



**OBJ-23-W3/2**

## **Proof of evidence relating to Biodiversity Net Gain and Breeding Farmland Birds.**

### **Appendices to Proof of Evidence**

**TRANSPORT AND WORKS ACT 1992: APPLICATION FOR THE PROPOSED  
NETWORK RAIL (CAMBRIDGE SOUTH INFRASTRUCTURE ENHANCEMENT) ORDER**

Planning Ref: 20/05054/CTY,  
21/02957/TWA

Produced by Guy Belcher BSc (Hons) MCIEEM, Biodiversity Officer, on  
behalf of Cambridge City Council (OBJ23)

Issued: 7 January 2022

**COVER PAGE**

## **CONTENTS**

### **Appendices**

- i. Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc. published by the Environment Working Group, March 2021
- ii. Letter to NR update on CCC position issued 07.12.2021

**Appendix i. Shared regional principles for protecting, restoring and enhancing the environment in the Oxford-Cambridge Arc.  
published by the Environment Working Group, March 2021**

# Shared regional principles for protecting, restoring and enhancing the environment in the **Oxford-Cambridge Arc**







Contents	
Foreword	3
The joint declaration	4
The Arc vision	5
<b>The Principles</b>	<b>7</b>

# Foreword

The days when we could take our environment for granted are long gone. We must now seek out every opportunity we can to protect and enhance what we have left and ensure that we do everything we can to ensure that the Oxford-Cambridge Arc is a place where we can all work and live truly sustainably.

Both the Arc Leadership Group’s OxCam Arc Economic Prospectus and the Government’s publication, planning for sustainable growth: introduction to the Arc Spatial Framework has given top billing jointly to the economy and the environment. It is now our job to ensure that the environment is at the centre of everything we do and every decision we take.

The work of the OxCam Arc Environment Working Group has been focused on putting forward this set of principles that will allow us to be outstandingly ambitious and aspirational for the OxCam Arc. If we can get this right then the world will look to our ‘Green Arc’ as an internationally significant exemplar for the very best in sustainable living and working, for practical ways to doubling nature, and innovative solutions to energy and water shortages as well as stimulating a green economy.

These principles will form the basis for the creation of an OxCam- wide Environmental Strategy that will embrace everything from green spaces, to housing standards, to sustainable transport, energy generation and transmission and water management and conservation.

It is vital, as we and government move forward with the OxCam Arc, that we take the people already living here with us. We can do this by committing to greener transport, by doubling the number of trees and acreage of accessible managed green spaces, by protecting our chalk streams and supporting local green energy production to name but a few.

If we are to double economic growth along the OxCam Arc then as a minimum we must be doubling nature and ensuring that the Arc leads the way in the zero carbon living and working of the future.

**Councillor Bridget Smith,**  
Leader South Cambridgeshire District Council,  
Chair Arc Environment Working Group

Left  
Paragliding off the  
Dunstable Downs Chiltern  
Hills in Bedfordshire



## In March 2019, Government and local partners set out their ambition for the Arc in a joint declaration<sup>1</sup>:

“We want better places to live, which are beautiful and inspiring, to benefit the Arc’s residents today as well as tomorrow. The Government has already set out its intention for the Arc to embody England’s 25 Year Environment Plan, which we will work together to deliver, including through planning for local natural capital. We want new developments to use intelligent and sensitive design to create or enhance habitats and improve habitat connectivity, in situ and in the surrounding area. We also want to improve access to the environment for existing and new communities in order to improve health and wellbeing.”

“Conserving and enhancing the natural environment is at the heart of Government’s ambitions for the Arc. The 25 Year Environment Plan also sets out our comprehensive approach to improving landscapes and habitats, and

the aspiration to move to a policy of net environmental gain. We expect the policy for the wider Oxford-Cambridge corridor to embody this approach.”

An Environment Working Group (EWG) has been established to take forward the environmental pillar outlined within the joint declaration. The EWG will work with partners in the Arc, including those responsible for the other pillars, to ensure that the protection and enhancement of the environment is at the heart of decision-making and any actions are based on a clear and agreed evidence base.

<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/799993/OxCam\\_Arc\\_Ambition.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/799993/OxCam_Arc_Ambition.pdf)

**Above**  
Sunrise at Willen Lake in Milton Keynes.

**Right**  
Elmsbrook eco-town - Bicester.

**In October 2020 an economic prospectus for the Arc was published jointly by local authorities and the Local Enterprise Partnerships within the Arc. It outlines the following vision:**

“By 2050, the Arc will be a world leading place for high-value growth, innovation and productivity. A global hub where ideas and companies are generated and thrive, home to exemplary models of 21st century development, with a high-quality environment and outstanding quality of life, and with a strong economic focus that drives inclusive clean growth.”

**The environmental principles supporting this vision are set out in this document. They are ambitious and will require the collective effort of all partners in the Arc if they are to be delivered.**







**The regional principles have been written and agreed by the Arc’s local partners and stakeholders. They are informed by Government policy. They are a clear statement of regional intent that will help to clarify the commitment to adopting an approach that results in environmentally sustainable economic growth. This includes the protection, restoration and enhancement of the environment (air, water, land, soil, biodiversity), net biodiversity and net environmental gain, net zero carbon, the sustainable use of resources.**

**Above**  
Cotswolds Hills Countryside in the area of outstanding natural beauty.

**Right**  
Autumn view of the river Nene Valley, near Castor village, Cambridgeshire.

The principles align with the government’s 25 Year Environment Plan<sup>2</sup> and the commitment in the joint declaration to embody the 25 year plans goals and ambitions.

We will also take account of other appropriate government strategies, plans and guidance. Our aim is for the principles to inform and become an integral part of developing plans and statements in relation to the Arc, local plans, local council activities and the plans and activities of activities and delivery programs for all bodies operating in the Arc. It is also our ambition to see universities, private sector developers and third sector organisations adopt these principles.

**The principles address how we will tackle some of the biggest challenges of our time:** achieving net zero carbon, climate resilience, biodiversity net gain, environmental net gain, doubling the area of land actively managed for nature, restoring, protecting and enhancing the natural environment and ensuring renewable natural capital (resources derived from living things that if properly managed can be replenished) remains available for future generations.

# The principles



<sup>2</sup>A Green Future: Our 25 Year Plan to Improve the Environmentfile/799993/OxCam\_Arc\_Ambition.pdf



# The Arc partners will seek to:

1.

Work towards a target of net zero carbon at an Arc level by 2040. This will include:

- a. Ensuring all **decisions about development and new infrastructure support this goal.**
- b. Working with Government to **enhance building regulations and planning policy to actively reduce the carbon footprint of, and energy consumption in, new buildings.**
- c. Pursuing a **major programme of transformation** in existing settlements and infrastructure to reduce energy intensity and carbon emissions.
- d. Construction, operational and transport activities.

2.

**Protect, restore, enhance and create new nature areas and natural capital assets, including nationally and locally designated wildlife sites and priority habitats, and links between them. We will implement the spatial planning mitigation hierarchy of avoid, minimise, remediate, compensate and gain. This will include:**

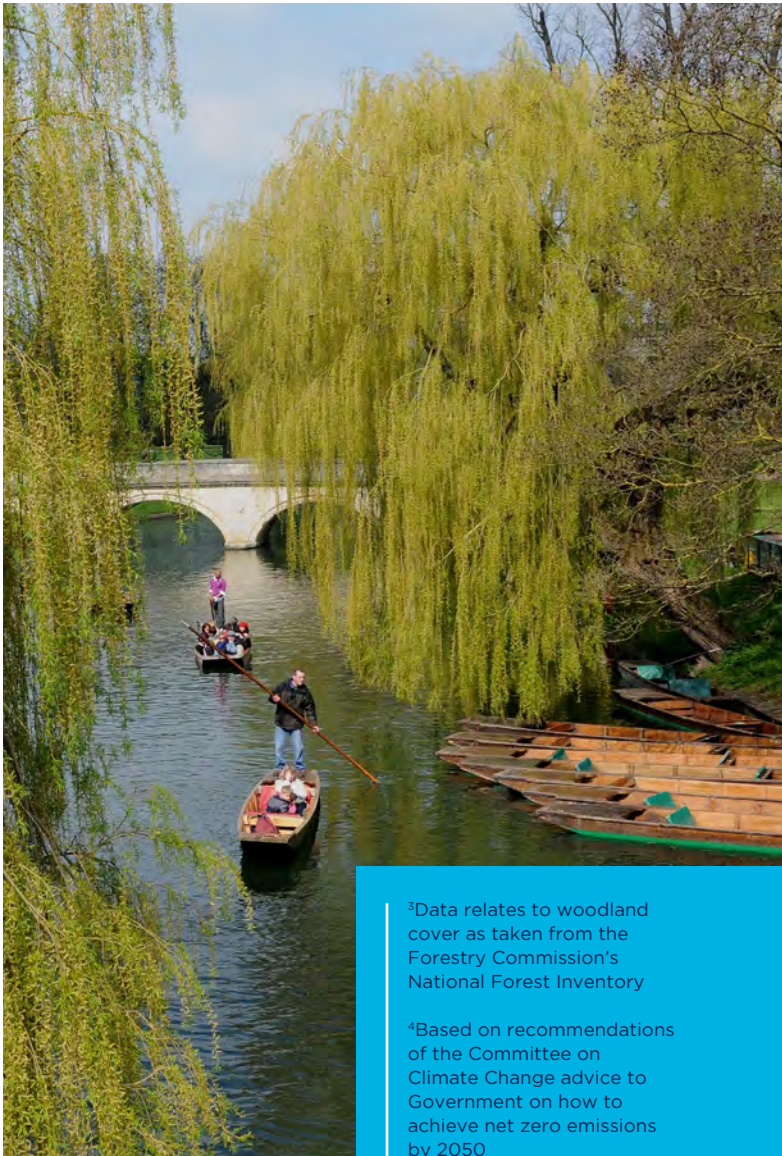
- a. Doubling the area of land managed primarily for nature in the Arc (**‘Doubling Nature’**). To contribute to Government’s commitment to protecting 30% of land for nature conservation by 2030. We will seek to maximise public, private and third sector funding opportunities **to protect, restore and enhance the natural environment** and maintain existing, and increase investment in, natural capital assets, working with partners including major landowners and our important agriculture sector across the Arc.



**Above**  
Heron Valley, Rushmere  
Country Park, Leighton  
Buzzard.

**Right**  
Punting on the River  
Nene, Peterborough.

- b. Coordinating work on local nature recovery strategies and the Arc’s contribution to **the Nature Recovery Network for England** by creating more, bigger, better-connected places, in the required condition, for nature including landscape scale interventions.
- c. Delivering **biodiversity net gain for Town & Country Planning Act developments of 20%.** This is above the 10% Government mandated minimum to reflect the Arc’s world leading environmental ambitions.
- d. Delivering **biodiversity net gain for all developments of 20% with a minimum requirement of 10%** including Nationally Significant Infrastructure and projects brought forward outside of the Town & Country Planning Act. This is to reflect the Arc’s world leading environmental ambitions.
- e. **Working with Government to develop a suitable net environment gain metric that** incorporates biodiversity net gain and, once available, to set an ambitious target to reflect the Arc’s world leading environmental ambitions.
- f. Establishing **human and nature mobility corridors** across the Arc – using existing or new transport corridors for maximum environmental benefit/gain.
- g. **Increasing tree and woodland cover across the Arc from 7.4%<sup>3</sup> to 19%<sup>4</sup>.** This is in recognition of the ability of trees and woodlands to deliver a wide range of environmental, health, social and economic benefits. We will ensure the right trees are planted in the right places.
- h. Protecting and enhancing protected landscapes. Enhancing landscape character areas, recognising the intrinsic character and beauty of the wider countryside.



<sup>3</sup>Data relates to woodland cover as taken from the Forestry Commission’s National Forest Inventory

<sup>4</sup>Based on recommendations of the Committee on Climate Change advice to Government on how to achieve net zero emissions by 2050



## 3.

**Be an exemplar for environmentally sustainable development, in line with the ambitions set out in the government's 25 year plan. This will incorporate a systems-based and integrated assessment and implementation approach and will fully recognise the associated health and wellbeing benefits. We will aim to go beyond the minimum legislated requirements for development. This will include:**

- a. **All new settlements, urban extensions and infrastructure contributing to the achievement of delivering net biodiversity gain, net environmental gain, and net zero carbon** both in site and route selection and in the design of settlements and transport corridors. In addition, areas of tranquillity will be protected and measures taken to avoid light pollution and protect dark sky areas. Making cycling and walking more attractive ways to travel and investing in zero emission public transport of the future.
- b. **Understanding the impact of development on the natural environment**, including cumulative and indirect impacts (taking into account associated housing and other forms of development), so that these can be addressed in line with the mitigation hierarchy, and carrying out environmental and strategic assessments as appropriate for the type and scale of development programmes including options and proper community consultation.
- c. Understanding the Arc's environmental capacity to accommodate different levels of growth and development in different locations and **ensuring that planned growth and development remains well within environmental capacity limits.**
- d. Working with Government to **enhance the building regulations and the role of planning policy so that they align with sustainability principles, and actively reduce the carbon footprint, water and energy consumption** in new and existing buildings. We will encourage Arc local partners to exceed the minimum standards required by building regulations.
- e. Promoting the switch to renewable and other sustainable energy supplies, improving travel choices, and supporting changing working practices. This will enable **improvements to the design and development of sustainable communities and the protection and enhancement of the natural environment.**

Right  
People walking in open  
spaces.

## 4.

**Ensure that existing and new communities see real benefits from living in the Arc including through:**

- a. **Maximising the health and wellbeing benefits of nature** by providing sector-leading areas of accessible nature-rich greenspace in, and accessible to, new settlements, urban extensions and commercial zones and increasing and enhancing greenspace, and access to it, for existing settlements in the Arc.
- b. **Promoting and increasing equality of sustainable access to nature and its benefits** by investing in, increasing and enhancing nature-rich greenspace in the places and communities where it is most lacking. We will improve access to greenspace and nature, ensuring Natural England's Access to Natural Greenspace standards, and (once available) Green Infrastructure Standards, are maximised for existing housing and delivered for future developments.





## 5.

**Use natural resources wisely by:**

- a. Working to address existing **water resource, water quality and flood management** issues and through an integrated approach across the water agenda ensure future issues and risks are managed, including in the context of climate change, with a focus on nature-based interventions.
- b. Ensuring that soil quality is properly protected and improved including within development, infrastructure and agricultural activities.
- c. Making **more efficient use and management of waste and resources**, working towards a circular economy with no net waste and promoting the use of sustainable building materials and construction guidelines.
- d. Working with local authorities to share best practice and coordinate action being taken on local **air quality management plans** including addressing emissions from agriculture and from installations regulated by the Environment Agency.
- e. Supporting the development of interventions that reduce the **impact of agriculture on the environment** and support productivity.
- f. Helping to build collaboration between farmers to generate catchment and landscape scale environmental improvement under the **Environmental Land Management Scheme**.
- g. Ensuring that the required mineral resources for the Arc are sourced in an environmentally sensitive manner and that mineral sites are restored in a coordinated manner to after-uses that benefit nature and people, as well as helping to provide ecosystem services such as carbon sequestration and water management.

**We will continue to work with the other Arc pillars to develop appropriate environmental principles for incorporation within these workstreams.**

**We will review and update the environmental principles in the light of developing policies, practices, evidence, experience, knowledge and governance arrangements.**





## Resourcing our ambitions

**To achieve delivery of these principles we will need to work collaboratively across the public, private and third sectors. Some resources are already in place and there are many more that we will need. As a starting point we will:**

- Build on the work of the Arc Local Natural Capital Plan and the associated work in the 5 counties to **make publicly available, agreed baseline maps for natural capital and ecosystem services across the Arc**. Resources will be required to maintain the data and make it accessible.
- Work with the statutory agencies and with local councils to ensure ready **access to the wide range of environmental data** currently collected by them.
- **Work with government to agree methodologies** for both net biodiversity gain and net environment gain for use within the Arc. We will establish a technical group(s) to assess net gain propositions on behalf of local planning authorities and provide planning committees with independent advice.
- **Support and promote a 5 yearly environmental census** across the Arc including promoting public engagement through citizen science approaches.
- Use **evidence on health, deprivation and ecosystem services demand** (e.g. for air quality improvement) to inform planning for greenspace, habitats and **natural capital assets**.
- Work with all those that fund nature improvement work across the Arc including the Defra Group, water companies, environmental Non-Governmental Organisations, local councils, catchment partnerships, housing and commercial property developers and infrastructure providers, together with those allocating Environment Land Management System funding, and private investors to **take a more efficient and effective systems based approach to natural capital and ecosystem systems based interventions**. We will seek to ensure that funding is used strategically and not in a piecemeal way.
- **Invest in projects that deliver natural capital and environmental benefits**, such as carbon sequestration, pollinator habitats, soil improvement, flood alleviation and water resource resilience, and establish Arc-wide and more local Natural Capital Investment Plans to inform and support the emerging Arc Spatial Framework.

Right  
Sunlight shines through  
beech trees in the bluebell  
woods of Oxfordshire.

## Monitoring

We will pursue our commitment as outlined within these principles and will work with government and local partners on the development of associated metrics and targets in line with the 25 Year Environment Plan, carbon reduction commitments and the UN Sustainable Development Goals.

## Engagement

We will engage and consult with communities, residents and people working in the Arc, as well as businesses, other organisations and NGOs, on the vision and ambitions for sustainable environmental growth in the Arc.

This document is supported by the Arc Leadership Group, Arc Universities Environment Group, Arc Local Enterprise Partnerships, England's Economic Heartland, and has been drafted with input from the Arc Local Nature Partnerships whose members include representatives from environment NGOs, local councils, LEPs, developers, businesses, business representation bodies, the Environment Agency, Natural England, and the Forestry Commission and important contributions from central government departments, other environment NGOs and businesses.





**Below**  
Sunrise panorama at  
the Campbell park in  
Milton Keynes.

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Leadership Group: March 2021





## **Appendix ii. Letter to NR update on CCC position issued 07.12.2021**

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07 December 2021

Dear Ms Peters,

**Network Rail (Cambridge South Infrastructure Enhancements) Order  
OBJ23 Cambridge City Council**

Thank you for your letter dated 18 November providing an update on Network Rail's (NR) response to the objections raised by Cambridge City Council. Your correspondence supplements NR's earlier letters dated 1 October and follows on from meetings between the Council's officers and NR Consents Manager and NR Planning Manager in recent weeks.

This letter provides advice from officers on the status of the Council's objections. The purpose of the letter is to aid ongoing discussions with NR at officer level. To be clear, the advice within this letter is given at officer level and does not constitute the formal position of the Council, which will be provided in the Council's Proof of Evidence and our Statement of Common Ground for the Public Inquiry.

I have addressed each of the objections raised in the Council's Statement of Case as summarised in Section 7 of our statement. I have reordered these by grouping them under three key headings, which broadly form the topics on which the Council intends to provide evidence at the Public Inquiry. These combine the Council's objections as local planning authority and landowner with a tenant interest in Hobson's Park.

This letter also puts in writing two matters which have arisen through discussions with NR since the submission of the Council's Statement of Case. These are the



need for additional tree planting in Hobson's Park to mitigate for the loss of structural planting within the AstraZeneca site boundary, and the need for commuted sums towards increased maintenance costs for Hobson's Park (see items 6 & 11).

As discussions on the draft planning conditions are still in progress, this letter does not confirm the position on the proposed draft condition wording, other than where specifically referred to. For the avoidance of doubt, the omission of comments on any draft conditions does not imply agreement to them. Further correspondence will be provided in response to the updated draft conditions sent by NR Planning Manager.

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

#### ***Planning objections***

##### **1. Exchange land – adequate mitigation**

**Further information on the landscaping and biodiversity features, and the accessibility and safety of crossing Addenbrooke's Road is required in order to assess whether the proposed exchange land is appropriate replacement for the loss of existing public open space, in accordance with Local Plan 2018 policy 67.**

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. Officers require further information to demonstrate that the landscape and biodiversity, and amenity value of the proposed land will provide adequate compensation for the area of Hobson's Park to be lost. This also includes demonstrating that the proposed exchange land is accessible safely given its location physically separate from the rest of Hobson's Park and requiring users to cross Addenbrooke's Road to move between the park and the proposed land. As no further information has been provided, the Council maintains its objection on this ground.

##### **2. Exchange land – timing**

**The exchange land to compensate for the permanent loss of public open space and the new access routes outside of the site compound must be laid out and available for use before the use of areas of existing public open space for the development commences, in order to provide satisfactory replacement in accordance with Local Plan 2018 policy 67.**

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

##### **3. Use of Hobson's Park**

**The temporary use of Hobson's Park must be justified both in terms of the area of land and the duration for which the land is required, and this must be**

**secured through a condition in order to minimise the temporary loss of public open space in accordance with Local Plan 2018 policy 67.**

Your letter refers to a soil management plan. While a soil management plan is required in respect of the temporary use of Hobson's Park this does not provide a response to the Council's objection above because it does not justify the use of Hobson's Park or demonstrate that the area and duration of use is the minimum required.

Updated deposited plans were issued by NR Consents Manager on 26 November which showed a reduced area of temporary land acquisition on Hobson's Park for the site compound. Officers are currently reviewing this and will provide comments in due course.

Notwithstanding this, the Council also requires a response from NR to justify the area of land required and the duration for which that land is required. This additional information will be reviewed by officers alongside the amended deposited plans before the Council can consider whether this matter has been resolved.

Insofar as the soil management plan is concerned, the Council will give consideration to the plan once it has been received but until the Council has had an opportunity to review the plan, officers advise that the Council's objection has not been resolved.

#### **4. Permanent spoil placement**

**There must be no spoil permanently placed within areas of public open space and this must be secured through a condition in order to ensure that spoil placement does not lead to the permanent loss of public open space or harm to the character of the public open space in accordance with Local Plan 2018 policy 67.**

Your letter commits to a condition to provide a soil management plan. While a soil management plan is required in order to agree where soil will be placed, the Council also requires a compliance condition to control where soil will NOT be placed. This is in the form of a compliance condition to prevent excavated material being placed within the public open space unless agreed through the soil management plan or landscaping works.

Officers discussed wording of a suitable condition at the meeting with the NR Planning Manager on 18 November which was subsequently drafted and proposed by the NR Planning Manager (sent on 22 November) as follows:

*No excavated material or other material shall be placed within public open space, including Hobson's Park, other than in accordance with the approved landscaping details or the approved details for temporary storage contained within the approved soil management plan.*

Officers advise that the Council requires this condition to be agreed in the Statement of Common Ground before this matter can be resolved.



## **5. Trees**

**The application has not demonstrated compliance with Local Plan policy 71 for the preservation and protection of trees and hedges. An Arboricultural Implications Assessment (AIA) and Arboricultural Method Statement (AMS) must be submitted prior to determination, and the impact on Tree Preservation Orders (TPOs) and other trees and hedges must be minimised and mitigated through protection measures and replacement planting secured through conditions.**

Your letter refers to conditions to secure the implementation of tree protection measures. While such conditions are necessary, this is not sufficient to resolve the Council's objection. As matters currently stand, the Council is not satisfied that the potential impact on trees and hedges can be satisfactorily addressed through conditions because no information has been provided about the extent of tree and hedge loss and the options for mitigation.

Therefore, while officers are happy to engage with NR in respect of the wording of any possible conditions to secure the implementation of tree protection measures, the Council requires submission of further evidence in respect of the extent of tree and hedge loss and the potential mitigation for that loss BEFORE the Council is in a position to agree that this issue can be satisfactorily addressed by way of conditions.

At our meeting with NR Consents Manager on 5 October, officers were advised that the AIA and AMS would come much later on in the process, but that further information may be provided. The Council requires information about the loss of trees and options for appropriate replacement planting to mitigate any impact before the Council can consider whether this issue can be satisfactorily resolved by way of condition.

Any additional information provided will be reviewed by the Council before it can consider whether this matter has been resolved.

## **6. Structural planting in Hobson's Park**

During discussions with NR and following correspondence with representatives for AstraZeneca, officers have been made aware that the boundary of the permanent and temporary land acquisition includes land within the AstraZeneca site, specifically land within the site boundary of the reserved matters consent for the AstraZeneca South Plot development, which has come forward under the outline consent for the Cambridge Biomedical Campus (CBC).

As NR are aware, the outline consent for the CBC secured structure planting along the western boundary of the CBC along the railway line, and secured strategic gaps connecting the green open space within the retained Green Belt with open spaces within the CBC, including one gap which aligns with the station proposals. These elements of structural planting are important components of the mitigation for the CBC.

The Council has been informed that the areas of permanent and temporary mitigation mean that the structural planting along the railway line must be removed and cannot be replaced, and that the station platform including the walkover will align with the strategic gap. As a result, the CBC mitigation cannot be achieved in accordance with the outline consent if the station works go ahead.

It is critical that the proposal includes appropriate mitigation for the loss of structural planting within the CBC. The Council's landscape officer has met with NR Landscape Consultant to discuss options for replacement planting on the eastern side of Hobson's Park. This would require planting mature large specimens and with ground and soil preparation which promotes the fast establishment of trees.

The Council's landscape officer has advised that a suitable planting scheme could be implemented to mitigate this impact, however these details must be secured through inclusion in the Design Principles document. Officers advise that the Council requires submission of an updated Design Principles document to review before this matter can be resolved.

The cost of maintaining these trees is covered in item 11 below.

### ***Landowner objections***

#### **7. Hobson's Park – temporary and permanent work**

**The use of existing public open space for the creation of new access routes and temporary work required for the construction must be the minimum requirement and must be justified.**

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. Please provide a formal response.

Your letter refers to our comments on the notation of the pedestrian and cycling route on Parameter Plan 1: Access and Movement requesting this is amended to read 'Proposed segregated new pedestrian and cycle access'. You have responded to explain that the detail of the route will come forward through the discharge of conditions which will allow further discussion with stakeholders. Officers advise that the Council accepts this.

#### **8. Hobson's Park – landscaping of routes**

**The layout of new routes across the public open space should consider the impact on the remaining green spaces between the routes, and any resulting changes to the management regime required or to the use of these spaces for recreation.**

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

#### **9. Timing of exchange land and new access routes**



**The exchange land and the new access routes outside of the site compound must be laid out and available for use prior to commencement of the use of the existing open space for the works, which must be secured through an amendment to paragraph 36 of Part 4 of the draft Order. Confirmation that the exchange land will be secured for public open use in perpetuity through the draft Order must be provided.**

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

#### **10. Pedestrian link beneath Cambridge Guided Busway**

**The pedestrian link across the Cambridge Guided Busway between Hobson's Park and the Active Recreation Area must be complete before the existing connection beneath the Cambridge Guided Busway is lost. This must be secured through the Order.**

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

#### **11. Commuted sums towards increased maintenance costs**

The Council is reviewing the implications of the proposed works on the maintenance costs for Hobson's Park. This includes additional costs of maintaining any paths, hard surfacing and structures that fall within the Council's maintained areas, and the additional cost of maintaining tree planting on the western side of the railway line as replacement planting for the trees to be lost on the CBC. Officers will discuss this further with NR and provide an estimate of any additional costs for which contributions will be need to be agreed.

#### **Impact on biodiversity and biodiversity net gain**

#### **12. Biodiversity Net Gain (BNG)**

**The application has not provided sufficient Information to demonstrate the minimum 10% biodiversity net gain target is achievable and can provide appropriate mitigation on or near to the site, and as a result has not demonstrated compliance with Local Plan 2018 policies 69 and 70, and NPPF 2021 paragraph 174.**

Your letter refers to conditions to secure the delivery of the 10% BNG target. While this condition is necessary to approve the detail of the ecological mitigation, this is not a sufficient response to the matter above as it does not demonstrate that this target is achievable and can provide appropriate mitigation. This is because there is no further information about the deliverability of biodiversity enhancements.

Your earlier letter dated 1 October and meetings with the NR Consents Manager have confirmed that NR has entered into discussions with Cambridgeshire County Council with a view to securing an Options Agreement for the provision of all the BNG units required to meet the 10% target at Lower Valley Farm in Fulbourn.

The letter advised that once discussion have progressed further with the County Council, NR will be able to provide confirmation that it has secured the mechanism for delivering the required 10% BNG. Officers have been advised that NR are aiming to secure the Option Agreement with the County Council ahead of the public inquiry.

In addition to this, officers understand that the BNG calculations submitted with the TWAO application for the 'worst case scenario' are being updated to reflect the changes to the site compound area and to landscaping and that the calculations will be reissued to the Council, however officers have not had sight of this.

The Council currently maintains its objection on these grounds which have not been addressed. Officers look forward to receiving the updated BNG calculations and further information on the proposed mitigation to review before the public inquiry. This additional information will be reviewed by the Council before it can consider whether this matter has been resolved.

### **13. Birds**

**The potential impact on the breeding population of Corn Bunting along the line of the rail track and construction route, and on Corn Bunting and Skylark nesting within Hobson's Park needs to be given more weight in the assessment of the impact on existing biodiversity, in accordance with Local Plan 2018 policies 69 and 70.**

Your letter advises that NR are looking into whether additional mitigation is necessary to reduce the potential impact on the breeding population of Corn Bunting and nesting of sky larks within Hobson's Park. This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council does not agree that this issue has been resolved and requires further information on the availability of options for mitigation to review before it can consider whether this matter has been resolved.

### **Planning objections**

### **14. Green Belt**

**The application has not made a full and clear case to demonstrate the proposal would not be inappropriate development within the Green Belt in accordance with the NPPF paragraph 150 and Local Plan policy 4, or that very special circumstances exist, in accordance with NPPF paragraph 148.**

You have referenced the Department of Transport Strategic Outline Business Case for Cambridge South Station which sets out the requirement for the station and how the proposed location was identified, and the Planning Statement which explains how this meets Green Belt policy in accordance with the NPPF 2021. The Council

acknowledges that NR has put forward a case for the proposal being not inappropriate development in the Green Belt. Officers do not make a judgement as to whether the proposal complies with the NPPF in this regard but are now satisfied that the Inspector has satisfactory information to consider the matter.

## **15. Drainage**

**Details as requested by the Sustainable Drainage Engineer must be submitted prior to determination in order to demonstrate the proposals comply with Local Plan policy 32 relating to flood risk.**

Your previous letter dated 1 October provided a detailed response to the issues raised by the Council's sustainable drainage engineer. Officers have reviewed this and confirmed this was acceptable in an email to NR Consents Manager dated 5 October. Officers advise that the Council's objection has been resolved.

## **16. Green roofs**

**The proposals for biodiverse green roofs must be confirmed as to whether or not they are required as part of the LVIA and Green Belt mitigation.**

Your letter states that given the current stage of design, NR cannot confirm the exact location and amount of green biodiverse roof as part of the proposed development. As a result, no amendments will be made to remove the word 'potential' from the Parameter Plan: Land Use and Landscape drawing.

While the Council acknowledges that there is not yet a detailed design for the station, officers have requested in the comment above clarification from NR about whether a biodiverse green roof is required as part of the LVIA and Green Belt mitigation. The Council requires confirmation on this with reference to the submitted documents for the Council to review before this matter can be resolved.

Regarding the wording of the draft condition to secure details of biodiverse green roofs, officers have discussed this at meetings with NR Planning Manager. The Council accepts that the detail of the roof could come forward under the condition requiring the detailed design of the station building and landscaping details, so that a separate condition is not required.

Notwithstanding this, the Council requires that the specification for the substrate and mix of species and a maintenance plan for the biodiverse green roof – as detailed in the draft condition wording requested by the Council – must be included in the Design Principles document and must be complied with unless there are planning or biodiversity reasons which make this not possible. The Council requires submission of an updated Design Principles document to review before this matter can be resolved.

Your letter also responds to our comments on biodiverse green walls requesting details of this feature as many types are not sustainable and are high maintenance. You have responded to explain that this detail would come forward through the conditions. Officers advise that the Council accepts this.



## **17. BREEAM**

**A condition for submission of a BREEAM pre-assessment demonstrating the scheme is on-target to achieve BREEAM 'excellent' rating is required in accordance with Local Plan policies 28, 29 and 31, and the Sustainable Design and Construction SPD.**

Your response proposes an additional condition to secure submission of a BREEAM pre-assessment. The Council's sustainability consultant supports the wording of the proposed draft conditions 20, 21 and 22 sent by NR Planning Manager on 22 November. The Council requires this condition to be agreed in the Statement of Common Ground before this matter can be resolved.

## **18. Trip generation and cycle parking**

**Cambridgeshire County Council Highways Authority must support the predicted trip generation, modal share and number of cycle parking spaces in accordance with Local Plan policies 81 and 82.**

Your letter dated 1 October provided a more detailed response with reference to the Transport Assessment. Officers advise that the Council has made its position clear and has nothing further to add. Officers will review the draft condition 19 to secure details of cycle parking as sent by NR Planning Manager on 22 November.

## **19. Car parking**

**The maximum number of car parking spaces for each user group must be specified in the Design Principles and details of cycle parking facilities must be secured through the recommended revised wording, in accordance with Local Plan policy 82.**

Your letter confirms that NR will amend the Design Principles to specify that no more than 9 vehicle parking spaces will be provided within the station forecourt (5 spaces for blue badge holders and 4 spaces for station staff and maintenance staff) and space for no more than 6 passenger and taxi drop-off/pick-up will be provided within the station forecourt. Officers advise that the Council requires submission of an updated Design Principles document to review before this matter can be resolved.

## **20. Environmental Health conditions**

**Conditions relating to noise and vibration, lighting and electric vehicle charging points must be secured in order to mitigate the impact on residential amenity and sensitive receptors, in accordance with Local Plan 2018 policies 34, 35, and 36.**

Your letter confirms that NR does not have an objection in principle to the proposed conditions on noise and vibration, and lighting. The wording of those conditions was discussed between the Council's environmental health officers and NR Planning Manager at the meeting on 18 November. The re-drafted conditions issued by NR

Planning Manager on 22 November will be reviewed by officers before the Council can confirm whether this matter has been resolved.

Your letter provides no further information in response to the Council's requirement for electric vehicle charging points. This was also discussed between environmental health officers and NR Planning Manager. Officers set out the case for providing electric vehicle charging for Blue Badge Holders at the station. NR Planning Manager explained that this issue has been escalated within NR. Officers advise that the Council requires confirmation that the provision will be made and agreement to a condition to secure this within the Statement of Common Ground before this matter can be resolved.

I trust the contents of this letter are clear, however if you have any queries then please do not hesitate to contact me.

Yours sincerely,

Charlotte Burton MRTPI  
Principal Planning Officer (Strategic Sites)  
**Greater Cambridge Shared Planning**