



NRE 8.1

TRANSPORT AND WORKS ACT 1992

**Transport and Works (Applications and Objections
Procedure) (England and Wales) Rules 2006**

**THE NETWORK RAIL (CAMBRIDGE SOUTH
INFRASTRUCTURE ENHANCEMENT) ORDER**

OPEN SPACE - SUMMARY PROOF OF EVIDENCE

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The Network Rail (Cambridge South Infrastructure Enhancement) Order**1. INTRODUCTION****1.1 Qualifications and Experience**

- 1.1.1 My name is David Jones. I have been retained by Network Rail to provide technical support to Network Rail in the drafting and review of the Public Open Space Assessment.
- 1.1.2 I hold a BA (Hons) in Planning Studies, a Diploma in Town Planning and an Urban Design Diploma. I am a Chartered Member of the Royal Town Planning Institute with 36 years' experience as a Town Planner.

1.2 Summary of Evidence

- 1.2.1 The baseline review for the Project has identified two areas of public open space (POS) within the Transport and Works Act Order (TWAO) site boundary that may be impacted during the construction and/or operational phases of the Cambridge South Infrastructure Enhancements (CSIE) Project.
- 1.2.2 During the construction period, two areas of POS are required temporarily at Long Road Sixth Form College (350 sqm) and Hobson's Park (57,826 sqm). For the operational phase, 20,439 sqm of POS is to be acquired permanently within Hobson's Park and 303 sqm within Long Road Sixth Form College, representing a total permanent land-take of 20,742 sqm.
- 1.2.3 Section 19 (1) of the Acquisition of Land Act 1981 requires that for land to be compulsory acquired for permanent use by statutory undertakers for their undertakings, exchange land is to be provided that is no less in area and is equally advantageous to the persons entitled to rights over such land and to the public.
- 1.2.4 In accordance with the methodology set out in the accompanying Environmental Statement (ES) to the TWAO and the 'Design Manual for Roads and Bridges' (DMRB) LA 112 (Highways England et al, 2019), an assessment has been undertaken to consider the impacts of the CSIE Project on the areas of POS to be acquired, both temporarily and permanently.
- 1.2.5 In relation to the two areas of POS at Hobson's Park and Long Road Sixth Form College required temporarily as site compounds and for temporary access for the former, the ES has concluded that in relation to landscape character and visual amenity, the impacts on both areas are not significant. The areas of land required for construction purposes have been reduced for both sites more recently.
- 1.2.6 In terms of permanent land-take, the ES has concluded that in relation to Hobson's Park, following the return of the land to POS on completion of construction works and the mitigation measures proposed, the significance of effect is considered to be not significant. In the case of the Long Road Sixth Form College, in view of the mitigation measures proposed within the ES, the significance of effects is also considered to be not significant.
- 1.2.7 In the absence of replacement land directly adjacent to the CSIE Project suitable for acquisition as replacement POS, Network Rail has been required to consider the use of agricultural land parcels to the south of Addenbrooke's Road and the Cambridge Biomedical Campus. Four potential areas of exchange land have been assessed in line with the criteria set out for the

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provision of replacement land based on national guidance, local planning policy and relevant case law.

- 1.2.8 The results of this Assessment show that the proposed replacement site immediately to the south of Hobson's Park, covering an area of 20,840 sqm scored highest against the three assessment criteria of Quality, Quantity and Accessibility, as the most suitable site to mitigate for the permanent loss of POS in Hobson's Park and Long Road Sixth Form College.
- 1.2.9 In addition, a landscape scheme incorporating an area of native planting and habitat creation, including a seasonal pond and connecting footpaths is proposed for the replacement site. An indicative landscape layout (Drawing Ref. 158454-ARC-00-ZZ-DRG-EEN-000076) was submitted as part of the request for deemed planning permission and will be developed and implemented following approval of the landscape design by the local planning authority.
- 1.2.10 In terms of timing, Network Rail are required to take land temporarily in order to provide access to the works sites south of Addenbrookes Road and to construct the proposed accommodation bridge. As a result of this and the need to complete the permanent land purchase, discharge the planning conditions relating to the landscape scheme and the accommodation bridge, Network Rail will not be able to provide the exchange land until much later in the construction programme, though it will be no later than the date of the permanent acquisition of the public open space.
- 1.2.11 Three objectors have objected to the CSIE Project on the grounds of POS and in relation to the following principal matters to which responses have been provided within my Proof of Evidence:
- 1.2.12 **The methodology and conclusions of the POS Assessment:** I maintain that the Quality scoring for the proposed replacement site within the POS Assessment is based largely on its location directly to the south of Hobson's Park and to the west of the railway line in contrast to the three other potential areas of exchange land which are located to the east of the railway line with no direct connectivity to Hobson's Park. I have reviewed the scoring criteria within the POS Assessment and consider that the Accessibility scoring for the proposed replacement site at Hobson's Park should be reduced from 4 to 3.
- 1.2.13 **The selection of the proposed replacement site:** I do not support the objection made that the proposed replacement site is poor compensation for the loss of land on the eastern edge of Hobson's Park compared to a potential site closer to the Cambridge Biomedical Campus. In terms of Quality and Accessibility this potential site has no direct connectivity to the POS to be permanently acquired within Hobson's Park and for this reason has a lower score within the POS Assessment. 'Time' is not considered to be a relevant criterion within the assessment process and is not referred to.
- 1.2.14 **Justification for various activities associated with the temporary use of the existing POS.** I have highlighted the reduction in temporary land-take in Hobson's Park and Long Road Sixth Form College. Reference is made to the mitigation measures to be detailed in the Construction Transport Management Plan (CTMP) and best practice measures within the Code of Construction Practice (CoCP) Part B to control and manage construction activity during this period. Network Rail has made reference to details of hard and soft landscape proposals to be approved by the local planning authority and its agreement to an additional condition in relation to spoil placement.

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- 1.2.15 A single 'objection' from Mr Meed to the Section 19 Application was made on ecological grounds rather than on any specific open space land issues and for this reason no further reference has been made to it within the Proof of Evidence.

1.3 Conclusion

- 1.3.1 As compensation for the permanent loss of two areas of POS at Hobson's Park and Long Road Sixth Form College as a result of the CSIE Project, exchange land is to be provided on land immediately to the south of Hobson's Field in line with the assessment criteria set out in national guidance and local planning policy.
- 1.3.2 This will result in the provision of an additional area of POS, greater in area than that to be lost which will be of at least as equivalent in quality as the existing POS. In comparison with other potential replacement sites within the vicinity, the proposed exchange land has been shown to be the most suitable, thus meeting the legislative provisions of the Acquisition of Land Act 1981 and the applicable national and local policy requirements.