



**DOCUMENT NUMBER: NRE7.2**

# **Proof of Evidence – Cultural Heritage (Ms Jennifer Wylie)**

**(Inquiries Procedure (England & Wales) Rules 2004)**

January 2022



The Network Rail (Cambridge South Infrastructure Enhancements) Order



Proof of Evidence

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# **Cambridge South Infrastructure Enhancements**

## **Cultural Heritage Proof of Evidence**

JANUARY 2022

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## Contents

<b>Acronyms and Abbreviations.....</b>	<b>7</b>
<b>1 Introduction.....</b>	<b>8</b>
<b>2 Evidence Summary.....</b>	<b>10</b>
<b>3 Relevant Legislation and Policy Context .....</b>	<b>13</b>
<b>4 Work Undertaken to Date.....</b>	<b>18</b>
<b>5 Cultural Heritage Significant Effects of Cambridge South Infrastructure Enhancements .....</b>	<b>25</b>
<b>6 Response to Objectors .....</b>	<b>40</b>
<b>7 Conclusions .....</b>	<b>44</b>
<b>8 Declarations .....</b>	<b>45</b>

## Tables

<b>Table 4-1 Summary of non-designated archaeological assets that will experience effects from the CSIE Project.....</b>	<b>19</b>
<b>Table 4-2 Summary of engagement with stakeholders pre and post-making the TWAO application .....</b>	<b>22</b>

## Figures

<b>Plate 1 Location of Scheduled Monument (labelled as SM4) in relation to TWAO application boundary 26</b>	
<b>Plate 2 General Shot of Scheduled Monument. Looking towards Addenbrooke's Road .....</b>	<b>27</b>
<b>Plate 3 General shot over Scheduled Monument looking towards Addenbrooke's Road.....</b>	<b>28</b>
<b>Plate 4 View from eastern edge of Scheduled Monument looking towards White Hill .....</b>	<b>29</b>
<b>Plate 5 Location of Nine Wells Monument in relation to Project. Monument is marked as LB48 .....</b>	<b>31</b>
<b>Plate 6 Nine Wells Monument showing position within close vegetation cover .....</b>	<b>32</b>
<b>Plate 7 View from Nine Wells Monument looking towards approximate location of CSIE Project.....</b>	<b>33</b>
<b>Plate 8 View from footpath on south side of Addenbrooke's Road and east side of railway line looking towards Nine Wells Monument (within Nine Wells Nature Reserve and shielded from view by dense tree cover) .....</b>	<b>34</b>
<b>Plate 9 Location of Asset 17 .....</b>	<b>37</b>

## Acronyms and Abbreviations

CAU	Cambridge Archaeological Unit
CCiC	Cambridge City Council
CCoC	Cambridge County Council
CoCP	Code of Construction Practice
CPPF	Cambridge Past, Present and Future
CSIE	Cambridge South Infrastructure Enhancements
DBA	Desk-based Assessment
DPD	Development Plan Document
ES	Environmental Statement
HE	Historic England
HET	Historic Environment Team
NPPF	National Planning Policy Framework
SCDC	South Cambridgeshire District Council
TWAO	Transport and Works Act Order
TRA	Trumpington Residents' Association
WSI	Written Scheme of Investigation

# 1 Introduction

- 1.1.1 My name is Jennifer Wylie. I am an Associate Technical Director – Cultural Heritage at Arcadis. I have been retained by Network Rail to provide specialist advice on Cultural Heritage matters pertaining to the Cambridge South Infrastructure Enhancements (“**CSIE**”) Project (“the **CSIE Project**”). I have over 17 years’ experience as a Cultural Heritage specialist and over 13 years’ experience in the assessment of cultural heritage impacts and the design of mitigation for major infrastructure projects, including railways and other linear infrastructure.
- 1.1.2 I am an Associate member of the Chartered Institute for Archaeologists. I hold an MA in Experimental Archaeology and a BA (Hons) in Archaeology.
- 1.1.3 My involvement in the CSIE Project began in 2018 when Arcadis was awarded the contract to deliver the environmental impact assessment to support the Transport and Works Act Order application (“the **TWAO application**”). My role on the CSIE Project was to undertake technical review of all Cultural Heritage reports completed as part of this commission. In this regard, I have completed technical reviews of the Cultural Heritage chapter of the Scoping Report (**NR16 Vol 3, Appendix 2.1**) and Environmental Statement (**NR 16 Vol 2**) and the Cultural Heritage Desk-based Assessment (**NR16 Vol 3 Appendix 11.2**). I have also read the geophysical report (**NR16 Vol 3, Appendix 11.3**) and archaeological evaluation report (**NR16 Vol 3, Appendix 11.4**) produced as part of the Environmental Impact Assessment in support of the deemed planning application.
- 1.1.4 As a technical reviewer for the CSIE Project I have a good understanding of the Cultural Heritage work that has been carried out and I have made a comprehensive site visit to the location of the CSIE Project and its setting.
- 1.1.5 I will provide evidence on all Cultural Heritage matters including:
- a. A summary of cultural heritage assessment work carried out to date, the identified potential impacts and effects of the CSIE Project on cultural heritage assets, the mitigation proposed and any residual effects anticipated. These are summarised from the various cultural heritage reports that have been produce as part of the TWAO application and are presented in section 4 of my evidence.
  - b. Responses to objections that refer to cultural heritage assets. These are presented in section 6 of my evidence.
  - c. My conclusions as to the significance of the main residual effects on cultural heritage assets and the implications for consenting the CSIE Project.
- 1.1.6 My evidence will therefore deal with Item 8 of the Secretary of State’s Statement of Matters dated 27 October 2021 (“the **SoM**”). The SoM refer in particular to impact of the CSIE Project on the Scheduled Monument, a site revealed by aerial photography W of White Hill Farm, Great Shelford. National Heritage List 1006891 (“the **Scheduled Monument**”).
- 1.1.7 My evidence will be broken down into the following sections:
- Section 1: Introduction;
  - Section 2: Evidence Summary, which will contain a summary of this proof of evidence;
  - Section 3: Relevant Legislation and Policy Context, which will summarise the relevant legislation and policy applicable to the heritage assessment carried out for the CSIE Project;



Section 4: Work Undertaken to Date, which will present a summary of the heritage assessment work carried out as part of the CSIE Project. This will include a summary of desk-based assessment, archaeological fieldwork and engagement with stakeholders;

Section 5: Cultural Heritage Significant Effects of CSIE, which will set out the significant effects of CSIE as identified by the heritage assessment supporting the TWAO application;

Section 6: Response to Objectors, which will contain my response to the objectors who have mentioned heritage assets within their objections;

Section 7: Conclusions; and

Section 8: Declaration

## 2 Evidence Summary

- 2.1.1 In my evidence I deal with all matters relating to cultural heritage for the CSIE Project including the Scheduled Monument; 'site revealed by aerial photography W of White Hill Farm, Great Shelford'.
- 2.1.2 In section 3 of my evidence I outline the relevant legislation, national and local planning policy and guidance that apply to the CSIE Project so far as they relate to cultural heritage. In summary the relevant legislation includes the Ancient Monuments and Archaeological Areas Act 1979 (**B45**) and the Planning (Listed Building and Conservation Areas) Act 1990 (**B44**). Section 16 of the National Planning Policy Framework (NPPF) (**D1**), specifically paragraphs 194 to 205 (excluding paragraph 198) are applicable as are the relevant policies of the Cambridge (City Council) Local Plan (**D6**); the South Cambridgeshire Local Plan (**D8**); Cambridge Southern Fringe Area Action Plan (**D11**) (which forms part of the statutory development plan for South Cambridgeshire) and the Emerging Greater Cambridge Local Plan (**D98**).
- 2.1.3 In section 4 of my evidence I outline the cultural heritage assessments and investigations undertaken to date as part of the CSIE Project and detail the consultation carried out with relevant stakeholders.
- 2.1.4 A comprehensive suite of cultural heritage assessments and surveys have been carried out as part of the TWAO application for the CSIE Project. These include a cultural heritage desk-based assessment (**NR16 Vol 3, Appendix 11.2**), a geophysical survey (**NR16 Vol 3, Appendix 11.3**) and an archaeological evaluation (**NR16 Vol 3, Appendix 11.4**). In addition, a total of 110 archaeological events have previously taken place within the 500m study area applied for the cultural heritage assessment carried out to inform the TWAO application. These previous archaeological events include archaeological evaluation and excavation across a large proportion of the land within the study area. The results of these previous archaeological events were reviewed and included in the cultural heritage assessment.
- 2.1.5 During preparation of the TWAO application and after submission of the deemed planning consent ongoing consultant was carried out with key stakeholders including Historic England ("**HE**"), Cambridge County Council Historic Environment Team ("**HET**") and the Hobson's Conduit Trust.
- 2.1.6 Engagement with HE focused on the Scheduled Monument and resulted in agreement between both parties that a programme of archaeological fieldwork will be undertaken to mitigate the impacts to the portion of the Scheduled Monument that will be impacted by the CSIE Project. HE have raised no objections to the application for deemed planning consent (or the proposed TWAO). HE have submitted a representation in which they stated that the approach to assessment and mitigation is to their satisfaction and that they support the commitment to making an application for Scheduled Monument Consent (**NR10**) as set out in the proposed TWAO (**Rep 07**).
- 2.1.7 Engagement with Cambridge County Council Historic Environment Team focused on ensuring appropriate assessment was carried out to inform the TWAO application. Agreement was reached that geophysical survey and evaluation would take place to inform the ES. This work was completed and the results shared the Cambridge County Council Historic Environment Team and incorporated into the ES. The results of this work were used to outline appropriate mitigation for archaeological remains that will be impacted by the CSIE Project. Cambridge County Council Historic Environment Team have not objected to the application for deemed planning consent.

- 2.1.8 Ongoing consultation with the Hobson's Conduit Trust was carried out by Network Rail. Much of this engagement relates to Hobson's Conduit as a watercourse and matters to do with drainage.
- 2.1.9 However, with specific reference to Heritage, the Hobson's Conduit Trust noted in their correspondence with Network Rail that they were pleased to note the explicit recognition of the rich history of early settlement in the vicinity of the Project and welcomed the plans for further investigation. In their response Network Rail confirmed that they planned to continue to be informed by the advice from the *"County Archaeologist"* and HE in relation to the archaeological resource within the Project. In their correspondence both Hobson's Conduit Trust and Network Rail agree that their engagement has been positive and productive.
- 2.1.10 In section 5 of my evidence I recap and summarise the significant effects of the CSIE on heritage assets and provide commentary on the effects on the heritage assets raised in the objections.
- 2.1.11 The Project would have no impact on any World Heritage Sites, registered parks and gardens, registered battlefields or conservation areas. In addition, no non-designated, locally listed buildings will experience effects from the Project.
- 2.1.12 The Scheduled Monument will be affected by the Project, which is partially located within the Project boundary. Geophysical survey and archaeological evaluation carried out as part of the CSIE Project has identified further archaeological remains associated with the Scheduled Monument but outside of the scheduled area. Prior to the commencement of construction activity the small portion of the Scheduled Monument and associated archaeological activity that would be impacted would be subject to archaeological strip, maps and record excavation to preserve these features by record. This mitigation approach would be secured through condition 11 Archaeological mitigation, investigation and evaluation<sup>1</sup> of the deemed planning consent and Scheduled Monument consent for the works within the Scheduled Monument will be applied for as committed to in document **NR 10** of the deemed planning consent. HE have stated that this approach is to their satisfaction and note that they support the commitment made to apply for Scheduled Monument consent in the request for deemed planning permission, subject to a minor change in the title of condition 11. The requested change to the title has been agreed with HE.
- 2.1.13 Following the implementation of the archaeological mitigation to be secured through condition 11 the scheduled monument will experience moderate adverse effects which is less than substantial harm for the purposes of the policies of the NPPF. HE have also stated in their representation dated 2<sup>nd</sup> August 2021 that they would not consider the impacts to the overall significance of the monument to be substantial harm.
- 2.1.14 Seven Grade II Listed Buildings will experience very minor effects from the Project. In the case of all of these listed buildings the effects will arise from changes within their setting. None of the effects on these listed buildings will be significant and will equate to the lower end of harm and definitely less than substantial harm for the purposes of the policies of the NPPF. During construction effects on these listed buildings will be mitigated through management of the flow of construction traffic and good site housekeeping practices including use of fencing, hoarding and bunding, and damping down of dust. These measures will be outlined if the CoCP part B (**NR 16 Vol 3, Appendix 2.4**). During operation designed planting around the proposed substation building will provide screening for views across from the approach to the Nine Wells Monument. The monument itself is screened by existing vegetation and tree cover and will not experience any effects on its significance as a result of the CSIE Project.

- 2.1.15 There are 12 non-designated archaeological assets located either partially or wholly within the CSIE Project boundary these assets are of medium or low value. With the mitigation measures in place one non-designated asset will experience a significant effect as a result of the CSIE Project. The remaining 11 non-designated heritage assets affected by the CSIE Project, including Hobson's conduit, will experience effects that are non-significant. Prior to the commencement of construction activity areas of known archaeological deposits would be subject to strip, maps and record excavation to preserve these features by record. This mitigation approach would be secured through condition 11 of the deemed planning consent (see the Proof of Evidence of Mr Pearson (**NRE9.2**) for the latest proposed conditions). Effects on Hobson's Conduit will be mitigated through appropriate planting which will be secured through condition 29: Hard and Soft Landscaping of the deemed planning consent.
- 2.1.16 In Section 6 of my evidence I respond to the objections to the CSIE Project that reference cultural heritage assets. The objections focus primarily on matters not directly related to cultural heritage assets and are light on detail specific to cultural heritage. None of the objections raise concerns about the level of surveys undertaken or the information provided in the assessments undertaken to inform the ES. Two objections seek confirmation that impacts to a Scheduled Monument are avoided or adequately mitigated but does not state that the objectors believe that the mitigation proposed in the Code of Construction Practice ("the **CoCP**") and ES of Strip Map and Record excavation or the conditions listed in the Deemed Planning Permission are inadequate. In Section 4 below I have set out how this approach to mitigation was arrived at and demonstrate that agreement to this approach has been reached with HE and the archaeological advisors to the local planning authority.
- 2.1.17 Other comments from objectors relate to potential effects to the listed building within Nine Wells nature reserve. In Section 6 below I have detailed what assessment of the listed building has been undertaken and demonstrate that the effects on it from CSIE will be limited.
- 2.1.18 Other comments from objectors reference Hobson's Brook or Hobson's conduit. It is not clear from the written objection whether the objectors are specifically concerned with Hobson's Brook or Hobson's conduit as a heritage asset. However, in section 6 below I have addressed how the assessment considered effects of Hobson's Brook or Hobson's conduit as a heritage asset as that is where my expertise intersects with the comments made in the objections.
- 2.1.19 In my professional opinion, sufficient assessment has been carried out to ensure that the impacts of the CSIE Project have been understood and appropriate mitigation designed and secured through draft conditions of the deemed planning consent. I consider that, if the mitigation measures set out in the environmental statement are implemented in full, then the CSIE Project would fulfil its obligations regarding the preservation of cultural heritage.

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<sup>1</sup> Note that the numbering of the revised draft planning conditions is correct at time of production of proof but may be subject to change.

## 3 Relevant Legislation and Policy Context

- 3.1.1 In this section of my evidence I will outline the legislation and policy context that the Heritage assessment has been carried out within.

### 3.2 Legislation

- 3.2.1 The assessment was carried out in accordance with the requirements of the Transport and Works Act 1992 (as amended) (**B1**) and related rules and guidance. The following legislation is also of relevance to the assessment:
- a. The Planning (Listed Buildings and Conservation Areas) Act 1990 (**B44**) which applies special protection to buildings and areas of special aesthetic or historic value (“the **1990 Act**”); and
  - b. The Ancient Monuments and Archaeological Areas Act 1979 (**B45**) (“the **1979 Act**”).

#### Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.2.2 Section 66(1) of the 1990 Act states that “in considering whether to grant planning permission for the 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 aesthetic or historic value which it possesses”.
- 3.2.3 In considering the CSIE Project against the tests set out in the 1990 Act, attention should be focused on the Listed Buildings identified as being affected by the CSIE Project as I have set out in Section 4 of my evidence. In applying the test of this act to the CSIE Project consideration should be given as to whether the building or its setting or any features of special aesthetic or historic value which it possesses are not preserved and if they are not, to what degree this lack of preservation is acceptable.

#### Ancient Monuments and Archaeological Areas Act 1979

- 3.2.4 The 1979 Act gives statutory protection to any structure, building or work which is considered to be of particular historic or archaeological value and regulates any activities which may affect such areas. Under the Act any work that is carried out on a Scheduled Monument must first obtain Scheduled Monument consent.
- 3.2.5 Scheduled Monument consent will be sought prior to the commencement of construction of the CSIE Project (see the Applicant’s List of consents, permissions or licences under other enactments, **N10**). Such consent may be granted where works will result in damage to the scheduled monument and the application has demonstrated that that damage amounts to less than substantial harm, and there is an appropriate level of public benefit for the works to proceed. In addition, Scheduled Monument consent

is likely to be granted with conditions that require appropriate mitigation and or recording works to take place.

## 3.3 Policy

3.3.1 The following policy documents are of relevance to the assessment:

- c. National Planning Policy Framework 2021, specifically Section 16, paragraphs 194 to 205 (excluding paragraph 198) (**D1**);
- d. Cambridge (City Council) Local Plan (adopted October 2018) (**D6**);
- e. South Cambridgeshire Local Plan (adopted September 2018) (**D8**);
- f. Cambridge Southern Fringe Area Action Plan; Development Plan Document (DPD) (adopted February 2008) (**D11**); and
- g. Emerging Greater Cambridge Local Plan (**D98**).

### National Planning Policy Framework

3.3.2 National policy relating to the archaeological resource is outlined in the National Planning Policy Framework (NPPF) which was published in 2012 and updated most recently in July 2021. The NPPF is a material consideration in planning decisions. Section 16 of the NPPF “Conserving and Enhancing the Historic Environment” contains the government’s policies relating to the historic environment.

3.3.3 Paragraph 194 states “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

3.3.4 Paragraph 197 states that when determining planning applications local authorities should take account:

“a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.”

3.3.5 Paragraph 199 states that “when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more

important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”

- 3.3.6 Paragraph 200 states that: “Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably Scheduled Monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”

- 3.3.7 Paragraph 201 states that “Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

‘a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.”

- 3.3.8 Paragraph 203 states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non designated heritage assets, a balanced judgement would be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

- 3.3.9 Paragraph 204 states that “Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development would proceed after the loss has occurred.”

- 3.3.10 Paragraph 205 states that “Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost, whether wholly or in part, in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.”

- 3.3.11 When applying the tests of the NPPF to the CSIE Project, the assessments carried out to inform the proposed Order and condition 11 of the deemed planning consent demonstrate that the CSIE Project has considered the significance of heritage assets, avoided substantial harm to any designated heritage assets and committed to recording and enhancing understanding of the heritage assets that will be affected by the CSIE Project. The conditions to which it is proposed the deemed planning consent is

made subject also demonstrate that a commitment has been made to the development going ahead after the loss of the heritage assets that will be impacted by the CSIE Project.

### **Cambridge City Council Local Plan**

- 3.3.12 The Cambridge Local Plan is the statutory development plan for the Cambridge area to 2031. Chapter seven of the plan relates to the Protection and Enhancement of the Character of Cambridge. In particular, Policy 61 contains advice regarding the “Conservation and enhancement of Cambridge’s historic environment”. This policy directs decision-makers to ensure that applications for development demonstrate understanding of the significance of heritage assets and any potential impacts on their significance along with providing justification for works that would lead to harm or substantial harm to heritage assets. The aim of this policy is to preserve or enhance the significance of the heritage assets of the City of Cambridge. As the CSIE Project interacts with heritage assets, this policy is of relevance to the CSIE Project.

### **South Cambridgeshire Local Plan**

- 3.3.13 The South Cambridgeshire Local Plan is the statutory development plan for the South Cambridgeshire area to 2031. The Local Plan’s policies and proposals cover the period 2011 to 2031. Chapter six entitled Protecting and Enhancing the Natural and Historic Environment contains Policy NH/14 “Heritage Assets.” This policy states that development proposals will be supported when they sustain and enhance the significance of heritage assets, including their settings, as appropriate to their significance and in accordance with the National Planning Policy Framework. This policy is of relevance to the CSIE Project due to the interaction between heritage assets and the CSIE Project.

### **Cambridge Southern Fringe Area Action Plan; Development Plan Document**

- 3.3.14 The Cambridge Southern Fringe Area Action Plan forms part of the statutory development plan for South Cambridgeshire. Chapter D Trumpington West contains subsection D8 on Archaeology and Heritage. This section lays out the following relevant objective: D8/a To develop an appropriate archaeological strategy which mitigates any adverse effects of the development on the archaeological resource. This objective is relevant to the CSIE Project due to the interaction between archaeological remains and the Project. Condition 11 of the deemed planning consent demonstrates the commitment to delivering appropriate archaeological mitigation as part of the CSIE Project.

### **Emerging Greater Cambridge Local Plan**

- 3.3.15 Cambridge City Council (“**CCiC**”) and South Cambridgeshire District Council (“**SCDC**”) are preparing a joint Local Plan for their combined districts (Greater Cambridge) as set out in the adopted Greater Cambridge Local Development Scheme. A full draft of the Local Plan has yet to be published at the time of the TWAO application. At the time of the preparation of this proof of evidence the first proposals had been published in August 2021 for consideration by councillors with the aim of releasing them for public consultation in November and December 2021. Consultation on the Local Plan ended at 5pm on 13 December 2021.
- 3.3.16 Draft Policy GP/HA Conservation and enhancement of heritage assets is of relevance to the CSIE Project and recognises the important contribution made by heritage assets to Cambridge. The policy



will require developments to demonstrate how proposals preserve or enhance the significance of heritage assets.

## 3.4 Guidance

3.4.1 The following national guidance is of relevance to the assessment:

- a. The National Planning Practice Guidance (NPPG), offered by the Department for Levelling Up, Housing and Communities to support the NPPF (**D4**). The section of relevance to this assessment is the guidance on the Historic Environment, specifically the guidance on decision-making: historic environment;
- b. International Council on Monuments and Sites (ICOMOS) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011) (**D66**);
- c. Chartered Institute for Archaeologists (CIfA) 'Code of conduct' (2019) (**D67**), 'Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment' (2014) (**D68**); and 'Standard and guidance for historic environment desk-based assessment' (2017) (**D69**);
- d. HE's 'Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning Note 2' ("**GPA2**") (2015) (**D70**);
- e. HE's 'The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3' ("**GPA3**") (2017). This document sets out guidance on managing change within the settings of heritage assets, including archaeological remains, historic buildings, sites, areas and landscapes (**D71**);
- f. HE's 'Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment' which sets out guidance on assessing and articulating the significance of heritage assets' (2008) (**D72**); and
- g. Network Rail's standard on Heritage Care and Development (**D73**). Specifically, section 3, Planning and the legal context.

## 4 Work Undertaken to Date

### 4.1 Assessment

- 4.1.1 A comprehensive suite of cultural heritage assessments and surveys have been carried out as part of the TWAO application for the CSIE Project. These include a cultural heritage desk-based assessment (**NR16 Vol 3, Appendix 11.2**), a geophysical survey (**NR16 Vol 3, Appendix 11.3**) and an archaeological evaluation (**NR16 Vol 3, Appendix 11.4**). In addition, a total of 110 archaeological events have taken place within the 500m study area applied for the cultural heritage assessment carried out to inform the TWAO application. These previous archaeological events include archaeological evaluation and excavation across a large proportion of the land within the study area. The results of these previous archaeological events were reviewed and included in the cultural heritage assessment carried out to inform the TWAO application.
- 4.1.2 The CSIE Project would have no impact on any World Heritage Sites, registered parks and gardens, registered battlefields or conservation areas. In addition, no non-designated, locally listed buildings will experience effects from the Project.
- 4.1.3 The Scheduled Monument will experience significant effects as a result of the Project. This Scheduled Monument is partially located within the CSIE Project boundary. Geophysical survey and archaeological evaluation carried out as part of the CSIE Project has identified further archaeological remains associated with the Scheduled Monument but outside of the scheduled area. Prior to the commencement of construction activity the small portion of the Scheduled Monument and associated archaeological activity that would be impacted would be subject to archaeological strip, maps and record excavation to preserve these features by record. This record will comprise of a written report, photographic archive and archive of finds recovered from site. The report will include a narrative discussion of the archaeological sequence. This mitigation approach would be secured through a planning condition and Scheduled Monument consent for the works within the Scheduled Monument will be applied for. As part of this condition, the archaeological contractors, working on behalf of the Applicant, will be required to submit and agree a written scheme of investigation ("the **WSI**") with the local planning archaeological advisor prior to the commencement of this work. Broad mitigation measures have been included in the CoCP Part A (**NR 16 Vol 3, Appendix 2.4**).
- 4.1.4 HE have stated that this approach is to their satisfaction and note that they support the commitment made to apply for Scheduled Monument consent in the Request for Deemed Planning Permission, subject to a minor change in the title of condition 11 (see the Proof of Evidence of Mr Pearson (**NRE9.2**) for the latest version of the proposed conditions). This requested Change to the title of condition 11 has been agreed with HE.
- 4.1.5 More detailed information about the implications of the CSIE Project for the Scheduled Monument is set out in Section 5 below.
- 4.1.6 Seven Grade II Listed Buildings will experience effects from the Project. None of these effects will be significant. The listed buildings that will experience effects are:
- Four Mile House;
  - De Freville Farmhouse Complex (contains 3 listed buildings);

- Dovecote at Granhams Farm;
- 32-38 Granhams Road; and
- Nine Wells Monument

- 4.1.7 In the case of all of these listed buildings the effects will arise from changes within their setting. During construction effects on these listed buildings will be mitigated through management of the flow of construction traffic and good site housekeeping practices including use of fencing, hoarding and bunding, and damping down of dust. These measures will be outlined in the CoCP Part B (**NR 16 Vol 3, Appendix 2.4**) and secured through condition 9. During operation designed planting around the proposed substation building will provide screening for views across from the approach to the Nine Wells Monument. The monument itself is screened by existing vegetation and tree cover. Further detail on the implications of the CSIE Project for Nine Wells Monument is provided in Section 6 below.
- 4.1.8 There are 12 non-designated archaeological assets located either partially or wholly within the CSIE Project boundary; these assets are of medium or low value. Prior to the commencement of construction activity areas of known archaeological deposits would be subject to strip, maps and record excavation to preserve these features by record. This record will comprise of a written report, photographic archive and archive of finds recovered from site. The report will include a narrative discussion of the archaeological sequence. This mitigation approach would be secured by proposed condition 11 of the deemed planning consent. As part of this condition, the archaeological contractors, working on behalf of the Applicant, will be required to submit and agree a WSI with the local planning archaeological advisor prior to the commencement of this work. Broad mitigation measures have been included in the CoCP Part A.
- 4.1.9 With the mitigation measure in place one non-designated asset will experience a significant effect as a result of the CSIE Project. The remaining 11 non-designated heritage assets affected by the CSIE Project will experience effects that are non-significant. I have covered the asset that will experience a significant effect in more detail in section 5 below. Table 4-1 briefly summaries the non-designated assets that will experience effects. The numbers in brackets by each asset name relate to the CSIE Project ID numbers assigned to each asset in the ES and are included here for ease of cross referencing back to the ES (**NR 16 Vol 2**).

*Table 4-1 Summary of non-designated archaeological assets that will experience effects from the CSIE Project*

Asset	Potential effect in absence of mitigation	Phase	Mitigation measure	Residual effect
Cropmark Complex (17)	Large adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Moderate Adverse Significant
Middle Bronze Age	Moderate Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record	Slight Adverse Not Significant

features (102)			excavation prior to construction to preserve assets by record.	
Undated cropmark enclosures (11)	Moderate Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant
Mid to Late Iron Age settlement (64)	Moderate Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant
Roman Road (239)	Moderate Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant
Romano-British agricultural activity (100)	Slight Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant
Romano-British and Medieval agricultural features (103)	Slight Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant
Romano-British field system (63)	Moderate Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant
Evidence of medieval agricultural activity and ridge and furrow (101)	Slight Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant
Great Eastern Railway (Shepreth	Negligible	Construction and operation	None proposed	Neutral Not Significant

Branch) (240)				
Hobson's Conduit and Hobson's Brook (237)	Slight Adverse	Construction and operation	Sympathetic planting and landscaping to soften the transition from open space to urban form.	Negligible Not Significant
possible ditch (217) of unknown date	Slight Adverse	Construction	Asset is part of a group of known archaeological remains which would be subject to a strip, map and record excavation prior to construction to preserve assets by record.	Slight Adverse Not Significant

## 4.2 2020 Geophysical Survey

4.2.1 A geophysical survey was commissioned by Arcadis and undertaken by Magnitude Survey in 2020 to improve the understanding of the Scheduled Monument and its immediate surrounding area. The survey detected archaeological activity, located both within the currently scheduled area as well as extending beyond the scheduled extent to the south, and also possibly to the north. The presence of buried utilities was also revealed to the north of the Scheduled Monument. Archaeological activity was identified in the form of a potentially Romano-British field system consisting of multiple extended linear ditches, with some linear features corresponding with cropmarks of a former roman villa, inside the scheduled area. Along with three clearly identified rectilinear enclosures and two partial enclosures, as well as three further possible partial enclosures, the cropmarks were interpreted as an Iron Age to Roman period settlement. An area of regular linear anomalies was identified in the northwest area of the monument together with the lines of known buried services.

## 4.3 2021 Trench Evaluation

4.3.1 An archaeological evaluation was commissioned by Arcadis and carried out by Cambridge Archaeological Unit (CAU) in 2021. It was the first intrusive archaeological evaluation to investigate this feature and took place in the areas outside the Scheduled Monument. Targeting the results of the 2020 geophysical survey as well as sampling previously uninvestigated areas, evidence was revealed of activity from both the Bronze Age and the Roman period. As these features were located in immediate proximity on almost identical alignments, which was also the case on other excavations within the study area at Granham's Farm, it indicates a continued use of the landscape from the Bronze Age through to the Roman period. The excavation also proved that the features in the non-designated area are associated with the Scheduled Monument. When viewed in conjunction with the geophysical survey results it is clear that a ditch just to the south of the Scheduled Monument represents part of a trackway that formed the northern limit of a settlement attached to the southeast corner of the building complex within the scheduled area.

## 4.4 Engagement with Stakeholders

- 4.4.1 An ongoing programme of engagement with heritage stakeholders has been undertaken prior to the making of the TWAO application and following preparation of the application for deemed planning consent.
- 4.4.2 **Error! Reference source not found.** Table 4-2 provides a summary of consultation with stakeholders with respect to Cultural Heritage prior to and following the making of the TWAO application and how the views expressed were addressed.

*Table 4-2 Summary of engagement with stakeholders pre and post-making the TWAO application*

Stakeholder	Date	Summary of Engagement
HE, CCoC and HET	March 2019	HE confirmed they needed to be notified of works that may impact upon nationally designated archaeological assets.  An email request was sent from Network Rail to arrange a meeting with HE to notify them and the meeting was arranged for the 15 <sup>th</sup> May 2019.
HE, CCoC HET, at HE office.	15 <sup>th</sup> May 2019	First meeting with HE and HET to discuss further archaeological works including with regard to the Scheduled Monument at White Hill Farm. HE and HET highlighted importance of being kept apprised of progress of assessment works.  It was agreed that HE and HET would be kept apprised of developments of the archaeological assessment and that the recommendation of HE and HET that further archaeological investigation was required in order to make an accurate assessment would be acted upon.
HE and CCoC HET	6 <sup>th</sup> June 2019	Follow up engagement in line with the requirement from HE/HET to be kept informed; illustrative work limits site boundary and minutes of meeting on 15 <sup>th</sup> May sent.  A request was also sent to HET for a brief for archaeological work for the scope of the Desk Based Assessment (“DBA”). The DBA was then carried out in accordance with brief supplied by HET.
CCoC HET	1 <sup>st</sup> July 2020	Following receipt of a response from HET on 1 <sup>st</sup> July 2020 a meeting was proposed to discuss further steps required with regard to more information needed on archaeological deposits in southern part of the proposed development site.  The meeting was held on 4 <sup>th</sup> August 2020 to discuss these matters.
CCoC HET	4 <sup>th</sup> August 2020	The meeting was to discuss the information needed on archaeological deposits in southern part of the proposed development site. During this meeting it was agreed that an intrusive archaeological investigation was required south of Addenbrooke’s Road. It was agreed that CCoC HET would supply a brief.

		It was also agreed with CCoC HET that no further pre-determination archaeological investigations were required north of Addenbrooke's Road due to extensive previous investigation.
HE and HET CCoC	8 <sup>th</sup> July 2020	<p>As part of the requirement from HE/HET to be kept informed of works progress; HE was asked to respond with any comments regarding the geophysics survey of the Scheduled Monument and advise regarding proposals for the archaeological potential of the proposed eastern and western compound. The same request for comment was also sent to CCoC HET. HE responded on 20<sup>th</sup> July 2020 to state that the findings were broadly accepted and noted the archaeological potential of the areas immediately adjacent to the railway remains unknown.</p> <p>The advice from HE was acknowledged and further investigative works to determine the archaeological potential of the site are planned.</p>
HE	15 <sup>th</sup> January 2021	<p>A meeting with HE was held to discuss scope of investigations within the Scheduled Monument and the application for Scheduled Monument consent.</p> <p>An action from the meeting was for HE to be provided with additional plans of test pit areas corresponding to results from the geophysical survey. This was done.</p>
HET CCoC	18 <sup>th</sup> February	Written confirmation was received that further archaeological evaluation to the north of Addenbrooke's Road is not necessary. HET also issued a recommendation for a 5% sample for trench evaluation to the south of Addenbrooke's Road.
HE and HET CCoC	24 <sup>th</sup> February 2021	<p>Meeting to review the trench plan and to agree on definition of scope for evaluation investigation.</p> <p>Following the meeting the trench plan was updated and combined with brief to be issued by HET to form the WSI for the archaeological works.</p>
HET CCoC	5 <sup>th</sup> March 2021	Design brief for archaeological evaluation issued by HET CCoC.
HET CCoC	5 <sup>th</sup> May 2021	Formal approval of WSI written in accordance with brief issued by HET CCoC and trench plan approved by HET CCoC and HE.
HE	12 <sup>th</sup> May 2021	Advice that HE approved the application of Scheduled Monument Consent to DCMS for evaluation within the Scheduled Monument.
HET CoCC	9 <sup>th</sup> June 2021	Arcadis issued archaeological evaluation report to HET CoCC.

## 4.5 Further Engagement with Historic England

- 4.5.1 Following the submission of the TWAO application HE submitted a written representation where they set out their position in relation to the application and deemed planning consent (**REP 07**). In this response HE noted the detailed assessment work that has been undertaken to inform the TWAO application and stated that they did not consider the impacts on the Scheduled Monument to cause substantial harm to the significance of the monument.
- 4.5.2 HE noted that Scheduled Monument consent will be required for the works and advised that minor modifications be made to the wording of condition 11 of the deemed planning consent to clarify that the CSIE Project is committed to archaeological mitigation and investigation rather than just evaluation and that the development also refers to the construction of haul roads and compounds.
- 4.5.3 In a letter from Network Rail to HE dated 26 August 2021 Network Rail agreed to HE's proposed changes to the wording of condition 11.

## 4.6 Hobson's Conduit Trust

- 4.6.1 Prior and subsequent to the making of the TWAO application and the application for deemed planning consent, ongoing dialogue has been maintained between Network Rail and Hobson's Conduit Trust. Much of this engagement relates to Hobson's Conduit as a watercourse and matters to do with drainage. The dialogue also covers matters relating to Nine Wells Nature Reserve (but not specifically the Nine Wells Monument). As these matters are not heritage-specific I will leave them for others with more relevant experience to summarise and discuss.
- 4.6.2 However, with specific reference to heritage, the Hobson's Conduit Trust noted in their correspondence with Network Rail that they were pleased to note the explicit recognition of the rich history of early settlement in the vicinity of the Project and welcomed the plans for further investigation. In their response Network Rail confirmed that they planned to continue to be informed by the advice from the "*County Archaeologist*" and HE in relation to the archaeological resource within the Project.
- 4.6.3 In their correspondence both Hobson's Conduit Trust and Network Rail agree that their engagement has been positive and productive. Hobson's Conduit Trust are supportive of the CSIE Project.



## 5 Cultural Heritage Significant Effects of Cambridge South Infrastructure Enhancements

5.1.1 In this section of my evidence I set out evidence relating to the main cultural heritage assets which have the potential to experience significant effects from the CSIE Project. The main cultural heritage assets addressed below are:

- The Scheduled Monument
- Cropmark Complex (ES project ID number 17).

5.1.2 I have also set out evidence relating to the Nine Wells Monument and Hobson's Brook/Hobson's Conduit as while they will not experience significant effects they have been raised in objections as assets of interest.

### 5.2 Scheduled Monument: 'Site revealed by aerial photography west of White Hill Farm'

5.2.1 This part of my evidence deals with Item 8 of the Statement of Matters.

5.2.2 The only Scheduled Monument that would be affected by the CSIE Project is 'Site revealed by aerial photography West of White Hill Farm'. This asset is a cropmark complex of rectangular enclosures, revealed by aerial photography west of White Hill Farm. The asset is located within a flat arable field, the result of regular plough activity to a depth of 0.30m. This asset is partially within the CSIE Project boundary and lies between the Cambridge to London railway to the east and Hobson's Brook to the west. The plates below show the location of the Scheduled Monument in relation to the Project and how the Scheduled Monument appears on the ground today.



Plate 1 Location of Scheduled Monument (labelled as SM4) in relation to TWAO application boundary



*Plate 2 General Shot of Scheduled Monument. Looking towards Addenbrooke's Road*

- 5.2.3 Various archaeological investigations have been carried out at the site of the Scheduled Monument prior to and during the assessment carried out to inform the CSIE Project. Investigations carried out prior to the CSIE Project include a walkover survey and two phases of fieldwalking. The walkover survey of the site carried out in 1989 noted slight variation in soil colour although no artefacts were recorded. Fieldwalking to the south of the monument produced animal bone and a thin scatter of oyster shell, along with ceramic fragments. Further fieldwalking identified finds from the 1st and 4th centuries, confirming the Romano-British date, although no Iron Age finds were found.
- 5.2.4 The 2020 geophysical survey carried out to inform the TWAO application for CSIE (**NR16 Vol 3, Appendix 11.3**) has improved understanding of the Scheduled Monument as it detected archaeological activity, located both within the currently scheduled area as well as extending beyond the scheduled extent to the south, and also possibly to the north. The presence of buried utilities was also revealed to the north of the monument. Archaeological activity has been identified in the form of a potentially Romano-British field system consisting of multiple extended linear ditches, with some linear features corresponding with cropmarks of a former roman villa, inside the scheduled area. Along with three clearly identified rectilinear enclosures and two partial enclosures, as well as three further possible partial enclosures, the cropmarks have been interpreted as an Iron Age to Roman period settlement. An area of regular linear anomalies has been identified in the northwest area of the Scheduled Monument together with the lines of known buried services.



- 5.2.5 The 2021 Archaeological Evaluation carried out by Cambridge Archaeological Unit (CAU) to inform the TWAO application for the CSIE Project (**NR16 Vol 3, Appendix 11.4**) took place in the areas surrounding the Scheduled Monument but not within the monument itself. Targeting the results of the 2020 geophysical survey as well as sampling previously un-investigated areas, evidence was revealed of activity from both the Bronze Age and the Roman period. The excavation also proved that the features in the non-designated area are associated with the Scheduled Monument. When viewed in conjunction with the geophysical survey results it is clear that a ditch just to the south of represents part of a trackway that formed the northern limit of a settlement attached to the southeast corner of the building complex within the scheduled area. Aerial photographs show that this trackway extended southeast for at least 1km towards Granham's Farm.
- 5.2.6 The Scheduled Monument has no visible above ground remains as demonstrated by the image above (see Plate 2). It is located within an area characterised by post-medieval and modern agricultural activity, modern infrastructure, housing and commercial development. The Scheduled Monument's setting to the west has been considerably changed by the recently developed Scotsdale garden centre, greenhouses and houses. To the east the Cambridge to London railway has also considerably changed its setting and views east across to White Hill. As such there is little within the landscape that informs its setting. One element within the landscape today that is constant with the likely setting of the potential roman villa within the scheduled area is White Hill to the east of the Scheduled Monument. As the highest point within the landscape it is likely that there would have been a visual relationship between White Hill and the potential roman villa. Today there is still a visual relationship between White Hill and the Scheduled Monument, albeit partially interrupted by the railway line (Plate 4).



*Plate 3 General shot over Scheduled Monument looking towards Addenbrooke's Road*



*Plate 4 View from eastern edge of Scheduled Monument looking towards White Hill*

- 5.2.7 The CSIE Project will not alter the current visual relationship between White Hill and the Scheduled Monument. Overall, the setting of the Scheduled Monument does not make a significant contribution to its significance. Of greater importance to the significance of the Scheduled Monument is the below ground archaeological remains that have been identified by successive phases of archaeological investigations in this area. The asset has historic and evidential interest for its potential to yield further information on the Prehistoric and Roman settlement of the area. It has group value as it forms part of a multi-period landscape.
- 5.2.8 The construction of the proposed length of haul road access the Shrepreth Branch Junction would run within the eastern edge of the Scheduled Monument and would cause a direct, physical impact on the portion of the monument and its associated archaeological remains that it passes through. For clarity the haul road will impact a narrow strip immediately adjacent to the eastern boundary of the Scheduled Monument, close to the railway line.
- 5.2.9 The recent site investigations (geophysics and evaluation) found that the archaeological features are shallow in nature (0.35m below ground level). This means that the features would be vulnerable to either crushing and/or compaction by heavy vehicles, especially if the area became very wet due to heavy rain, even if a temporary trackway were to be laid on the ground surface.
- 5.2.10 There is a programme of archaeological mitigation proposed to mitigate the effects on the Scheduled Monument. This will include a programme of strip, map and record excavation to preserve archaeological remains impacted by the haul road by record. This work will be secured by proposed condition 11 of the deemed planning consent. Landscaping to the north of the Scheduled Monument will screen the permanent compound and substation and lessen the changes within the setting of the monument. This will be secured by proposed condition 29 of the deemed planning consent. The TWAO application makes a commitment to applying for Scheduled Monument consent for the proposed mitigation works within the Scheduled Monument. This commitment is set out in document **NR10** of the deemed planning consent. The proposed scope, approach and methodology for all archaeological mitigation work will be detailed in a Written Scheme of Investigation which will be submitted to and agreed with the archaeological advisors to Cambridge County Council. HE will also be invited to review and comment on the Written Scheme of Investigation as the work relates to a Scheduled Monument. Again, this will be secured by proposed condition 11 of the deemed planning consent.
- 5.2.11 Following mitigation, the effect on the Scheduled Monument would be Moderate adverse which is a significant effect. However, I do not consider this to be substantial harm for the purposes of applying the NPPF's policies, as the majority of the physical remains of the monument will be retained, including the most significant archaeological features located in the north-western portion of the monument. There will be little change to the setting of the monument so overall the significance of the monument will be preserved. Finally, the archaeological mitigation that will be carried out will create an opportunity for enhanced understanding of the physical remains of the monument.
- 5.2.12 I note that in their written response to the TWAO application for CSIE dated 2<sup>nd</sup> August 2021 HE are also of the opinion that the effect on the monument will result in less than substantial harm for the purposes of applying the policies of the NPPF (**Rep 07**).



## 5.3 Listed Building: Nine Wells Monument

- 5.3.1 The Nine Wells Monument is a grade II listed building situated within an area of dense tree cover within the Nine Wells Nature Reserve 130m east of the Project (Plate 5). The polished granite obelisk monument was erected in 1861 in dedication to Hobson's Conduit, a water course and conduit which was built as the principal water supply to the city of Cambridge for over 250 years from the 17th century. The monument also carries an inscription to the benefactors of the water course including Thomas Hobson, the 16<sup>th</sup> and 17<sup>th</sup> Century carrier (from whom the term 'Hobson's Choice' is supposedly derived) who was a prominent local figure and businessman. This asset has historic interest for its connections to the city of Cambridge, Hobson's Conduit and Nine Wells Springs.



Plate 5 Location of Nine Wells Monument in relation to Project. Monument is marked as LB48



*Plate 6 Nine Wells Monument showing position within close vegetation cover*

- 5.3.2 The setting of the Nine Wells Monument is primarily informed by its location in a small, grassed area within the Nine Wells nature reserve. As I observed during my site visit the nature reserve is heavily wooded and there is significant vegetation all around the area the monument is sited in (Plate 6, Plate 7). There is no visual connection between the Nine Wells Monument and anything outside of the nature reserve. At the location of the monument there is some background noise from the nearby Addenbrooke's Road and the railway, although this is somewhat deadened by the heavy tree cover.





*Plate 7 View from Nine Wells Monument looking towards approximate location of CSIE Project*



*Plate 8 View from footpath on south side of Addenbrooke's Road and east side of railway line looking towards Nine Wells Monument (within Nine Wells Nature Reserve and shielded from view by dense tree cover)*

- 5.3.3 Nine Wells Monument is sited close to the springs that source the water for the conduit (the spring is also located within Nine Wells Nature Reserve). Therefore, its setting includes the brook/conduit. However, this is not a visual relationship as there is no line of sight between the monument and the brook/conduit.
- 5.3.4 Because the Nine Wells Monument is shielded by the trees of Nine Wells Nature Reserve there is no intervisibility between the CSIE Project and the Nine Wells Monument (Plate 8). The closest elements of the Project to the monument will be the substation. Sympathetic planting around the proposed new substation building would increase the shielding of the monument from this aspect of the CSIE Project. Therefore, there are no likely significant effects on the listed building. When considered against the tests laid out in the 1990 Act it is my opinion that the tests are met as the building, its setting and features of special aesthetic or historic value which it possesses are retained and with respect to the tests of NPPF no harm will be experienced by this asset.
- 5.3.5 I also note that neither HE nor the HET have raised concerns regarding effects on the heritage significance of Nine Wells Monument in response to the application for deemed planning consent.



## 5.4 Hobson's Brook/Conduit

- 5.4.1 Hobson's Conduit and Hobson's Brook is a 17<sup>th</sup> century fresh water supply system which has a small interaction with the western edge of the CSIE Project. It flows northwards from Nine Wells Nature Reserve along the western edge of Hobson's Park and into the city centre. It is fed by the springs at Nine Wells, crossing the TWAO application boundary close to Addenbrooke's Road. The open watercourse, although non-designated, is a highly important feature within the landscape of south Cambridge, forming a constant historic element within the area as it has evolved from a medieval/post-medieval agricultural landscape to 19th-21st century suburban sprawl. The open landscape of the Hobson's Park Nature Reserve and the agricultural land south of Addenbrooke's Road inform its setting. The relationship between Hobson Brook / Conduit and Nine Wells Monument also contributes to its significance but there is no visual relationship between these two assets. The level of survival of the route of the open watercourse is good although at any particular point the actual shape and profile of the watercourse is unlikely to be wholly original. It has group value with a range of associated structures, including the listed Nine Wells Monument. It has historic and archaeological interest, as well as group value.
- 5.4.2 The works in this area of the site will not physically impact Hobson's Brook/ Hobson's Conduit. The changes within the Hobson's Park open space (including construction of the new rail station) would not result in significant change within the setting of Hobson's Brook/Hobson's Conduit such that it would not be possible to understand the asset's historical significance as the Project would be set against the already urban backdrop of the Cambridge Biomedical Campus. In addition, there would be a good amount of the open space of Hobson's Park retained between the proposed new station and Hobson's Brook. Sympathetic planting and landscaping in the vicinity of the station would soften the transition from open space to urban form and further preserve the immediate setting of Hobson's Brook / Hobson's Conduit.
- 5.4.3 In addition, the group value that Hobson's Brook/Hobson's Conduit has will Nine Wells Monument would be unaffected as would be contribution that each makes to the others significance. With the Project in place, it would still be possible to fully understand the relationship between these two assets. Overall, all the effects on Hobson's Brook/Hobson's Conduit would easily fall into the category of less than substantial harm and would not be significant. I also note that neither HE nor the Cambridge County Council Historic Environment Team have raised concerns regarding effect on the heritage significance of Hobson's Brook/Hobson's Conduit in response to the application for deemed planning consent. Hobson's Conduit Trust have engaged in ongoing consultation with Network Rail regarding interactions between the CSIE Project and Hobson's Brook/Hobson's Conduit but have not raised and specific concerns relating to the heritage significance of the asset. As noted previously, Hobson's Conduit Trust are supportive of the Project.

## 5.5 Non-designated archaeological assets

- 5.5.1 The Cropmark Complex (ES project ID number 17) has been identified as experiencing significant effects from the CSIE Project. The Cropmark Complex is associated with the Scheduled Monument and is also highly likely to be associated with Bronze Age, Iron Age and Roman activity recorded to the north. This asset is identified as asset 17 in the ES and its location is shown in Plate 9 below. The 2021 investigations carried out to inform the TWAO application revealed the shallow nature of the features within the Cropmark Complex. As a result of this shallowness, the ground intrusive element of the CSIE Project in this area would cause a direct, physical impact on the parts of the Cropmark Complex within the CSIE Project boundary. As a result this asset would experience effects of Moderate Adverse. These effects would be significant for the purposes of the ES.
- 5.5.2 The impacts upon the Cropmark Complex will be mitigated with a programme of archaeological strip, map and record excavation which will also cover other archaeological remains within the Project boundary that will be impacted by the CSIE Project but will not experience significant effects. The proposed scope, approach and methodology for all archaeological mitigation work will be detailed in a Written Scheme of Investigation which will be submitted to and agreed with the archaeological advisors to CCoC. The archaeological mitigation work will be secured through condition 11 of the deemed planning consent.

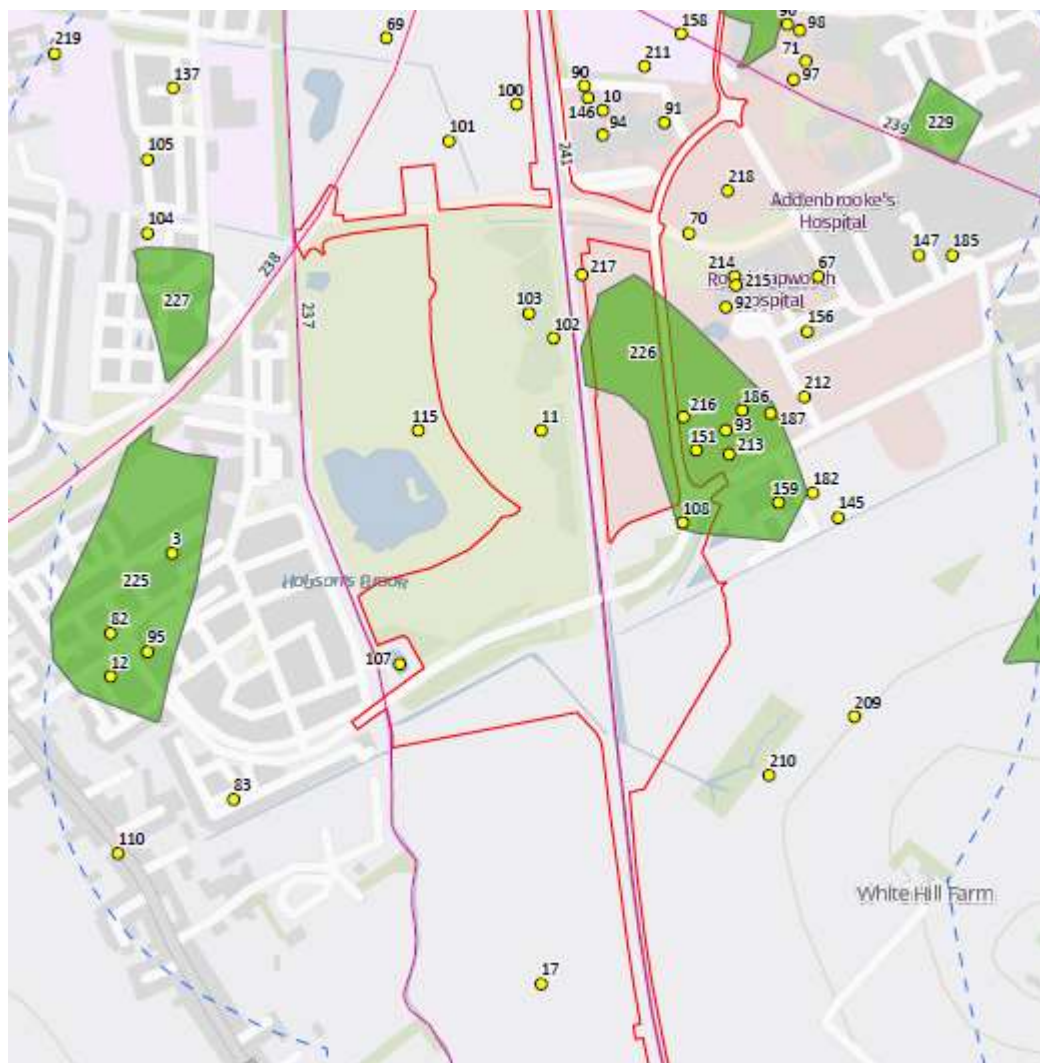


Plate 9 Location of Asset 17

## 5.6 Limitations

- 5.6.1 During the production of the ES a request was made by consultees for Network Rail to undertake full aerial survey and LiDAR (light detection and ranging) analysis. This was not undertaken as the evidence from the assessments and surveys carried out demonstrated that the fragmentary nature of the study area, along with the high levels of modern and archaeological disturbance, would lead to limited useful information being obtained. In addition, a combination of archaeological investigations carried out to inform the TWAO application and the large number of previous archaeological investigations completed prior to the CSIE Project has provided more extensive and detailed information of the archaeological potential of the CSIE Project than aerial survey and LiDAR analysis would have. However, a review of previous aerial photographic assessments covering large parts of the study area was undertaken. Given the wealth of evidence obtained from other sources the lack of a full aerial survey and LiDAR analysis is acceptable as sufficient understanding of the significance, extent and potential impacts to the assets was gathered from the work that was done and the assessment was proportionate.

- 5.6.2 During the archaeological evaluation no evaluation trenches were placed within the Scheduled Monument. However, the combination of the results of the geophysical survey and the results of the trenches in the immediate vicinity of the scheduled area provided sufficient evidence to allow an appropriate mitigation strategy for the Scheduled Monument to be devised. Given the sensitive nature of the archaeological remains within the Scheduled Monument and the detailed information that was gathered from the geophysical survey and trenches outside of the Scheduled Monument it is acceptable in these circumstances that no trenches were excavated within the scheduled area. Sufficient evidence was gathered to understand the archaeological potential of the remains and devise an appropriate mitigation strategy. Both HE and CCoC are aware of the trenching strategy and are satisfied with the approach. HE made specific reference to this approach being sufficient to inform understanding of the designated area in their representation dated 2 August 2021.

## 5.7 Summary of significant effects considered against relevant legislation and policy

- 5.7.1 In this section I shall briefly summarise the significant effects of the CSIE Project and outline how these effects should, in my view, be considered in accordance with the relevant legislation and planning policies. I will also consider the non-significant effects on the two assets that have been mentioned in objections and outline how these effects should, in my view be considered in accordance with the relevant legislation and planning policies. However, for a detailed assessment of the compliance of the CSIE Project and the TWAO application with legislation and planning policy I defer to the Planning proof of evidence.
- 5.7.2 The Scheduled Monument will experience significant effects as a result of direct physical impacts on a portion of the scheduled area. As I have outlined in section 3.2 above this asset is protected under the provisions of the Ancient Monuments and Archaeological Areas Act (**B45**) and any works affecting the monument require Scheduled Monument consent. Paragraphs 199 and 200 of the NPPF (**D1**) are also of relevance. Paragraph 199 directs decision makers to give great weight to a designated asset's conservation and paragraph 200 states that any harm or loss of significance of a designated heritage asset should require clear and convincing justification. Substantial harm to, or loss of, assets of the highest significance, such as a Scheduled Monument should be wholly exceptional.
- 5.7.3 In this case, the loss of the Scheduled Monument is partial only, and limited. The justification for the partial loss of the Scheduled Monument is derived from the need for the CSIE Project (addressed in the evidence of Network Rail as a whole) and the fact that the shallow nature of the below ground archaeological remains preclude a preservation in situ solution. The harm would in my view be less than substantial as I noted previously.
- 5.7.4 I note that in their representation HE also note that paragraphs 199 and 200 of the NPPF are of relevance and must be considered in the planning balance but they did not offer any objection to the TWAO application based on those (or any other) policies. The CSIE Project has acknowledged that it will have an impact on the monument and in accordance with the requirements of the NPPF and the

1979 Act an appropriate programme of archaeological mitigation has been committed to and an application for Scheduled Monument consent will be submitted prior to any works (**NR10**).

- 5.7.5 The Listed Nine Wells Monument will not experience any loss to its significance as a result of the CSIE scheme. As such the tests set out in the NPPF are met for this asset.
- 5.7.6 In terms of the significant effect on the non-designated heritage asset referred to in this proof of evidence as the Cropmark Complex, NPPF paragraphs 203, 204 and 205 are of relevance as they deal with effects on non-designated heritage assets. Paragraph 203 directs decision makers to take account of the significance of non-designated heritage assets and reach a balanced judgement having regard to the scale of the harm or loss of the heritage asset. This heritage asset will experience loss of a low percentage of the scheduled area through the implementation of the CSIE Project. However, this can be weighed against the knowledge that will be gained from the mitigation proposed through condition 11 of the deemed planning consent and the overall benefit of the CSIE Project. Paragraph 205 directs decision makers to ensure that developers record and advance understanding of the significance of heritage assets that will be lost. This will be achieved through the implementation of the mitigation to be secured through condition 11 of the deemed planning consent.
- 5.7.7 Hobson's Brook/Hobson's Conduit will experience negligible effects arising from changes within its setting as a result of the CSIE Project. These effects will be mitigated through planting secured through condition 29 of the deemed planning consent. Paragraphs 203 and 205 are again relevant here.
- 5.7.8 The relevant policies of the Cambridge City Local Plan (**D6**), South Cambridgeshire Local Plan (**D8**), Cambridge Southern Fringe Area Action Plan (**D11**) and Emerging Great Cambridge Local Plan (**D98**) are also of relevance to the effects on the Scheduled Monument, the Listed Nine Wells Monument, Hobson's Brook/Hobson's Conduit and the non-designated Cropmark Complex. However, as these policies broadly echo the NPPF the Project can be considered compliant with these policies insofar as it is compliant with the NPPF.

## 6 Response to Objectors

- 6.1.1 In this section of my evidence, I respond to those objectors who have raised issues relating to cultural heritage in their objections to CSIE. Of the 25 objections received, 2 made reference to cultural heritage or cultural heritage assets. The objections that mentioned cultural heritage or cultural heritage assets were:
- a. OBJ07 Trumpington Residents Association and Statement of Case (**E14**) ("the **TRA**")
  - b. OBJ14 Cambridge Past Present and Future and Statement of Case dated 15/09/21 (**E7**) ("**CPPF**")
- 6.1.2 I will also respond to the South Cambridgeshire Statement of Case, which was submitted on 15 September 2021 (**E10**).
- 6.1.3 Finally, I note that the objection submitted by Mr Dave Jackson (**OBJ 20**) states that he "fully endorse(s) all the comments in the Trumpington Residents Association submission". Therefore, my response to the Trumpington Residents association can also be considered a response to Mr Jackson.

### 6.2 Objection OB07 Trumpington Residents Association

- 6.2.1 The TRA state that they recognise the need for the station proposed as part of the CSIE Project to serve the growing needs of the Cambridge Biomedical Campus. Instead, their objection is to specific aspects of the proposed development. The section of their objection which is of relevance to cultural heritage is their objection to the effect on Nine Wells Local Nature Reserve.
- 6.2.2 In their objection the TRA strongly object to the effects on Nine Wells Local Nature Reserve during the construction of the station and asset that *"it would definitely not be the case that the setting of the nature reserve, its listed monument and the scheduled (site of White Hill Farm) monument are preserved"*. The objection specifies that the positioning of the main construction compound (CC1) a minimum of 30m from the nature reserve is not acceptable to the Trumpington Residents Association and that, in their opinion, the temporary diversion of National Cycle Route 11 may reduce the distance between the construction compound and the nature reserve. The Trumpington Residents Association ask that the minimum amount of land between CC1 and the nature reserve is increased.
- 6.2.3 In reviewing the detail of the objection it appears to me that the main concern of the TRA is the distance between the nature reserve as a whole and not specifically the Grade II listed Nine Wells Monument located within the nature reserve or the Scheduled Monument of White Hill Farm located approximately 130m to the west of the nature reserve. In this section I will however focus my response specifically on the effects on the Grade II listed Nine Wells Monument and the Scheduled Monument as that is where my expertise and the comments made by the TRA intersect.
- 6.2.4 As I have outlined in section 4 and section 5 of my evidence the Scheduled Monument and the listed Nine Wells Monument both have relatively limited settings and the contribution that each asset's setting makes to their significance is limited. In the case of Nine Wells Monument views into and beyond the CSIE Project do not form part of the asset's setting. As such it is my opinion that with the CSIE Project in place the setting of both assets will be preserved and it will still be possible to understand the significance of both assets and how their setting contributes to that significance.



- 6.2.5 The location of the construction compound will not alter the significance of either the listed Nine Wells Monument or the Scheduled Monument. There is no visual relationship between Nine Wells Monument and the construction compound and the construction compound will not interfere with the functional and historical association between Nine Wells Monument and Hobson's Brook / Hobson's Conduit. As such the setting of the monument will be very little changed.
- 6.2.6 In considering what changes the CSIE construction compound might bring to the area around the Nine Wells Monument I have also considered noise. It is likely that there will be a temporary increase in noise levels during operation of the construction compound, however this will be against the existing backdrop of road and rail noise already audible from the site of Nine Wells Monument (although I defer to my colleagues who are experts in Noise for the details on this matter). This temporary increase in noise levels will not prevent understanding of the significance of Nine Wells Monument as a marker commemorating the creation of Hobson's Conduit. Noise, and the absence of noise does not make a significant contribution, positive or negative, to the significance of this asset.
- 6.2.7 Overall the objection from the TRA does not contain any specific reference to the heritage assessment carried out as part of the TWA0 application and, as I have demonstrated, the assessment already addresses the concerns raised by the TRA which are related to the setting of Nine Wells Monument and the Scheduled Monument. As the assessment demonstrates and as I have outlined in my evidence, Nine Wells Monument listed building and the Scheduled Monument will both experience change within their setting but these changes will not be sufficient to affect the significance of either asset or how their setting contributes to their significance. As such I do not agree with the objections raised by the TRA in relation to the effects on heritage assets.
- 6.2.8 The Statement of Case submitted by the TRA is a carbon copy of their objection and therefore my comments addressing their objection also apply to their Statement of Case.

## 6.3 Objection OB14 Cambridge Past, Present and Future

- 6.3.1 CPPF define themselves as a civic society who, among other things, work to protect, celebrate and improve the important built heritage of Cambridge and who own and care for a small list of green spaces and historic buildings in and around Cambridge.
- 6.3.2 The basis of the objection raised by CPPF is the temporary and permanent adverse effects on Hobson's Park. However, CPPF note that they support the new station in principle. The specific concerns that CPPF have in relation to Hobson's Park are to ensure that the new station does not negatively impact the park, its wildlife and users and that any impacts on Nine Wells Nature Reserve, Hobson's Brook and the "Scheduled Ancient Monument" are avoided or adequately mitigated. Although it is not specifically stated within the objection which Scheduled Monument CPPF are concerned with I have assumed that it is 'Site revealed by aerial photography west of White Hill Farm' Scheduled Monument as this is the nearest one to Hobson's Park, Nine Wells nature reserve and the nearest Scheduled Monument to the Project. While the objection from CPPF covers a range of topics associated with Hobson's Parks and Nine Wells nature reserve I will focus my response on the heritage assets within these areas as that is where my expertise and the points raised in the objection intersect.

- 6.3.3 CPPF object to the proposed location of an electricity sub-station and rail systems enclosure/compound in the southern part of Hobson's Park south of Nine Wells Bridge due to the strategically important view from Trumpington towards White Hill (design and access statement, paragraph 5.1.3 & figure 5-1, page 31; and Drawing 158454-ARC-00-ZZ-DRG-EEN-000076) (**NR15**). CPPF wish for, in their words, a less obtrusive location to be identified to leave this view undisturbed.
- 6.3.4 Subsequent to their objection, CPPF supplied a Statement of Case dated 15/09/21. This Statement of Case does not mention any heritage assets or raise any heritage specific concerns.
- 6.3.5 As I have outlined in my evidence in section 4 a programme of archaeological investigations have been carried out to inform the TWAO application for CSIE to develop understanding of the Scheduled Monument. These include a geophysical survey carried out in 2020 (**NR16 Vol 3, Appendix 11.3**) and an archaeological evaluation carried out in 2021 (**NR16 Vol 3, Appendix 11.4**). The results of these surveys have allowed sufficient understanding of the archaeological remains associated with the Scheduled Monument to be gained and an appropriate programme of mitigation devised. The details of this are contained within section 3 of my evidence.
- 6.3.6 The impacts on the significance Hobson's Brook / Hobson's Conduit as a heritage asset are extremely limited and restricted to changes within the wider setting of the asset which do not affect the ability to understand the significance of Hobson's Brook / Hobson's Conduit as a heritage asset. As outlined in section 4 and section 5 of my evidence these changes will be mitigated through sympathetic planting and landscaping around the station building which will ease the transition between the built form of the station against the backdrop of the Biomedical campus and the open space of Hobson's Park. This will be secured through proposed condition 29 of the deemed planning consent.
- 6.3.7 Nine Wells Monument is in the Nine Wells nature reserve and has a very restricted setting enclosed by the close tree cover of Nine Wells Nature reserve as I have outlined in section 3 of my evidence. Because of this restricted setting Nine Wells Monument will experience limited effects from the CSIE Project. Any effects can and will be further adequately mitigated through sympathetic planting around the proposed new substation building (secured through proposed condition 29), which would increase the shielding of the monument from the CSIE Project.
- 6.3.8 With regard to the view from Trumpington towards White Hill, there is nothing specifically about this view that adds to the significance of any of the heritage assets I have discussed. White Hill can be considered to be part of the setting of the Scheduled Monument but no aspect of the CSIE Project will alter the relationship between White Hill and the Scheduled Monument. The placement of the substation in the proposed location will not affect the significance of the Scheduled Monument and the proposed planting around the sub-station will adequately shield the visual relationship between the substation and the Scheduled Monument.

- 6.3.9 Overall it is clear to me that while the objection raised by CPPF makes reference to the Scheduled Monument and Hobson's Brook / Hobson's Conduit there are no heritage specific points raised in their objection or statement of case other than a general reference to avoiding or mitigating impacts to the Scheduled Monument. As I have outlined in my evidence measures have been implemented as part of the CSIE Project and through the proposed conditions of the deemed planning consent to avoid impacts to the Scheduled Monument where possible and where those impacts cannot be avoided a clear plan for mitigation through archaeological excavation and recording has been outlined and secured by proposed condition 11. In addition, the effects on Hobson's Brook / Hobson's Conduit are negligible and will be subject to mitigation which has been secured through proposed condition 29. It is therefore my opinion that the concerns relating to heritage raised by CPPF in their objection have been addressed.

## 6.4 South Cambridgeshire District Council Statement of Case

- 6.4.1 SCDC submitted their Statement of Case of 15 September 2021. In their Statement of Case SCDC state that they object to the CSIE Project and among the site constraints they list are the Scheduled Monument west of the railway line and to the south of Addenbrooke's Road (which I determine to be 'Site revealed by aerial photography west of White Hill Farm'), the Grade II listed Nine Wells Monument, Hobson's Brook and Great Shelford Conservation Area. However, in their ground for objection they only mention the Scheduled Monument.
- 6.4.2 SCDC's objection relating to the Scheduled Monument states that they require the works affecting the Scheduled Monument to be minimal and have the support of HE and the CCoC archaeology team, and that mitigation must be secured through condition. As I have already outlined in my evidence a full assessment of the impact on the scheduled monument has been carried out and this assessment has been used to inform a programme of archaeological mitigation. This work will be secured by proposed condition 11 of the deemed planning consent. Landscaping to the north of the monument will screen the permanent compound and substation and lessen the changes within the setting of the monument. This will be secured by proposed condition 29 of the deemed planning consent.
- 6.4.3 The TWAO application makes a commitment to applying for Scheduled Monument consent for the proposed mitigation works within the Scheduled Monument. This commitment is set out in document **NR10** of the deemed planning consent. The proposed scope, approach and methodology for all archaeological mitigation work will be detailed in a WSI which will be submitted to and agreed with the archaeological advisors to CCoC. HE will also be invited to review and comment on the Written Scheme of Investigation as the work relates to a Scheduled Monument. Again, this will be secured by proposed condition 11 of the deemed planning consent. HE has submitted a representation to confirm that they are satisfied with this approach (**Rep 07**). CCoC have raised objections to the CSIE Project but none of these objections relate to the Scheduled Monument and during the assessment to support the TWAO application we reached agreement with HET on our approach to the Scheduled Monument. On this basis it is my opinion that the objection by SCDC has been addressed.

## 7 Conclusions

- 7.1.1 There are two cultural heritage assets that will experience significant effects as a result of the CSIE Project. They are the Scheduled Monument of Site revealed by aerial photography west of White Hill Farm' and the cropmark complex (ES project ID number 17). The effects on both of these assets will be adequately mitigated through archaeological strip, map and record excavation and secured through condition 11 of the deemed planning consent. Engagement with both HE and the Cambridge County Council Historic Environment Team over the course of the CSIE Project has led to agreement on the treatment of these assets and no objection has been raised to the CSIE Project by either party.
- 7.1.2 Effects on the Nine Wells Monument listed building and Hobson's Brook/Hobson's Conduit will not be significant. These effects will be adequately mitigated through appropriate planting and landscaping which will be secured through condition 29 of the deemed planning consent.
- 7.1.3 As outlined in my evidence all of the designated heritage assets that will experience effects as a result of the CSIE Project will experience less than substantial harm and in the case of Nine Wells Monument no harm will be experienced.
- 7.1.4 Three objections to the CSIE Project mention heritage assets. All objections mention the Scheduled Monument and one objection mentions the listed Nine Wells monument. One objection also mentioned Hobson's Conduit. In the case of all objections there is no specific reference to any of the heritage assessment carried out to inform the TWAO application. The objections raised by TRA and CPPF contains fairly generalised concerns regarding impacts to the assets referenced. The objection raised in the SCDC statement of case is specific to mitigation of effects upon the Scheduled Monument, but it does not raise any additional points that were not dealt with in the assessment to inform the TWAO application.
- 7.1.5 As I have outlined in my evidence the heritage assessment work carried out to inform the TWAO application adequately addresses these comments and a full and appropriate programme of mitigation has been designed and agreed with relevant stakeholders.

## 8 Declarations

8.1 I hereby declare as follows:

- a. This proof of evidence includes all facts which I regard as being relevant to the opinion that I have expressed and that the Inquiry's attention has be drawn to any matter which would affect the validity of that opinion.
- b. I believe the facts that I have stated in this proof of evidence are true and that the opinions expressed are correct.
- c. I understand my duty to the Inquiry to help it with matters within my expertise and I have complied with that duty.

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