



Document No. NRE9.2

# **Proof of Evidence – Planning (Mr John Pearson)**

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

**January 2022**

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

*Planning Proof of Evidence – January 2022 - Document NRE9.2*

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## **1. INTRODUCTION**

### **1.1 Qualifications and Experience**

- 1.1.1 My name is John Pearson. I am Director of Environment Services with Schofield Lothian Limited. I have been retained by Network Rail to provide specialist advice on Town Planning matters pertaining to the Cambridge South Infrastructure Enhancements Project (“the **CSIE Project**”).
- 1.1.2 I hold BSc (hons) in Environmental Planning (Transport and Communication) and a Post Graduate Diploma in Town and Country Planning, both from the City of Birmingham University (formerly the University of Central England). I am a chartered member of the Royal Town Planning Institute and have 24 years’ experience as a town planner.

### **1.2 Scope of Evidence**

- 1.2.1 My involvement in the CSIE Project began in September 2021 when I was appointed as the town planning expert witness to support the TWAO application. My role on the project was to provide the town planning proof of evidence and address town planning related objections and representations.

### **1.3 Structure of this Proof of Evidence**

- 1.3.1 I will provide evidence on all town planning related matters including:
- (a) Section 2 sets out the application for deemed planning permission (and identifies related works to be carried out under permitted development rights);
  - (b) Section 3 provides details of the relevant development plan policies and other material policy considerations;
  - (c) Section 4 sets out my planning assessment of how the CSIE Project accords with the development plan;
  - (d) Section 5 provides a summary of consultation;
  - (e) Section 6 addresses planning conditions and design principles;
  - (f) Section 7 considers effects of the CSIE Project on other planned development in the area;
  - (g) Section 8 sets out my response to objections and representations; and
  - (h) Section 9 sets out my conclusion

**The Network Rail (Cambridge South Infrastructure Enhancement) Order***Planning Proof of Evidence – January 2022 - Document NRE9.2***2. APPLICATION FOR DEEMED PLANNING PERMISSION****2.1 Introduction**

- 2.1.1 Network Rail Infrastructure Limited (Network Rail) is applying to the Secretary of State for an Order under the Transport and Works Act 1992 (“the **proposed TWAO**”) to authorise the construction and operation of the CSIE Project.
- 2.1.2 The TWAO, if made, would authorise Network Rail to carry out the following:
- (a) construct a new station (Cambridge South) on the West Anglia Main Line (WAML) adjacent the Cambridge Biomedical Campus (CBC);
  - (b) install new railway track and associated infrastructure; and
  - (c) operate and maintain the station and associated railway infrastructure.
- 2.1.3 The proposed TWAO would also authorise Network Rail to compulsorily acquire land and rights, to occupy land on a temporary basis, to divert utilities, to make provision for temporary alternative routes and permanent diversions and to stop up or alter roads and level crossings permanently and temporarily.
- 2.1.4 The proposed TWAO does not in itself grant planning permission. Therefore Network Rail have submitted a request alongside the proposed TWAO, seeking that the Secretary of State for Transport direct that planning permission for the proposed development be granted (referred to hereafter as deemed planning permission or consent) under section 90(2A) of the Town and Country Planning Act 1990.
- 2.1.5 There are also elements of the proposed development that fall within the scope of Network Rail’s permitted development rights under Part 18 of the Town and Country Planning (General Permitted Development) Order 2015 SI No 596 (as amended) (“the **GPDO**”). These elements are discussed further below.

**2.2 Request for Deemed Planning Permission**

- 2.2.1 The request for deemed planning consent is seeking permission for development which is comparable to an outline planning approval. Further details of the development including the detailed mitigation for the construction works, station building design, design of other structures and buildings associated with the development and landscaping/ restoration proposals are proposed to be secured through a number of planning conditions which are set out in Appendix A. These have been broadly agreed with the local planning authority. Further details are provided in Section 6 below.
- 2.2.2 The proposed development for which planning permission is requested is the scheduled works defined by Article 6 and Schedule 1 of the proposed TWAO (**NR2**). The works are to be undertaken within the limits defined on the deposited plans and sections subject to the powers to deviate as set out in Article 7.
- 2.2.3 The works defined in Schedule 1 are as follows:
- (a) Work No. 1 – A railway (Down Cambridge Loop Line) (580 metres in length) on the western side of the course of the existing railway (Bethnal Green to King’s Lynn line) commencing 20 metres north of Long Road (A1134) overbridge and terminating at Work No.3.

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- (b) Work No. 2 – A railway (Up Cambridge Loop Line) (586 metres in length) on the eastern side of the course of the existing railway (Bethnal Green to King's Lynne line) commencing 20 metres north of Long Road (A1134) overbridge and terminating at Work No.3.
- (c) Work No. 3 – A new station (Cambridge South) located directly south of the (Guided Busway) overbridge consisting of four new platforms and associated railway lines, a station footbridge with stairs and lifts, high level concourse, eastern and western entrance buildings with ticketing and staffing facilities and associated forecourt areas and a secondary means of escape footbridge.
- (d) Work No. 4 – A new path (pedestrian and cycling) (378 metres in length) commencing at the Guided Busway route on the west side of Hobson's Park and terminating at Work No. 3.
- (e) Work No. 5 – A new pedestrian path (96 metres in length) including an at grade crossing over the Guided Busway commencing at Work No.4 in Hobson's Park and terminating 96 metres on the north of its commencement on the north of the Guided Busway route within the Active Recreation Area.
- (f) Work No. 6 – A railway (Down Cambridge Loop Line) (448 metres in length) on the western side of the course of the existing railway (Bethnal Green to King's Lynne line) commencing at Work No.3 and terminating 110 metres south of Addenbrooke's Road (Nine Wells) overbridge.
- (g) Work No. 7 – A railway (Up Cambridge Loop Line) (447 metres in length) on the eastern side of the course of the existing railway (Bethnal Green to King's Lynne line) commencing at Work No.3 and terminating 108 metres south of Addenbrooke's Road (Nine Wells) overbridge.
- (h) Work No. 8 – Realignment of the railway (Down Shepreth Branch Line) (1036 metres in length) on the western side of the existing railway commencing 775 metres south of Addenbrooke's Road (Nine Wells) overbridge and terminating 25 metres east of Cambridge Road overbridge, works include the relocation of the existing telecommunications mast and associated equipment and the installation of a new equipment building.
- (i) Work No. 9 – A crossover (138 metres in length) between the Up and Down railway lines of the existing railway (Bethnal Green to King's Lynne line) commencing 35 metres south of Dukes No.2 Level Crossing and terminating 138 metres south of its commencement.
- (j) Work No. 10 – Realignment of the railway (Up Shepreth Branch Line) (502 metres in length) on the eastern side of the existing railway commencing 200 metres north of Webster Level Crossing and terminating 25 metres east of Cambridge Road overbridge.
- (k) Work No. 11 – Agricultural accommodation bridge over the Hobson's Brook 420m west of the railway, commencing at a point 25 metres south of Addenbrooke's Road and terminating at a point 82 metres south of its commencement.

2.2.4 In addition to the scheduled works, Article 6(3) allows Network Rail to undertake the following:

- (a) electrical equipment, signalling and permanent way works;
- (b) hoardings and fencing, ramps, means of access and footpaths, bridleways and cycle tracks;

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- (c) embankments, cuttings, aprons, abutments, retaining walls, wing walls and culverts;
- (d) works to install or alter the position of apparatus, including mains, sewers, drains and cables;
- (e) works to alter or remove any structure erected upon any highway or adjoining land;
- (f) landscaping and other works to mitigate any adverse effects of the construction maintenance or operation of the scheduled works;
- (g) works for the benefit or protection of premises affected by the scheduled works;
- (h) works to alter the course of, or otherwise interfere with, a watercourse other than a navigable watercourse; and
- (i) works to erect and construct offices and other buildings, machinery, apparatus, works and conveniences.

2.2.5 The deemed planning permission is accompanied by a number of drawings, see Table 2-1, which set out the vertical and horizontal extent of the CSIE Project's buildings and structures, and which are proposed to be secured by condition (**No. 2, Accordance with drawings**). The existing plans listed in Table 2-1 were included in the list of drawings for approval as part of the original request for deemed planning permission. Network Rail would suggest these should not be included in that list but, in the list of drawings for information. An updated table of drawings for approval is included with the planning conditions in Appendix A.

**Table 2-1 Schedule 2: List of Deemed Planning Drawings****Part 1: Drawings for Approval**

<b>Title / Location</b>	<b>Drawing Description</b>	<b>Drawing Number</b>
Cambridge South Station area	Deemed Planning Drawings - Existing Plan - Sheet 1 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000011
	Deemed Planning Drawings - Existing Plan - Sheet 2 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000012
	Deemed Planning Drawings - Existing Plan - Sheet 3 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000013
	Deemed Planning Drawings - Existing Plan - Sheet 4 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000014
Shepreth Branch Junction	Deemed Planning Drawings - Existing Plan - Sheet 5 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000015
Cambridge South Station	Deemed Planning Drawings - Existing Site Sections - Sheet 1 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000021
	Deemed Planning Drawings - Existing Site Sections - Sheet 2 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000022
	Deemed Planning Drawings - Existing Site Sections - Sheet 3 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000023
	Deemed Planning Drawings - Existing Site Sections - Sheet 4 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000024
	Deemed Planning Drawings - Existing Site Elevations	158454-ARC-ZZ-ZZ-DRG-LEP-000031
Cambridge South Station area	Deemed Planning Drawings - Proposed Plan - Sheet 1 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000051
	Deemed Planning Drawings - Proposed Plan - Sheet 2 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000052
	Deemed Planning Drawings - Proposed Plan - Sheet 3 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000053



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<b>Title / Location</b>	<b>Drawing Description</b>	<b>Drawing Number</b>
	Deemed Planning Drawings - Proposed Plan - Sheet 4 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000054
Shepreth Branch Junction	Deemed Planning Drawings - Proposed Plan - Sheet 5 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000055
Cambridge South Station	Deemed Planning Drawings - Proposed Site Sections - Sheet 1 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000061
	Deemed Planning Drawings - Proposed Site Sections - Sheet 2 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000062
	Deemed Planning Drawings - Proposed Site Sections - Sheet 3 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000063
	Deemed Planning Drawings - Proposed Site Sections - Sheet 4 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000064
	Deemed Planning Drawings - Proposed Elevations	158454-ARC-ZZ-ZZ-DRG-LEP-000071

**Part 2: Parameter plans**

<b>Title / Location</b>	<b>Drawing Description</b>	<b>Drawing Number</b>
Cambridge South Station Parameter Plans	Deemed Planning Drawings - Parameter Plans - Access and Movement	158454-ARC-ZZ-ZZ-DRG-LEP-000100
	Deemed Planning Drawings - Parameter Plans - Land Use and Landscape	158454-ARC-ZZ-ZZ-DRG-LEP-000101
	Deemed Planning Drawings - Parameter Plans - Heights	158454-ARC-ZZ-ZZ-DRG-LEP-000102

**2.3 Permitted Development Works**

- 2.3.1 The proposed works also include improvements to the existing railway infrastructure southwest of Cambridge Station in the vicinity of the Hills Road Overbridge. These works comprise the extension of an existing shunt spur that runs southwest from Hills Road Overbridge and a new switchover to connect the shunt spur into the mainline. The works will include associated signalling equipment. This element of the CSIE Project is within the current footprint of Network Rail's operational land and will be delivered as part of an enabling works package.
- 2.3.2 The proposed track works at Hills Road shunt spur can be delivered using Network Rail's existing permitted development powers under Part 18, Class A, (not requiring prior approval) of the GPDO. Therefore, Network Rail are not seeking permission for these works as part of the request for deemed planning permission.
- 2.3.3 The works have however been included within the Environmental Impact Assessment (EIA) and are documented in the Environmental Statement (ES) (**NR16**).

**The Network Rail (Cambridge South Infrastructure Enhancement) Order***Planning Proof of Evidence – January 2022 - Document NRE9.2***3. RELEVANT POLICY CONTEXT****3.1 Introduction**

- 3.1.1 This section sets out the relevant planning policy context as it relates to the CSIE Project. It sets out for the purposes of section 70 of the Town and Country Planning Act 1990 the relevant development plan, other material policy considerations and the relevant policy allocations.

**3.2 The Development Plan**

- 3.2.1 In granting planning permission, the decision maker should have regard to the provisions of the development plan so far as they are material to the application<sup>1</sup> and should determine the application in accordance with it, unless material considerations indicate otherwise<sup>2</sup>. The CSIE Project is located within the administrative boundary of Cambridge City Council (CCiC) and South Cambridgeshire District Council (SCDC) therefore the development plan comprises the following documents:

- (a) Cambridge City Council Local Plan (2018) (**D06**) ("the **CLP**")
- (b) South Cambridgeshire Local Development Plan (2018) (**D08**) ("the **SCLP**")

- 3.2.2 The relevant policies are listed in Appendix B and the key points as they are relevant to the CSIE Project are summarised within the assessment in Section 4.

**3.3 Other Material Policy Considerations**

- 3.3.1 Other material considerations include:

- (a) The National Planning Policy Framework (July 2021) (NPPF) (**D01**) particularly the following sections:
  - i. Chapter 2 (Achieving sustainable development)
  - ii. Chapter 6 (Building a strong, competitive economy)
  - iii. Chapter 8 (Promoting healthy communities)
  - iv. Chapter 9 (Promoting sustainable transport)
  - v. Chapter 12 (achieving well-designed places)
  - vi. Chapter 13 (Protecting Green Belt Land)
  - vii. Chapter 14 (Meeting the challenge of climate change, flooding and coastal change)
  - viii. Chapter 15 (Conserving and enhancing the natural environment)
  - ix. Chapter 16 (Protecting the Historic Environment)
  - x. Chapter 17 (Facilitating the sustainable use of minerals)
- (b) National Transport Policy including the following:

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<sup>1</sup> S70(2) Town and Country Planning Act 1990

<sup>2</sup> S38(6) Planning and Compulsory Purchase Act 2004

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- i. National Policy Statement for National Networks (2014) (**D05**)
- ii. Connecting people: a strategic vision for rail (DfT 2017) (**D63**)
- iii. Railways Act 2005 High Level Output Specification (HLOS) (2017) (Doc. Ref. B42)
- iv. Rail network enhancements pipeline (2019) (Doc. Ref. B43)
- v. Decarbonising Transport (2021) (**D27**)

Details of these documents are contained in Appendix B.

- (c) Greater Cambridge Sustainable Design Construction supplementary planning document (SPD) (2018) (**D12**)
- (d) Cambridgeshire Flood and Water SPD (adopted 2018) (**D13**)
- (e) Cambridgeshire and Peterborough Local Transport Plan (2020) (**D18**)
- (f) Transport Strategy for Cambridge and South Cambridgeshire (2014) (**D10**)
- (g) District Design Guide SPD (2010) (**D36**)
- (h) Landscape in New Development SPD (2010) (**D96**)
- (i) Biodiversity SPD (2009) (**D97**)
- (j) Trees and Development Sites SPD (2009) (**D64**)
- (k) Public Art SPD (2009) (**D14**)

3.3.2 Documents identified in paragraph 3.3.1 (g) to (k) were written to provide guidance to support previously adopted SCDC Development Plan Documents that have been superseded by the South Cambridgeshire Local Plan 2018. These documents still provide material considerations when making planning decisions, with the weight in decision making to be determined having regard to consistency with national planning guidance and the adopted South Cambridgeshire Local Plan 2018.

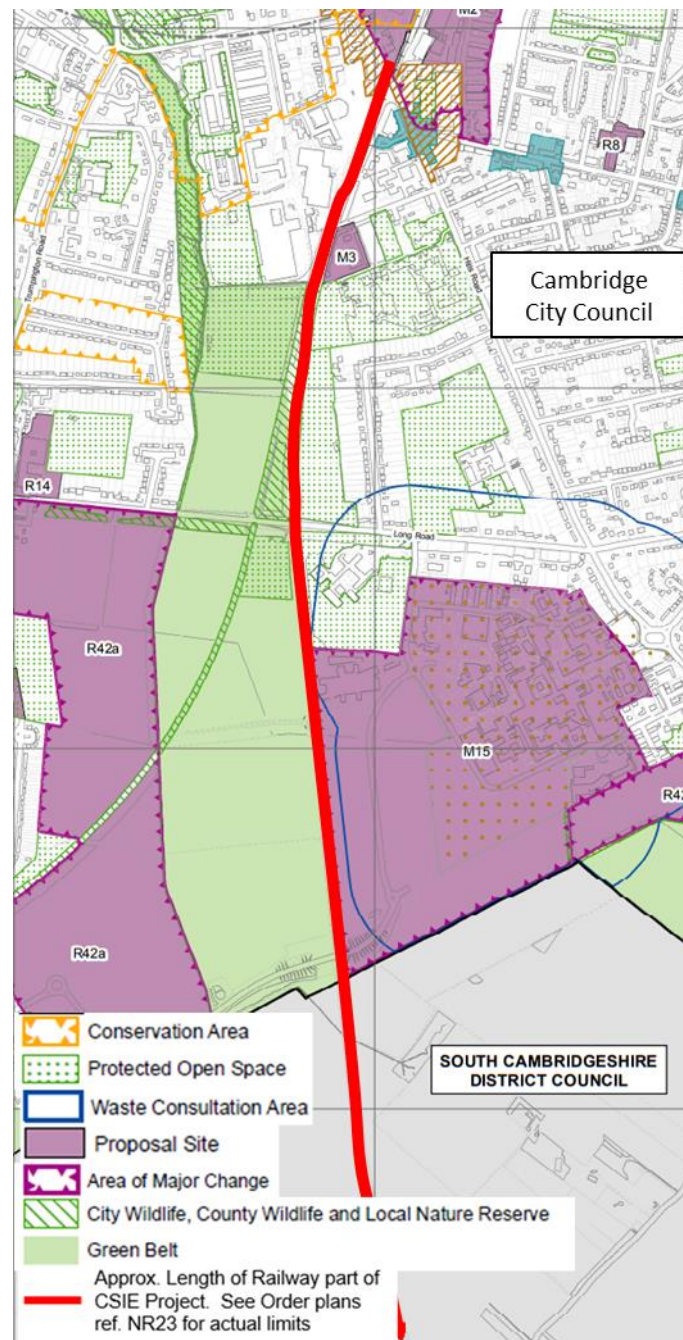
### **3.4 Relevant Policy Allocations**

- 3.4.1 Figure 3-1 (Extract from the Cambridge Policies Map 2018 (**D7**)) shows the administrative boundary between CCiC and SCDC. The proposed new station and associated works will be located within CCiC's boundary. The works involving Shepreth Junction, alterations to Webster's level crossing, and the majority of the Railway Systems Compound will be situated within SCDC'S boundary. Elements of the proposed development, including the accommodation bridge over Hobson's Brook, will span both administrative areas.
- 3.4.2 Figure 3-1 and Figure 3-2 (Extract from the SCDC's Adopted Policies Map (2018) (**D75**)) show the policy designations relevant to the area where the CSIE Project is proposed.

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Figure 3-1 Extract from the Cambridge Policies Map (2018)



3.4.3 The site boundary includes the following relevant CCiC policy allocations/designations.

- (a) Green Belt
- (b) Area of Major Change / Proposal Site (M15)
- (c) Area of Major Change / Proposal Site (R42a)
- (d) City Wildlife County Wildlife and Local Nature Reserve
- (e) Protected Open Space (St Mary's School Playing Field / Long Road Sixth Form)
- (f) Waste Consultation Area
- (g) Cambridge Airport Public Safety Zone

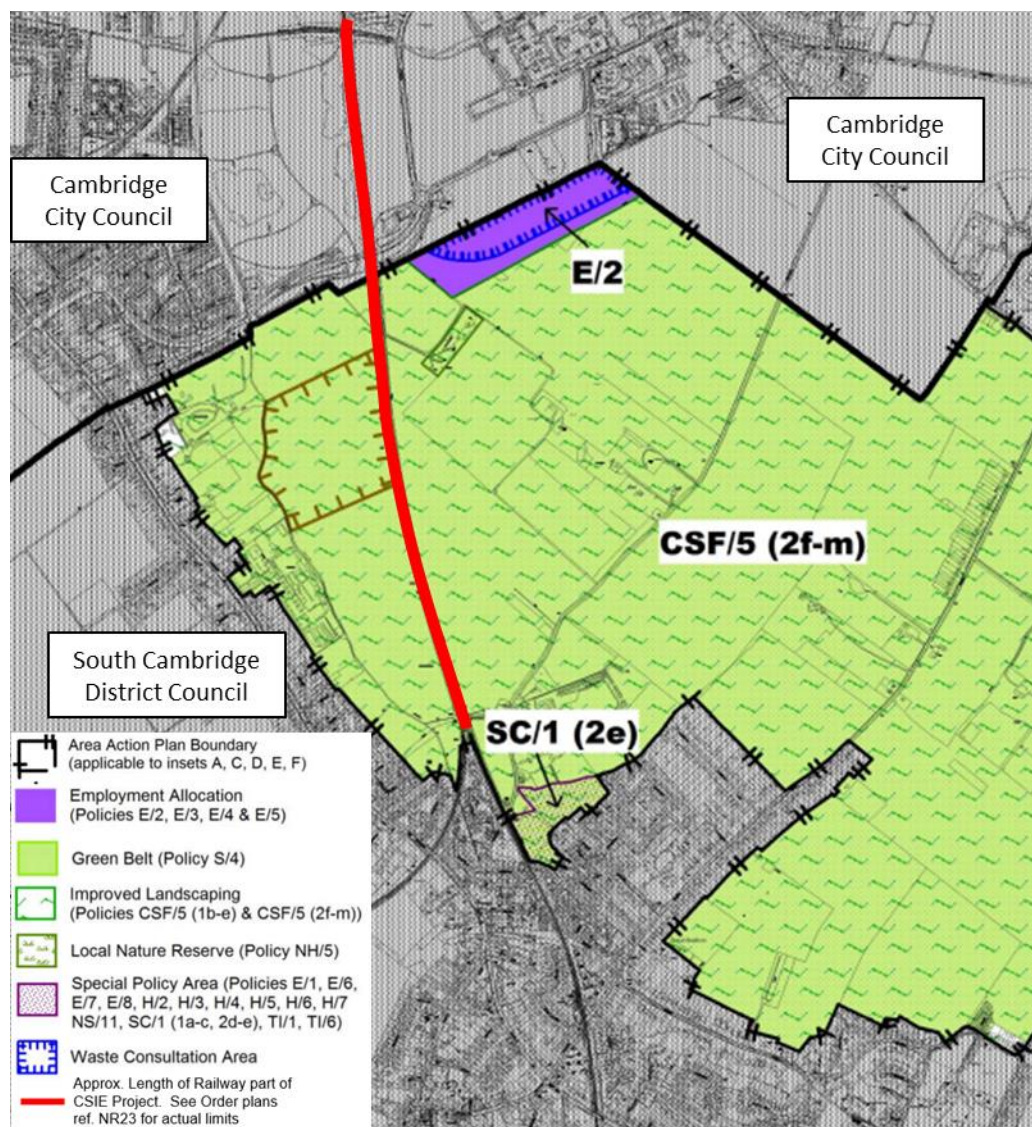


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- (h) Mullard Radio Astronomy Observatory consultation area

**Figure 3-2: Extract from the SCDC's Adopted Policies Map (2018) – Inset E South Addenbrooke's**



3.4.4 The site boundary includes the following relevant SCDC policy allocations/designations:

- (a) Green Belt
- (b) Improved Landscaping (Policies CSF/5 (2f-m))
- (c) Scheduled Ancient Monument
- (d) Area Action Plan Boundary (Cambridge Southern Fringe)
- (e) Employment Allocation (E/2)
- (f) Cambridge Airport Public Safety Zone

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- 3.4.5 The site boundary is located adjacent to following designations:
- (a) Special Policy Area (SC/1 (2e))
  - (b) Waste Consultation Area
  - (c) Mullard Radio Astronomy Observatory consultation area
- 3.4.6 The following planning policies in the development plan have been scoped out of further assessment.
- 3.4.7 **CLP Policy 37 Cambridge Airport Public Safety Zone and Air Safeguarding**, explains that certain types of development will not be permitted if it is located within the Public Safety Zone as identified within the Policies Map. The proposed development is not situated within the Public Safety Zone.
- 3.4.8 **Policy TI/6 Cambridge Airport Public Safety Zone** of the SCLP, advises that within the Cambridge Airport Public Safety Zone, there is a general presumption against new development or changes of use. Figure 12: Cambridge Airport Safeguarding Zones of the SCLP sets out the zones and the respective structure height thresholds which trigger consultation with the operator of the airport and the Ministry of Defence. Based on the current design of the proposed development, the consultation is not triggered as there are no structures greater than 15 metres above ground level.
- 3.4.9 Both **Policy 39 (Mullard Radio Astronomy Observatory, Lord's Bridge)** of the CLP and **Policy TI/7 (Lord's Bridge Radio Telescope)** of the SCLP set out that planning permission will only be granted for development that would not result in any risk of interference to the Mullard Radio Astronomy Observatory at Lord's Bridge. Network Rail have consulted with the University of Cambridge who have not raised any concerns regarding the proposed CSIE Project's effect on the Mullard Radio Astronomy Observatory.
- 3.4.10 **Policy 60 (Tall buildings and the skyline in Cambridge)** of the CLP requires the assessment of any proposal for a structure that breaks the existing skyline and/or is significantly taller than the surrounding built form to be considered against a set criteria. The proposed height of the Station is about 14.5m which is of similar height to the guided busway bridge across the railway and significantly less than the proposed AstraZeneca development within the Cambridge Biomedical Campus ("the **CBC**").

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4.1.1 In this section, the relevant planning considerations for the CSIE Project are examined and considered against the development plan and any other relevant planning and transport policies.

4.1.2 The approach taken to this appraisal broadly follows that taken in the planning statement by following the topics covered in the Environmental Statement where they are relevant together with the addition of the Principle of the Proposed Development, Green Belt, Design, Public Open Space, Lighting and Public Art. The topics are covered in the following order:

- (a) Principle of the Proposed Development
- (b) Transport
- (c) Green belt
- (d) Public Open Space
- (e) Design, Landscape and Visual Impact
- (f) Biodiversity
- (g) Cultural Heritage
- (h) Noise and Vibration
- (i) Ground Conditions and Contamination
- (j) Water Resources and Flood Risk
- (k) Lighting
- (l) Air Quality
- (m) Climate Change – Adaptation and Greenhouse Gases
- (n) Public Art

**4.2 Principle of the proposed Development**

4.2.1 The principle of the CSIE Project is considered to be supported through the development plan. The provision of a new station at Cambridge South is not specifically referenced within the CLP or SCLP but, both documents recognise the importance of sustainable development.

4.2.2 The CSIE Project as set out by Mr Wingfield in his proof (Doc Ref. NRE2.2) will provide a direct rail access to the CBC removing the need for travellers to route via Cambridge Station making it more accessible and attractive to the highly skilled workforce it needs. This supports **CLP Strategic Objective 10** and **SCLP Policy S/2 (Objectives of the Local Plan)** which state:

**(Strategic Objective 10)** promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge's role as a world leader in higher education, research, and knowledge-based industries while maintaining the quality of life and place that contribute to economic success.

**(Policy S/2 a.)** To support economic growth by supporting South Cambridgeshire's position as a world leader in research and technology based industries, research, and education; and supporting the rural economy.

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- 4.2.3 **Strategic Objective 13** of the CLP wants development to be located to help minimise the distance people need to travel and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport. Further to this **Policy 80 (sustainable access to development)** supports development where it demonstrates that prioritisation of access is by walking, cycling and public transport, and is accessible for all. By providing a new station close to the CBC it will encourage this modal shift from road to rail, reducing the journey time for people wishing to access the CBC and other areas in the vicinity of Cambridge South Station and will make trips easier for patients visiting the hospitals, medical staff, researchers, other employees and residents accessing the station to travel elsewhere. It will therefore support the ongoing development of the Cambridge Southern Fringe and CBC area in a sustainable manner.
- 4.2.4 **Policy 1** of the CLP and **Policy S/3** of the SCLP (**The presumption in favour of sustainable development**) set out that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained within the NPPF. The principle of the CSIE Project meets the requirements of the NPPF through compliance with the following chapters:
- (a) **Chapter 2 (Achieving Sustainable Development)** by supporting the growth of the CBC (economic objective), providing a modal shift from road to rail (environmental objective) and supporting the needs of the local community by providing an accessible rail service (social objective).
  - (b) The support for the growth of the CBC is supported by **Chapter 6 (Building a strong, competitive economy)** in that planning decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
  - (c) **Chapter 9 (Promoting sustainable transport)** in that the proposed development will promote opportunities for walking, cycling and public transport use and offer a genuine choice of transport modes to access the area, leading to reductions in congestion and related emissions, and improved air quality and public health.
- 4.2.5 **Policy 17** (Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change) of the CLP and **Policy E/2** (Cambridge Biomedical Campus Extension) of the SCLP set out to support the continuing growth and development of the CBC (CLP Local Plan Proposal Site M15 and SCLP Proposal Site E/2). The provision of a new station adjacent to the CBC will provide additional public transport capacity into the area through an 'access for all' station. This will enable a further modal shift away from car usage that will mitigate the impact of the CBC on the existing road network and parking in the surrounding area (Policy 17(d)) and enhance access to and within the Cambridge Biomedical Campus (Policy E/2(2) (i))
- 4.2.6 The CSIE Project is supported by SCLP Policy **TI/2 (Planning for Sustainable Travel)** and CLP **Policy 80 (Supporting sustainable access to development)**, which seek development that will reduce the need for travel by car and prioritises access by walking, cycling and public transport, and is accessible for all respectively. As noted in the Proof by my colleague Mr Hilling (**NRE2.2**), Cambridge South Station will reduce the journey time for people wishing to access the CBC and other areas in the vicinity of Cambridge South Station and will make trips easier for patients visiting the hospitals, medical staff, researchers, other employees and residents accessing the station to travel elsewhere.



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- 4.2.7 **CLP Policy 5 (Sustainable transport and infrastructure Development)** requires proposals to be consistent with and contribute to the implementation of the transport strategies and priorities set out in the **Cambridgeshire Local Transport Plan (D18)** (“the **LTP**”) and the **Transport Strategy for Cambridge and South Cambridgeshire (D10)** (“the **TSCSC**”). The need for a new station to serve the CBC is recognised within both the LTP and TSCSC as follows: LTP page 4-107 under Local Rail Infrastructure Needs, identifies that a new station to serve the Addenbrooke’s Hospital, the CBC and the Cambridge Southern Fringe residential development would markedly improve access to what is already one of the larger biomedical sites in the world. When fully built out, the CBC will have up to 30,000 employees, and will be an even bigger draw for trips from outside of the Cambridge area, including from the international gateways of Stansted Airport, Gatwick Airport and London St Pancras.
- 4.2.8 TSCSC page 5-4, under the heading Interventions in Cambridge, states that: ‘In the city, passenger transport, walking and cycling will be the priority... In the longer term, three new rail stations may be provided on the outskirts of the city at Addenbrooke’s (to serve the Cambridge Biomedical Campus) Cherry Hinton and Fulbourn to provide new gateways into the city.’
- 4.2.9 CLP Policy 5 also includes that CCiC will support a range of sustainable transport interventions, with particular emphasis on securing modal shift and the greater use of more sustainable forms of transport. In particular, by promoting sustainable transport and access for all to and from major employers, education and research clusters, hospitals, schools and colleges. This would include the CBC.
- 4.2.10 Other material policy considerations comprise the following and are set out below:
- (a) National Planning Statement for National Networks (**D5**)
  - (b) Connecting people: a strategic vision for rail published in 2017 (D63)
  - (c) Rail network enhancements pipeline (RNEP) (Autumn Scheme Updates 2019) (B43)
  - (d) Decarbonising Transport, published in 2021 (**D27**)
  - (e) Cambridgeshire and Peterborough Local Transport Plan (2020) (**D9**)
- 4.2.11 The **NPS for National Networks** published in 2014 (**D5**) is, by virtue of paragraph 1.4, a material consideration for decisions made under the Town and Country Planning Act 1990. Paragraph 2.10 outlines that the Government has concluded at a strategic level that there is a compelling need for development of the national networks, both as individual networks and as an integrated system.
- 4.2.12 The NPS for National Networks is not scheme specific and does not set out a programme of rail improvements. The proposed development is supported through paragraphs 2.37 to 2.41 through providing improvements to the capacity, capability, reliability and resilience of the rail network for passenger to reflect growth in demand, reduce crowding, improve journey times, maintain or improve operational performance and facilitate modal shift from road to rail. Further, by encouraging a modal shift from road to rail it can help reduce transport’s carbon emissions, as well as providing wider transport and economic benefits.
- 4.2.13 Connecting people: a strategic vision for rail published in 2017 (**D63**) evidences the Government’s commitment to invest £5m in the development of proposals for a new station at Cambridge South to support one of the largest bio-medical campuses in Europe being consolidated in Cambridge and provide direct rail links to central London, Stansted Airport and regional housing development sites.

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- 4.2.14 Further commitment is made through the Rail network enhancements pipeline (RNEP) 2017 which identifies that the government is working in partnership with local stakeholders, and has provided funding to undertake further work on a new station at Cambridge South, where one of the largest bio-medical campuses in Europe is being consolidated. Further the RNEP scheme update in 2019 identifies Cambridge South as one of the schemes which are seeking funding from the Department for Transport to progress through the RNEP decision gateways before moving into delivery. Details of funding for the CSIE Project are included in the Proof of Evidence of Mr Wingfield (**NRE11.2**).
- 4.2.15 The DfT's Decarbonising Transport, published in 2021, (**D27**) provides support through Priority 1, which seeks to accelerate the modal shift to public and active transport and its commitments to build extra capacity on our rail network to meet growing passenger and support significant shifts from road to rail and to improve rail journey connectivity with walking, cycling and other modes of transport.
- 4.2.16 Paragraph 3.66 of the Cambridgeshire and Peterborough Local Transport Plan (D9) identifies that a new station at Cambridge South will help to improve inter-regional connectivity and provide important longer-distance commuting links into Cambridge. Further Cambridge South station will support development at the Cambridge Biomedical Campus, expected to generate over 30,000 additional journeys by 2031, and relieve congestion in and around the campus by providing greater sustainable transport options. Commuting into Cambridge by rail will become a more attractive option, allowing residents to switch from car and improving access to skilled labour for our dynamic, productive firms.
- 4.2.17 The principle of the CSIE Project is therefore considered to be supported by the development plan in accordance with CLP policies **1, 5, 17, 80** and SCLP policies **S/2, E/2, S/3** and **TI/2**.
- 4.2.18 Both SCDC and CCiC in their Statements of Case to the Secretary of State (**E10** and **E11**) confirm their support for the aim of the CSIE Project to promote connectivity within Cambridgeshire to facilitate future growth in the area and promote sustainable development, which aligns with the Cambridgeshire and Peterborough Combined Authority Local Transport Plan (2020) (**D28**). Further it supports the vision and strategic objectives of the CLP to promote sustainable economic growth and maximise sustainable transport modes, and in accordance with Local Plan policy 5 which supports implementation of LTP.
- 4.2.19 This also supports the objectives of the SCLP to promote sustainable economic growth and maximising sustainable transport modes (**policy S/2**).

**4.3 Transport**

- 4.3.1 The CSIE Project as set out in Section 6.2 above is supported by relevant Development Plan policies related to transport including CLP policies **1, 5, 80** and SCLP policies **S/2, S/3** and **TI/2**. It is also supported by wider material policy considerations comprising the following:
- (a) NPS for National Networks (**D5**)
  - (b) Connecting people: a strategic vision for rail (2017) (**D63**)
  - (c) Rail network enhancements pipeline (RNEP) (2019) (**B43**)
  - (d) Decarbonising Transport (2021) (**D27**)
  - (e) Cambridgeshire and Peterborough Local Transport Plan (2020) (**D9**)

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- 4.3.2 Both CLP **Policy 81 (Mitigating the transport impact of development)** and SCLP **policy CC/6 (Construction methods)** seek to mitigate the transport impact from developments. Policy 81 requires sufficient information is provided in the form of a transport assessment and a travel plan should accompany major development. Policy **CC/6** requires applications to provide a should include a Construction Environmental Management Plan (“**CEMP**”) or similar document to demonstrate vehicles are not routed through villages and haul roads are designed to avoid adverse impacts, there is a methodology for crossing public roads and to keep mud and dust off the public haul road.
- 4.3.3 The transport effects of the CSIE Project have been assessed in Chapter 17 of the Environmental Statement (**NR16**) which includes a Transport Assessment (ES Appendix 17). The ES concludes that there would be net beneficial effects on transport networks, transport networks users and sensitive receptors during the operational phase.
- 4.3.4 During construction the Main Works Contractor will undertake works in such a way as to maintain access and avoid traffic disruption during construction, wherever practicable. The details of controls on traffic and transport relating to the construction works will be secured through a Construction Traffic Management Plan (“the **CTMP**”) and Construction Travel Plan forming part of the Code of Construction Practice (“the **CoCP**”) Part B. The CoCP and associated plans effectively forms the CEMP for the project as noted in Policy CC/6. These would be secured through a proposed condition (**No. 10 Code of Construction Practice**) on the deemed planning permission (see Appendix A (NRE9.3)). From a transport point of view this should satisfy the requirements of the development plan as required by SCLP policy CC/6 and CLP Policy 81.
- 4.3.5 A separate Proof has been prepared by my colleague Mr Hilling (**NRE2.2**) which concludes as to the significance of the main residual effects on traffic and transport.

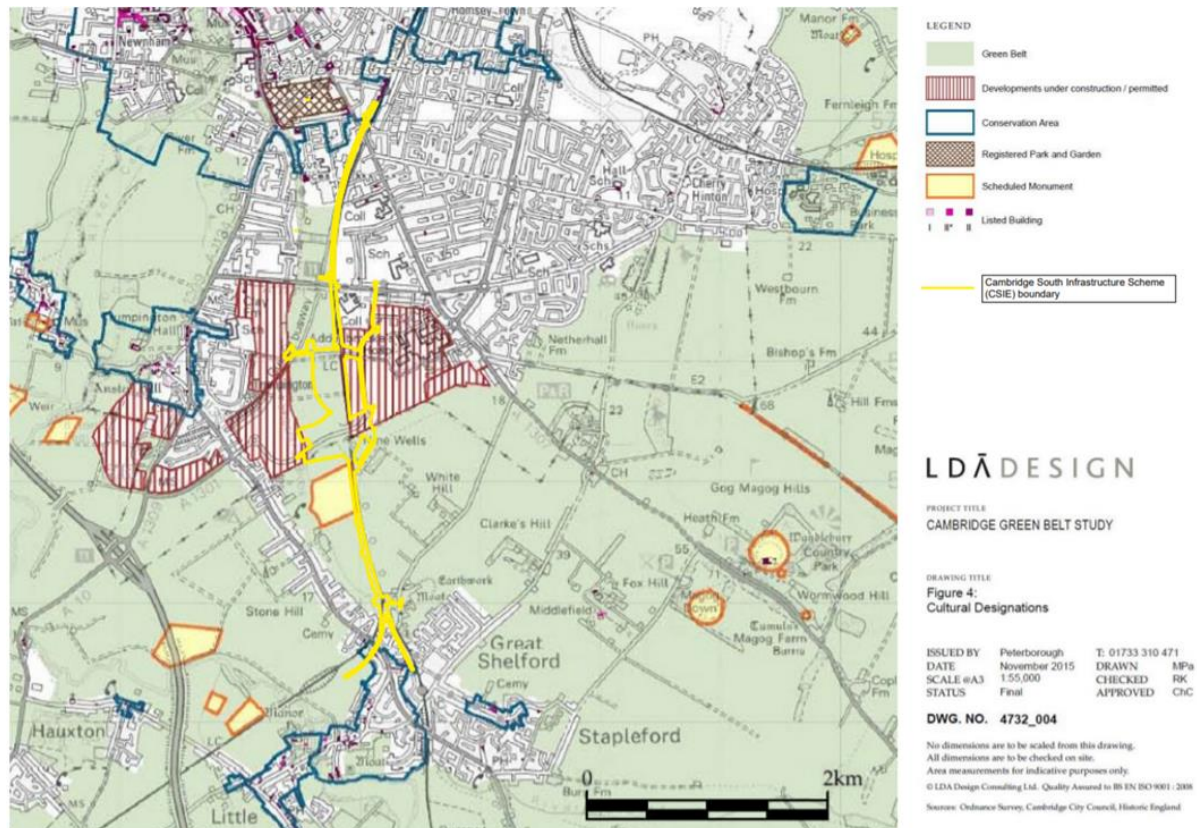
**4.4 Green belt**

- 4.4.1 The CSIE Project is partly situated within an area of the Green Belt. This is described in more detail in paragraphs 1.2.3 and 1.2.4 and Figure 3, reproduced below as Figure 4-1, of the document entitled Consideration of the Greenbelt Issues (**NR18**) submitted as part of the TWAO application.

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Figure 4-1 Cambridge Green Belt



- 4.4.2 The relevant Development Plan policies comprise **CLP Policy 4 (Green Belt)** and **SCLP Policy S/4 (Cambridge Green Belt)** and **Policy NH/8 (Mitigating the Impact of Development in and Adjoining the Green Belt)**. Policies 4 and S/4 both require that new development will only be approved in accordance with Green Belt policy in the **NPPF (Chapter 13)**. Policy NH/8 requires that proposed development should be designed to not have an adverse effect on the Green Belt.
- 4.4.3 The NPPF sets out in paragraph 147 that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 goes on to say that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 4.4.4 The NPPF goes on in paragraph 149 to state that construction of new buildings is inappropriate but defines a number of exceptions. Paragraph 150 then defines a number of additional forms of development which are deemed not inappropriate provided they preserve the green belt's openness and do not conflict with the purposes of including land within it. One of these is local transport infrastructure which can demonstrate a requirement for a Green Belt location.
- 4.4.5 The proposed development is considered to be local transport infrastructure. This view is supported by CCiC in their Statement of Case (**E11**), in which they state, 'The Council agrees that the proposal would be 'local transport infrastructure', however the need for a Green Belt location has not been evidenced within the submission.'

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- 4.4.6 The DfT's Cambridge South Station: Strategic Outline Business Case (**C3**) ("the **SOBC**") and Network Rail's Outline Business Case (**NR20**) ("the **OBC**") provide the relevant context in terms of the case for the proposed development and justify the need for its location adjacent to the CBC. A fundamental objective of the CSIE Project, as presented within these respective documents, is to improve access to the CBC and therefore, given the location of the existing railway infrastructure, the location of the new station is required to be situated along the railway line between Addenbrooke's Bridge and Nine Wells Bridge.
- 4.4.7 Chapter 3 (Development Need and Consideration of Alternatives) of the ES (Doc Ref. NR16), provides a detailed explanation on the need for the proposed development and the consideration of alternatives. The chapter shows how the consideration of feasible alternatives formed a significant part of the process of proposed development's evolution and summarises the robust option selection process that has been undertaken. In connection with phases of the option selection process, the project undertook consultation with key stakeholders and the local community in relation to the preferred location of the new station. Further information on the public/stakeholder consultation can be viewed within the Consultation Report (**NR7**).
- 4.4.8 Paragraph 3.3.66 of the ES (**NR16**), explains that in conclusion of the option selection process, the "project identified that a northern station location with vehicular access from Francis Crick Avenue provides the best solution for a Cambridge South station. Additional infrastructure is required to ensure that there are no service disbenefit for passengers resulting from the new station. These works are in the form of a new higher speed extended double junction at Shepreth Branch Junction along with a new crossover immediately south of Cambridge Station at Hills Road".
- 4.4.9 The location is further supported by CLP Policy 5, which states that development proposals must be consistent with and contribute to the implementation of the transport strategies in the LTP and TSCSC. As noted above in paragraphs 4.2.7 and 4.2.8, the CSIE Project is clearly contemplated in the LTP and the TSCSC..
- 4.4.10 Network Rail commissioned the report Consideration of the Greenbelt Issues (**NR18**) to assess whether the CSIE Project preserves the openness of the green belt and does not conflict with the purposes of including land within it as set out in paragraph 150 of the NPPF. The report concludes in Table 5 which is reproduced here as Table 4-1.

**Table 4-1: Consideration of Green belt Issues (Table 5)**

Sub area	Conflict with Green Belt Purpose	Reduction in Openness	Degree of Harm
<b>9.1 South of Addenbrooke's Rd</b>	Negligible conflict	Negligible reduction in openness	Negligible
<b>9.2 North of Addenbrooke's Rd</b>	Minor conflict	Minor reduction in openness	Minor
<b>10.2 north of Granham's Rd</b>	Negligible / No conflict	No reduction in openness.	Negligible / None

- 4.4.11 The resultant overall degree of harm to the Green Belt is negligible to none, save that in sub-area 9.2, where there would be "minor alteration to key elements, features, qualities or

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characteristics relevant to GB openness or purposes, such that post development the baseline would be largely unchanged despite discernible differences.”

4.4.12 Further paragraph 8.1.2 of that document confirms that the proposed introduction of the Cambridge South station within the Green Belt would:

- ‘be relatively small in physical extent compared to the size of the GB sub-areas that the development’s components are located in;
- be experienced over a short distance relative to the overall approach into the city through this part of the GB;
- not compete with, or conflict in terms of intervisibility, setting, or importance with the historic core that the GB seeks to protect;
- be well related to its location within the GB – being associated with the existing railway and by being a necessary part of the neighbourhood around it that have been identified in the Cambridge Inner Green Belt Boundary Study (CIGBBS) (Doc Ref D15);
- prevent the sense of ‘sprawl’ through the GB by purposefully positioning built form in areas of existing confinement, and by bolstered these with additional new site appropriate planting;
- help retain the rural setting of the GB at the city’s edge by positioning the station and its associated infrastructure at a point where there is limited intervisibility between the two;
- maintains the intrinsic openness of the valued GB green corridor between the city’s edge and the historic core;
- bring about less traffic on Nine Wells Bridge as a result of people using the station to access the CBC rather than cars and taxis;
- retain the critical separation between Cambridge and its surrounding necklace of villages within the GB;
- strengthen and enhancing the setting of and mosaic of habitats along Hobson’s Brook; and
- help create a softer, green edge to the city when viewed from the southern areas of the GB.’

4.4.13 The design of the proposed development is outline in nature but, has been heavily influenced by its Green Belt location. The design has sought to minimise land take within the Green Belt. For instance, the station’s main forecourt, which will provide access for motorised vehicles, drop off areas and disabled parking spaces, is situated to the eastern side of the railway, and not within the Green Belt to the west.

4.4.14 The final designs of buildings and landscaping are reserved by proposed deemed planning conditions (e.g., Nos. 17 (Detailed design approval: Cambridge South station),<sup>18</sup> (External Materials: Cambridge South Station), 26 (Detailed design approval: Other elements of the proposed development), 27 (Lighting Scheme), 29 (Hard and Soft Landscape)) (Appendix A). To provide surety about how these designs will be progressed a number of updated Design Principles (Appendix C) have been produced to guide the future detailed design. Table 4-2 provides examples of the Design Principles relating to the Green Belt. These Design Principles are required to be adhered to when discharging the relevant planning conditions (No. 3

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Accordance with Design Principles) and should ensure that designs can demonstrate that they satisfy SCDC Policy **NH/8** (Mitigating the Impact of Development in and Adjoining the Green Belt).

**Table 4-2: Greenbelt Related Design Principles**

No.	Subject	Design Principle
<b>3.1B</b>	<b>Be appropriate to its setting and conserve the character and form of the green corridor, Hobson's Park to the west and the open countryside beyond</b>	By careful consideration of the landscape elements, form and materials balance visual legibility of the Station from key destinations, with visual and physical integration into Hobson's Park and the Green Belt.
<b>3.7A</b>	<b>Minimise its footprint</b>	In recognition of the site as a 'green corridor' which contributes to the important characteristics of the city and is a key component for providing amenity and biodiversity the proposed Development within Hobson's Park avoids excessive landtake, during construction and operation, to allow retention of as much of the existing vegetation, open space and path network as possible.

- 4.4.15 As part of a detailed review of the construction methodology Network Rail has significantly reduced the area of the Green Belt it proposes to utilise during the proposed construction by about 66%. Network Rail have issued revised Order plans (**N23**) to reflect this change.
- 4.4.16 As demonstrated above, the proposed development will provide local transport infrastructure, which will not cause adverse harm to the openness or purposes of the Green Belt. The justification for the development's location within the Green Belt is driven by the objectives of the SOBS (**C03**) and OBC (**NR20**), the location of the existing railway infrastructure and CBC, and has been carefully selected following an option selection process and public/stakeholder consultation described further in the Proofs of Evidence of Mr Barnes and Mr Wingfield (**NRE1.1** and **NRE11.1**).
- 4.4.17 The proposed development is therefore considered to be not inappropriate development within the green belt and in accordance with the NPPF and consequently with the development plan policies CLP Policy 4 (Green Belt) and SCLP Policy S/4 (Cambridge Green Belt). The proposed deemed planning conditions and Design Principles provide for the final designs to be brought forward such they will mitigate any adverse effect on the Green Belt in compliance with SCDC Policy NH/8 (Mitigating the Impact of Development in and Adjoining the Green Belt).

## **4.5 Public Open Space**

- 4.5.1 The Public Open Space (POS) Assessment (**NR19**) submitted with the TWAO application identifies two areas of public open space as being affected by the CSIE Project. These areas comprise sections of Hobson's Park and Long Road Sixth Form College. Figures 2 and 3 in the POS Assessment define these areas as TL1 (Hobson's Park) and TL2 (Long Road Sixth Form College) during construction and PL1 (Hobson's Park) and PL2 (Long Road Sixth Form College), see Figure 4-2.

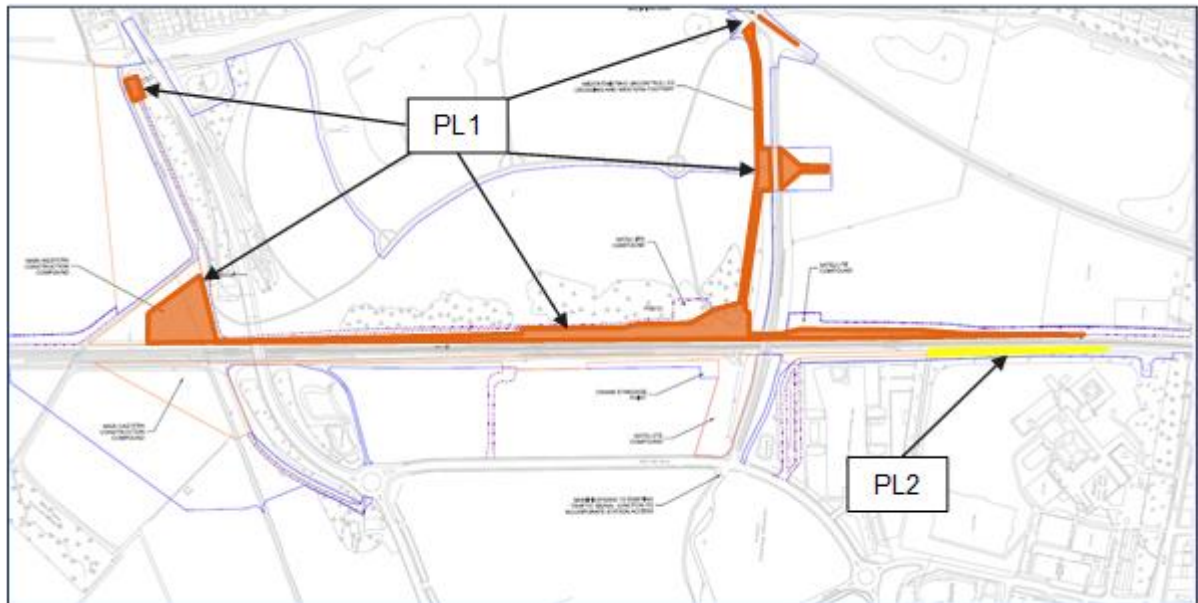


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- 4.5.2 These areas lie within the CCiC boundary save for a small area with SCDC comprising the Railway Systems Compound. This small area comprises farmland and is located in the Green Belt. It is not considered as public open space with the SCLP. The Summary of Findings in the POS Assessment confirms the CSIE Project will result in the permanent acquisition of 20,742 m<sup>2</sup> of POS comprising 20,439m<sup>2</sup> within Hobson's Park, out of a total of 482,880m<sup>2</sup> (approximately 4.2%), and 303 m<sup>2</sup> out of a total site area 42,500m<sup>2</sup> (approximately 0.007%) within the grounds of Long Road Sixth Form College.

**Figure 4-2 Permanent land take at Hobson's Park and Long Road Sixth Form College**



- 4.5.3 The development plan policy relating to POS within the SCLP is **Policy SC/1 (Allocation of Open Space)** and it relates to the allocation of sites to meet the need for open space with the SCDC area. Although it is identified as a relevant policy in the SCDC Statement of Case I do not believe it is relevant to the CSIE Project as it deals with specific site allocations to meet local need for open space, and the Project does not affect those allocations. The CLP **Policy 67 (Protection of open space)** on the other hand states that development proposals will not be permitted which would harm the character of, or lead to the loss of, open space of environmental and/or recreational importance unless:
- a. the open space can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost; and
  - b. the re-provision is located within a short walk (400m) of the original site.
- 4.5.4 This is broadly in line with paragraph 99 of the NPPF (**D1**) which notes that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
- 4.5.5 The CSIE Project proposes to provide 20,840m<sup>2</sup> of replacement open space to the south of Addenbrooke's Road which lies within 400m of the original site. The Public Open Space Assessment (**NR19**) explains that once the replacement POS has been provided "there will be no significant long-term residual effects on open space provision" and that "there will therefore



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be a net gain in POS once the proposed Development becomes operational”. A summary of the POS Assessment work undertaken to date, with particular reference to the loss of existing POS, the identification of potential areas of exchange land, the methodology used in assessing the preferred replacement site and conclusions on the overall findings of the POS assessment and its compliance with the legislative framework and established policy and guidance in support of the CSIE Project can be found in my colleague David Jones’s Proof of Evidence (Open Space) (**NRE8.2**).

- 4.5.6 As he explains, this re-provision also satisfies the requirement under the Acquisition of Land Act 1981 to provide exchange land that is no less in area and is equally advantageous for use to the persons. The order will be subject to special Parliamentary procedure unless the Secretary of State for Levelling Up Housing and Communities gives a certificate in accordance with the provisions of section 19 of, and paragraph 6 of Schedule 3 to, the Acquisition of Land Act 1981. The Secretary of State for Levelling Up Housing & Communities directed on the 7 October 2021 of his intention to give a certificate before he reaches a decision. Public notice of his intention was given in accordance with the statutory requirements and one objection was received, albeit that the objection does not in fact appear to relate to POS matters. Again, this is addressed in Mr Jones’s Proof.
- 4.5.7 The proposed re-provision was supported by the CCiC in their objection to the Secretary of State (**OBJ23**) in which CCiC state that “it is considered to be the most appropriate location for exchange land, and the success of the area for mitigation will depend on the landscaping details secured through conditions [No. 29 (Hard and Soft Landscape)]”. However, this view seems to have been revised in their statement of Case (**E11**) which states “Further information on the landscaping and biodiversity features, and the accessibility and safety of crossing Addenbrooke’s Road is required in order to assess whether the proposed exchange land is appropriate replacement for the loss of existing public open space.” The SCDC Statement of Case (**E10**), notes “Some biodiversity enhancement would be provided on the proposed public open space exchange land to the south of Addenbrooke’s Road, which is supported by the Council’s Ecology Officer”.
- 4.5.8 The CSIE Project has proposed a number of planning conditions on the proposed deemed planning permission in order to address concerns raised by CCiC regarding the final landscaping scheme (including planting) and achieving biodiversity net gain. These proposed conditions are provided in Appendix A. These conditions will ensure that the replacement open space is satisfactorily provided in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost. These will also address comments made by the CCiC in its objection to the Secretary of State (**OBJ23**) which seek appropriately worded conditions to provide landscape details (including planting plans), details to ensure the prevention of spoil placement in the POS and detailed information on the stripping and storage of the existing low nutrient topsoil prior to temporary surfacing being laid and what that surfacing will be.
- 4.5.9 Safe access to the exchange land would be via travelling under Nine Wells Bridge and once constructed via the new accommodation bridge, the approval of which would be subject to a proposed planning condition (No. 26 (Detailed design approval: Other elements of the proposed development)). This would mean that there is no need to cross Addenbrooke’s Road.
- 4.5.10 CCiC have also requested in their statement of case (**E11**) that the exchange land is provided prior to areas of the Hobson’s Park being taken temporarily for the construction works. The draft order contains certain requirements relating to the provision of replacement open space land and the vesting of the existing open space land. Network Rail note that, as currently drafted, Article

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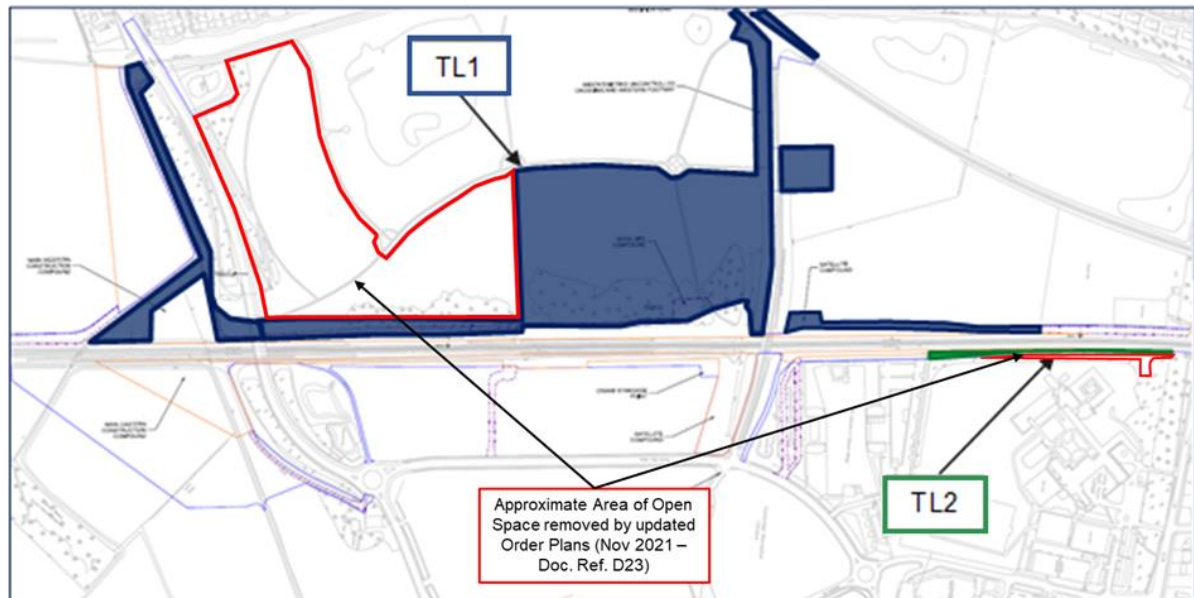
36(1) of the Draft Order, provides that Network Rail shall not under the powers of the Order vest any part of the existing open space until it has vested so much of the replacement land as is equivalent in area to the amount of the existing open space that is required for the authorised works. Article 36(3) provides that Network Rail must lay out as replacement open space so much of the replacement land which has been vested under Article 36(1) before the authorised works are first brought into use. Once CCiC has certified that the land has been satisfactorily laid out, the land then vests in the Pemberton Trustees and CCiC (Article 36(4)). This clause is only triggered when Network Rail take permanent possession of land classed as open space. However in light of the representations made, Network Rail has reviewed its position and can now commit to providing the replacement land before any of the existing open space is permanently vested, accordingly Article 36 will be amended to reflect this position and revised draft Order will be submitted to the inquiry.

- 4.5.11 In order to construct the works, Network Rail require to take land temporarily and will not formalise the permanent land take until towards the end of the construction programme. This will allow Network Rail to seek to minimise the permanent land take where possible and only acquire that land is required by the operational CSIE Project. Network Rail also need the exchange land temporarily to provide access to the work sites south of Addenbrooke's 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 layout the exchange land (No. 29 (Hard and Soft Landscape)) and the accommodation bridge (No. 26 (Detailed design approval: Other elements of the proposed development)), Network Rail will not be able to provide the exchange land until much later in the construction programme.
- 4.5.12 In the event Network Rail were required to provide the exchange land prior to the start of the construction works it would create an unsafe conflict between the public and its proposed temporary use during the construction of the project for construction traffic accessing areas south of Addenbrooke's Road and the construction of the accommodation bridge. To provide a safe arrangement Network Rail would require additional land to provide the haul road to access the construction works south of Addenbrooke's Road and for the construction of the accommodation bridge to remove any conflict between the public using the exchange land and the construction works. This would potentially have knock on effects on the Green Belt and result in loss of farm land. The approvals and landscape work to layout the exchange land would also lead to a significant delay to the start of the construction works for the CSIE Project and therefore a delay to its opening and the wider benefits it brings to the area which as noted above in the principle of development both CCiC and SCDC support. Network Rail will review their programme in order to seek to provide the Exchange Land at the earliest time and certainly before the station is brought into operation.
- 4.5.13 Network Rail have also been working closely with their construction partners to look at reducing the amount of temporary land take within Hobson's Park. As a result, a large area of the park envisaged for storing excavated material has now been removed from the proposed TWA0. This has reduced the area of Hobson's Park that is required temporarily during construction by around 66% (from 170,503m<sup>2</sup> to 57,826m<sup>2</sup>). Network Rail have issued revised Order plans (**NR23**) to reflect this change. Figure 4-3 (This is a sketch so refer to the actual Order plans (Doc Ref NR23). During construction an area of 57,826m<sup>2</sup> is now required with Hobson's Park out of a total park area of 482,880m<sup>2</sup> (approximately 12%) and an area of 2,761m<sup>2</sup>, out of a total site area of some 42,500m<sup>2</sup> (approximately 6.5%) is required at Long Road Sixth Form College, as shown on Figure 4-3.

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**Figure 4-3 Temporary land take at Hobson's Park and Long Road Sixth Form College**



- 4.5.14 Network Rail will continue to look at their construction methodology and land requirements during construction in order to manage and mitigate the effects of the proposed construction works on the park. A number of planning conditions which will enable the local authority to control the development includes No. 10 (Code of construction practice), No. 11 (Construction Ecological Method Statement), No. 34 (Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP)) and No. 28 soil management plan. These would all provide greater clarity on how the construction works will be undertaken and the mitigation to limit the effects of those works on the park.
- 4.5.15 The CSIE Project will provide the exchange land in compensation for the permanent loss areas of POS and will obtain approval of the details which are reserved by the proposed planning conditions. As set out in my colleague David Jones's proof (**NRE8.2**), 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, providing informal footpaths, biodiverse habitats (including a pond) and seating areas. It will be easily accessible to the public for similar recreational and leisure activities as the existing POS being acquired, with no significant long-term residual effects on open space provision.
- 4.5.16 Given the above the CSIE Project will comply with the requirements of CLP policy 67 in that the POS on completion of the works will be replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost.

## 4.6 Design, Landscape and Visual Impact

- 4.6.1 The design of the CSIE Project presented for deemed planning approval is outline in nature with specific details of the design reserved through the proposed planning conditions. This includes Nos. 17 (Detailed design approval: Cambridge South station), 18 (External Materials: Cambridge South Station), 26 (Detailed design approval: Other elements of the proposed development), 27 (Lighting Scheme) and 29 (Hard and Soft Landscape). These are set out in Appendix A.

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- 4.6.2 The location, scale and height of the CSIE Project buildings and infrastructure is secured through the deemed planning permission drawings (Doc ref. NR13). These are supported by illustrative designs of how the station building could be developed. The SCDC objection to the Secretary of State (**OBJ24**) suggested that there is no vertical extent to the Railway Systems Compound and Sub Station elements but, these are included on the parameter plan drawing no. 158454-ARC-ZZ-ZZ-DRG-LEP-000102 (**NR13**) referred to in the planning condition for this aspect of the works and listed in Schedule 2 of the request for deemed planning permission.
- 4.6.3 The proposals are also supported by a proposed set of design principles (Appendix C) secured through the proposed planning condition requiring the detailed designs to be in accordance with the design principles. These principles set out the key design issues to be addressed through detailed design, providing a framework along with deemed planning drawings within which designs can be submitted and approved by the relevant local planning authority.
- 4.6.4 Relevant development plan policies include CLP **Policies 8 (Setting of the city), 14 (Areas of Major Change and Opportunity Areas – general principles), 34 (Light pollution control), 55 (Responding to context), 56 (Creating successful places), 57 (Designing new buildings) and 59 (Designing landscape and the public realm)** and SCLP policies **HQ/1 (Design Principles), NH/2 (Protecting and Enhancing Landscape Character), NH/6 (Green Infrastructure) and SC/9 (Lighting Proposals)**. In summary these require that new development is of a high quality, improves visual amenity, is accessible, responds to its context, protects the amenity of occupiers and surrounding uses, is sustainable and is safe.
- 4.6.5 The importance of good quality design is also recognised in **NPPF Chapter 12 (achieving well-designed places) (D1)**, paragraph 124 of which advises that “The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.” The paragraph goes on to describe the crucial role good design can play in regard to sustainable development.
- 4.6.6 The Design and Access Statement, which formed part of the TWAO application, explains the evolutionary process of the CSIE Project’s design and how consultation has informed the proposals. It sets out how the proposals could be realised in accordance with the deemed planning drawings and the Design Principles.
- 4.6.7 The CCiC representation to the Secretary of State (**OBJ23**) states that “The scale and massing identified in the parameter plans and described within the Design Principles is acceptable”. Further in their Statement of Case (**E11**) they state that “the Council has given minimal consideration to the illustrative scheme, except that it demonstrates a high-quality operational station could come forward within the parameters and principles. Overall, based on the level of information submitted with this application, the Council supports the approach to approve a set of Design Principles through the consent, and for the planning conditions to mandate that the detailed design of the station building and landscape works must come forward in compliance with those approved Design Principles.”
- 4.6.8 Table 4-3 sets out a non-exhaustive list of the design principles and provides a flavour of how they have been developed to ensure that the detailed design proposals will comply with the development plan policies. The principles set out in the Table 4-3 have been revised in light of the objections received and to reduce some repetition within them. These have been discussed initially with the local planning authorities and Network Rail will continue to work with them to ensure they deliver the necessary design mitigation. These revised Design Principles are contained in Appendix C.

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<b>No.</b>	<b>Subject</b>	<b>Design Principle</b>
<b>3.1B</b>	<b>Be appropriate to its setting and conserve the character and form of the green corridor, Hobson's Park to the west and the open countryside beyond</b>	By careful consideration of the landscape elements, form and materials balance visual legibility of the Station from key destinations, with visual and physical integration into Hobson's Park and Green Belt.
<b>3.2F</b>	<b>Create a new accessible interchange appropriate to the context</b>	The proposed works will provide suitable amenities such as cycle parking, lifts, wayfinding and connected spaces that are intuitive with careful consideration of desire lines both within and beyond the station.
<b>3.3A</b>	<b>Community access</b>	To the west, there will be a Station Entrance in the northeast corner of the park interfacing with the existing park access routes to provide safe, and level access straight into the station.
<b>3.4A</b>	<b>Accessible and flexible, public transport interchange</b>	A variety of covered cycle parking areas to both sides of the station to suit various types of bicycles are to be provided, as well as accessible taxi and kiss and ride areas including ramps/ lifts for evacuation to ensure the station provides a fully accessible and flexible, public transport interchange.
<b>3.4B</b>	<b>Fully accessible</b>	From the entrance through the ground floor accommodation to the platform environment, the design is inclusive for all users of the station
<b>3.5C</b>	<b>Collaborate</b>	Prior to the submission of conditions relating to the detailed design of the station the Network Rail will engage with the Cambridgeshire Quality Panel.
<b>3.6D</b>	<b>Provide space for interchange</b>	With the Cambridge Guided Busway, pedestrian, kiss-and-ride and cycle access, as well as the potential CSET scheme space is to be provided to support the movement of people between modes which will all converge on or near the railway station access.
<b>3.7A</b>	<b>Minimise its footprint</b>	In recognition of the site as a 'green corridor' which contributes to the important characteristics of the city and is a key component for providing amenity and biodiversity the CSIE Project within Hobson's Park avoids excessive landtake, during construction and operation, to allow retention of as much of the existing vegetation, open space and path network as possible.
<b>3.7H</b>	<b>Restrict vehicular access to the east side only</b>	Given the recreational and wildlife value of the Green Belt/Hobson's Park, vehicular access and parking, apart from necessary maintenance, will be located on the east side of the station.
<b>3.7N</b>	<b>Form and Material</b>	The material palette will be contemporary but in proportion and sympathetic to its setting acknowledging the materials currently being developed within the neighbouring

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No.	Subject	Design Principle
		AstraZeneca Southern Biomedical Campus masterplan and the more natural palette within Hobson's Park.

- 4.6.9 During construction a number of measures are intended to protect existing landscape and ecological features. These are secured through the proposed planning conditions and include the requirement to submit an Arboricultural Method Statement (“the **AMS**”), Tree Protection Plan (“the **TPP**”) (Condition no. 34) and Ecological Method Statement (“the **EMS**”) (Condition no. 11).
- 4.6.10 As a result of the proposed mitigation the ES Chapter 13 (Landscape and visual) (**NR16**) concluded that there would be no significant negative effects to visual amenity and landscape character either during the proposed development’s construction or operation phases.
- 4.6.11 It is considered that the outline design as set by the deemed planning drawings and the detailed design proposals to be brought forward to discharge the relevant conditions listed in Appendix A in accordance with the design principles will ensure that the CSIE Project will accord with the development plan policies including CLP **Policies 8 (Setting of the city), 14 (Areas of Major Change and Opportunity Areas – general principles), 34 (Light pollution control), 55 (Responding to context), 56 (Creating successful places), 57 (Designing new buildings) and 59 (Designing landscape and the public realm)** and SCLP policies **HQ/1 (Design Principles), NH/2 (Protecting and Enhancing Landscape Character), NH/6 (Green Infrastructure) and SC/9 (Lighting Proposals)**.

## 4.7 Biodiversity

- 4.7.1 The CSIE Project interfaces with the following City and County Wildlife Sites:
- (a) Hobson’s Brook (located within the site, south of Addenbrooke’s Road); and
  - (b) Triangle North of Long Road (located outside the deemed planning permission boundary but, within the TWAO limits)
- 4.7.2 Although not identified as a wildlife site, Hobson’s Park is noted for its Semi-improved Neutral grassland (a Local BAP Priority Habitat for Cambridgeshire and Peterborough), parkland trees and areas of Broad-leaved plantation woodland has protected species including birds, bats and amphibian species. These are described in the Chapter 8 Biodiversity within the ES (Doc Ref **NR16**).
- 4.7.3 The CSIE Project is very close to the following City Wildlife sites:
- (a) Nine Wells; and
  - (b) Long Road Plantation
- 4.7.4 The development plan provides clear protection for these sites through CLP **Policies 18 (Southern Fringe Areas of Major Change) 69 (Protection of sites of biodiversity and geodiversity importance), 70 (Protection of Priority Species and Habitats) and 71 (Trees)** and SCLP **Policies NH/4 (Biodiversity), NH/6: Green Infrastructure and NH/13: Important Countryside Frontage**. Broadly these policies require that applications should only be granted where they do not have an adverse effect on sites of biodiversity importance. Policy 18 is more specific in that it seeks to retain and enhance the strategic green corridor that extends from the Chalk Hills to Long Road along the Vicar’s Brook/Hobson’s Brook corridor and retain the nature and character of the two watercourses.

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- 4.7.5 In addition to protection CLP **Policies 8 (Setting of the city), 57 (Designing new buildings) and 59 (Designing landscape and the public realm)** and SCLP policies **S/2 (b) (Objectives of the Local Plan)** and **NH/4 (Biodiversity)** require development to enhance biodiversity.
- 4.7.6 This is supported by **Chapter 15 (Conserving and enhancing the natural environment)** of the NPPF that sets out in Paragraph 174 that planning decisions should contribute to and enhance the natural and local environment.
- 4.7.7 During construction, ecological mitigation measures will be secured through a number of proposed planning conditions requiring the submission of further details including a Code of Construction Practice Part Bunder condition No. 10 (Code of construction practice), No. 12 (Construction Ecological Method Statement) and No. 34 (Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP)).
- 4.7.8 To minimise the effect of the proposed development on completion the works have been sited along the existing rail corridor and the permanent land take has been minimised to allow for the operation of the railway including a railway system compound, the new station and land for essential mitigation including the exchange land.
- 4.7.9 Land used temporarily for construction will be restored and proposals will be included as part of the wider landscape proposals covering the permanent works. These proposals will need to be submitted and approved under the proposed landscape condition (No. 29). In addition, the proposed station design will also be subject of a proposed planning condition which includes a providing detail of a green roof.
- 4.7.10 The permanent landscape designs will also need to accord with the proposed design principles. Table 4-4 sets out those of particular relevance to demonstrate how the CSIE Project will bring forward its final proposals. The full Design Principles are set out in Appendix C which as previously noted have been updated in response to objections received to provide more surety on Network Rail's proposals.

**Table 4-4: Selected Biodiversity Design Principles**

No.	Subject	Design Principle
3.7A	Minimise its footprint	In recognition of the site as a 'green corridor' which contributes to the important characteristics of the city and is a key component for providing amenity and biodiversity the proposed Development within Hobson's Park avoids excessive landtake, during construction and operation, to allow retention of as much of the existing vegetation, open space and path network as possible.
3.7E	Integrate well with both the built and natural environment	Located between Cambridge Biomedical Campus, the largest centre of medical research and health science in Europe and the Trumpington residential area, the design of the station needs to maintain and serve as a visual amenity to both sides of this emerging urban context each side of the Green Belt.
3.7F		The layout of the station will seek to integrate and connect with the landscape setting of Hobson's Park and its watercourses by creating a visually and biodiversity enriching design.
3.7G		Integrate swales and attenuation ponds into their setting.
3.7K	Integrate with the	The station emphasises the landscape context through the potential use of a planted / landscaped roof contributing to local biodiversity. The

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	<b>proposed CBC landscape masterplan</b>	detail will be discussed with future asset owners and maintainers in the next stage of design.
<b>3.7M</b>	<b>urban greening and green linkages</b>	The prevailing landscape context should inform opportunities for an east-west biodiversity gain through urban greening and green linkages.
<b>3.7O</b>	<b>Biodiverse roof</b>	Network rail will seek to provide the station with a biodiverse roof with an extensive substrate of varying in depth. The roof will be planted/seeded with an agreed mix of species focused on wildflower planting indigenous to the local area and shall seek to contain no more than a maximum of 25% sedum (green roofs only).
<b>3.7R</b>	<b>Birds</b>	Network Rail will include suitable habitat for Corn Buntings within the southern boundary of the proposed exchange land.
<b>3.9A</b>	<b>Habitat</b>	Within this landscape context, the station infrastructure should where feasible, seek to be an integral part of the natural landscape enabling species migration and providing diverse habitats.
<b>3.9C</b>	<b>Habitat</b>	Design proposals shall prioritise improving connectivity between existing habitats wherever reasonably practicable.
<b>3.9D</b>	<b>Net Gain</b>	Network Rail are committed to achieving 10% net gain in biodiversity as part of the CSIE Project.

4.7.11 The ES Chapter 8 covering Biodiversity (Doc Ref N16) recognises that once all the proposed mitigation is implemented, there will be one remaining residual impact associated to the loss of woodland habitat which is significant at the local scale.

4.7.12 The CCiC and SCDC statements of case (**E10** and **E11**) have asked for confirmation on how the BNG target will be achieved. Given the constrained site available, Network Rail are not able to provide the additional features to meet the BNG target within the order limits and have entered into discussions with Cambridgeshire County Council ("**CCoC**") with a view to securing an Option Agreement for the provision of all the BNG units required to meet the 10% target, as set out in the Technical Note – Biodiversity Net Gain Assessment updated TWAO boundary (Doc Ref. 158454-ARC-ZZ-ZZZ-REP-ENV-000008 included in the appendices to my colleague Guy Stone's proof (**NRE12.2**). In terms of what Network Rail will be seeking to provide off site through CCoC it would comprise the following which takes into account the revised Order plans:

- Grassland: 5.48ha or 38.54 units
- Woodland: 3.45ha or 8.87 units
- Scrub: 0.93ha or 8.70 units
- Ponds: 1.1ha or 9.29 units

4.7.13 CCoC have initially confirmed that their Lower Valley Farm site at Fulbourne will be able to provide all the necessary units and their proposal includes the ongoing maintenance of the new habitats for the required 30 year period. Network Rail are aiming to secure the Option Agreement



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with the County Council ahead of the public inquiry into the TWAO application for the CSIE Project, at which point Network Rail should be able to provide confirmation that they have secured the mechanism for delivering the 10% BNG target.

- 4.7.14 In any event, the commitment to achieving 10% BNG will be secured through a proposed planning condition (No. 13) to submit a BNG report to the local planning authority and it is included in the proposed design principles. The BNG report will demonstrate BNG best practice and minimum 10% BNG.
- 4.7.15 The CCiC and SCDC statements of case (**E10** and **E11**) have raised that the proposal should seek to achieve 20% BNG in accordance with SCDC adopted Doubling Nature Strategy (2021) and CCiC emerging strategy Biodiversity Strategy 2021 – 2030 (Both documents can be found in the appendices to my Colleague Mr Stones proof (NRE12.2)). The targets set in these strategies are aspirational and do not form part of the adopted development plan but do form a material consideration in terms of what the two local authorities consider as ‘enhancement’.
- 4.7.16 Network Rail’s position is that the 10% BNG target is consistent with the requirements of the Environment Act 2021 which will, when the relevant provisions are brought into force, require that certain developments deliver at least 10% increase in biodiversity. The CSIE Scheme will also deliver wider benefits which will support broader policy considerations around climate change and sustainability through encouraging a reduction in car travel and a model shift towards public transport. As a result, Network Rail do not believe that an increased BNG target is warranted and given the development plan only seeks to enhance biodiversity rather than setting a specific target, the commitment to a 10% increase in line with the Environment Act 2021 is sufficient. This is addressed in my colleague Guy Stone’s Proof (**NRE12.2**).
- 4.7.17 The CCiC Statement of Case (**E11**) noted concerns regarding the potential permanent displacement of corn buntings. Network Rail’s assessment noted the highest number of corn bunting territories were recorded in the recently created habitats of Hobson’s Park. This area has been established within the past 10 years for recreation and as a nature reserve for the adjacent Trumpington residential area. Therefore, corn buntings have successfully colonised newly created habitats within a short period of time despite extensive construction taking place immediately to the east Trumpington and the west (the AstraZeneca development), and the construction of Addenbrooke’s Road and the Guided Busway routes across the park in 2008. Such construction will have created the types and scale of disturbance similar to those likely from the proposed scheme. The recolonisation of the area by corn bunting is testament to their resilience in this location.
- 4.7.18 In the permanent scheme habitat for corn buntings can be provided along the southern boundary of the Exchange Land. Network Rail can include details to provide Corn Bunting Habitat within the final landscape scheme in the design principles. This would state ‘Network Rail will include suitable habitat for Corn Buntings within the southern boundary of the proposed exchange land’.
- 4.7.19 Further as part of a detailed review of the construction methodology Network Rail has significantly reduced the area of the Hobson’s Park it proposes to utilise during the proposed construction by about 66%. Network Rail have issued revised Order plans (**N23**) to reflect this change. This should reduce any potential impact on Skylarks and Corn Buntings using Hobson’s Park.
- 4.7.20 During construction proposals to provide mitigation along the Haul Road north of Addenbrooke’s road can be included within the Construction Ecological Method Statement. The details of this mitigation will be subject to the local planning authorities’ approval under the proposed deemed

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planning conditions (No. 12). This issue is discussed in more detail including potential mitigation measures during construction in my colleague Guy Stone's Proof (**NR12.2**).

- 4.7.21 CCiC and SCDC have raised concerns in their statement of case regarding the loss of trees and hedgerows. The indicative landscape plans (**NR13**) submitted with the deemed planning permission show the areas of planting proposed to be removed.
- Cambridge South Station – North of Addenbrookes Bridge Indicative Landscape Plan - Sheet 1 of 4 (Drg ref. 158454-ARC-00-ZZ-DRG-EEN-000074)
  - Cambridge South Station Indicative Landscape Plan -Sheet 2 of 4 (Drg 158454-ARC-00-ZZ-DRG-EEN-000075)
  - Cambridge South Station – South of Nine Wells Bridge Indicative Landscape Plan -Sheet 3 of 4 (Drg 158454-ARC-00-ZZ-DRG-EEN-000076)
  - Shepreth Junction Indicative Landscape Plan -Sheet 4 of 4 (Drg 158454-ARC-00-ZZ-DRG-EEN-000077)
- 4.7.22 Since the TWAO submission was made Network Rail have removed the hammerhead from plot 12 which will reduce the land take in the vicinity of Long Road Sixth Form College (Drg ref. 158454-ARC-00-ZZ-DRG-EEN-000074) where there is an existing line of mature trees and reduced the area of Hobson's Park required to support construction by about 66%. Network Rail have issued revised Order to reflect this change.
- 4.7.23 During construction Network Rail have agreed to the inclusion of a condition no. 12 regarding the submission of an AMS and a TPP. The wording of this condition is based on that proposed by CCiC in Appendix 2 of their Statement of Case. In paragraph 56 of CCiC's objection they reference the need for an Arboricultural Implications Assessment (AIA) but, this is not included in the proposed wording of their condition. I understand that an AIA is used to identify, evaluate and possibly mitigate the extent of direct and indirect impacts on existing trees as a result of the current proposal. Given that the extent planting to be removed is shown on the deemed planning drawings and this has been assessed in the ES, the commitment to provide a TPP will identify how trees will be protected through the construction works should mean the need for an AIA in addition is not required. The proposed planning condition will require Network Rail discuss the works to trees to ensure where reasonably practicable that trees are protected and maintained during the construction works. In particular the TPP will set out the details of protection measures to minimise the loss of trees including within plot 12 at Long Road Sixth Form whilst Network Rail construct the proposed overhead line equipment.
- 4.7.24 The effects on Biodiversity have been assessed in Chapter 8 of the ES (**NR16**) with one remaining residual impact associated to the loss of woodland habitat. Network Rail have since the assessment was undertaken reduced the proposed land take and have provided suitable planning conditions that also secure a number of Design Principles to ensure the works are discussed and agreed with the local planning authorities in a way that protects and enhances biodiversity. This is further supported by the additional clarity now provided as to how it will achieve a 10% BNG once the CSIE Project is completed.
- 4.7.25 As a result and balanced against the wider benefits of the proposed development to provide the modal shift in transport from car to public transport and active travel that help the area meet other policy requirements which are supported by CCiC and SCDC it is considered that the CSIE Project is in accordance with development plan Policies 18, 69, 70 and 71 of the CLP and policy NH/4, NH/6 and NH/13 of the SCLP.

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- 4.8.1 The CSIE Project is located in an area of known prehistoric and Roman activity, with a wide range of heritage assets including designated archaeological remains and non-designated archaeological remains. The excavation works which were undertaken to develop the adjacent CBC complex revealed a large amount of prehistoric and Roman activity. The proposed Development impinges on the White Hill Farm Scheduled Monument (SM4) boundary.
- 4.8.2 The CSIE Project does not directly affect the character or appearance of any listed buildings and does not lie within a conservation area. The following listed buildings are close to the proposed development and were assessed in **Chapter 11 (Cultural Heritage)** of the ES. The assessment concluded there was no significant effect on the setting of these buildings.
- Maris Farmhouse (LB61) located approximately 70m south-east,
  - Four Mile House (LB62) is located 18m north,
  - De Freville Farmhouse complex (LB47, LB60, LB67) is between 60m and 100m southeast of the Shepreth branch line,
  - Dovecote Granham's Farm (LB78) is located 45m east,
  - 32-38 Granham's Road (LB71) is located 85m east
- 4.8.3 The development plan policies comprise CLP **Policy 61 (Conservation and enhancement of Cambridge's Historic environment)** and SCLP **Policy NH/14 (Heritage Assets)**. Policy NH/14 sets out 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 NPPF. This is echoed in Policy 61 which requires proposals to provide clear justification for any works that would lead to harm or substantial harm to a heritage asset yet be of substantial public benefit, through detailed analysis of the asset and the proposal.
- 4.8.4 The Chapter D Trumpington West of the Cambridge Southern Fringe Area Action Plan (**D11**) 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.
- 4.8.5 Paragraph 199 of the NPPF (Chapter 15: Conserving and enhancing the natural environment) (**D1**) sets out that when considering the impact of a proposed development on the significance of a designated heritage asset paragraph 199 states that 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.
- 4.8.6 Given that there are known or potential archaeological features within the proposed development area the CSIE Project has committed to providing an archaeological written scheme of investigation to be approved by the relevant planning authority. This will set out an agreed programme of archaeological works to be undertaken prior to the commencement of the main works. Separately an application for Scheduled Monument Consent ("the **SMC**") will be made to the Secretary of State for Digital, Culture, Media and Sport before any work can be carried out which might affect a monument either above or below ground level.
- 4.8.7 My Colleague Ms Wylie's Proof of Evidence in respect of heritage (Doc Ref. NRE7.2) explains that when applying the tests of the NPPF to the CSIE Project the assessment carried out in

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Chapter 11 of the ES (Doc. Ref. N16) carried out to inform the proposed TWAO and proposed planning conditions relating to archaeology (No. 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 project. In their written response to the TWAO application for CSIE dated 2<sup>nd</sup> August 2021 Historic England set out that overall, the impacts involve a moderate degree of harm to designated remains, although they would not consider the impacts to be ‘substantial harm’ to the significance of the (scheduled) monument overall.

- 4.8.8 Historic England requested minor modifications to the proposed deemed planning conditions to clarify that the commitment would be to archaeological mitigation and investigation rather than just to evaluation works. Network Rail have made these changes.
- 4.8.9 Given the assessment undertaken in Chapter 11 of the ES (**N16**), the conclusion of my colleagues Ms Wylie’s Proof (**NRE7.2**), the proposed mitigation (Planning condition and Scheduled Monument application) and conclusion made by Historic England in their representation on the TWAO application it can be concluded that the impacts on the heritage assets would result in less than substantial harm as defined by the NPPF. Given the wider the wider benefits of the proposed development to provide the modal shift in transport from car to public transport and active travel that help the area meet other policy requirements which are supported by CCiC and SCDC it is considered that on balance the CSIE Project is in accordance with the development plan CLP policy 61 and SCLP policy NH/14 and meets the tests set out in the NPPF.

## 4.9 Noise and Vibration

- 4.9.1 The CSIE Project has the potential to generate noise and vibration impacts during the construction and operational phases of the development. The relevant development plan policy comprises SCLP **Policy SC/10 (Noise Pollution)**, **Policy HQ/1 (Design Principles)** and **Policy 35 (Protection of human health and quality of life from noise and vibration)** of the CLP. Policy SC/10 requires that development will not be granted if it has an unacceptable adverse impact on the indoor and outdoor acoustic environment of existing or planned development or has an unacceptable impact on countryside areas. Policy HQ/1 is similar in intent as it seeks to protect the health and amenity of occupiers and surrounding uses from development which would create unacceptable impacts such as noise and vibration. Policy 35 differs slightly in that development will be permitted if it is demonstrated that it will not lead to significant adverse effects and impacts, including cumulative effects and construction phase impacts wherever applicable, on health and quality of life/amenity from noise and vibration. Both Policies note that planning conditions can be attached to ensure adverse impacts can be mitigated or controlled.
- 4.9.2 Chapter 5 (Noise) and Chapter 6 (Vibration) of the ES provide (**NR16**) assessments of the environmental impact of the proposed development with respect to noise and vibration.
- 4.9.3 During construction the ES considered that there would be significant noise effects on the following receptors:
  - (a) AstraZeneca Academy House,
  - (b) The Belvedere area,
  - (c) Long Road Sixth Form College,

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- (d) MRC Laboratory of Molecular Biology trackside (east),
- (e) AstraZeneca BioMed Site; and
- (f) Anne McLaren Building receptors.

- 4.9.4 In addition, adverse impacts on quality of life from vibration were identified as being significant during some construction activities for the Abberley Woods, Davey Crescent and Granham's Close Residences. Adverse impacts on operation of scientific facilities during construction phase were assessed as significant for the Anne McLaren Building and the MRC Laboratory of Molecular Biology.
- 4.9.5 During operation there were assessed to be no significant effects from Noise or Vibration.
- 4.9.6 In order to mitigate the effects from noise and vibration the deemed planning permission proposes a planning condition requiring the CSIE Project to comply with the CoCP Part A (No. 10) that sets out measures for how effects from construction noise and vibration will be managed. As part of the proposed planning condition no. 10 Network Rail will be required to submit a CoCP Part B that will contain a number of detailed management plans including a Noise and Vibration Management Plan which will set out the proposed mitigation measures in line with Best Practicable Means ("**BPM**"). The Greater Cambridge Shared Planning team ("the **GCSP**") have set out their preference for this management plan to be used instead of a consent under section 61 of the Control of Pollution Act 1974.
- 4.9.7 CCiC and SCDC in their Statements of Case to the Secretary of State (**E10** and **E11**)) identify that careful consideration of noise and vibration management, monitoring and community liaison will need to be detailed within Part B of the CoCP document. Given that these documents will be submitted for their approval they can ensure the appropriate mitigation is in place.
- 4.9.8 The potential for unacceptable noise and vibration effects from construction on sensitive scientific equipment and animals used in testing have been identified in the objections by the Medical Research Council (**OBJ09**), University of Cambridge (**OBJ08**) and Cambridge City Council (**OBJ23**). These are responded to fully in the Proofs of Evidence of my colleagues Lynden Spencer-Allen and Simon Taylor (**NRE3.2** and **NRE4.2**). In short, Network Rail are seeking to agree protective provisions through private agreements with the University of Cambridge and the Medical Research Council in respect of the CSIE Project potential impacts on sensitive scientific equipment. These will require Network Rail to agree relevant mitigation with the owners of the sensitive scientific equipment directly.
- 4.9.9 With respect to the operational effects Network Rail have agreed a proposed planning condition regarding noise from fixed plant associated with the CSIE Project (No. 30) and from the proposed public address/voice alarm (PAVA) system (No. 31). This should ensure that the conclusion of the noise assessment in the ES are delivered i.e., no significant effect.
- 4.9.10 Given the findings of the noise and vibration assessments and the proposed mitigation measures which have been and will be included to reduce impacts, the CSIE Project is considered to be in accordance with the development plan policies SC/10 and HQ/1 of the SCLP and policy 35 of the CLP which requires proposed development to demonstrate that it would not lead to significant adverse effects and impacts on health and quality of life/amenity from noise and vibration.

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### 4.10 Ground Conditions and Contamination

- 4.10.1 There is the potential for localised contamination to be present associated with the existing railway infrastructure. The proposed development will also affect areas of best and most versatile (“**BMV**”) land (as assessed through the Agricultural Land Classification (ALC) system). During construction there is the potential for the introduction of new contamination sources from construction activities. These could introduce contaminant pathways to human health receptors, controlled waters and buildings and infrastructure.
- 4.10.2 The relevant development plan policies comprise **Policy 8 (Setting of the City)** that seeks to safeguard the best and most versatile agricultural land and proposals will only be granted permission where sustainable development considerations and the need for development are sufficient to override the need to protect the agricultural value of land. **SCLP Policy NH/3: (Protecting Agricultural Land)** similarly sets out that planning permission will not be granted for development which would lead to the irreversible loss of Grades 1, 2 or 3a agricultural land unless:
- a. Land is allocated for development in the Local Plan;
  - b. Sustainability considerations and the need for the development are sufficient to override the need to protect the agricultural value of the land.
- 4.10.3 **CLP Policy 33 (Contaminated land)** explains that development will only be granted where there are no adverse health impacts or controlled waters to future occupiers or surrounding occupiers including from off-site gas migration. **SCLP Policy SC/11: Contaminated Land** sets out that development will only be permitted where land is, or can be made, suitable for the proposed use.
- 4.10.4 Chapter 12 (Ground Conditions and Contamination) of the ES (**NR16**) provides an assessment of the effects of the proposed development on the ground conditions, contamination and hydrogeological receptors resulting from the construction of the proposed development has been undertaken. It also assesses the effect on BMV land. Operational effects were scoped out.
- 4.10.5 To mitigate the effects, all construction activities will be carried out in accordance with the CoCP parts A and B and associated plans which include Emergency and Incident Response Plan, Dust Management Plan and Pollution Control plan, a contaminated land remediation strategy (based on the preliminary contamination assessment in the ES and further site investigations) and Soil Management Plan. These measures are all secured through proposed planning conditions on the deemed planning permission (Nos. 6 to 9 (Contaminated Land), 10 (CoCP) and 28(Soil Management Plan)). Overall based on this mitigation the ES assessment is that there are no significant effects from contamination. This confirms that the CSIE Project will not cause adverse effects to health or controlled waters and on completion the land will be suitable for the proposed use. The CCiC Statement of Case supports this approach stating “it is acknowledged that contaminated land is likely to be a low risk in the proposed station area. The phased approach to contaminated ground investigations within the draft conditions 6 – 9 is acceptable and will ensure that the site is suitable for its proposed end use, in accordance with Local Plan policy 33”.
- 4.10.6 However, during construction a total of approximately 7.5ha (based on available mapping) of BMV (Grade 2) land (a receptor of Very High sensitivity) in agricultural use would be temporarily lost from agricultural production. Following the restoration of land required temporarily, the permanent loss would be reduced to approximately 4.5ha of BMV (Grade 2) land in current

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agricultural use. This is assessed in the ES as a Significant effect as there are no additional measures available to mitigate for this loss of BMV land.

- 4.10.7 The permanent loss of the BMV land is required mainly to facilitate the provision of the exchange land, the railway systems compound, railway maintenance area and an attenuation pound.
- 4.10.8 In terms of the permanent loss of the BMV Grade 2 agricultural land, the development plan policies Policy 8 and Policy NH/3 provide that it is acceptable if there are wider sustainability considerations and a need for the development. As set out in section 4.2 (above) the principle of the development is to encourage more sustainable form of transport by encouraging a modal shift from the car to rail. This is supported by Statements of Case submitted by both CCiC and SCDC.
- 4.10.9 On balance, given these sustainability benefits it is considered that the loss of the BMV grade 2 land can be justified and the CSIE Project should be considered to accord with the Development plan policies 8 and NH/3. Further given the proposed mitigation outlined above the CSIE Project will not cause adverse effects to health or controlled waters and on completion the land will be suitable for the proposed use. Therefore, it will accord with development plan policies 33 and SC/11.

#### **4.11 Water Resources and Flood Risk**

- 4.11.1 The majority of the proposed development is located within Flood Zone 1 on the Flood Map for Planning (Rivers and Sea) but, land where the new station is proposed is shown to be within Flood Zones 2 and 3.
- 4.11.2 The development plan policies for water resources and flood risk comprise the following.
- 4.11.3 CLP **strategic objective no. 2** which requires development to be highly water efficient, contribute to overall flood risk reduction through water sensitive urban design, and help to improve the quality of the River Cam and other water features in the city;
- 4.11.4 CLP **Policy 31 (Integrated water management and the water cycle)**, the key parts of which relevant to the CSIE development are as follows:
  - a. surface water is managed close to its source and on the surface where reasonably practicable to do so; [...]
  - c. water is seen as a resource and is re-used where practicable, offsetting potable water demand, and that a water sensitive approach is taken to the design of the development;
  - d. the features that manage surface water are commensurate with the design of the development in terms of size, form and materials and make an active contribution to making places for people; [...]
  - f. any flat roof is a green or brown roof, providing that it is acceptable in terms of its context in the historic environment of Cambridge (see Policy 61: Conservation and Enhancement of Cambridge's Historic Environment) and the structural capacity of the roof if it is a refurbishment. Green or brown roofs should be widely used in largescale new communities
  - g. there is no discharge from the developed site for rainfall depths up to 5 mm of any rainfall event;

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- h. the run-off from all hard surfaces shall receive an appropriate level of treatment in accordance with Sustainable Drainage Systems guidelines, SUDS Manual (CIRIA C753), to minimise the risk of pollution;
- i. development adjacent to a water body actively seeks to enhance the water body in terms of its hydromorphology, biodiversity potential and setting;
- j. watercourses are not culverted and any opportunity to remove culverts is taken; and
- k. all hard surfaces are permeable surfaces where reasonably practicable and having regard to groundwater protection.

4.11.5 **Policy 32 (Flood risk)** sets out that development will be permitted providing it is demonstrated that:

- a. the peak rate of run-off over the lifetime of the development, allowing for climate change, is no greater for the developed site than it was for the undeveloped site;
- b. the post-development volume of run-off, allowing for climate change over the development lifetime, is no greater than it would have been for the undeveloped site. If this cannot be achieved then the limiting discharge is 2 litre/s/ha for all events up to the 100-year return period event;
- c. the development is designed so that the flooding of property in and adjacent to the development would not occur for a 1 in 100 year event, plus an allowance for climate change and in the event of local drainage system failure;
- d. the discharge locations have the capacity to receive all foul and surface water flows from the development, including discharge by infiltration, into water bodies and into sewers;
- e. there is a management and maintenance plan for the lifetime of the development, which shall include the arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime; and
- f. the destination of the discharge obeys the following priority order:
  - firstly, to ground via infiltration;
  - then, to a water body;
  - then, to a surface water sewer.

Discharge to a foul water or combined sewer is unacceptable.

4.11.6 Development will be permitted if an assessment of the flood risk is undertaken following the principles of the National Planning Policy Framework (2021). **Policy CC/7 (Water Quality)** requires development proposals to demonstrate there are adequate water supply, sewerage and land drainage systems (including water sources, water and waste water infrastructure) to serve the whole development, or an agreement with the relevant service provider to ensure the provision of the necessary infrastructure prior to the occupation of the development. Also, it requires that the quality of ground, surface or water bodies will not be harmed, and opportunities have been explored and taken for improvements to water quality, including renaturalisation of river morphology, and ecology. Lastly it requires that appropriate consideration is given to sources of pollution, and appropriate Sustainable Drainage Systems (SuDS) measures are incorporated to protect water quality from polluted surface water runoff.



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- 4.11.7 **Policy CC/8: Sustainable Drainage Systems** sets out that development proposals must incorporate appropriate sustainable surface water drainage systems (SuDS) appropriate to the nature of the site.
- 4.11.8 **SCLP Policy CC/9 (Managing Flood Risk)** is similar to the CLP policies and requires to minimise flood risk, development will only be permitted where:
- a. The sequential test and exception tests established by the National Planning Policy Framework demonstrate the development is acceptable (where required).
  - b. Floor levels are 300mm above the 1 in 100 year flood level plus an allowance for climate change where appropriate and where appropriate and practicable also 300mm above adjacent highway levels.
  - c. Suitable flood protection / mitigation measures are incorporated as appropriate to the level and nature of flood risk, which can be satisfactorily implemented to ensure safe occupation, access and egress. Management and maintenance plans will be required, including arrangements for adoption by any public authority or statutory undertaker and any other arrangements to secure the operation of the scheme throughout its lifetime;
  - d. There would be no increase to flood risk elsewhere, and opportunities to reduce flood risk elsewhere have been explored and taken (where appropriate), including limiting discharge of surface water (post development volume and peak rate) to natural greenfield rates or lower, and
  - e. The destination of the discharge obeys the following priority order:
    - i. Firstly, to the ground via infiltration;
    - ii. Then, to a water body;
    - iii. Then, to a surface water sewer;
    - iv. Discharge to a foul water or combined sewer is unacceptable.
- 4.11.9 Network Rail proposals are supported by an appropriate Flood Risk Assessment (FRA) in line with the requirements of the NPPF as part of the EIA (**NR 16**, Appendix 18.2). This complies with CLP and SCLP development plan policies 36 and CC/9 respectively. The FRA concluded the following:
- (a) The location of the proposed station has been informed by a sifting process whereby different options were considered and compared. There were no reasonably available sites that delivered all of the objectives of the project within a lower flood risk zone and therefore the Sequential Test is passed. In accordance with the NPPF, the proposed Development site is considered to be appropriate, on flood risk grounds, for the type of development proposed;
  - (b) The wider sustainability benefits of the scheme associated with achieving a modal shift in transport from road to rail and economic and social benefits of providing improved public transport and active travel access to the CBC and wider community from the proposed Development satisfy Part 1 of the Exception Test; and
  - (c) The hydraulic modelling undertaken to qualify flood risk from the North Ditch shows that the proposed station is at low risk of flooding from this watercourse over its design lifetime. Given this, along with the implementation of the Surface Water Drainage Strategy and suitable connections to the sewer network, no sources of flooding are considered to pose an onerous risk to the site in the context of the proposed

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Development. The proposed Development would not increase flood risk to third parties over its lifetime, including for climate change, thus satisfying Part 2 of the Exception Test.

- 4.11.10 As a result of satisfying the Exception Test the CSIE Project is considered appropriate development in accordance with the development plan.
- 4.11.11 As the request for deemed planning consent is seeking permission for development which is comparable to outline planning approval, to ensure that detailed proposals are brought forward to comply with the development plan, Network Rail have proposed planning conditions (Nos. 14 to 16) relating to surface water drainage which take account of the principles within the flood risk assessment.
- 4.11.12 Consultation throughout the process has been undertaken with relevant bodies, principally the Environment Agency (EA) and CCoC in their role as the Lead Local Flood Authority (LLFA), and the Hobson's Conduit Trust. The CCoC have not raised any objection to the flood risk assessment in their statement of case and the EA although raising an initial objection regarding the hydraulic modelling have subsequently removed it following receipt of additional information. This was confirmed in a letter on 20 September 2021.
- 4.11.13 The CCiC have raised an objection in their Statement of Case (**E11**) that due to estimates of attenuation volumes using Quick Storage calculations they do not give a good level of confidence due to the significant of variables assumed and should be used as a starting point of the design. In addition, they have asked for individual discharges rates at outfall to be confirmed, review proposals for below ground storage to be replaced by open features and how water quality will be managed before discharges are made to the north ditch.
- 4.11.14 Network Rail note the objective of the modelling assessment undertaken to inform the FRA was to quantify the capacity of the north ditch at the proposed development site (focused on the station building location). A model was developed for this specific purpose and the model has applied conservative assumptions and a steady state inflow. The model predicts that the flows generated in a 0.1% annual chance flood event (with climate change allowance) remains in channel. The model is considered adequate for showing that there would be no loss of floodplain storage volume and no compensation storage is required. As noted above neither the EA nor the Lead Local Flood authority have raised concerns regarding the model.
- 4.11.15 Network Rail have included a number of planning conditions (Nos. 14 to 16) to ensure that the surface water drainage is designed and implemented, taking into account SuDS principles, to ensure there is no increase in flood risk. This includes both during the construction phase and operational phase. Another proposed planning condition (No. 7) requires submission of a contaminated land remediation strategy that will provide mitigation measures for works affecting ground water. Additional measures to protect water quality will be included in the CoCP parts A and B including the associated management plans in particular the Pollution Control Plan will include mitigation measures to protect the water environment and will set out how construction activities will be undertaken in accordance with best practice guidance such as CIRIA C532 'Control of Water Pollution from Construction Sites'. These proposed conditions will require approval from the relevant planning authority.
- 4.11.16 A number of adjacent land owners and interested parties including the AstraZeneca (OBJ03), University of Cambridge (OBJ08), Medical Research Council (OBJ09), Cambridge Medipark Limited and CBC Estate Management Company Limited (OBJ10/11) have raised concerns regarding drainage these objections are dealt with in my Colleague Sue Broken's Proof (NRE5.2)

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but, in short Network Rail are seeking to enter into legal agreements which each to ensure their drainage rights are maintained and designs do not compromise how their land is currently drained in order to ensure there is no increase in flood risk.

- 4.11.17 The objections from CCiC and others are around the detailed design which Network Rail are comfortable can be resolved either through private agreement with the landowner or through the discharge of the deemed planning conditions. These objections and Network Rail's approach to water resources and flood risk are addressed in more detail in my colleague Sue Brocken's Proof of Evidence (**NRE5.2**).
- 4.11.18 Overall, given the commitment to provide further details through the proposed deemed planning conditions and that the FRA has no outstanding objections from either the LLFA or the EA it is considered that the CSIE Project is in accordance with the development plan with respect to CLP policies 31, 32 and SCLP policies CC/7, CC/8, CC/9.

## **4.12 Lighting**

- 4.12.1 Lighting will be required for the safe operation of the station and during periods of low light whilst the construction works are progressed. The development plan policies relating to lighting are the following:
- 4.12.2 **CLP Policy 34 (Light Pollution Control)** that requires proposals to demonstrate that the lighting is minimum to undertake the task and minimises upwards or intrusive lighting, impact on local residents and wildlife and landscape character. Due to the nature of the proposed development and its location adjacent to and partly within Hobson's Park, the use of external artificial lighting forms a key design consideration both during construction and operation of the development.
- 4.12.3 **SCLP Policy SC/9 (Lighting Proposals)** which similarly requires development to be the minimum required for reasons of public safety, crime prevention / security, and living, working and recreational purposes, that there are no unacceptable adverse impact on the local amenity of neighbouring or nearby properties, or on the surrounding countryside, no dazzling or distraction to road users including cyclists, equestrians and pedestrians and is to the County Council's standards.
- 4.12.4 The proposed development will seek to ensure that upwards or intrusive light spillage, impact to local residential amenity and landscape character will be minimised. To ensure the satisfactory implementation of a lighting strategy and to reduce impact of light pollution from the development on the surrounding area and Hobson's Park, planning conditions are proposed which require the approval of the station buildings (No. 17), an artificial Lighting scheme for the permanent works (No. 27) and a Lighting Management Plan (as part of the CoCP Part B) for the temporary works (No. 10) from the LPA. These conditions reflect the request from SCDC in their statement of case (**E10**). This should enable Network Rail to bring forward proposals which can demonstrate they do not have a negative impact from light pollution and the station design is integrated into park. This should allay concerns raised by Cambridge Past, Present & Future in their objection (**OBJ14**). The lighting scheme would also need to be brought forward in accordance with design principle 3.9Q (**NR15**) that requires Lighting will be the minimum necessary to provide safe conditions and will be in accordance with relevant guidance set out in the 'Guidance Notes for the Reduction of Obtrusive Light, 2020- GN01/20'.
- 4.12.5 Given the lighting proposals are not yet established, the proposed planning conditions provide the local planning authority controls in order to ensure that the proposals will satisfy Policy SC/9

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of the SCLP and policy 34 of the development plan. Therefore, the development should be viewed as acceptable in terms of its potential effects from artificial lighting.

### 4.13 Air Quality

- 4.13.1 The proposed CSIE Project development has the potential to cause a change in the number of vehicle trips on the local road network during operation with an anticipated decrease in local road traffic due to modal shift to rail. Activities associated with the construction of the proposed CSIE Project have the potential to impact air quality by generating dust and vehicle exhaust emissions. The CSIE Project is not located in an area subject to an air quality management area (AQMA).
- 4.13.2 The relevant development plan policies relating to the air quality are CLP **Policy 36 (Air quality, odour and dust)** and SCLP **Policy SC/12 (Air Quality)**. Policy 36 sets out that development will be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions to air. In a similar vein Policy SC/12 states development will be permitted where it can be demonstrated that it does not lead to significant adverse effects on health, the environment or amenity from emissions to air. The transport assessment in the ES Chapter 17 does set out there will be a reduction in vehicular trips on the local road network, through encouraging more people to travel by rail to and from the CBC and surrounding area and through encouraging sustainable travel. The ES chapter 7 (Air Quality) concludes that overall, the potential effects from NO<sub>2</sub>, PM10 and PM2.5 for existing receptors are negligible and Not Significant.
- 4.13.3 With respect to the construction phase a number of mitigation measures are proposed and secured through the proposed conditions on the deemed planning permission. These include compliance with the CoCP Part A and submission of the CoCP Part B and in particular a Dust Management Plan which require approval from the local authority (Condition No. 10 CoCP). On the basis of these mitigation measures being implemented the ES concluded there would be negligible / non significant effects on air quality during construction.
- 4.13.4 CCiC in their Statement of Case requested a planning condition to secure the provision of electric vehicle for the nine parking spaces at the station in order to mitigate the impact on residential amenity. Network Rail notes that CLP **Policy 82 (Parking management)** identifies that the council will strongly support electric vehicle charging points or the infrastructure to ensure their future provision which should be provided within a development where reasonable and proportionate. Network Rail do not consider it is reasonable and proportionate to put in the electric vehicle charging points at this time given there are only nine spaces and the effects on air quality as assessed in the ES do not support this further mitigation. However, Network Rail understand the general movement towards electric vehicles, and have proposed a planning condition (No. 32) to ensure the necessary infrastructure including ducting, capacity within the station network and ability to connect to the grid is provided. This satisfies Policy 82.
- 4.13.5 SCDC raised a concern in their Statement of Case (**E10**) regarding whether the ES had overlooked negative impacts on local roads around the development site due to cars waiting / idling to pick up passengers. SCDC recommended a condition for ongoing monitoring of these roads once the CSIE Project is operational. Network Rail consider it likely that any changes in emissions from idling vehicles would be offset by the reduction in vehicle movements to the CBC. This is supported by the findings of the Transport Assessment which demonstrates that the proposed vehicular usage of the station is 'Negligible', even during the AM and PM peaks, when compared to the current and future vehicular usage of the wider CBC. In addition, it would be

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extremely difficult to quantify through air quality monitoring the impact of the station related vehicles as opposed to those associated with the CBC and other activities. Network Rail believe this is a matter for the highway authority who have not raised any concerns in this regard.

- 4.13.6 Based on the findings of the ES, and the securing of the proposed mitigation measures through the proposed planning conditions, it is concluded that the CSIE Project is in accordance with the development plan policies 36, 82 and SC/12 with respect to air quality.

### 4.14 Climate Change – Adaptation and Greenhouse Gases

- 4.14.1 The CSIE Project is seeking to help deliver a modal shift to public transport with a new station serving the CBC and wider area. It will connect to the existing guided bus network, provide 1000 cycle parking spaces and connectivity to existing cycle and walking routes and provide very limited car parking (9 spaces) to help drive a shift to active travel and public transport with passengers and staff encouraged to walk, cycle or use public transport to travel to/from the station. Both CCiC and SCDC set out in their statements of case that they support the aim of the CSIE scheme to promote connectivity within Cambridgeshire to facilitate future growth in the area and promote sustainable development.
- 4.14.2 The development plan policies in relation to climate change are within the CLP and SCLP.
- 4.14.3 **Strategic objective 1** of the CLP requires all new development to be capable of adapting to the impacts of climate change. This is delivered through the policies in Section four that sets out how the development plan will contribute to the achievement of sustainable development in terms of how the plan will address the challenge of mitigating and adapting to our changing climate, and other resource management issues. Relevant policies with respect to climate change within the CLP are **Local Plan policies 28, 29 and 31**.
- 4.14.4 **Policy 28 (Carbon reduction, community energy networks, sustainable design and construction, and water use)** requires that all development should take the available opportunities to integrate the principles of sustainable design and construction into the design of proposals. Proposals should outline their approach to ‘a. adaption to climate change, b. carbon reduction, c. water management, d. site waste management and e. use of materials. In addition, the policy sets out development should achieve a minimum BREEAM Level of ‘Excellent’.
- 4.14.5 **Policy 31 (Integrated water management and the water cycle)** details the water management and water cycle requirements which developments will need to adhere to. Amongst others, this includes requirements for green/brown roofs, improvement of existing water bodies, permeable surfacing and other surface water management requirements e.g., SUDs.
- 4.14.6 Like the CLP the SCLP sets out an overarching objective of the local plan to ensure development responds robustly to the challenges of climate change, this is set out in **Policy S/2 (Objectives of the Local Plan)**. As with the CLP Chapter 4 of the SCLP provides the relevant policies relating to climate change including Policies CC/1 and CC/4
- 4.14.7 **Policy CC/1 (Mitigation and Adaptation to Climate Change)** sets out that planning permission will only be granted for proposals that demonstrate and embed the principles of climate change mitigation and adaptation into the development. Applicants must submit a Sustainability Statement to demonstrate how these principles have been embedded into the development proposal. The level of information provided in the Sustainability Statement should be proportionate to the scale and nature of the proposed development.

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- 4.14.8 **Policy CC/4 (Water Efficiency)** requires proposals for development to be accompanied by a water conservation strategy, which demonstrates a minimum water efficiency standard equivalent to the BREEAM standard for 2 credits for water use levels unless demonstrated not practicable.
- 4.14.9 The measures Network rail will implement during construction are secured through the CoCP Part A and Part B by way of a proposed planning condition (No. 10). Chapter 13 of the CoCP deals with climate change in detail and sets out the mitigation measures and initiatives to be developed by Network Rails contractor to reduce the impacts on climate change. As part of the CoCP part B there will be a section on water resources that will include details on the use of water efficient sanitaryware and initiatives such as rainwater harvesting. Further a number of management plans will be prepared which will detail the measures to be used. These include:
- (a) Flood Emergency Response Plan will set out processes for dealing with potential flooding and inundation during rain events at each compound and storage area;
  - (b) Emergency and Incident Response Plan to set out process to be followed for a pollution incident ensure that water resources are protected for instance;
  - (c) Construction Logistics Plan to manage the sustainable delivery of goods and materials;
  - (d) Dust Management Plan which will set out the BPM to control emissions of dust during construction. This will respond to extended dry spells that may cause increased dust production;
  - (e) Site Waste Management Plan (SWMP) to ensure that waste is minimised and materials are recycled in line with the waste hierarchy;
  - (f) Materials Management Plan to document how excavated material will be reused on site or on other sites within reasonable proximity;
  - (g) Pollution Control Plan to safeguard the quality of surface water; and
  - (h) Carbon Efficiency Plan to manage and reduce Green House Gas emissions and promote good practice.
- 4.14.10 The design of the CSIE works including the station, Railway Systems Compound Buildings and Structures and associated landscaping are yet to be finalised. The deemed planning permission is seeking permission for development which is comparable to an outline planning approval. As a result, there are a number of planning conditions proposed to ensure that the station design acceptable (e.g., Condition Nos. 17 and 26). These conditions require the submission of further details in accordance with the design principles for the CSIE project. A number of these design principles relate to climate change and are detailed in Table 4-5.

**Table 4-5: Climate Change Design Principles**

No.	Subject	Design Principle
3.9E	Energy	Encourage energy efficiency in the station design.
3.9F	Energy	The station will be designed to a BREEAM target rating of excellent.
3.9G	Climate	The station will be designed with the aim of being resilient to climate change and the space to support passenger growth.

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<b>3.9I</b>	<b>Climate</b>	SuDS measures are to be identified and incorporated into the design of all external hard surfaces.
<b>3.9I</b>	<b>Resources</b>	The station shall be efficient in its use of resources and multifunctional wherever reasonably practicable. For example, structures will be designed to accommodate multiple functions where it makes sense to do so.
<b>3.9K</b>	<b>Resources</b>	The station works are to be designed in a way which considers the whole life cycle of the proposed Development to minimise waste and provide future flexibility.

- 4.14.11 As well as being referenced in the design principles, the requirement for BREEAM is secured through the proposed planning conditions. In response to the concerns raised in the CCiC statement of case (**E11**) Network Rail have included an additional condition with respect to the pre assessment stage (condition Nos. 23 to 25).
- 4.14.12 Further to the above we note that the final landscape design which is secured by a proposed planning condition could look at species capable of adapting to our changing climate as required by **CLP Policy 59 (Designing landscape and the public realm)**.
- 4.14.13 The ES in its assessment summary of Chapter 9, entitled “Climate Part 1 – Climate Change Adaptation “ (**NR16**) states at paragraph 9.7.4, that “Taking into account the proposed mitigation measures which are set out above no significant impacts have been identified for the CSIE Project in either the construction phase or operational phase.” The mitigation measure is secured through the proposed planning conditions and are detailed above.
- 4.14.14 Paragraph 10.6.3 of the ES assessment on Climate Change – Green House Gases (Doc Ref. NR16) summarises the potential effect, stating “Emissions arising as a result of the proposed Development represent less than 0.00003% of total emissions in any five-year carbon budget during which they arise. In this context, it is concluded that the GHG impact of the proposed Development would not have a material impact on carbon reduction targets as set by the UK Government.”
- 4.14.15 On the basis of the assessment in the ES (Doc Ref. NR16), the proposed mitigation secured through the proposed deemed planning permission conditions and that the overall aim of the project is to deliver a modal shift to public transport with a new station serving the CBC and wider area, it is considered that the CSIE Project complies with the development plan policies 28, 29, 31, S/2, CC/1 and CC/4.

## **4.15 Public Art**

- 4.15.1 To accord with **Policy 56 (Creating successful places)** of the CLP and the Public Art SPD and **Policy HQ/2 (Public Art and New Development)** of the SCLP which encourage public art to be included in within proposals, the proposed development will seek to integrate public art within its design. This will be secured through a proposed condition (No. 20) on the deemed planning permission of a ‘Public Art Delivery Plan’.

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- 5.1.1 The administrative boundary between CCiC and SCDC runs through the proposed development. Network Rail entered into formal pre-application discussions with the authorities' fully integrated planning service delivered through the GCSP.
- 5.1.2 Consultation up to the submission of the TWA0 is summarised in the Planning Statement (Doc Ref. NR14) and Consultation Report (Doc Ref. NR7). In summary Network Rail and GCSP have established a close working relationship with regular meetings with Council officers, the Network Rail project team and its consultant and designer, Arcadis. This engagement has seen GCSP provide technical and planning input into the design and scope of the EIA. Briefings have been delivered to local councillors via the Southern Area Committee and the Joint Development Control Committee.
- 5.1.3 As part of the proposed development's design process, the station proposals were presented to the Cambridgeshire Quality Panel in December 2020.
- 5.1.4 This engagement has continued since submission of the TWA0 application. Table 5-1 sets out the meetings held on planning matters since the Submission of the TWA0 application.

**Table 5-1 GCSP Planning meetings**

Meeting Date	Points of discussion
16 August 2021	Meeting covered the points raised in the CCiC and SCDC representations, with initial comments back from NR and clarifications sought on the representations
5 October 2021	Response on conditions Update to Design Principles re: limit to parking spaces AZ western landscaping and strategic gaps CAD overlay of AZ/NR schemes Green Belt justification Draft SoCG Temp. management of NCN 11 Use of Hobson's Park Construction programme
15 October 2021	Options for replacement of AZ's western boundary landscaping
3 November 2021	CBC structural landscaping
10 November 2021	Planning Conditions
18 November 2021	Draft conditions relating to landscaping, ecology and tree works
19 November 2021	Draft conditions relating Environmental health issues
23 November 2021	Draft conditions relating to drainage
9 December 2021	Impact on AZ / CBC planning permission
14 December 2021	NR Responses to GCSP letters of 8 Dec 2021 Planning conditions Design principles



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- 6.1.1 Draft planning conditions were submitted with the Order application attached to the Request for Deemed Planning Permission (Doc Ref. NR12). Representations relating to the proposed conditions were subsequently received from CCiC, SCDC and Historic England.
- 6.1.2 The draft conditions have been revised in order to address the matters raised within these representations, provide greater flexibility, reduce duplication and provide additional clarity. This has included amending certain of the original conditions, as well as including wholly new conditions.
- 6.1.3 The revised wording has been discussed and broadly agreed with the GCSP. The GCSP at the time of writing are reviewing the final NR drafting.
- 6.1.4 Discharge of the planning conditions will ensure that the CSIE Project can be constructed and operated in accordance with the development plan.
- 6.1.5 The newly proposed conditions relate to the following topic areas:

<b>Subject</b>
Surface water drainage Strategy - Construction
Surface water drainage Strategy - Operation
Platform Announcement Sound System
Electric Vehicle Charge Points
Spoil placement Excavated Material
Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP)
Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) implementation
Construction Replacement tree planting
Biodiversity Net gain
BREEAM Pre-Assessment: Station Building
Changes
Surface Water Drainage Strategy Construction
Surface Water Strategy
Excavated material
Pedestrian link beneath Cambridge Guided Busway
Footpaths & Cycleways

- 6.1.6 The amended / deleted conditions are listed as follows:

<b>Original No.</b>	<b>Subject</b>
3	Accordance with Design Principles
4	Flood Risk Assessment (Deleted)

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Original No.	Subject
5	Phasing plan
6	Submission of preliminary contamination assessment
7	Submission of site investigation report and remediation strategy
8	Implementation and completion of remediation strategy works
9	Unexpected contamination
10	Code of Construction Practice
11	Archaeological mitigation, investigation and evaluation
12	Construction Ecological Method Statement (EMS)
13	Surface water drainage Scheme
14	Detailed design approval: Cambridge South station
15	External Materials: Cambridge South Station
19	Cycle Parking: Cambridge South Station
20	Green Biodiverse Roof: Cambridge South Station (Deleted)
21	BREEAM Design Stage Certification
23	Detailed design approval: Other elements of the proposed development
24	Lighting Scheme
25	Vegetation Removal, Retention and Protection (Deleted)
26	Soil Management Plan
27	Earthworks (Deleted)
28	Tree Pits (Deleted)
29	Hard and Soft Landscape

6.1.7 A schedule of the revised draft conditions proposed by Network Rail is contained within Appendix A of this Proof of Evidence.

6.1.8 It is the intention of Network Rail to produce a Statement of Common Ground in conjunction with the GCSP setting out areas of agreement on planning conditions and any areas still to be resolved.

## **6.2 Design Principles**

6.2.1 The design principles underpin the design and set out design matters which the detailed design of the CSIE Project shall address. The Design principles are secured through the proposed Deemed planning conditions which require designs to be in accordance with the design principles.

6.2.2 Network Rail have proposed some changes to the Design Principles submitted with the TWAO application, in order to address some of the objections raised in particular, from CCiC and SCDC.

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In addition, a number of design principles are proposed to be removed as they repeat commitments already made in the design principles document.

6.2.3 The revised Design Principles are contained in Appendix C. This is still under review and network Rail will seek to agree with the GCSP a final set.

6.2.4 Table 6-1 provides details of the changes to the previously submitted Design Principles.

**Table 6-1 Changes to Design Principles**

<b>Original No.</b>	<b>Name</b>	<b>Change</b>
<b>3.1A</b>	<b>Identity</b>	Deleted as repeats other design principles regarding integration with context
<b>3.1B</b>	<b>Placemaking</b>	Amended
<b>3.1C</b>	<b>Be appropriate to its setting</b>	Combined with 3.1E as cover the same issue
<b>3.1E</b>	<b>Conserve the character and form of the green corridor, Hobson's Park to the west and the open countryside beyond</b>	Deleted as this is achieved by the parameter plans which locate the station adjacent the existing railway.
<b>3.1F</b>	<b>Frontage to the East</b>	Duplicates 3.1C
<b>3.2A</b>	<b>Form a gateway</b>	Amended for clarity
<b>3.2B</b>	<b>Cater for different passengers</b>	Moved to 3.3A and renamed community access. Replaced by new Car parking principle
<b>3.2C</b>	<b>Improve passenger experience through good station design</b>	Amended last sentence for clarity
<b>3.2F</b>	<b>Create a new accessible interchange appropriate to the context</b>	Deleted ref. to Urban greening as covered elsewhere.
<b>3.2G</b>	<b>Fully accessible</b>	Moved to section 3.4 Inclusive
<b>3.2H</b>	<b>Provide space for information</b>	Moved to Inclusive
<b>3.3A</b>	<b>Be permeable to the community it serves</b>	Duplication regarding fitting in with context. Replaced by community access (was Cater for different passengers, see above)
<b>3.4A</b>	<b>Resilient</b>	Deleted as included in 3.9G
<b>3.4B</b>	<b>Enhanced accessibility</b>	Deleted as duplicates design principle replaced by 'Fully Accessible'
<b>3.4C</b>	<b>Considerate</b>	Renamed 'Accessible and flexible, public transport interchange'
<b>3.4D</b>	<b>Convenient</b>	Deleted as duplicates design principle replaced by 'Fully Accessible'

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Original No.	Name	Change
3.4E	Provide considered and accessible places for people	Deleted as duplicates design principle replaced by 'Fully Accessible'
3.6F	Connect modes	Deleted first sentence re. covered cycle parking as duplicates previous Design Principle
3.6G	Maximise cycle and pedestrian access from both east and west	Amended name and provided further clarity in main text of Design Principle
3.7E	Integrate well with both the built and natural environment	Changed reference to Great Kneighton to Trumpington.
3.7F		Deleted as provides context for 3.7E and duplicates other design principles about context.
3.7G		Deleted as provides context for 3.7E and duplicates other design principles about context.
3.7H	Restrict vehicular access to the east side only	Amended to clarify the intention of the Design Principle
3.7I	Integrate with the existing park landscape structure	Deleted as it's a statement of fact and covered by the parameter plans
3.7J		Amended to provide clarity, moved to Integrate well with both the built and natural environment
3.7K		Amended to provide clarity
3.7L	Integrate well with both the built and natural environment	Minor amendment to text
3.7M		Moved to Integrate with the existing park landscape structure
3.7N		Deleted as covered elsewhere
3.7P	Improve local biodiversity	Amended name to urban greening and green linkages to be more appropriate, "
3.7Q		Moved to Integrate well with both the built and natural environment
3.8A	Minimise its footprint	Deleted as duplicates 3.7A
3.8C	Smart Architecture	Deleted as covered in revised 3.9G 'Climate'
3.8G	Provide robust operational flexibility	Deleted last section. Based on a number of principles the station needs to include two entrances the last bit does not add to this.
3.9B	Habitat	Deleted as biodiversity target is to achieve 10% net gain which is covered in another Design Principle.
3.9H	Climate	Amended to reflect 3.8C
3.9P	Heritage	Amended to aid clarity.

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- 6.2.5 It is the intention of Network Rail to produce a Statement of Common Ground in conjunction with the GCSP setting out areas of agreement on Design Principles and any areas still to be resolved.

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## 7. RESPONSE TO OBJECTIONS

- 7.1.1 In this section of my evidence, I summarise the key objections received on Town Planning issues in response to the CSIE Project and provide a response to those objections. Given that town planning covers a wide number of areas including flood risk, transport, ecology, heritage and design amongst others many of the responses will have been dealt with in my colleagues' proofs under those individual topics. Rather than repeat I will cross refer to where the response can be found.
- 7.1.2 Network Rail has contacted all statutory objectors and remains willing to meet with them to discuss the concerns raised. A number of meetings have already taken place.
- 7.1.3 Network Rail continues to engage with statutory bodies including GCSP who represent both CCiC and SCDC. Good working relationships have been established with these bodies through engagement and consultation prior to the submission of the TWAO application.
- 7.1.4 Network Rail are holding regular meetings with these statutory bodies to address grounds of objection (or other representations) made with the aim of agreeing a Statement of Common Ground and securing the withdrawal of objections (where applicable).
- 7.1.5 The following section summarises the principal Town Planning themes raised in the objections and related statements of case and outlines a summary response in relation to each objector.

### 7.2 Objections

#### OBJ03 - AstraZeneca UK Limited and Medimmune Limited

- 7.2.1 AstraZeneca Ltd (AZ) raised objections in the following areas related to planning policy and considerations:
- (a) Drainage (Flood Risk)
  - (b) Loss of parking
  - (c) Western Boundary Planting
  - (d) Strategic Gaps
  - (e) Ability of AZ to comply with their planning permission.
  - (f) Northern boundary planting
- 7.2.2 I deal with each of these issues in turn; first summarising the issues raised, before setting out my response.
- 7.2.3 **Issue:** “**The ability to complete the consented drainage attenuation scheme for the South Plot will be compromised.** Drainage of this site is incredibly complex and has been a major issue in the consenting of the site. AZ understand Network Rail will also require a drainage strategy for its project and AZ is waiting for confirmation that the TWAO works will create no consequent negative impact on the site’s consented drainage scheme. Whilst Network Rail has not completed the design of its drainage scheme AZ is seeking a commitment that it will not do anything to compromise the performance of the South Plot drainage scheme so that the South Plot drainage scheme can be completed in its entirety as consented without impactful alteration.”
- 7.2.4 **Response:** Network Rail will not compromise the performance of the South Plot drainage scheme. They will share the results of their drainage modelling with AZ for review and once

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Network Rail have acquired absolute title will re-grant existing easement rights to AZ. These easement rights will replicate the currently permitted levels of flow of 6.94 litres per second from the site into North Ditch and will not be constrained because of the reduction in land area due to the compulsory acquisition.

- 7.2.5 Overall, the drainage design will be dealt with via a proposed planning condition (Nos 14 to 16) to be approved by the local authority to ensure appropriate consideration of the area drainage and associated flood risk is addressed. A Land and Works Agreement with AZ will cover consultation and their agreement on this matter.
- 7.2.6 **Issue: Loss of car parking spaces**, “19 car parking spaces to be provided on South Plot in accordance with the planning consent are within the land shown to be permanently acquired. The loss of parking is a serious concern and it is unclear at this point whether and if so how many parking spaces could be provided elsewhere within the AZ site...”
- 7.2.7 **Response:** Network Rail have submitted revised plans which remove this area from the scheme.
- 7.2.8 **Issue: (a) Western Boundary Planting**, “This is a requirement of the CBC Outline Planning Permission (OPP) (06/0796/OUT), as environmental mitigation to make the CBC development acceptable (referred to as mitigation in the CBC ES; October 2006). It is shown on OPP Parameter Plan 6. OPP Condition 42 required a structural landscaping scheme for the CBC to be approved including ‘a) a minimum 12-14m structural woodland landscaping scheme, with additional 3m x 4.8 deep tree blocks positioned at a maximum of 15m centres, in accordance with parameter plan 6 and plan 1700/SK180707.01B, along the western edge of the allocated biotech and biomedical research and development area shown on parameter plan 1, south of the Cambridgeshire Guided Bus embankment’. The western buffer planting within the site was therefore approved in accordance with the OPP requirements, through discharge of OPP Condition 45 which required submission with the RM [reserved matters] application of ‘an accompanying landscaping scheme for the associated plot’.”
- 7.2.9 **Issue: (b) Strategic Gaps**, “OPP Condition 7 required that ‘A minimum of two gaps of at least 25m in width shall be provided within the biomedical and biotech research and development area shown on parameter plan 1 south of the Cambridgeshire Guided Busway route between buildings.’ The OPP condition states the gaps ‘shall not be occupied by any buildings’. As required by the condition, the gaps were agreed through the Phase 1 RM permission (14/1633/REM) – a 25m gap to the south of the Energy Centre and 12.5m gap to the south of the land now to occupied by the Travel Hub (with the other 12.5m of the southern gap being provided by the development to the south). The gaps approved through the landscape design for the Phase 1 RM permission (14/1633/REM) have been carried out through into AZ’s current RM permission for the South Plot (20/05027/REM). The Network Rail land take includes land within the provided Strategic Gaps and proposes a ‘building’ (i.e. the station structure) within the northern gap. As such, AZ will not be able to deliver key landscaping elements of its RM permission and risks being non-compliant with the OPP and required mitigation for the CBC. It is noted that a landscaping condition is proposed in its draft planning conditions contained within its request for deemed planning permission submitted with the TWAO application. It is assumed that this will include the western boundary landscaping area, but it is unclear how AZ is protected from the risk of not being able to deliver its RM permission and the western boundary planting required by the OPP. It is also noted that landscaping will also be lost along the northern boundary of the AZ site, but that this area of landscaping is not included on parameter plan 6, nor specifically referred to in OPP Condition 42. The principle of risk to AZ of not being able to

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implement its approved landscaping scheme remains with a lower planning risk given it does not form part of the mitigation required by the OPP/ES.”

- 7.2.10 **Issue: (c) Ability of AZ to comply with their planning permission.** “Assurance is therefore required from Network Rail that the planning risks associated with the permanent land take, and therefore AZ’s ability to deliver its approved landscaping design (specifically required by the OPP/ES), is borne by Network Rail and does not jeopardise AZ’s ability to deliver the rest of its scheme in accordance with its planning consents. AZ cannot be in a situation where its site must be altered or reconfigured at a later date in order to satisfy planning conditions that became impossible to deliver because of the works authorised by the TWAO.”
- 7.2.11 **Issue: (d) Northern Boundary Planting.** “in connection with the South Office Building and the Station Forecourt, the two developments when completed need to sit side by side and with level differences across the sites it will be crucial to agree a scheme of hard and soft landscaping which is complimentary to both projects. Such a scheme needs to take into account the need to segregate pedestrian and cycle traffic flows as well as provide an aesthetically pleasing and functionally secure line between the two realms, an issue also applicable to the Western physical boundary. AZ expects to have an instrumental role in the development and agreement of this scheme with Network Rail prior to its submission to Cambridge City Council recognising that this design detail is not currently refined sufficiently at this stage to finalise the levels and layout.”
- 7.2.12 **Response:** I deal with the three issues lettered (a)-(d) together. Network Rail propose to amend Article 35 of the proposed TWAO to include additional paragraphs which deal with the consequential impacts of the proposed TWAO on the AstraZeneca planning permission. Network Rail believe this approach follows similar precedents in the DCOs for the Riverside Energy Park, South Humber Bank Energy Park, and Hinkley Point C Nuclear Power station. Although those are DCOs rather than TWAOs, I am advised that this wording is within the scope of the powers of the Transport and Works Act (TWA) 1992. Section 5(4)(b) of the TWA provides that a TWAO may include “such supplemental and transitional provisions as appear to [the Secretary of State] to be necessary or expedient in connection with the order; and paragraph 8 of Schedule 1 to the TWA provides that a TWAO may make provision for “The imposition and exclusion of obligations or of liability in respect of any acts or omissions.” In this case, we are excluding the developer under the AZ permission from any liability that might result from being unable to implement that permission in accordance with the conditions.
- 7.2.13 Network Rail have discussed this with both AZ and GCSP, who subject to drafting have not raised any objections to this approach in order to regularise this situation. There is a small area of the AZ South Office Building access which is not within the Order Limits and would potentially require a minor amendment to the existing planning approval. As this would not be picked up by the proposed TWAO and may require the submission of a non-material amendment application (subject to confirmation from GCSP) to regularise. To cover this outstanding issue and the larger issues of the strategic gap and western planting Network Rail have proposed an agreement with AZ to compensate for costs reasonably and properly incurred by the AZ to prepare and submit a Section 73 Application or a Section 96A Application as required to ensure that they are not in breach of the CBC OPP or AZ RM approvals.
- 7.2.14 In order to ensure that the intention of the planning conditions on the AstraZeneca scheme are delivered Network Rail propose include additional planting within the CSIE Project. To replace the AstraZeneca western boundary planting additional trees and ecological features such as bat and bird boxes which were proposed along AstraZeneca boundary are to be included within the CSIE Project limits on the western side of the railway as part of the proposed landscape scheme.



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Network Rail have committed to increase this by 10%, consistently with what will be required by the proposed planning condition on biodiversity net gain in the Environment Act 2021 in the future.

- 7.2.15 To mitigate the potential effect on the strategic gap, Network Rail propose to instal a living green fence on the boundary between AstraZeneca and Network Rail. The Design Principles for the CSIE project (Appendix C) have been updated to reflect this required planting.
- 7.2.16 With respect to the northern boundary planting Network Rail have entered into an agreement with AZ to develop the landscape plans collaboratively with them to ensure they are designed and constructed so as to complement the design of both schemes.
- 7.2.17 The implementation of these proposals will be through the discharge of a proposed planning condition relating to the landscape design (No. 29) of the CSIE project (See Appendix A). The condition requires that the details are in accordance with the proposed design principles (See Appendix C).

**OBJ7 – Trumpington Residents' Association**

- 7.2.18 Trumpington Residents Association (TRA) raised objections in the following areas related to planning policy and related considerations:
  - (a) Restrictions on the use of the station;
  - (b) Reduced impact on Hobson's Park;
  - (c) Alternatives;
  - (d) Electricity sub-station and rail systems enclosure;
  - (e) Maintenance track within the western boundary of Hobson's Park;
  - (f) Compensation for loss of Hobson's Park land and potential future footbridge; and
  - (g) Nine Wells nature reserve and historic monument.
- 7.2.19 Other transport related issues including the path from Cambridge Guided Busway (CGB) to Addenbrooke's bridge, the path from Addenbrooke's bridge to western station building, proposed pedestrian access to western station building and cycle parking at the western station building have been addressed in the Transport Proof of Mr Hilling (**NRE2.2**).
- 7.2.20 The issues raised in points (a) to (g) will be dealt with in turn; first summarising the issues raised, before setting out my response.
- 7.2.21 **Issue: Restrictions on the use of the station**, "We ask that the Order and Deemed Planning Permission, if granted, should be on condition that the station's purpose is restricted primarily to serving the travel needs of the staff, patients and visitors to the health and life sciences organizations located on the Cambridge Biomedical Campus, with a secondary benefit to local residents accessed only by public transport/active travel except for people with mobility difficulties unable to use public transport, walk or cycle to get to the station."
- 7.2.22 **Response:** Network Rail are not able to restrict the use of the station in the way described as this would not be enforceable or appropriate.
- 7.2.23 **Issue: Impact on Hobson's Park**, "We also ask that the Order includes a further condition that no additional demands on land in Hobson's Park or other parts of the "strategic green corridor

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that extends from the Chalk Hills to Long Road along the Vicar's Brook/Hobson's Brook corridor", which also includes Nine Wells Local Nature Reserve, will be countenanced without prior public consultation followed by application for a new TWA Order and Deemed Planning Permission. [Cambridge City Local Plan 2018, Policy 18, page 71]."

- 7.2.24 **Response:** Network Rail are only seeking powers to take the land described by the Order Plans. There is no need for any further conditions as Network Rail would be unable to use a larger footprint unless they were granted further approvals by amongst others the Council and/or the Secretary of State. Network Rail have submitted revised Order plans showing an approximate 66% reduction in the area of Hobson's Parks they require. Network Rail have issued revised Order plans (**N23**) to reflect this change.
- 7.2.25 **Issues: Temporary Adverse Effects on Hobson's Park** "It is unacceptable that Network Rail's application, if granted, would remove from public use for upwards of two years 35 per cent of Hobson's Park for construction purposes. [Public Open Space Assessment, paragraph 5.1.3, Figure 2, & paragraph 5.1.6]. The Association has consistently argued that the proposed size of the western station building construction compound is excessive and should be reduced significantly, as should the extent of the proposed temporary construction area, the vast majority of which is inappropriately proposed on the western side of the railway in Hobson's Park".
- 7.2.26 **Reduce land acquisition of Hobson's Park,** "We ask that the temporary land acquisition proposed in Hobson's Park is significantly reduced through a large reduction in the size of the western station building construction compound and in the temporary construction area. This would be consistent with the spirit of the Environmental Statement, reduce the need for the extensive "Area-specific mitigation" envisaged by Network Rail and reduce the extent now proposed of mature trees and shrubs having to be removed, including trees planted by pupils of Fawcett School nine years ago. [Environmental Statement, Landscape & Visual, 13.4 Design & mitigation, pages 13-42 & 13-43]."
- 7.2.27 **Response:** Network Rail have provided updated Order plans which have reduced the land take in Hobson's Park by around 66%. Network Rail have issued revised Order plans (**N23**) to reflect this change. The remainder of the land within the order is required to facilitate the construction of the CSIE Project, this is explained in my Colleague Mr Barnes Proof (**NRE1.2**).
- 7.2.28 The use of the Hobson's Park temporarily for construction is assessed in terms of its effect on the Green Belt and Open Space in Sections 4.4 and 4.5 as not inappropriate development within the green belt nor having a significant impact on the provision of open space. Therefore, it is considered acceptable in terms of the development plan in relation to policies regarding the Green Belt and Open Space.
- 7.2.29 **Issue: "Alternatives,** there is sufficient land on the eastern side but not the will on Network Rail's part to insist by means of compulsory purchase or otherwise that it should be provided in support of the station's construction by the organizations on the Biomedical Campus. While Network Rail is willing to compulsorily appropriate land from Hobson's Park, which is adversely affected by the proposed station, it is not willing to compulsorily acquire land from organizations on the Campus for whose benefit the station is to be built. We object strongly to this and to its de facto statement by Network Rail that Hobson's Park land is of lesser value than land in the Biomedical Campus – and that because it is public open space it is freer for construction use than Campus land notwithstanding the large disbenefit to the public it would entail for a significant period of time. This is not acceptable. The Park's status in the Local Plan described above and in the affections of residents, should give it much greater protection than Network Rail proposes."

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- 7.2.30 **Response:** The land parcels on the eastern side of the railway are part of the proposed Addenbrooke's Hospital expansion. In the event they were used for the CSIE Project it would delay the construction of the Hospital.
- 7.2.31 **Issue: Electricity sub-station and rail systems enclosure,** "The area is populated by hares which, as explained in our earlier comments, is a rapidly diminishing species due primarily to intensive agricultural methods. We ask that Network Rail's proposal that an electricity sub-station and railway systems enclosure be located as shown in Drawing 158454-ARC-00-ZZ-DRG-EEN-000076 is rejected and a suitable alternative location "under or in the immediate vicinity of Nine Wells Bridge" be identified for either or both elements. We appreciate the effort Network Rail has made to screen the two rail facilities with landscaping – but this is a strategically important view from Trumpington towards White Hill which forms the first part of the Gog Magog Hills stretching away from Cambridge city edge towards Magog Down, Wandlebury and beyond. A less obtrusive location should be identified to leave this view undisturbed."
- 7.2.32 **Response:** Network Rail are unable to relocate the electricity sub-station and rail systems enclosure/ compound. The compound is required to be close to the railway and there is no suitable alternative location which does not comprise part of the green belt or areas which form part of committed development including the proposed Addenbrookes Hospital and CBC expansion. There is also no additional land provided within the proposed TWAO for an alternative location.
- 7.2.33 In particular we note the request to locate the compound under the Nine Wells Bridge. This is not possible for the following reasons:
- (a) It would impede maintenance and operational functionality due to headroom restrictions. The height of HGVs or cranes required to install/replace compound equipment would be restricted by the bridge soffit.
  - (b) Risk of explosion/fire within compound could impact the structural stability of bridge and increase the public safety risk.
  - (c) Increased fencing requirements necessary to safeguard the public and prevent vandalism.
  - (d) Insufficient space between the bridge abutment and railway corridor for an emergency/maintenance vehicular access and Railway Systems Compound.
  - (e) Risk of errant vehicle from bridge damaging rail systems compound.
  - (f) Risk of trespass from overbridge into rail systems compound
  - (g) Public safety risk and risk of vandalism due to the High Voltage and Signalling cables that run from the compound directly to the railway corridor.
  - (h) Creates a potential obstruction to the Highways Authority carrying out bridge structure surveys
- 7.2.34 The ES concluded that there would be no significant negative effects to visual amenity and landscape character either during the proposed development's construction or operation phases and as such the chosen location is acceptable.
- 7.2.35 Network Rail have included additional land to allow for a suitable landscape and planting scheme to mitigate the impact of the compound. The landscaping details will be subject to a proposed planning condition (No. 29) which will require the approval of the local planning authority.

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Nevertheless Network Rail following a site meeting on the 3<sup>rd</sup> December are prepared to review the layout and arrangement of structures within the proposed limits of the TWAO. If alternative acceptable proposals could be identified, they would be brought forward as part of the detailed design and submitted to the local authority via a proposed planning condition. These proposals would need to not give rise to any materially new or materially different environmental effects from those assessed in the Environmental Statement.

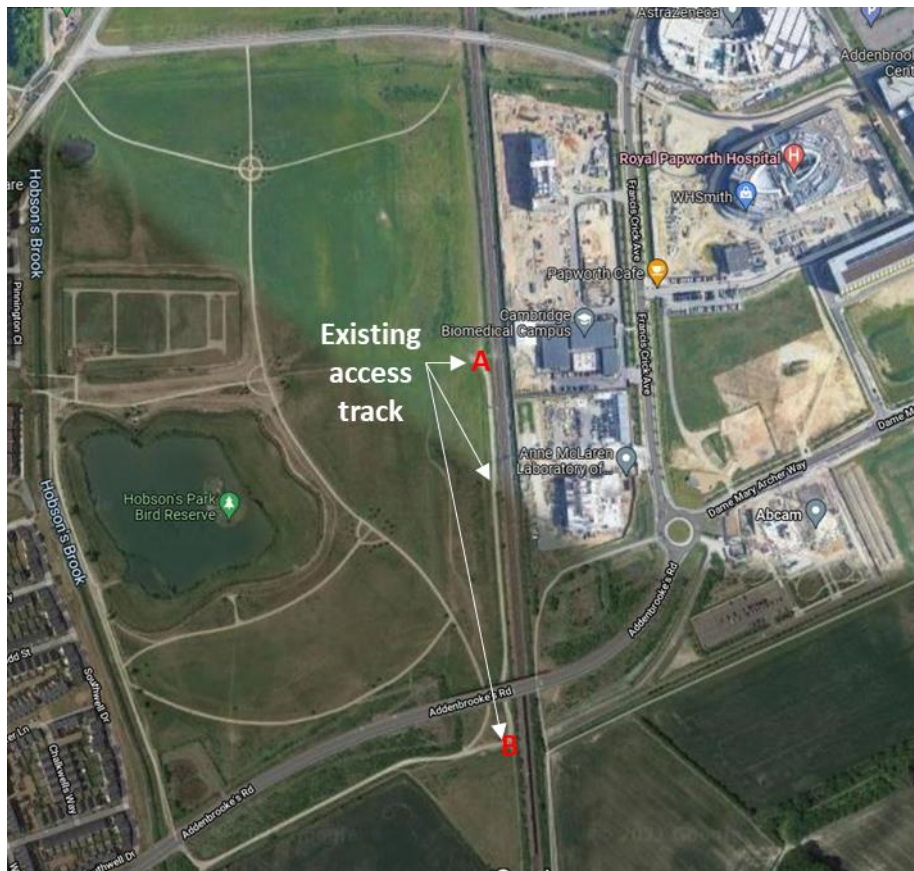
**7.2.36 Issue: Maintenance track within the western boundary of Hobson's Park,** "There is not an existing western maintenance/emergency vehicle track within Hobson's Park, nor was one included in any of Network Rail's public consultations. The Association objects strongly to the creation of a western maintenance/emergency vehicle track as an unwarranted intrusion into and loss of Park land. There used to be a temporary construction haul road in this location on the eastern side of Hobson's Brook from Addenbrooke's Road to the old haul / farm bridge across the Brook opposite Pinnington Close and the new Clay Farm Community Garden. But this was removed by Countryside Properties when its construction purpose was complete. It is now awaiting full restoration as Hobson's Park land and is not available for the purpose Network Rail has in mind. There is also an informal pedestrian path of cut grass from the old haul bridge to the Guided Busway, which is also on the eastern side of Hobson's Brook; and another informal cut grass path from the Busway entrance to the park to North Ditch, but these are not maintenance tracks nor should they be. Network Rail has not explained why a western track is thought necessary. We ask that the mooted western maintenance track is removed from the application and excluded from the Order."

**7.2.37 Response:** As depicted in Figure 7-1 the existing track used by Countryside Properties runs to the west of the railway line northwards from just to the south of Addenbrooke's Road. Reference was included in the Consultation stakeholder information pack in Appendix B (Proposed Station Location Plan) (**NR07**). Network Rail have included the right to access the western side of the station via the route delineated as Land Parcel 008 on the Deposited Plans (NR9) within the TWAO application. This access route is required to enable localised maintenance activities to be undertaken on an ad hoc basis. Network Rail have also included the right to set up a small compound (as and when required) adjacent to the western station forecourt to facilitate the maintenance activities. No permanent surfacing will be installed, due to the infrequent nature of the requirement to access the station for maintenance purposes. However, as certain maintenance activities will require vehicles, plant and materials to be delivered to the western side of the station e.g., landscaping maintenance, fencing repairs, replacement of cycle stands etc. Network Rail does need to secure the rights to access over the park. In the unlikely event that damage is caused with the park as a result of maintenance activities, Network Rail will repair the damage to the satisfaction landowner and Cambridge City Council (as maintainer of the park).

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Figure 7-1 Existing access track



- 7.2.38 **Issue: Compensation for loss of Hobson's Park land and potential future footbridge – "Exchange land"**, "We ask that the 'Potential future footbridge' shown at the eastern end of the exchange land is provided by Network Rail as part of the development and that this is made a condition of the Order and deemed planning permission. Without the additional footbridge the exchange land would be a cul-de-sac with one access only. This would not best facilitate the passive recreational use of the exchange land and would be a safety hazard in an isolated area at risk of anti-social behaviour...Network Rail also needs to make clear how maintenance vehicles and personnel would access the railway infrastructure presently served by the two level crossings, using the proposed accommodation bridge and exchange land."
- 7.2.39 **Response:** The 'potential future footbridge' detailed on drawing 158454-ARC-ZZ-ZZ-DRD-LEP-000054 (Doc Ref. NR 13) is an additional pedestrian footbridge which Network Rail may be able to provide, but this will be subject to separate discussions with the landowners and Hobson's Conduit Trust. If this proposal is acceptable to all parties, Network Rail will include the details within the detailed design for the landscaping scheme which will be submitted to GCSP to discharge the relevant proposed deemed planning permission condition.
- 7.2.40 Network Rail would use the proposed field access through the Exchange Land and will seek a license to traverse the edge of the field in order to gain access to the railway.
- 7.2.41 **Issue: Nine Wells**, "We strongly object to the adverse impact on and risk to Nine Wells Local Nature Reserve during construction of the station when it would most definitely not be the case that – 'The setting of Nine Wells local nature reserve, its listed monument, and the Scheduled (site of White Hill Farm) monument are preserved.' [Design & Access Statement, paragraph 3.4.14, page 22]. Despite our strong representations in the public consultations, Network Rail is

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still proposing to locate the station's main construction compound (CC1) at "a minimum" of only 30 metres from the Reserve. As National Cycle Network Route 11 is to be temporarily diverted around the perimeter of the compound during construction of the station, the minimum distance may be even less. This is not acceptable. The Reserve is a fragile environment surrounded by potential risks including not only the proposed station but also the Greater Cambridge Partnership's Cambridge South East Transport Scheme whose dedicated busway and active travel path are to be constructed at the same time between the railway line and the Reserve. [TRA public consultation response letter 13 November 2020, page 10, and letter to Network Rail, 21 January 2021]"

- 7.2.42 **Response:** The boundary of the nature reserve is approximately 75 metres away from the edge of the proposed Order limits. The ES reports no significant effects on either the nature reserve or the Listed Monument within. My colleagues Ms Wylie (Heritage) and Mr Stone (Ecology) provide a more substantive response in their proofs of evidence regarding these issues (**NRE7.2** and **NRE12.2**).

**OBJ08 - University of Cambridge Estates Division**

- 7.2.43 The University of Cambridge Estates Division raise the following issues related to planning policy and related considerations, specifically with respect to the effects of the works on sensitive equipment within the Anne McLaren Building (AMB) and the future development of Plot 9:
- (a) Noise and vibration
  - (b) Electromagnetic interference (EMI)
  - (c) Drainage
  - (d) Development of Plot 9
  - (e) Planning Context and Considerations
- 7.2.44 With respect to matters a to c Network Rail are seeking to enter into a Land and Works Agreement with the University of Cambridge Estates Division to provide details of their construction methodology, potential EMI output and drainage proposals such that both parties can agree suitable mitigation is in place. Network Rail note that the agreement will provide a legally binding commitment to ensure that existing land drainage assets serving the various landowners interests are maintained and/or re-provided and any rights are re-provided. Further details can be found in my colleagues Lynden Spencer-Allen (Vibration) (NRE3.2), Simon Taylor (Noise) (NRE4.2), Sue Brocken (Drainage) (NRE5.2) and Rafat Kadhim (EMI) (NRE13.2) proofs of evidence.
- 7.2.45 **Issue: Development of Plot 9,** "The Scheme risks significantly interfering with the University's future development options for Plot 9. Plot 9 is likely to be developed, in due course, with a facility involving biomedical and/or biotechnology uses. The University is concerned that the Scheme will have detrimental impacts on its plans in this regard, including in relation to drainage (see section 8 below) and also the potential loss of developable area (particularly should any part of Plot 9 be permanently acquired)."
- 7.2.46 **Response:** Outline planning permission was granted for Plot 9 in 2017 (Ref. 16/1078/OUT) and this includes reference to the western boundary planting that is a requirement of the CBC Outline Planning Permission (OPP) (06/0796/OUT). Network Rail would propose to deal with this in the same or similar manner as described in the response to OBJ03 with respect to the

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Western Boundary Planting, Strategic Gaps, Ability of AZ to comply with their planning permission and Northern boundary planting.

- 7.2.47 Network Rail will continue to work with the University of Cambridge to understand and resolve the conflict between the two schemes.
- 7.2.48 **Issue: Planning Context and Considerations,** The UoC make reference to a number of areas in the planning statement regarding air quality, noise and flood risk (including drainage) with reference to the NPPF, National Planning Practice Guidance, Guidance for the Natural Environment 2019, The CLP policy 17, Cambridgeshire Flood and Water SPD and Greater Cambridge Sustainable Design and Construction SPD. The assertion is that the planning statement has not demonstrated that the scheme is in accordance with these documents.
- 7.2.49 **Response:** Within this proof I have addressed how the CSIE Project complies with the development plan and relevant wider material consideration on these topic areas in sections 4.9 (Noise and Vibration), 4.11 (Water Resources and Flood Risk) and 4.13 (Air Quality).
- 7.2.50 The proposed planning conditions have been discussed with the GCSP and revised drafting is included in Appendix A. Network Rail do not believe it is appropriate to mitigate the effects of their development on the AMB or Plot 9 directly through these mechanisms and have been seeking to agree protective provisions through a private agreement with the University of Cambridge to provide details of their construction methodology and drainage prior to starting relevant works. These will require Network Rail to agree relevant mitigation with the UoC to ensure the impacts of the CSIE Project are acceptable. It will also ensure that existing land drainage assets serving the UoC area are maintained and/or re-provided and any rights are re-provided.

**OBJ09 - Medical Research Council**

- 7.2.51 The Medical Research Council raise the following areas related to planning policy and related considerations:
- (a) Vibration from construction works and ongoing use
  - (b) Electromagnetic interference (EMI)
  - (c) Generation Dust and Dirt
  - (d) Noise
  - (e) Impact of the Haul Road and on-going Rights of Access for Maintenance
  - (f) Drainage
  - (g) Biodiversity
  - (h) Security
  - (i) Alternatives Not Considered
- 7.2.52 With respect to all of these matters Network Rail are seeking to enter into a Legal Agreement with the Medical Research Council to provide details of their construction methodology (including any traffic management), potential EMI output, security measures and drainage proposals such that both parties can agree suitable mitigation is in place.
- 7.2.53 In particular with respect to Biodiversity, the issue relates to the removal of trees between the Laboratory of Molecular Biology and the railway. As noted on the indicative Landscape plans



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submitted with the deemed planning permission (**NR13**) it is Network Rail's intention to replace this planting on completion of the works. The proposals in relation to this area are discussed further in my colleague Mr Barnes Proof (**NRE1.2**). The detail of the replacement planting would be submitted to the relevant planning authority for approval under the proposed landscape planning condition (No. 29), see Appendix A. Network Rail can commit to sharing the proposals with the MRC prior to submission to ensure they are satisfied with the proposals.

- 7.2.54 Further details can be found in my colleagues Lynden Spencer-Allen (Vibration) (NRE3.2), Simon Taylor (Noise) (NRE4.2), Sue Brocken (Drainage) (NRE5.2) and Rafat Kadhim (EMI) (NRE13.2) proofs of evidence.

**OBJ10/11 - Cambridge Medipark Limited and CBC Estate Management Company Limited**

- 7.2.55 Cambridge Medipark Limited and CBC Estate Management Company Limited raised objections in the following areas related to planning policy and considerations:

- (a) Impact on other infrastructure at the Biomedical Campus;
- (b) Impact on drainage systems;
- (c) Impact on the ability to bring forward the remainder of Phase 2 of the development; and
- (d) Cumulative impact of the Cambridge South East Transport scheme.

- 7.2.56 Points (a) and (d) are dealt with in the proof of evidence of my colleague Mr Hilling (Transport) (**NRE2.2**), whilst point (b) is dealt with in the proof of evidence of Mrs Brocken (Drainage) (**NRE5.2**).

- 7.2.57 I deal with issue (c); first summarising the issue raised, before setting out my response.

- 7.2.58 **Issue: Impact on the ability to bring forward the remainder of Phase 2 of the development,** The Scheme as currently devised will impact on CML's ability to bring forward the multi-storey carpark (MSCP) to replace the Abcam temporary carpark as part of Phase 2. The MSCP is designed to accommodate all parking for all the commercial Phase 2 development. The proximity of the main construction compound to the site of the future MSCP and also the proposed rerouting of the cycle route into this area of the Campus will, in the absence of appropriate arrangements by the Promoter, impede development in this area of the Campus. It is imperative that access is maintained to allow CML to construct and operate the necessary car parking facilities to service the Phase 2 development in its entirety. More widely, there is simply insufficient information provided by the Promoter as to how the construction of the Scheme would be compatible with the construction of the remainder of the Phase 2 development.

- 7.2.59 **Response:** Network Rail propose to include a mechanism within a separate Land and Works Agreement with both Cambridge Medipark Limited and CBC Estate Management Company Limited to work collaboratively with both parties to ensure sufficient information is available to develop construction methodologies and management requirements so that both projects can be developed concurrently without either having the effect of precluding delivery of the other. Network Rail do not believe there are any areas of conflict between the projects which cannot be resolved.

**OBJ13 – Cambridge Group Ramblers**

- 7.2.60 The Cambridge Group Ramblers notified the Department for Transport that they are withdrawing their objection based on the correspondence received from Network Rail on the 14 December



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2021. This correspondence noted Network Rail would include a planning condition (No. 38) to ensure Access into Hobson's Park will be maintained at all times from both Addenbrooke's Road and the Trumpington Residential area, see Appendix A.

**OBJ14 - Cambridge Past, Present and Future**

- 7.2.61 Cambridge Past, Present and Future raised objections in the following areas related to planning policy and considerations:
- (a) land acquisition proposed in Hobson's Park to be significantly reduced
  - (b) Alternative construction compounds
  - (c) Design of the western station building
  - (d) Electricity sub-station and rail systems enclosure
  - (e) Maintenance track within the western boundary of Hobson's Park
  - (f) Compensation for loss of Hobson's Park land – "Exchange land"
  - (g) Combining habitat mitigation schemes
- 7.2.62 I deal with each of these issues in turn; first summarising the issues raised, before setting out my response.
- 7.2.63 **Issue: Land acquisition proposed in Hobson's Park to be significantly reduced,** "We ask that the temporary land acquisition proposed in Hobson's Park is significantly reduced through a large reduction in the size of the western station building construction compound and in the temporary construction area. This would be consistent with the spirit of the Environmental Statement, reduce the need for the extensive "Area-specific mitigation" envisaged by Network Rail and reduce the extent of trees and shrubs having to be removed, including trees planted by pupils of Fawcett School nine years ago."
- 7.2.64 **Response:** Network Rail have issued updated Transport and Works Order Plans that minimise the land take in Hobson's Park by about 66%. Network Rail have issued revised Order plans (**NR23**) to reflect this change.
- 7.2.65 **Issue: Alternative construction compounds.** Cambridge Past Present and Future suggest there is sufficient land on the eastern side of the station but not the will on Network Rail's part to insist by means of compulsory purchase or otherwise that it should be provided in support of the station's construction by the organisations on the Biomedical Campus.
- 7.2.66 **Response:** The land parcels identified by Cambridge Past, Present and Future are part of the proposed Addenbrookes' Hospital expansion. If this area were to be used for the CSIE Project it would delay the construction of the Hospital. This issue was addressed in greater detail in my response to the TRA's objection, above at paragraph 7.2.27.
- 7.2.67 **Issue: Design of the western station building/light pollution,** "we request that a condition is included which requires the design of the glass frontage and the landscaping in front of the station to be revised to better mitigate the permanent negative impact of light pollution and better integrate the station into park when viewed from the park. Alternatively, the area of exchange land should be increased to compensate for the negative impacts."
- 7.2.68 **Response:** To ensure the satisfactory implementation of the CSIE Project that will take into account the impact of light pollution from the development on the surrounding area and Hobson's

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Park, a number of planning conditions which require the approval of the station buildings (No. 17), landscaping (No. 29) and an artificial Lighting scheme (No. 27) are proposed, see Appendix A. These would need to be in accordance with the CSIE Design principles (Appendix C) and would require the approval of from the local planning authority. Cambridge Past Present and Future can therefore be reassured that the impact of the station building including its lighting will be acceptable.

- 7.2.69 **Issue: Electricity sub-station and rail systems enclosure**, “objects 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 in an unduly visible position... We ask that a condition be included which requires an alternative location for the electricity sub-station and railway systems enclosure.
- 7.2.70 **Response:** This is covered in my response to OBJ7
- 7.2.71 **Issue: Maintenance track within the western boundary of Hobson’s Park**, “Cambridge PPF objects to the creation of a western maintenance/emergency vehicle track as an unwarranted intrusion into and loss of Park land.”
- 7.2.72 **Response:** This is covered in my response to OBJ7
- 7.2.73 **Issue: Compensation for loss of Hobson’s Park land – “Exchange land”**, “Whilst we have no objection to this proposal, the provision of new parkland next to a road embankment, railway line and electricity sub-station can hardly be described as creating an attractive community asset. Neither is it of a generous size, given the cumulative impacts of the station on the park, including light pollution, noise pollution and loss of amenity.
- 7.2.74 **Response:** Network Rail are only required to provide replacement public open space for that which is lost permanently as part of the scheme. The ‘Exchange Land’ is required to be no less in area and equally advantageous for use and so should replace the perceived loss of amenity. Mitigation for light and noise pollution is dealt with through other means and will be subject to discharge of a proposed condition (Nos. 10, 27, 30 and 31). Further details on the provision of the “Exchange Land” are covered in Network Rail’s Public Open Space (POS) Assessment (NR19) and my colleague David Jones’s Proof of Evidence (Open Space) (NRE8.2).
- 7.2.75 **Issue: Combining habitat mitigation schemes**, “There are other development schemes proposed for this area, including for a new busway and East-West Rail, all of which will be required to create new areas of habitat and greenspace. These schemes will have a cumulative negative impact but there is an opportunity for them to work together to create a cumulative beneficial impact by combining habitat mitigation schemes to create a new large area of habitat for public benefit - instead of several small ones with little public or ecological benefit, such as the one proposed for this application. This is a missed opportunity and we would welcome any planning measures that can encourage and enable a collective approach to mitigating harm.”
- 7.2.76 **Response:** With respect to these other proposed developments Network Rail would be happy to discuss with the promoters’ opportunities to combine habitat mitigation schemes should programme align. Network Rail are currently seeking an agreement with Cambridge County Council to set out the mechanisms for continued engagement and for securing the necessary agreements so that both the CSIE and CSET projects can be delivered in collaboration with each other.
- 7.2.77

**The Network Rail (Cambridge South Infrastructure Enhancement) Order***Planning Proof of Evidence – January 2022 - Document NRE9.2***OBJ15 – Pemberton Trust**

- 7.2.78 The Pemberton Trust raised objections in the following areas related to planning policy and considerations:
- (a) Detailed access design
  - (b) Land drainage
  - (c) Green space and the country park
  - (d) Farm access
  - (e) Cambridge Guided Bus
- 7.2.79 Points (a), (d) and (e) are dealt with in the proof of evidence of Mr Hilling (Transport). Point (b) is dealt with in the proof of evidence of Mrs Brocken (Drainage).
- 7.2.80 I deal with the remaining issue; first summarising the issues raised, before setting out my response.
- 7.2.81 **Issue: Green space and the country park**, “To the west of the railway line, the Medipark development provides for the provision of the country park and access for the public to open spaces and the proposed scheme reduces the extent of this, which potentially impacts on the arrangements of future development and the creation of the park.”
- 7.2.82 **Issue:** Network Rail have been working closely with our construction partners J Murphy & Sons to look at reducing the amount of temporary land take within Hobson’s Park. As a result, a large area of the park envisaged for storing excavated material has now been removed from the proposed TWAO. This has reduced the area of Hobson’s Park that is required temporarily during construction by around 66%. Network Rail have issued revised Order plans (Doc ref. N23) to reflect this change. The permanent land take is that which is required to deliver the scheme and, insofar as this represents existing public open space, is to be replaced with equivalent provision as described in the Proof of Evidence of Mr Jones. It is not clear what future development the land take within the park is being said to potentially impact.

**OBJ18 Cambridgeshire County Council and Greater Cambridgeshire Partnership**

- 7.2.83 Cambridgeshire County Council and Greater Cambridgeshire Partnership raised objections in the following areas related to planning policy and considerations:
- (a) Biodiversity Net Gain across the two schemes.
  - (b) The location of attenuation ponds and landscape and drainage requirements for both schemes, and how these can work together and to ensure the correct land take is sought for each scheme.
  - (c) The construction programmes for each scheme to complement each other and avoid duplication of works and unnecessary disruption to neighbouring businesses and the public where scheme layout overlaps.
- 7.2.84 With respect to these issues Network Rail continues to engage with the Cambridgeshire County Council and Greater Cambridgeshire Partnership regarding the interfaces between the CSIE and Cambridge South East Transport (CSET) schemes. Network Rail are seeking an agreement with Cambridge County Council to set out the mechanisms for continued engagement and for securing the necessary agreements so that both projects can be delivered in collaboration with

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each other. The current drafting covers the location of attenuation ponds, landscaping and construction programme and Network Rail envisage that the agreement will be extended to cover wider collaboration in relation to biodiversity improvements and protections and interaction of drainage provision.

**OBJ23 Cambridge City Council (CCiC)**

7.2.85 Cambridge City Council raised objections in the following areas related to planning policy and considerations:

- (a) Green belt
- (b) Biodiversity net gain
- (c) Birds
- (d) Exchange land, access and landscaping
- (e) Exchange land timing
- (f) Temporary use of Hobson's Park
- (g) Spoil Placement in the park
- (h) Preservation and protection of trees and hedges
- (i) Flood risk assessment
- (j) Green roof
- (k) BREEAM
- (l) Cycle parking
- (m) Car parking
- (n) noise and vibration, lighting and electric vehicle charging points
- (o) Layout of new routes across open space
- (p) Pedestrian link across the Cambridge Guided Busway

7.2.86 Point (c) is dealt with in the proof of my colleague Mr Stone (Biodiversity) (**NRE12.2**), point (l) in the proof of Mr Hilling (Transport) (**NRE 2.2**), and point (t) in the proof of Ms Brocken (**NRE5.1**).

7.2.87 I deal with each of the remaining issues in turn; first summarising the issues raised, before setting out my response.

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

7.2.89 **Response:** I have addressed this in Section 4.4 of this proof by providing an updated assessment against the NPPF. My assessment references the Department of Transport Strategic Outline Business Case for Cambridge South Station (**C3**) and the Consideration of Green Belt Issues report (**NR19**) submitted as part of the TWAO application. This concludes that the CSIE project is considered to be not inappropriate development within the green belt and in accordance with the NPPF and therefore should be deemed acceptable in planning terms.

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- 7.2.90 CCiC in their letter of the 7 December 2021 (Appendix D) have closed out this issue stating “The Council acknowledges that NR has put forward a case for the proposal being not inappropriate development in the Green Belt. Officers do not make a judgement as to whether the proposal complies with the NPPF in this regard but are now satisfied that the Inspector has satisfactory information to consider the matter.”
- 7.2.91 **Issue (b): Biodiversity net gain (BNG)**, “The application has not provided sufficient Information to demonstrate the minimum 10% biodiversity net gain target is achievable and can provide appropriate mitigation on or near to the site, and as a result has not demonstrated compliance with Local Plan 2018 policies 69 and 70, and NPPF 2021 paragraph 174.”
- 7.2.92 **Response:** I have addressed this in Section 4.7 of my proof.
- 7.2.93 Network Rail have also proposed a planning condition (No. 13) to provide a BNG report to explain how the 10% BNG will be provided. In addition, details of the how the BNG will be achieved have been issued to the CCiC. In the event the agreement is in place the drafting of this condition may need to be revisited.
- 7.2.94 **Issue (d): Exchange land, access and Landscaping**, “Further information on the landscaping and biodiversity features, and the accessibility and safety of crossing Addenbrooke’s Road is required in order to assess whether the proposed exchange land is appropriate replacement for the loss of existing public open space, in accordance with Local Plan 2018 policy 67.”
- 7.2.95 **Response:** Network Rail note that safe access to the exchange land would be via travelling under Nine Wells Bridge and once constructed via the new accommodation bridge. This would mean that there is no need to cross Addenbrooke’s Road.
- 7.2.96 Network Rail’s application for deemed planning is outline in nature and Network Rail believe that the proposed landscape condition (No. 29) is suitable to provide the council with further details regarding the final layout and design of the Exchange Land.
- 7.2.97 **Issue: (e) Exchange land timing**, “The exchange land to compensate for the permanent loss of public open space and the new access routes outside of the site compound must be laid out and available for use before the use of areas of existing public open space for the development commences, in order to provide satisfactory replacement in accordance with Local Plan 2018 policy 67.”
- 7.2.98 **Response:** I have addressed this issue at Section 4.5 of my proof of evidence.
- 7.2.99 **Issue (f): Temporary use of Hobson’s Park**, “The temporary use of Hobson’s Park must be justified both in terms of the area of land and the duration for which the land is required, and this must be secured through a condition in order to minimise the temporary loss of public open space in accordance with Local Plan 2018 policy 67.”
- 7.2.100 **Response:** Network Rail have been working closely with our construction partners J Murphy & Sons to look at reducing the amount of temporary land take within Hobson’s Park. As a result, a large area of the park envisaged for storing excavated material has now been removed from the proposed TWAO. This has reduced the area of Hobson’s Park that is required temporarily during construction by around 66%. Network Rail have issued revised Order plans (**NR23**) to reflect this change.
- 7.2.101 Network Rail will continue to look at their construction methodology and land requirements and in order to manage the effects of the proposed construction works on the park and associated features have proposed a number of planning conditions which will enable the local authority to

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control the development this includes the CoCP (No. 10), construction ecological method statement (No. 12), arboriculture method statement and tree protection plan (No. 28) and soils management plan (No. 34). These would all provide greater clarity on how the construction works will be undertaken and the mitigation to limit the effects of those works on the park.

- 7.2.102 **Issue (g): Spoil Placement in the park**, “There must be no spoil permanently placed within areas of public open space and this must be secured through a condition in order to ensure that spoil placement does not lead to the permanent loss of public open space or harm to the character of the public open space in accordance with Local Plan 2018 policy 67.”
- 7.2.103 **Response:** Network Rail have discussed the proposed planning conditions with the Local planning authority and have provided some revised wording for the condition regarding the Soil Management Plan (No. 34) and propose a new compliance condition (No. 33) stating “No excavated material or other material shall be placed within public open space, including Hobson’s Park, other than in accordance with the approved landscaping details or the approved details for temporary storage contained within the approved soil management plan”.
- 7.2.104 As noted above, Network Rail have also been working closely with our construction partners J Murphy & Sons to look at reducing the amount of temporary land take within Hobson’s Park. As a result, a large area of the park envisaged for storing excavated material has now been removed from the proposed TWAO.
- 7.2.105 The CCiC letter of the 7 December 2021 (Appendix D) indicates this matter is resolved to their satisfaction subject to agreeing the proposed planning condition.
- 7.2.106 **Issue (h): Preservation and protection of trees and hedges**, “The application has not demonstrated compliance with Local Plan policy 71 for the preservation and protection of trees and hedges. An AIA [Arboricultural Implications Assessment] and AMS [Arboricultural Method Statement] must be submitted prior to determination, and the impact on TPOs and other trees and hedges must be minimised and mitigated through protection measures and replacement planting secured through conditions.”
- 7.2.107 **Response:** I have addressed this issue at section 4.7 of my proof of evidence.
- 7.2.108 Further details are provided in my Colleague Mr Stone’s Proof (**NRE12.2**).
- 7.2.109 **Issue (i): Flood risk assessment**, Details as requested by the Sustainable Drainage Engineer must be submitted prior to determination in order to demonstrate the proposals comply with Local Plan policy 32 relating to flood risk.
- 7.2.110 **Response:** This issue is principally addressed in the evidence of my colleague, Mrs Brocken (Drainage) (**NRE5.1**).
- 7.2.111 However, I note that the Flood Risk Assessment in the ES has satisfied both the Environment Agency and CCoC as lead local flood authority. The EA having now removed their objection and Cambridge County Council did not raise any objection on this matter.
- 7.2.112 Network Rail have also provided some revised drafting for the proposed planning conditions (Nos. 14 to 16) to the local planning authorities with respect to the submission of the final drainage scheme for the CSIE Project.
- 7.2.113 The CCiC letter of the 7 December 2021 (Appendix D) notes that following receipt of Network Rail’s response on the 1 October 2021 which is summarised in Section 4.11 of this proof the Council’s objection on this ground has been resolved.

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- 7.2.114 **Issue (j): Green roof**, “The proposals for biodiverse green roofs must be confirmed as to whether or not they are required as part of the LVIA and Green Belt mitigation.”
- 7.2.115 **Response:** Network Rail have discussed the council’s proposed planning condition and provided some alternative wording following discussions. Given that the green roof is an integral part of the station it is proposed details will be submitted under the main station planning condition (No. 17). In addition, the council wording regarding the formation of the green roof has been included in the Design Principles. This will allow for the proposals to take account of any updated good practice guidance when the proposals are submitted rather than specified in a planning condition.
- 7.2.116 The CCiC letter of the 7 December 2021 (Appendix D) indicates that CCiC accept this can be dealt with through the proposed planning condition.
- 7.2.117 **Issue (k): BREEAM**, “A condition for submission of a BREEAM pre-assessment demonstrating the scheme is on-target to achieve BREEAM ‘excellent’ rating is required in accordance with Local Plan policies 28, 29 and 31, and the Sustainable Design and Construction SPD”.
- 7.2.118 **Response:** Network Rail have proposed a planning condition (No. 23) to provide a BREEAM pre assessment however, they are working to provide this prior to the inquiry.
- 7.2.119 The CCiC letter of the 7 December 2021 (Appendix D) indicates this matter is resolved to their satisfaction subject to agreeing the proposed planning condition.
- 7.2.120 **Issue: Car Parking (m)**, “The maximum number of car parking spaces for each user group must be specified in the Design Principles and details of cycle parking facilities must be secured through the recommended revised wording, in accordance with Local Plan policy 82”
- 7.2.121 Network Rail have proposed updated wording for the Design Principles to the CCiC and these are contained in Appendix C. The CCiC letter of the 7 December 2021 (Appendix D) indicates this matter is resolved subject to agreeing the proposed wording in the Design Principles.
- 7.2.122 **Issue (n): Noise and vibration, Lighting and Electrical Vehicles**, “Conditions relating to noise and vibration, lighting and electric vehicle charging points must be secured in order to mitigate the impact on residential amenity and sensitive receptors, in accordance with Local Plan 2018 policies 34, 35, and 36.”
- 7.2.123 **Response:** The Council have stated in a meeting regarding the proposed planning conditions their preference to manage construction noise and vibration through a noise and vibration management plan. Network Rail’s preference would be that noise and vibration is managed through the Section 61 process under the Control of Pollution Act 1974 rather than through a noise and vibration management plan under a planning condition (No. 10) and this should be removed from the list of plans to be submitted under the CoCP Part B. It is noted that the draft Order article 32(1)(a) refers explicitly to the use of section 61 of the Control of Pollution Act 1974 and this is supported by Section 7.2 of the CoCP Part A (**NR16** Appendix 2.4). Network Rail remain of the belief that this is in accordance with best practice and is a far more flexible and appropriate regime to manage construction noise and vibration impacts rather through the planning process with the submission of a noise and vibration management plan. I consider this reflects the approach taken in other major rail schemes and infrastructure project such as Crossrail, High Speed 2, Thameslink and Thames Tideway Tunnel.
- 7.2.124 However, Network Rail are satisfied that an approved Noise and Vibration Management Plan would provide defence against a section 60 notice under the Control of Pollution Act 1974 and a defence to proceedings in respect of statutory nuisance in relation to noise as noted by Article 32(1)(b).” Therefore, Network Rail do not object to the council’s approach and agree with the

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inclusion of the noise and vibration management plan noting it was in the proposed deemed planning conditions submitted with the TWAO application but, would not propose to do both and consideration should be given as to whether the CoCP Part A should be updated as necessary to reflect this.

- 7.2.125 Network Rail have put forward to the Council revised wording for a condition (No. 31) on operational noise from the station building and the Platform Announcement Sound System.
- 7.2.126 Network Rail have included a Lighting Management Plan within the CoCP Part B list of documents to be included. In addition, a revised condition (No. 27) on the artificial lighting for the permanent works has been put to the Council.
- 7.2.127 With respect to electric vehicle (EV) charging points Network Rail do not currently believe it is reasonable and proportionate to put in the EV charging points at this time. However, they are willing to include passive provision for their future installation given there are only nine parking spaces proposed for the CSIE project. Network Rail have provided amended drafting of the proposed planning condition (No. 32) such that the necessary infrastructure including ducting, capacity within the station network and ability to connect to the grid is provided.
- 7.2.128 **Issue (o): Layout of new routes across open space**, “The layout of new routes across the public open space should consider the impact on the remaining green spaces between the routes, and any resulting changes to the management regime required or to the use of these spaces for recreation”.
- 7.2.129 **Response:** The layout of new routes within the order limits through the park will depend on the final landscape scheme and these routes will be submitted as part of the Landscape proposals under the proposed planning condition. Routes outside the Order limits should remain as they are.
- 7.2.130 **Issue (p): Pedestrian link across the Cambridge Guided Busway**, “The pedestrian link across the Cambridge Guided Busway between Hobson’s Park and the Active Recreation Area must be complete before the existing connection beneath the Cambridge Guided Busway is lost. This must be secured through the Order”.
- 7.2.131 **Response:** Network Rail agree this is a sensible approach and have suggest a proposed planning condition (No. 37) to cover this matter.

**OBJ24 - South Cambridgeshire District Council**

- 7.2.132 South Cambridgeshire District Council raised objections in the following areas related to planning policy and considerations:
  - (a) Biodiversity net gain;
  - (b) Loss of trees;
  - (c) Landscape proposals;
  - (d) Scale and height on drawings;
  - (e) Noise;
  - (f) Vibration and engagement;
  - (g) Air quality;
  - (h) Lighting;



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- (i) Addenbrooke's Hospital campus masterplan;
- (j) NCN 11 route;
- (k) Scheduled Monument; and
- (l) Land drainage.

- 7.2.133 I deal with each of these issues in turn; first summarising the issues raised, before setting out my response. At the time of submitting this proof I note that the SCDC Cabinet Meeting of the 10<sup>th</sup> January 2022 is considering the officers report to confirm and note the Council's representation to the Public Inquiry on the CSIE Project. Paragraph 16 states "In summary, progress has been made on the majority of the technical matters which can be agreed through conditions, however objections remain on the following grounds: 1. The application has not provided sufficient information to demonstrate the 10% biodiversity net gain target is achievable and can provide appropriate mitigation on or near to the site, and as a result has not demonstrated compliance with Local Plan 2018 policy NH/4, and NPPF 2021 paragraph 174. 2. The loss of trees along the railway line and across the scheme must be minimised in accordance with Local Plan 2018 policies HQ/1, NH/2, and NH/4.
- 7.2.134 **Issue (a): Biodiversity net gain**, "The application has not provided sufficient Information to demonstrate the 10% biodiversity net gain target is achievable and can provide appropriate mitigation on or near to the site, and as a result has no demonstrated compliance with Local Plan 2018 policy NH/4, and NPPF 2021 paragraph 174"
- 7.2.135 **Response:** I deal with this issue at Section 4.7 of my proof of evidence.
- 7.2.136 Network Rail have also proposed a planning condition (No. 13) to provide a BNG report to explain how the 10% BNG will be provided. In the event the agreement is in place the drafting of this condition may need to be revisited.
- 7.2.137 **Issue (b): Loss of trees**, "The loss of trees along the railway line and across the scheme must be minimised, and a condition for tree protection measures must be imposed, in accordance with Local Plan 2018 policies HQ/1, NH/2, and NH/4."
- 7.2.138 **Response:** I have addressed this issue at section 4.7 of my proof of evidence.
- 7.2.139 **Issue (c): Landscape proposals**, "The application does not provide sufficient detail about the landscape proposals to provide unreserved assurance of the success of the LVIA mitigation, as required by Local Plan 2018 policies HQ/1, NH/2 and NH/8"
- 7.2.140 **Response:** The design of the CSIE Project presented for deemed planning approval is outline in nature with specific details of the design reserved through the proposed planning conditions. This includes the station design (No. 17), design of other structures and buildings associated with the development (No. 26), lighting (No. 27) and landscaping/ restoration proposals (No. 29).
- 7.2.141 The deemed planning drawings set out the maximum extent (or envelope), both in plan and vertically, of the proposed development. These are supported by illustrative designs of how the station building could be developed. The SCDC objection suggested that there is no vertical extent to the Railway Systems Compound and Sub Station elements but, these are included on the parameter plan drawing no. 158454-ARC-ZZ-ZZ-DRG-LEP-000102 referred to in the planning condition for this aspect of the works and listed in Schedule 2 of the request for deemed planning permission.

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- 7.2.142 The proposals are also supported by a proposed set of Design principles (Appendix C) secured through a proposed planning condition. These principles set out the key design issues to be addressed through detailed design, providing a framework along with deemed planning drawings within which designs can be submitted and approved by the relevant local planning authority.
- 7.2.143 Between the parameters set on the deemed planning drawings, the design principles and proposed planning conditions Network Rail believe there is sufficient detail and control to ensure that the outcomes of the LVIA are met.
- 7.2.144 The SCDC letter of the 7 December 2021 (Appendix E) notes that “officers advise that the Council accepts that the detail will come forward through the discharge of conditions for the detailed station design (No. 17) and landscape proposals (No. 29), and that this matter cannot be resolved at this stage”.
- 7.2.145 **Issue (d): Scale and height on drawings**, “The deemed planning consent drawings must provide more information to control the scale and height of the substation and railway systems compound to the south of Addenbrooke’s Road, in order that the buildings integrate into the rural location, in accordance with Local Plan 2018 policies HQ/1, NH/2 and NH/8.”
- 7.2.146 **Response:** The combination of the Limits of Deviation detailed in the Deposited Plans and Section (**NR09**) and the Deemed Planning Drawing – Parameter Plan (**NR13**) set the maximum scale and height for the proposed development. In respect to the rail systems compound, Network Rail requires the ability to place a Distribution Network Operator building (“the **DNO** building”) and associated railway plant and equipment within the proposed compound area. The extent of the DNO building and associated equipment is not yet known, as these are subject to detailed design and the requirements of the final station design and associated track, signalling and overhead line electrification requirements. The maximum height above ordnance datum has been confirmed as 18.0m, which includes a vertical limit of deviation of 1.5m. The existing AOD for the site of the proposed rail systems compound is 14.0m, therefore the maximum height of the structures is 4.0m and the minimum height 2.5m. The area surrounding the proposed rail system compound will be landscaped, the details of the landscaping will be subject to the approval of the local planning authority through the proposed landscape (No. 29) and detailed design (e.g., Nos. 17 and 26) planning conditions.
- 7.2.147 The SCDC letter of the 7 December 2021 (Appendix E) notes that “officers advise that the Council accepts this matter has been resolved.”
- 7.2.148 **Issues (e): Noise**, “Site-specific noise mitigation and attenuation measures must be included in the Code of Construction Practice for locations where works will occur that have the potential to adversely impact residential areas of Great Shelford, in accordance with Local Plan 2018 policies HQ/1 and SC/10”.
- 7.2.149 **Issue (f) Vibration and engagement**, “Good and early engagement with the Council and residents on both the mitigation measures and the consultation strategy to minimise the disruption from major construction ground-borne vibration impacts at Shepreth Branch Junction to local residents and impact on mental health, in accordance with Local Plan 2018 policies HQ/1 and SC/10”
- 7.2.150 **Response to issues (e) and (f):** In response to the above two issues Network Rail will be required to set out the proposed mitigation measures in line with BPM within the Noise and Vibration Management Plan required under the CoCP Part B and secured by the proposed deemed planning conditions (No. 10) (Noting Network Rail’s preference that this process should

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be managed through section 61 of the Control of Pollution Act 1974, see response to CCiC objection above at paragraphs 7.2.123 onwards).

- 7.2.151 The CoCP Part A requires that the timing of the advanced notifications will be set out in the CoCP Part B following consultation with the local authorities Environmental Health Officers.
- 7.2.152 It would be good practice for Network Rail to consult the Council's Environmental Health Team prior to submitting the CoCP and Noise and Vibration Management Plan and it would be expected they would be consulted once the formal submission to discharge the condition is made. Network Rail have entered into a Planning Performance Agreement with the GCSP to support this process.
- 7.2.153 **Issue (g): Air quality**, "Further discussions to secure a programme to monitor the impact on air quality on the adjacent minor residential roads around the development, in accordance with Local Plan 2018 policies HQ/1 and SC/12".
- 7.2.154 **Response:** The proposed development has been designed to promote access and egress to the new station by non-motorised users. The Transport Assessment (**NR16** Volume 3 – Appendix 17.2) demonstrates that the proposed vehicular usage of the station is negligible, even during the AM and PM peaks, when compared to the current and future vehicular usage of the wider Cambridge Biomedical Campus. As such Network Rail does not consider that operational air monitoring is therefore necessary.
- 7.2.155 Air quality modelling was undertaken for the operational impacts associated with traffic flow changes on the local road network as a result of the scheme and did not include modelling of idling vehicles at the station owing to a lack of information on idling times, locations, and frequency. There is no guidance or standard method for accurately calculating idling parameters. As such the level of detail provided in the traffic data (AADT24 with speed and % HDV split) is not sufficient to model idling traffic emissions accurately, and instead assumptions based on professional judgement must be made.
- 7.2.156 A conservative air quality sensitivity test was carried out, which assumes all vehicles (i.e., the opening year with-scheme scenario AADT) on Francis Crick Avenue travel at 5km/h. This method is suggested in para 7.249 Defra's LAQM TG.16 to replicate idling emissions from stationary traffic on a road source (for instance a taxi rank or bus stop) using the Emission Factor Toolkit. The assumption was made that all vehicles which use Frances Crick Avenue are producing idling emissions rates is a highly conservative one.
- 7.2.157 The test indicated that the annual mean NO<sub>2</sub> concentration at the closest sensitive receptor (Royal Papworth Hospital) increased by approximately 1µg/m<sup>3</sup> (it should be noted that the Royal Papworth Hospital is located approximately 80m to east of Frances Crick Avenue, allowing sufficient space for dispersion of emissions from the road). The total NO<sub>2</sub> concentration at this receptor is well below the AQS objective of 40µg/m<sup>3</sup> and therefore demonstrates that idling vehicles will not impact the conclusion of the assessment, where effects are shown to be 'Negligible'.
- 7.2.158 It is considered likely that any changes in emissions from idling vehicles would be offset by the reduction in vehicle movements to the CBC. This is supported by the findings of the Transport Assessment which demonstrates that the proposed vehicular usage of the station is 'Negligible', even during the AM and PM peaks, when compared to the current and future vehicular usage of the wider CBC.

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- 7.2.159 Network Rail for the reasons set out above do not consider that the proposed development will have any negative impacts on air quality arising from idling cars.
- 7.2.160 The SCDC letter of the 7 December 2021 (Appendix E) notes that “no further information is required on this matter and that the issue is more effectively managed as part of a wider traffic management programme around the station which is a matter for the Highways Authority.”
- 7.2.161 **Issue (h): Lighting**, “Replacement wording for the artificial lighting condition is required to secure compliance with the relevant guidance relating to construction and operational lighting, in accordance with local Plan 2018 policies HQ/1 and SC/9”.
- 7.2.162 **Response:** Network Rail agree in principle with the proposed planning condition but, have set out some minor revisions whereby the construction lighting is dealt with through a lighting management plan (No. 10) as part of the CoCP Part B documents.
- 7.2.163 The SCDC letter of the 7 December 2021 (Appendix E) indicates that this matter should be resolved subject to proposed planning condition being agreed.
- 7.2.164 **Issue (i): Addenbrooke’s Hospital campus masterplan**, “Network Rail must commit to engage in the review of the wider masterplan for the Addenbrooke’s Hospital campus currently being undertaken by the Cambridge University Hospitals NHS Foundation Trust to address connectivity issues, in accordance with Local Plan 2018 policies HQ/1 and TI/2.”
- 7.2.165 **Response:** Network Rail are engaging with the relevant stakeholders on these wider proposals and will continue to do so.
- 7.2.166 The SCDC letter of the 7 December 2021 (Appendix E) notes “officers advise that no further information is requires on this matter at this stage.”
- 7.2.167 **Issue (j): NCN 11 route**, “The works to the railway line at Shepreth Branch Junction must minimise the impact on the NCN 11 route and be considered carefully alongside the timing of works to other routes within the area to minimise disruption to users. Network Rail must consult with the Council, local cycling groups, Great Shelford Parish Council and other user groups.”
- 7.2.168 **Response:** Network Rail do not object to this and have offered revised wording to the proposed planning conditions (No. 38) such that details of proposed closure including times of the closure and management of pedestrians and cyclists to facilitate access during the closure have been submitted to and approved in writing by the local planning authority. Network Rail would expect the local planning authority to consult relevant local cycling groups, Great Shelford Parish Council and other user groups as appropriate. Network Rail would also seek to undertake preapplication discussions with these groups in line with best practice.
- 7.2.169 **Issue (k): Scheduled Monument**, “The works affecting the Scheduled Monument must be minimal and must have the support of Historic England and Cambridgeshire County Council Archaeology Team, and mitigation must be secured through conditions, in accordance with Local Plan 2018 policies HQ/1 and NH/14.”
- 7.2.170 **Response:** Network Rail is working with Historic England in relation to the Scheduled Monument and mitigation will be dealt with through the associated SMC which will be applied for by Network Rail. Further details are provided in my colleague Ms Wylie’s Heritage Proof (NRE7.2).
- 7.2.171 The SCDC letter of the 7 December 2021 (Appendix E) indicates that this matter should be resolved subject to proposed planning condition being agreed.

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- 7.2.172 **Issue (I): Land drainage**, “An informative should be applied to advise the applicant of the requirement to obtain land drainage bye law approval by the Council for works affecting the awarded watercourse.”
- 7.2.173 Response: Network Rail are currently reviewing the byelaw but, do not have an objection to the proposed informative.
- 7.2.174 The SCDC letter of the 7 December 2021 (Appendix E) notes the “council considers this matter to be closed for the purposes of the TWAO application.”
- 7.2.175

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- 8.1.1 The principle of the CSIE Project is strongly supported through the Development Plan and wider material considerations as set out in Section 4.2. Both SCDC and CCiC in their Statements of Case to the Secretary of State (**E10** and **E11**) confirm their support for the aim of the CSIE Project to promote connectivity within Cambridgeshire to facilitate future growth in the area and promote sustainable development, which aligns with the Cambridgeshire and Peterborough Combined Authority Local Transport Plan (2020) (**D28**).
- 8.1.2 The request for deemed planning consent is seeking permission for development which is comparable to outline planning approval. Further details of the development including the detailed mitigation for the construction works, station building design, design of other structures and buildings associated with the development and landscaping/ restoration proposals are proposed to be secured through a number of planning conditions which are set out in Appendix A. These have been broadly agreed with the local planning authorities.
- 8.1.3 The proposed CSIE project is in accordance with the Development Plan and there are no wider material considerations identified which would affect the conclusion that planning permission ought therefore to be granted. It is noted that given the outline nature of the application much of the detail will be subject to the proposed planning conditions to provide that final surety.
- 8.1.4 Most of the objections to the scheme relate to the lack of details due to the outline nature of the deemed planning application and fall within the following categories:
- (a) Level of Design;
  - (b) Impact on Open Space and provision of Exchange Land;
  - (c) Biodiversity including Trees;
  - (d) Drainage; and
  - (e) Effect on existing planning permissions.
- 8.1.5 Network Rail continue to refine their detailed design but, I am confident that the proposed planning conditions, amendments to the proposed TWAO and agreements with relevant landowners / occupiers effected by the works will provide the mechanism to ensure the CSIE project is undertaken with minimal effect and fulfil its remit to provide improved public transport access to the CBC and wider area.

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**9. DECLARATION**

- 9.1.1 The evidence which I have prepared and provide in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

Signed



John Pearson BSC (Hons) Pg Dip MRTPI

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