

TRANSPORT AND WORKS ORDER ACT 1992

TRANSPORT AND WORKS (INQUIRIES PROCEDURES) RULES 2004

INQUIRY INTO:

**THE PROPOSED NETWORK RAIL (CAMBRIDGE SOUTH INFRASTRUCTURE
ENHANCEMENTS) ORDER**

MAIN PROOF OF EVIDENCE

**ON MATTERS RELATING TO THE DRAINAGE ACCESSED BY CAMBRIDGE
UNIVERSITY HOSPITALS WITHIN THE CAMBRIDGE BIOMEDICAL CAMPUS**

IAN JACKSON – B.Eng., PGDip, Facilities Management

ON BEHALF OF CAMBRIDGE UNIVERSITY HOSPITALS NHS FOUNDATION TRUST

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LIST OF APPENDICES (bound separately)

Appendix 1: Suite of agreements confirming CUH's current rights and obligations in respect of surface water drainage

1 POSITION, QUALIFICATION AND EXPERIENCE

- 1.1 My name is Ian Jackson, and I am the Deputy Director of Estates and Facilities – Engineering, at Cambridge University Hospitals NHS foundation Trust (“**CUH**”).
- 1.2 I was appointed to my current post just under four years ago. I previously held the role of Deputy Director of Estates and Facilities Management at the Mid Essex Hospitals (five and a half years) and Infrastructure, Maintenance Management, and Design Engineer roles at CUH for in excess of 16 years, prior.
- 1.3 I am a fellow of the Institute of Healthcare Engineering and Estate Management and the British Institute of Facilities Management. I have a post graduate diploma in Facilities Management from Sheffield Hallam University and a Bachelor of Engineering degree specialising in building services engineering.
- 1.4 Reporting directly to the Director of Capital, Estates and Facilities Management at CUH, I am responsible for all aspects of buildings, engineering, and maintenance management for CUH. This includes responsibility for water management and drainage.

2 INTRODUCTION

2.1 Scope of Evidence

- 2.1.1 I have prepared this proof of evidence in connection with CUH's objection to the proposed Network Rail (Cambridge South Infrastructure Enhancements) Order (“**Order**”). In this proof references to the “**Project**” means the scheme underlying the Order.

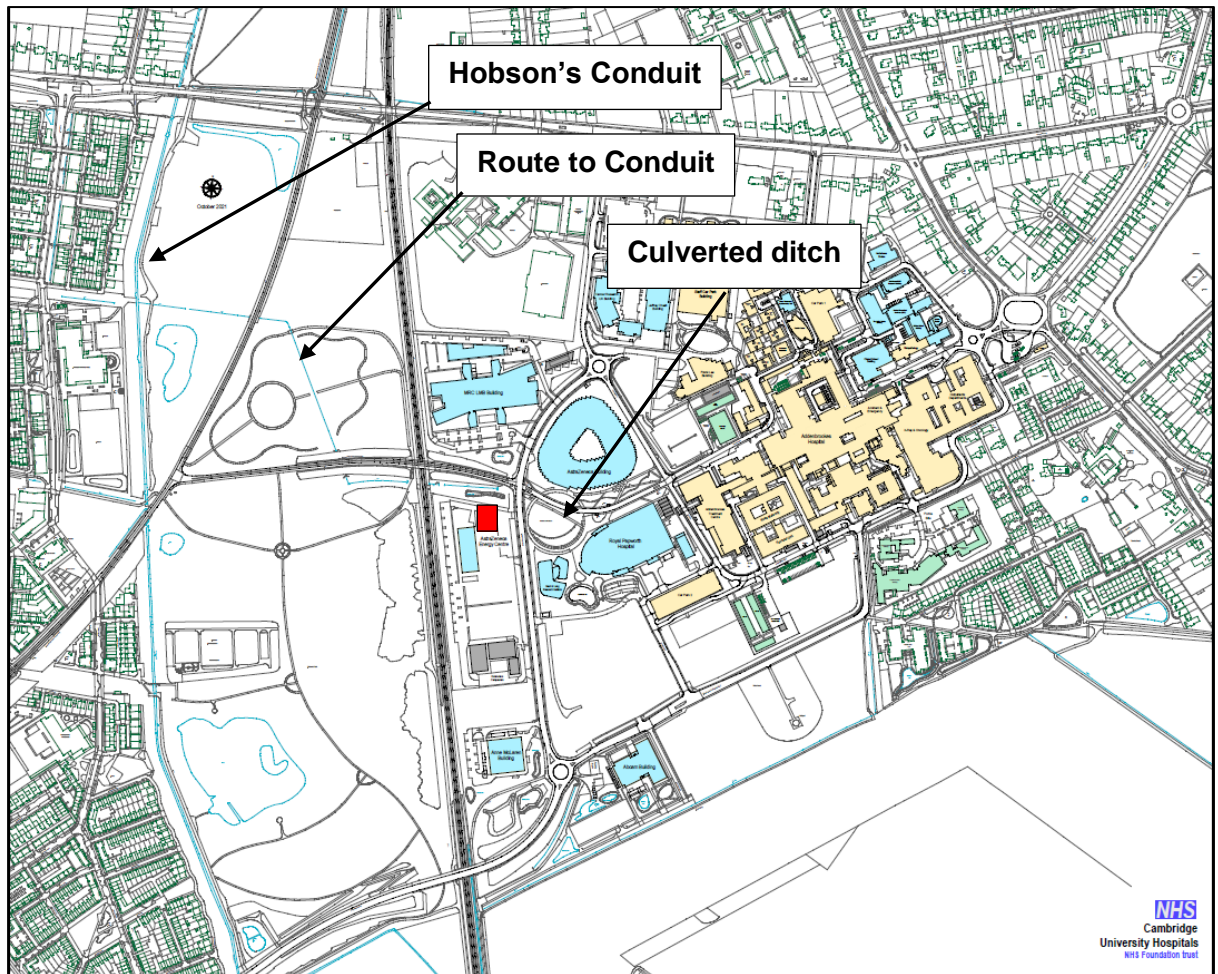
2.2 Structure of Evidence

- 2.2.1 This proof of evidence focuses on the concerns raised in CUH's objection in relation to the operational management of surface water drainage at CUH. In particular, this will be in relation to concerns CUH has in relation to the use of Hobson's Conduit (also known as Hobson's Brook).

2.2.2 Other matters of concern to CUH are addressed in the evidence of Carin Charlton, who will speak to operational management issues which could affect the CUH and how it functions linked to the Cambridge South Station development, and Elliot Page of Stantec UK Limited will speak specifically to concerns in relation to transport matters.

3 CUH's OBJECTIONS – ADDRESSING STATEMENT OF MATTERS ITEM 3(G) – THE LIKELY IMPACT...ON DRAINAGE

- 3.1 CUH has concerns in relation to surface water drainage. The concerns are specifically in relation to any obstruction, or change, which may come about as a result of the station development as CUH currently has rights for surface water drainage into a culverted ditch, which in turn feeds into Hobson's Conduit.
- 3.2 CUH is not challenging the modelling or drainage capacity assessment and is pleased to see the protective provisions for the Hobson's Conduit Trust ("**Trust**") set out in Schedule 12 part 4 of the draft Order. However, CUH is concerned to ensure that should a contamination incident take place, it is possible to readily ascertain whether it is attributable to CUH and if so, whether they are liable in terms of costs or claims to rectify.
- 3.3 CUH was established on its current site in the 1950's and since that time, the Hospital has been able to discharge surface water drainage into a ditch (now culverted across the Cambridge Biomedical Campus ("**CBC**") Green and Gardens) which in turn flows to Hobson's Conduit. Hobson's Conduit is owned and maintained by the Trust, whose objectives include preserving the historic chalk stream for its ecological and public amenity value and providing a water supply to (amongst others) the University Botanic Garden, and CUH works to uphold those objectives - preserving the chalk stream and avoiding contamination of the Conduit.
- 3.4 CUH's current rights in respect of surface water drainage are contained in an agreement entered into in 2008 with the Trust which was varied by a subsequent deed and variation agreements. Copies of the agreements are included at **Appendix 1**. The 2008 Agreement in particular sets out CUH's obligations as regards contamination and clean up.
- 3.5 Figure 1 below shows the existing CBC layout, the location of the Conduit and the existing access point for sampling.






Key:		Non CUH buildings on CBC
		CUH buildings on CBC
		Existing sampling point

Figure 1

3.6 CUH undertakes sampling of water entering the Conduit, on a quarterly basis, to ensure that the water quality is recorded. The purpose of the sampling is to ensure that there is no contamination. Currently, samples are taken from a non-culverted part of the drainage ditch at Francis Crick Avenue (location shown indicatively at Figure 1 above) however, as the Project includes culverting this part of the ditch, this will prevent CUH using the location for future sampling. Therefore, the sampling location will need to be relocated upstream, in the location of Robinson Way to ensure that CUH can continue to undertake sampling in order to comply with its existing commitments to the Trust. If agreements can be made with Network Rail (“NR”), at NR’s cost and including, where necessary, access requirements over any land within NR’s control, to create, a

sample point adjacent to Robinson Way, this would address CUH's remaining concerns.

4 WITNESS DECLARATION

I hereby declare as follows:

This proof of evidence includes all facts which I regard as being relevant to the opinions that I have expressed and that the inquiry's attention has been drawn to any matter which would affect the validity of that opinion.

I believe the facts that I have stated in this proof of evidence are true and that the opinions expressed are correct.