality Action Plan (2018)

## 1.0 Introduction

- 1.1 My name is Charlotte Burton, and I am a fully qualified planning officer presently employed by Greater Cambridge Shared Planning as a Principal Planning Officer. I am appearing at the Inquiry into the application for the Network Rail (Cambridge South Infrastructure Enhancement) Order on behalf of Cambridge City Council (hereafter referred to as 'the Council').
- 1.2 I am a fully chartered member of the Royal Town Planning Institute with 7 years' post-qualification experience. I have a Bachelor of Arts degree in Geography and a Master of Science degree in Spatial Planning. The evidence which I have prepared and provide for in this Proof of Evidence is true and I confirm that the opinions expressed are my true and professional opinions.
- 1.3 This evidence should be read alongside the Proofs of Evidence prepared by Alistair Wilson and Guy Belcher also on behalf of the Council, to which my Proof of Evidence refers to where appropriate.
- 1.4 The Council supports the aim of the Cambridge South Infrastructure Enhancements scheme, which accords with the vision and strategic objectives of the Local Plan 2018 to promote sustainable economic growth, respond to climate change, and maximise sustainable transport modes, and in accordance with Local Plan policy 5 which supports implementation of the Peterborough Combined Authority Local Transport Plan (2020).
- 1.5 Notwithstanding this, the Council has raised objections to the scheme where the proposal fails to comply with the adopted development plan and other material considerations, which are summarised in our representation to the public consultation (OBJ-23) and Statement of Case (E11-OBJ23). Since then, officers for the Council have engaged with the applicant to seek to resolve our objections, including several meetings and exchanges of correspondence.
- 1.6 Correspondence summarising these discussions and the current position on our objections is provided in the letter from the Council dated 07 December (Appendix B) and the response from the applicant's Planning Manager dated 10 December (Appendix C). My Proof of Evidence has been prepared based on the content of these documents, although review of the updated Design Principles document is ongoing at the time of writing.
- 1.7 The Council objects to the proposal on several grounds which are covered in my Proof of Evidence, and the Proofs of Evidence prepared by Alistair Wilson and Guy Belcher also on behalf of the Council. The objections relate to the following matters as outlined in the Statement of Matters:
  3. (i) The effect of the proposal on biodiversity including biodiversity net gain;
  4. Impact on Hobson's Park Nine Wells Local Nature Reserve;
  7. The adequacy of the Environmental Statement: the impacts on trees; and

10. The conditions proposed to be attached to the deemed planning permission for the scheme.

## **2.0 Description of proposals**

2.1 The works within the Cambridge City Council administrative boundary are the construction of a new railway station located between the Cambridge Biomedical Campus and Hobson's Park and bordered to the north by the Cambridge Guided Busway. The proposed station works comprise of:

- i. A two-storey station building with entrances on the east (Cambridge Biomedical Campus) and west (Hobson's Park) sides of the railway line, including a retail/catering unit;
- ii. Four platforms with step-free access via a footbridge and lifts; seating and platform canopies for waiting passengers;
- iii. An emergency evacuation footbridge and stairs a secondary covered footbridge at the platforms' southern end;
- iv. Cycle parking on both sides of the railway for a total of 1,000 cycles;
- v. Pedestrian and cycle access paths on both sides of the railway;
- vi. A station forecourt on the eastern side containing five parking bays for Blue Badge Holders; two parking bays for station staff; two parking bays for maintenance staff; three bays for drop-off/pick-up by private cars; and three bays for drop-off/pick-up by taxis; and
- vii. Introduction of 2 additional loop lines.

2.2 The scheme includes landscaping works within Hobson's Park to provide cycle and pedestrian connections across the park to the new station, as well as access for emergency and maintenance vehicles to the western station building from Addenbrooke's Road.

2.3 Permanent land acquisition of areas of public open space is required for the works and temporary land acquisition is required for the construction period which includes the construction compound. Replacement land for public open space is proposed on land to the south of Addenbrooke's Road.

## **3.0 Site description and context**

3.1 The site includes land on the eastern side of the railway line within the site allocation for the Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change within the Local Plan 2018. This is an allocation for health care and biomedical and biotechnology research and development uses.

3.2 The application site boundary includes land within the Cambridge Green Belt, including the railway line, Hobson's Park and Long Road Sixth Form College. Long Road Sixth Form College on the eastern side of the railway line is a

protected open space (SPO 29) within the Local Plan 2018. Hobson's Brook is a City Wildlife Site.

- 3.3 The site includes land within Hobson's Park and the Active Recreation Area which was secured as public open space through a Section 106 Agreement related to the Clay Farm development within the southern fringe. The area is intended for environmental and recreational use and was designed as being accessible from the development and supporting allotments, active play and recreation spaces.
- 3.4 The public open space was also designed to, and forms, an integral part of the sustainable drainage scheme for the development known as Clay Farm. The site levels currently support water storage before release into Hobson's Brook through ponds and attenuation basins. North Brook also runs through the proposed site. The area includes drainage ponds and biodiversity features.
- 3.5 The Cambridge Guided Busway runs through the site and includes a bridge over the railway line, with a pedestrian connection beneath the bridge to provide access between Hobson's Park and the Active Recreation Area. The area is crossed by paths which provides access between the Clay Farm development and the Cambridge Biomedical Campus, and throughout the public open space.
- 3.6 There is an area tree preservation order (TPOs) covering trees to the south of the Long Road bridge and individual TPOs on the St Mary's Playing Field to on the western side of the railway line. Small parts of the railway line and larger areas within the open space to the west and within the Cambridge Biomedical Campus are within Flood Zones 2 and 3, and within areas at risk of surface water flooding up to a 1 in 200 year rainfall event.
- 3.7 The National Grid high pressure pipeline runs though the site, including running parallel to the railway line on the eastern side and within the Cambridge Biomedical Campus. The site is within the Cambridge Airport Safeguarding Zone consultation area for any structure greater than 15m above ground level. The site is also within the Special Control of Advertisements Zone.

#### **4.0 Planning policy context**

- 4.1 The adopted development plan is the Cambridge Local Plan 2018 (D-06). The relevant policies are as follows:

- Policy 1 (The presumption in favour of sustainable development)
- Policy 4 (Green Belt)
- Policy 5 (Sustainable transport and infrastructure)
- Policy 8 (Setting of the City)
- Policy 14 (Areas of Major Change and Opportunity Areas – general principles)
- Policy 17 (Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change)
- Policy 18 (Southern Fringe Areas of Major Change)

Policy 28 (Carbon reduction, community energy networks, sustainable design and construction, and water use)  
 Policy 29 (Renewable and Low Carbon Energy Generation)  
 Policy 31 (Integrated water management and the water cycle)  
 Policy 32 (Flood Risk)  
 Policy 33 (Contaminated land)  
 Policy 34 (Light pollution control)  
 Policy 35 (Protection of human health and quality of life from noise and vibration)  
 Policy 36 (Air quality, odour and dust)  
 Policy 37 (Cambridge Airport Public Safety Zone and Air Safeguarding)  
 Policy 39 (Mullard Radio Astronomy Observatory, Lord's Bridge)  
 Policy 55 (Responding to context)  
 Policy 56 (Creating successful places)  
 Policy 57 (Designing new buildings)  
 Policy 59 (Designing landscape and the public realm)  
 Policy 60 (Tall buildings and the skyline in Cambridge)  
 Policy 61 (Conservation and enhancement of Cambridge's Historic environment)  
 Policy 67 (Protection of open space)  
 Policy 69 (Protection of sites of biodiversity and geodiversity)  
 Policy 70 (Protection of Priority Species and Habitats)  
 Policy 71 (Trees)  
 Policy 80 (Supporting sustainable access to development)  
 Policy 81 (Mitigating the transport impact of development)  
 Policy 82 (Parking management)  
 Policy 85 (Infrastructure delivery, planning obligations and the Community Infrastructure Levy)

#### 4.2 Relevant supplementary planning documents (SPDs) include:

Greater Cambridge Sustainable Design and Construction SPD (adopted 2018) (D-12)  
 Cambridgeshire Flood and Water SPD (adopted 2018) (D-13)  
 Public Art SPD (adopted in 2010) (D-14)

#### 4.3 Other material considerations include:

Draft Biodiversity SPD (pending adoption)  
 Open Space and Recreation Strategy (2011) (M1)  
 Cambridgeshire and Peterborough Local Transport Plan (2020) (D-09)  
 Transport Strategy for Cambridge and South Cambridgeshire (2014) (D-10)  
 Cambridge City Council Air Quality Action Plan (2018) (Appendix D)

#### 4.4 The National Planning Policy Framework (2021) (NPPF) (D-01) and National Planning Practice Guidance (NPPG) (D-04) are also material considerations.

## 5.0 Evidence

### Impact on biodiversity and biodiversity net gain

- 5.1 Local Plan policy 67 'Protected open space' states that development proposals will not be permitted which would harm the character of, or lead to the loss of, open space of environmental importance unless:
- a. the open space can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost; and
  - b. the re-provision is located within a short walk (400m) of the original site.
- The policy requires that proposals that include loss of open space of environmental importance must be satisfactorily replaced.
- 5.2 Hobson's Conduit is a City Wildlife Site and thus Local Plan policy 69 'Protection of sites of biodiversity and geodiversity importance' is relevant to the proposals. The policy states that development will be permitted if it will not have an adverse impact on such sites. Where development is permitted, proposals must include measures:
- a. to minimise harm;
  - b. to secure achievable mitigation and/or compensatory measures; and
  - c. where possible enhance the nature conservation value of the site affected through habitat creation, linkage and management.
- In exceptional circumstances, where the importance of the development outweighs the need to retain the site, adequate replacement habitat must be provided, and any replacement habitat must be provided before development commences on any proposed area of habitat to be lost, in accordance with the policy.
- 5.3 The NPPF promotes development providing measurable net gains for biodiversity and that opportunities to improve biodiversity in and around developments should be integrated as part of their design (paragraphs 174 and 180). The Environment Act introduces a statutory minimum biodiversity net gain target.
- 5.4 The NPPG states that 'net gains' in planning – including biodiversity net gain - are an approach to development that leaves the natural environment in a measurably better state than it was beforehand (paragraph 020). It goes on to explain that this is achieved by creating or enhancing habitats in association with development on-site, off-site or through a combination of on-site and off-site measures (paragraph 022).
- 5.5 The NPPG warns that 'care needs to be taken to ensure that any benefits promised will lead to genuine and demonstrable gains for biodiversity' (paragraph 023). It recommends provisions for biodiversity net gain should be resilient to future pressures from further development or climate change, and supported by appropriate maintenance arrangements.

- 5.6 The Council has provided evidence in the Proof of Evidence prepared by Guy Belcher that the application provides inadequate information about how the biodiversity net gain target will be achieved. This is because limited information has been provided about the proposed onsite mitigation and how options for further onsite mitigation have been exhausted.
- 5.7 Notwithstanding that the principle of offsite mitigation has not been accepted, for the reasons given in the Proof of Evidence prepared by Guy Belcher, insufficient information has also been provided to demonstrate that offsite mitigation can be secured through the proposed option at Lower Valley Farm secured through an acceptable legal mechanism for delivery and ongoing management and maintenance.
- 5.8 For these reasons, the application has failed to ensure that any benefits promised will lead to genuine and demonstrable gains for biodiversity, or that provisions for biodiversity net gain would be resilient to future pressures and supported by appropriate maintenance arrangements, contrary to recommendations within the NPPG, the NPPF and Local Plan policies 67 and 69.
- 5.9 The Council has identified a potential impact on Corn Bunting and Skylark in the Proof of Evidence prepared by Guy Belcher. Both bird species are Priority Species identified within Section 41 of the Natural Environment and Rural Communities Act. Local Plan policy 70 'Protection of priority species and habitats' states that:

*Development will be permitted which:*

- a. protects priority species and habitats; and*
- b. enhances habitats and populations of priority species.*

*Proposals that harm or disturb populations and habitats should:*

- c. minimise any ecological harm; and*
- d. secure achievable mitigation and/or compensatory measures, resulting in either no net loss or a net gain of priority habitat and local populations of priority species.*

*Where development is proposed within or adjoining a site hosting priority species and habitats, or which will otherwise affect a national priority species or a species listed in the national and Cambridgeshire-specific biodiversity action plans (BAPs), an assessment of the following will be required:*

- e. current status of the species population;*
- f. the species' use of the site and other adjacent habitats;*
- g. the impact of the proposed development on legally protected species, national and Cambridgeshire-specific BAP species and their habitats; and*
- h. details of measures to fully protect the species and habitats identified.*

*If significant harm to the population or conservation status of a protected species, priority species or priority habitat resulting from a development cannot be avoided, adequately mitigated, or, as a last resort, compensated for, then planning permission will be refused.*



- 5.10 The Proof of Evidence prepared by Guy Belcher demonstrates that the potential impact of the proposed development on Corn Bunting and Skylark within the application site area requires further assessment prior to determination in order to inform mitigation measures so that these populations are not negatively impacted during both the construction and operational phase of the proposed development. The proposal is therefore currently contrary to Local Plan 2018 policy 70.

### **Impact on Hobson's Park**

- 5.11 Local Plan policy 67 'Protected open space' states that development proposals will not be permitted which would harm the character of, or lead to the loss of, open space of environmental and/or recreational importance unless:
- a. the open space can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost; and
  - b. the re-provision is located within a short walk (400m) of the original site.
- 5.12 Notwithstanding the revised Deposited Plans (NR-22), the proposal would result in the temporary and permanent loss of open space within Hobson's Park. This area of open space was secured through the Section 106 Agreement for the Clay Farm development.
- 5.13 Hobson's Park is an open space of environmental and recreational importance. It provides important biodiversity mitigation and enhancement, and informal open space for the benefit of the residents, as set out in the Proof of Evidence prepared by Alistair Wilson and in the extract from the Open Space and Recreation Strategy 2011 (M1) below:

#### *Paragraph 4.7:*

##### *Cambridge Southern Fringe: Clay Farm*

*This site lies entirely within Cambridge's administrative area and provides 2,300 new homes and a mixture of other supporting uses. It is allocated in the Cambridge Local Plan 2006 and planning permission was granted in 2010. This site is an important gateway to Cambridge and will form a new edge to the City. Landscape and open space are key elements of overall character of the proposed development, with the existing trees, plantations, hedges, Hobson's Brook and associated ditches characterising the development, and providing the background around which the new landscape will be designed. The green corridor provides the transition between the urban fabric and the open countryside to the south, and remains in the Green Belt. A transition is proposed within this corridor from formal recreation/open space adjacent to Long Road to informal open space further south to merge with the countryside character beyond. This is achieved with the majority of active uses located north of The Busway's Addenbrooke's spur. South of The Busway spur will comprise wet/dry balancing ponds, a permanent wetland feature, informal species rich grassland and tree planting primarily along the western and southern edges. An allotment site of 1 hectare is included on the western edge of the southern section*

- 5.14 The use of part of Hobson's Park for the station buildings, structures and paths would result in the permanent loss of open space, and would also impact on the amenity value of the retained open space for the reasons explained in the Proof of Evidence prepared by Alistair Wilson. In summary this is because of the land to be permanently occupied and due to the disaggregation of the retained open space caused by the creation of new routes to the station.
- 5.15 The proposed exchange land would be required to provide biodiversity and amenity functions. The application has failed to demonstrate that the exchange land would provide adequate re-provision for the permanent loss of open space for the reasons explained in the Proof of Evidence prepared by Alistair Wilson. In summary, this is because of inadequate information on the landscaping and biodiversity features of the proposed exchange land, and the poor accessibility and safety of crossing Addenbrooke's Road.
- 5.16 Therefore, the proposal currently fails to demonstrate that the open space to be permanently lost or harmed as a result of the proposals can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard, contrary to policy 67.
- 5.17 The use of Hobson's Park during construction would result in the temporary loss of open space. The applicant has not proposed temporary replacement land. The Council has requested that the replacement land to compensate for the permanent loss is made available for use before the temporary use commences. This would provide some mitigation, however the applicant has not agreed to this. Therefore, the temporary loss of open space is also contrary to policy 67.
- 5.18 The Council has requested information from the applicant to justify both the extent of land required and the duration for which the land is required, however the applicant has not provided this. The Council does not consider that the revised Deposited Plans (NR-22) justify or explain the reason for the area for the temporary land acquisition. As a result, the application has not demonstrated that there are other material considerations that outweigh the temporary loss of open space and the conflict with policy 67.

### **Impact on trees**

- 5.19 Local Plan policy 71 'Trees' states that development will not be permitted which involves felling, significant surgery (either now or in the foreseeable future) and potential root damage to trees of amenity or other value, unless there are demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity value of the trees. Development proposals should:
- a. preserve, protect and enhance existing trees and hedges that have amenity value as perceived from the public realm;
  - b. provide appropriate replacement planting, where felling is proved necessary; and
  - c. provide sufficient space for trees and other vegetation to mature.

- 5.20 The proposal includes the removal and replanting of trees on the eastern side of the railway line on land owned by Long Road Sixth Form College. These are mature trees which have a high amenity value, as explained in the Proof of Evidence prepared by Alistair Wilson. Therefore, the proposal does not meet part a of policy 71.
- 5.21 The Council has requested more information from the applicant about the impact on these trees in the form of an Arboricultural Implications Assessment to assess the extent of tree removal required at the College to accommodate the development. This information has not been provided and thus the application fails to demonstrate that felling is necessary contrary to part b of policy 71.
- 5.22 The Council has provided evidence that the proposed replacement tree planting would not provide appropriate replacement planting contrary to part b of policy 71, because it would take decades to replace the amenity value of the existing mature woodland strip. In addition, the Council has provided evidence that the proposal is likely to have a significant and long-term impact on the retained trees within the woodland strip. In summary, this is due to the co-dependency of trees and the risk to the retained trees from changes in wind. Therefore, the application has not demonstrated that it would protect and preserve the retained trees contrary to part a of policy 71.

### **Planning conditions**

- 5.23 At the time of writing, the Council has not agreed a set of draft planning conditions with the applicant. Officers are in ongoing discussions with the applicant and expect to confirm an agreed set of planning conditions in a Statement of Common Ground. The Council requests that any matters that cannot be resolved through the Statement of Common Ground are discussed via the roundtable.
- 5.24 The Council provided information on the conditions it would be seeking in the original representation submitted to the public consultation (OBJ-23) and Statement of Case (E11-OBJ/23). Since then, the Council has engaged in further correspondence and meetings including with technical officers to discuss the wording of the proposed draft conditions.
- 5.25 The most up-to-date set of proposed draft conditions available to me at the time of writing are those that were emailed to me by the applicant's Planning Manager on 08 December. However, I understand from a meeting with the applicant's Planning Manager on 14 December that further amendments have been made to those conditions, including new conditions. The Council has not had an opportunity to review the amendments/additions in detail and therefore further discussions are required.
- 5.26 I have provided the Council's comments on the draft conditions dated 08 December in the table below. This includes comments on whether the conditions are supported, or whether insertions/amendments or further discussions are required. In summary, the Council supports the substance of most of the conditions, however further discussions are required on the draft

conditions relating to archaeology, biodiversity net gain, surface water drainage, public art, lighting and the pedestrian link between the Cambridge Guided Busway.

5.27 In addition to this, I understand following a meeting with the applicant's Planning Manager on 14 December that the proposed draft condition relating to the provision of electric vehicle charging points has not been agreed by the applicant. This condition is necessary in order to comply with the development plan for the reasons given below and therefore the Council would object to the removal of this condition.

5.28 The Council also requests an additional condition to secure compliance with the mitigation measures identified within the Environmental Statement. Draft wording for this is provided below.

#### Electric Vehicle Charging

5.29 Local Plan policy 36 'Air quality, odour and dust' states that development will be permitted where it can be demonstrated it does not lead to significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions to air.

5.30 The provision of electric vehicle charging points to enable the transition to low emission vehicles is a key priority in the Council's Air Quality Action Plan (2018) (Appendix D). The Greater Cambridge Sustainable Design and Construction SPD (2020) also supports the installation of electric vehicle charging points to reduce air quality impacts.

5.31 While the Council acknowledges that the proposed development is predicted to lead to a net reduction in vehicle numbers overall, nonetheless the development has the potential to see a worsening of air quality at a localised level due to vehicles making trips to use the station. The provision of active electric vehicle charging points is necessary to offset any potential worsening of air quality in the local area.

5.32 The Council welcomes the proposed intention to provide minimal car parking to serve the station. Nonetheless, Local Plan policy 82 'Parking management' states that electric vehicle charging points, or the infrastructure to ensure their future provision, should be provided within a development where reasonable and proportionate.

5.33 The provision of active electric vehicle charging points for blue badge holders and employees using these spaces is necessary to facilitate the national policy to shift to zero emission vehicles as combustion engines are phased out. The applicant has not provided evidence to demonstrate that the provision of active – as opposed to passive - charging points would not be reasonable or proportionate contrary to policy 82.

- 5.34 For these reasons, active charging points must be provided in accordance with Local Plan policies 36 and 82, and this must be secured through the draft planning condition provided in Appendix A.

#### Environmental Statement

- 5.35 The Council requests the following additional condition to ensure that the development takes place in accordance with the principles and parameters contained within the Environmental Statement:

*The development shall only be carried out in accordance with the mitigation measures as set out in the Environmental Statement*

*Reason: To ensure that the development takes place in accordance with the principles and parameters contained within the Environmental Statement.*

- 5.36 This additional condition will be discussed with the applicant during ongoing discussions to agree a set of draft planning conditions.

## **6.0 Conclusion**

- 6.1 While the Council supports the principle of development in accordance with policy 5 of the Local Plan, the proposal fails to comply with the development plan, because of the conflict with Local Plan policies 67, 69, 70 and 71 relating to the protection of open space, impact on biodiversity and impact on trees.
- 6.2 In reaching this judgement, I have taken account of the benefits of the scheme in terms of the alignment with the vision and strategic objectives of the Cambridge Local Plan 2018 to promote sustainable economic growth, respond to climate change, and maximise sustainable transport modes, and in accordance with Local Plan policy 5 which supports implementation of the Peterborough Combined Authority Local Transport Plan (2020).
- 6.3 Nonetheless, the benefits of the scheme do not outweigh the conflict with the development plan. Therefore, as matters stand, planning permission for the scheme should not be granted, and the Order should not be made, and a certificate under section 19(1)(b) of the acquisition of Land Act 1981 should not be granted.
- 6.4 These conflicts could be overcome through the submission of additional evidence which addresses the following points before the application is determined:
1. Acceptable details about the proposed onsite biodiversity mitigation and how options for further onsite mitigation have been exhausted; and acceptable details about the proposed offsite mitigation at Lower Valley Farm (including an acceptable legal mechanism to secure delivery) to demonstrate that the proposals will lead to genuine and demonstrable gains for biodiversity that are

resilient to future pressures and supported by appropriate maintenance arrangements, in accordance with the NPPG, the NPPF and Local Plan 2018 policies 67 and 69.

2. Further assessment of the potential impact on protected Corn Bunting and Skylark within the application site area to inform mitigation measures so that these populations are not negatively impacted during both the construction and operational phase of the proposed development, in accordance with Local Plan 2018 policy 70.
3. Acceptable details to assess the implications of the proposal on the future maintenance and a management of Hobson's Park, the Active Recreation Area, and the proposed exchange land; and mitigation measures (which could include the provision of new or altered accesses for maintenance, remediation works prior to transfer to the Council, and financial contributions to the Council towards additional costs of maintenance as a result of the proposed works) should be proposed to ensure that the biodiversity and amenity value of the open space provision is acceptable, in accordance with Local Plan 2018 policy 67.
4. Acceptable details of the landscaping and biodiversity features of the proposed exchange land; and details of an accessible and safe crossing point on Addenbrooke's Road to demonstrate that the permanent loss of open space can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost, in accordance with Local Plan 2018 policy 67.
5. Acceptable justification for the both the area of land and the duration for which the temporary acquisition of land is required during construction works to demonstrate that there are material considerations that outweigh the temporary loss of open space and the conflict with Local Plan 2018 policy 67.
6. Agreement that the replacement land to compensate for the permanent loss of open space is made available for use before the temporary use commences to provide some mitigation, in accordance with Local Plan 2018 policy 67.
7. An acceptable Arboricultural Implications Assessment to assess the extent of tree removal required at Long Road Sixth Form College to accommodate the development, and the impact on other co-dependent trees, to demonstrate that the proposal would preserve, protect and enhance existing trees, and to ensure that any replacement planting is appropriate, in accordance with Local Plan 2018 policy 71.

**END**