Appendices to Proof of Evidence Strategic Case for the Project NRE11.3



**NRE11.3** 

# Appendices to Proof of Evidence – Strategic Case for the Project (Mr Lewis Wingfield)

(Inquiries Procedure (England & Wales) Rules 2004)

January 2022

# The Network Rail (Cambridge South Infrastructure Enhancements) Order Appendices to Proof of Evidence: Strategic Case for the Project

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# The Network Rail (Cambridge South Infrastructure Enhancements) Order

- 1.1.1. At the pre-Inquiry meeting on 22 November 2021, it was requested that Network Rail put together a document offering an overview as to where its evidence in relation to particular issues could be found.
- 1.1.2. This is that document.

OBJECTOR	ISSUE	PROOF ADDRESSED IN	REFERENCE
OBJ 01 St John's	Adequacy of scoring exercise for replacement land	David Jones (NRE8.2)	Section 6.2
	Status of existing right of way	John Prest (NRE 6.2)	Section 11
	Specification and access over bridge	Bill Simms (NRE10.2) Andy Barnes (NRE1.2)	Section 10.3 AB Sec. 7.3
	Design of new bridge to ensure access/avoid H&S issues	Bill Simms (NRE10.2) Andy Barnes (NRE1.2)	Section 10.3 AB Sec. 7.3
	Need for land for Rail Systems Compound and how it will interact with Sustrans	Andy Barnes (NRE1.2)	Section 7.2
	Undertaking for costs	Bill Simms (NRE10.2)	Section 10.3
OBJ 02 – Chris Pointon	Capacity of the station as per Smarter Cambridge Transport (OBJ22) objection	Lewis Wingfield (NRE11.2)	Sections 9.8.2 and 9.8.9
OBJ 03 - AstraZeneca	Confirmation of no negative impact on drainage	Sue Brocken (NRE5.2) John Pearson (NRE9.2)	Section 10.2 Section 7.2
	Impact of loss of car parking	John Pearson (NRE9.2)	Section 7.2
	Proposed new boundary	John Pearson (NRE9.2)	Section 7.2
	Impact on service infrastructure (GSHP, earthing mat, gas main and comms cable)	Andy Barnes (NRE1.2)	Section 7.4
	Crane locations - to be understood and agreed	Andy Barnes (NRE1.2)	Section 7.5

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	Involvement in detailed design for station forecourt	Andy Barnes (NRE1.2)	Section 7.6
OBJ03- AZ (Continued)	Impact on office development	Bill Simms (NRE10.2) Andy Barnes	Section 10.4 Section 7.7
	Need to commit to aligning programmes	(NRE1.2) Andy Barnes (NRE1.2)	Section 7.8
	Terms of emergency egress easement	Bill Simms (NRE10.2)	Section 10.4
	Protection of service tunnel for Plot 39	Andy Barnes (NRE1.2)	Section 7.9
	(SOC Only) Impact on planning permission	John Pearson (NRE9.2) and Guy Stone (NRE12.2)	Section 7.2 Section 6.2
	(SOC Only) Items to be agreed	Bill Simms (NRE10.2)	Section 10.4
OBJ 04 - Saba	Impact on traffic flows and volumes on Multi Storey Car Park (MSCP)	Geoff Hilling (NRE2.2)	Section 9
	not adequately considered		
	not adequately considered  Failure to engage with Saba on scheme mitigation	Bill Simms (NRE10.2)	Section 10.5
		Bill Simms (NRE10.2) Geoff Hilling (NRE2.2) Bill Simms (NRE10.2)	Section 10.5 Section 9 Section 10.5
	Failure to engage with Saba on scheme mitigation  Short term and long term impact on the MSCP need to be	Geoff Hilling (NRE2.2)	Section 9
	Failure to engage with Saba on scheme mitigation  Short term and long term impact on the MSCP need to be considered, including on investment value	Geoff Hilling (NRE2.2) Bill Simms (NRE10.2)	Section 9 Section 10.5
OBJ 05 - EA	Failure to engage with Saba on scheme mitigation  Short term and long term impact on the MSCP need to be considered, including on investment value  No reasonable attempts to acquire land by agreement	Geoff Hilling (NRE2.2) Bill Simms (NRE10.2) Bill Simms (NRE10.2)	Section 9 Section 10.5 Section 10.5
OBJ 05 - EA OBJ 06 - CUH	Failure to engage with Saba on scheme mitigation  Short term and long term impact on the MSCP need to be considered, including on investment value  No reasonable attempts to acquire land by agreement  Need for Heads of Terms to be issued	Geoff Hilling (NRE2.2) Bill Simms (NRE10.2) Bill Simms (NRE10.2)	Section 9 Section 10.5 Section 10.5

	Impact on blue light routes	Geoff Hilling (NRE2.2)	Section 9
	Avoiding through traffic	Geoff Hilling (NRE2.2)	Section 9
	Personal safety of cycle routes	Geoff Hilling (NRE2.2)	Section 9
	Integration with CSET	Geoff Hilling (NRE2.2)	Section 9
	Land acquisition	Bill Simms (NRE10.2)	Section 10.6
OBJ06 Cambridge University Hospital	Cumulative impact with CSET	Geoff Hilling (NRE2.2)	Section 9
(Continued)			
	Accessibility for all inc. wayfinding	Geoff Hilling (NRE2.2)	Section 9
	Disruption and impacts during construction	Geoff Hilling (NRE2.2)	Section 9
	Enforcement and monitoring	Geoff Hilling (NRE2.2)	Section 9
	Drainage - need to attenuate to acceptable levels, no significant detrimental impacts upon Hobson's Brook	Sue Brocken (NRE5.2)	Section 10.2
	Observations upon Transport Assessment	Geoff Hilling (NRE2.2)	Section 9 and Appendix E; Section 9.8
		Lewis Wingfield (NRE11.2)	
OBJ 07 - TRA	Planning restriction on station's purpose	John Pearson (NRE9.2)	Section 7.2
	Restrict future development in Hobson's Park	John Pearson (NRE9.2)	Section 7.2
	Impact on Green Belt	John Pearson (NRE9.2)	Section 4.4
	Need to reduce temporary construction area	John Pearson (NRE9.2) Andy Barnes (NRE1.2)	Section 7.2 Section 7.10
	Proposed alignment of shared use path	Geoff Hilling (NRE2.2)	Section 9

	Reasons for rejection their preferred alternative - request for visual representation and information on additional culverting	Geoff Hilling (NRE2.2)	Section 9
	Shared nature of access to western station building - and lighting	Geoff Hilling (NRE2.2)	Section 9
	Restriction on cycle parking to the west - numbers and cycle stand types	Geoff Hilling (NRE2.2)	Section 9
	Location of Railway System Compounds and the consideration of alternatives	John Pearson (NRE9.2) Andy Barnes (NRE1.2)	Section 7.2 Section 7.11
OBJ07 Trumpington Residents' Association (Continued)	Objection to use of western park maintenance track	John Pearson (NRE9.2) Andy Barnes (NRE1.2)	Section 7.2 Section 7.12
	Seek to have 'potential future footbridge' made a condition of the Order	John Pearson (NRE9.2)	Section 7.2
	Maintenance vehicles and personnel access to railway infrastructure presently served by two level crossings	Andy Barnes (NRE1.2)	Section 7.13
	Impact on Nine Wells LNR	Guy Stone (NRE12.2) John Pearson (NRE9.2)	Section 6.3 Section 7.2
	Need for additional bus stops	Geoff Hilling (NRE2.2)	Section 9
OBJ 08 - UoC	Lack of information in the Environmental Statement concerning EMI effects	Rasheed Hameed (NRE13.2)	Section 6.1
	Lack of information in the Environmental Statement re EMI mitigation	Rasheed Hameed (NRE13.2)	Section 6.1
	Need for early noise and vibration mitigation, not just mitigation through CoCP	Lynden S-A (NRE3.2) Simon Taylor (NRE4.2)	Section 8.2; Section 10.3
	Impact of noise and vibration on animals	Lynden Ś-A (NRE3.2) Simon Taylor (NRE4.2)	Section 8.2; Section 10.3

	Impact of noise and vibration on AMB equipment	Lynden S-A (NRE3.2) Simon Taylor (NRE4.2)	Section 8.2; Section 10.3
	Noise and vibration impacts of construction vehicles.	Lynden S-A (NRE3.2) Simon Taylor (NRE4.2)	Section 8.2; Section 10.3
	Uncertainty re plots to be acquired	Bill Simms (NRE10.2)	Section 10.7
	Base map inappropriate	Bill Simms (NRE10.2)	Section 10.7
	Insufficient information to determine impacts on features of University Estate	Bill Simms (NRE10.2)	Section 10.7
	Unable to understand impacts upon drainage features and failure to commit to any features	Sue Brocken (NRE5.2)	Section 10.2
OBJ08 (University of Cambridge)	Clarity required in relation to management of features	Sue Brocken (NRE5.2)	Section 10.2
(Continued)	Need for mitigation measures to protect AMB and Plot 9 re flooding/drainage	Sue Brocken (NRE5.2)	Section 10.2
	Impact upon Plot 9 development	Andy Barnes (NRE1.2), Sue Brocken (NRE5.2) John Pearson (NRE9.2)	Section 7.14; Section 10.2 Section 7.2
	Errors in the Book of Reference	Bill Simms (NRE10.2)	Section 10.7
	Unclear whether alternative haul road locations have been considered	Andy Barnes (NRE1.2)	Section 7.15
	No discussion of alternatives for site compounds etc and need for additional mitigation for AMB	Andy Barnes (NRE1.2)	Section 7.16
	Failure to consider NPPF 185, 167 and 169 and para 003 of PPG on noise	John Pearson (NRE9.2)	Section 7.2

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**OBJ 09 - MRC** 

Failure to address Guidance for Nat Environment 2019 and CLP Policy 17, Cambridgeshire Flood Water SPD	John Pearson (NRE9.2)	Section 7.2
Failure to provide sufficient Noise, Vibration and Construction Dem and Construction Environmental Management Plan	no John Pearson (NRE9.2)	Section 7.2
Inadequate consultation with the University	Lewis Wingfield	Section 9.8.5
Impact of costs of relocation etc on funding	(NRE11.2) Lewis Wingfield (NRE11.2)	п
Vibration from construction works	Lynden S-A (NRE3.2)	Section 8.3
EMI from cabling	Rasheed Hameed (NRE13.2)	Section 6.2
Impacts of noise on mice	Simon Taylor (NRE4.2) Taylor	Section 10.2
Required mitigation on EMI, dust and dirt, Noise and Vibration.	Rasheed Hameed (NRE13.2), Andy Barnes (NRE1.2), Simon Taylor (NRE4.2) and Lynden S-A (NRE3.2)	Section 6.2 Section 7.17 Section 10.2 Section 8.3
Potential effects of EMI	Rasheed Hameed (NRE13.2)	Section 6.2
Generation of dust and dirt	Andy Barnes (NRE1.2)	Section 7.17
Noise effects	Simon Taylor (NRE4.2) Andy Barnes (NRE1.2)	Section 10.2 Section 7.18
Impact on tree line	John Pearson (NRE9.2)	Section 4.7

OBJ09 (MRC) (Continued)	Impact of haul road	Geoff Hilling (NRE2.2) and Bill Simms (NRE10.2)	Section 10; Section 10.8
	Need to re-provide drainage	Sue Brocken (NRE5.2)	Section 10.2
	Goods delivery and service access	Geoff Hilling (NRE2.2)	Section 10
	Future power provision to the LMB	Andy Barnes (NRE1.2)	Section 7.19
	Risk of utility diversions	Andy Barnes (NRE1.2)	Section 7.20
	Need for a biodiversity survey	Guy Stone (NRE12.2)	Section 6.4
	Need to ensure security of LMB building	Andy Barnes (NRE1.2)	Section 7.21
	Need for mitigation on	,	
	Drainage,	Sue Brocken	Section 10.2
	Security,	(NRE5.2)	Section 7.21
	Electromagnetic study and	Andy Barnes	Section 6.2
	Landscaping	(NRE1.2) Rasheed Hameed (NRE13.2) John Pearson (NRE9.2)	Section 4.7
	Need for negotiations to continue	Bill Simms (NRE10.2)	Section 10.8
	Impact of costs of mitigation on funding	Lewis Wingfield (NRE11.2)	Section 9.8
OBJ09 (MRC) (Continued)	Different treatment of Plot 20	Bill Simms (NRE10.2)	Section 10.8
	Not demonstrated land is required	Bill Simms (NRE10.2)	Section 10.9
OBJ 10/11 - CML CBC Limited	Lack of engagement	Bill Simms (NRE10.2)	Section 10.9

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	Impact on drainage systems	Sue Brocken (NRE5.2)	Section 10
	Impact on campus highway infrastructure	Geoff Hilling (NRE2.2)	Sections 9 & 10
	Impact on ability to bring forward to remainder of P2 development	John Pearson (NRE9.2) and Bill Simms (NRE10.2)	Section 7.2; Section 10.9
	Cumulative impact with CSET	Geoff Hilling (NRE2.2)	Section 9
	Additional infrastructure maintenance costs	Geoff Hilling (NRE2.2) & Lewis Wingfield (NRE11.2)	Section 9 Section 9.8.7
	No compelling case	Bill Simms (NRE10.2)	Sections 10.9 & 10.10
	AECOM Transport review	Geoff Hilling (NRE2.2)	Appendix H
	AECOM drainage review	Sue Brocken (NRE5.2)	Section 10.2; Appendix A
OBJ 12 - Cadent	Asset protection	Andy Barnes (NRE1.2)	Section 7.22
OBJ 13 - Ramblers	Withdrawn		
OBJ 14 - CPFF	Need to reduce temp land take in Hobson's Park	John Pearson (NRE9.2)	Section 7.2
	Light pollution and station design	John Pearson (NRE9.2)	Section 7.2
	Location of Railway Systems Compound	Andy Barnes (NRE1.2)	Sections 7.23 and 7.11
	Creation of western maintenance track including consideration of alternatives	Andy Barnes (NRE1.2)	Section 7.24
	Combining habitat mitigation schemes for Hobson's Park	John Pearson (NRE9.2)	Section 7.2
	Impact of noise on Hobson's Park	Simon Taylor (NRE4.2)	Section 10.4

OBJ 15 - Pembertons	Extent of land being taken	Bill Simms (NRE10.2) & Andy Barnes (NRE1.2)	Section 10.11 Section 7.25
	Nature of rights being taken	Bill Simms (NRE10.2)	Section 10.11
	No detailed design of access arrangement and impact on future developments	Geoff Hilling (NRE2.2)	Section 9
	Unsatisfactory to replace open ditches with underground culverts of limited capacity	Sue Brocken (NRE5.2)	Section 10.2
	Reduction in green space in country park impacts on arrangements of future development	John Pearson (NRE9.2) Andy Barnes (NRE1.2)	Section.7.2 & Section 7.26
	Adverse impact on farm access	Geoff Hilling (NRE2.2) Andy Barnes (NRE1.2)	Section 9; Section 7.26
	Lack of alignment with CSET	Geoff Hilling (NRE2.2)	Section 9
OBJ 16 - South Staffs Water	Asset protection	Andy Barnes (NRE1.2)	Section 7.22
OBJ 17 – Cambridge Countryside Alliances 1 and 2.			
Amances I and 2.	Not demonstrated land is required	Bill Simms (NRE10.2)	Section 10.12
	Extent of temporary land acquisition in the Country Park	Andy Barnes (NRE1.2)	Section 7.27
	Suitability of alternative access to the Alternative Recreational Area	Geoff Hilling (NRE2.2)	Section 9

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OBJ 17 – Cambridge
Countryside Alliances
1 and 2 (Continued)

OBJ 18 - CCoC and

GCP

Concern as to adequacy of drainage proposals and need for consultation prior to changes	Sue Brocken (NRE5.2)	Section 10.2
Impact on compliance with Hobson's Conduit Trust covenants	Sue Brocken	Section 10.2
Cumulative impacts with CSET	Geoff Hilling (NRE2.2)	Section 9
No compelling case	Bill Simms (NRE10.2)	Section 10.12
Concern over impact on plots 004a and 004c under busway track	Bill Simms (NRE10.2)	Section 10.13
Concern over TP of Plot 004	Bill Simms (NRE10.2)	Section 10.13
Use of soil nails in Plot 31	Andy Barnes	Section 7.28
Highways impact (position reserved)	Geoff Hilling (NRE2.2)	Section 9
Need for agreement	John Pearson	Section 7.2
Agreement re status of Genome Path	Geoff Hilling (NRE2.2)	Section 9
Agreement needed in relation to scheme overlap	Geoff Hilling (NRE2.2) Andy Barnes (NRE1.2)	Section 9 Section 7.29
Agreement re BNG/location of attenuation ponds/construction programmes	Sue Brocken (NRE5.2) Andy Barnes (NRE1.2)	Section 10.2 Section 7.29
	consultation prior to changes Impact on compliance with Hobson's Conduit Trust covenants Cumulative impacts with CSET No compelling case  Concern over impact on plots 004a and 004c under busway track Concern over TP of Plot 004 Use of soil nails in Plot 31 Highways impact (position reserved) Need for agreement Agreement re status of Genome Path Agreement needed in relation to scheme overlap  Agreement re BNG/location of attenuation ponds/construction	consultation prior to changes  Impact on compliance with Hobson's Conduit Trust covenants  Cumulative impacts with CSET  Roeoff Hilling (NRE2.2)  Concern over impact on plots 004a and 004c under busway track  Concern over TP of Plot 004  Bill Simms (NRE10.2)  Use of soil nails in Plot 31  Andy Barnes (NRE1.2)  Highways impact (position reserved)  Roed for agreement  Agreement re status of Genome Path  Agreement needed in relation to scheme overlap  Agreement re BNG/location of attenuation ponds/construction programmes  (NRE5.2)  Andy Barnes  (NRE2.2)  Agreement re BNG/location of attenuation ponds/construction programmes

OBJ 19 - St Mary's School			
	Details of any stopping up	Geoff Hilling (NRE2.2)	Section 9
1	Potential damage to access from construction traffic	Geoff Hilling (NRE2.2) Andy Barnes (NRE1.2)	Section 9 Section 7.30
,	Need for assurances re access to boundary fence	Bill Simms (NRE10.2)	Section 10.14
	No information about accommodation works	Bill Simms (NRE10.2) Andy Barnes (NRE1.2)	Section 10.14 Section 7.31
OBJ 20 - Dave Jackson			
	Size of the temporary works compound at Hobson's Park	Guy Stone (NRE12.2) Andy Barnes (NRE1.2)	Section 6.5; Section 7.32
	Object to station being used to reduce reliance on Cambridge City Centre station because of increase in motorised traffic	Geoff Hilling (NRE2.2)	Section 9
OBJ 21 - Mr & Mrs Price	Extent of cycle parking on west of station	Geoff Hilling (NRE2.2)	Section 9
Tille	New access path should on north side of North Ditch	Geoff Hilling (NRE2.2)	Section 9
	Raising of SW pathway to provide level access	Geoff Hilling (NRE2.2)	Section 9
	Location of Railway Systems Compound	Andy Barnes (NRE1.2)	Section 7.34
	Construction compounds excessively large and will destroy area of young woodland	Andy Barnes (NRE1.2)	Section 7.32 & 7.33

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#### OBJ 22 – Smarter Cambridge Transport

OBJ 23 - CCiC

Disagreement with forecasting approach	Lewis Wingfield (NRE11.2)	Section 9.8
Highly conflicted access arrangements	Geoff Hilling (NRE2.2)	Section 9
Complaint about bus accessibility	Geoff Hilling (NRE2.2)	Section 9
Response to Traffic Assessment	Geoff Hilling (NRE2.2)	Appendix F
Commentary on Strategic Outline Business Case	Lewis Wingfield (NRE11.2)	Section 9
Commentary on CBC Transport Needs Review Report	Geoff Hilling (NRE2.2)	Section 9
Preferred design	Lewis Wingfield (NRE11.2)	Section 9.8
Need for a Green Belt location and clear statement as to how works have been minimised	John Pearson (NRE9.2)	Sections 4.4 & 7.2
No clear comment as to whether impact on openness acceptable	John Pearson (NRE9.2)	Sections 4.4 & 7.2
Need to amend plan name re segregated pedestrian/cycle access	Geoff Hilling (NRE2.2)	Section 10
Request confirmation that the green roof is definite and details of green wall proposal given unsustainable/high maintenance	John Pearson (NRE9.2)	Section 7.2
Further detail about landscaping required to assess if replacement land comparable	John Pearson (NRE9.2)	Section 7.2
Further detail about safety of access and crossing points to assess if replacement land comparably accessible	David Jones (NRE8.2)	Section 7.3 and Appendix E; Section 7.2
	John Pearson (NRE9.2)	
Exchange land to be laid out and made available ahead of use of HP	David Jones (NRE8.2)	Section 5.4;
	John Pearson (NRE9.2)	Section 4.5
Need for a condition about spoil storage	John Pearson (NRE9.2)	Section 7.2

	Need for minimisation of construction compound	John Pearson	Section 7.2
	Need for minimisation of construction compound	(NRE9.2)	Section 7.2
OBJ 23 - CCiC (Continued)	Aspire to 20% BNG, using as much on site provision as possible	Guy Stone (NRE12.2) John Pearson (NRE9.2)	Section 6.6 & Section 4.7
	More information about the BNG proposals must be submitted	Guy Stone (NRE12.2) John Pearson (NRE9.2)	Section 6.6 & Section 4.7
	Impact on skylark and corn bunting	Guy Stone (NRE12.2)	Section 6.6
	Compliance with CLP and NPPF policy on sites of biodiversity importance	Guy Stone (NRE12.2)	Section 6.6
	Impact on trees and compliance with Policy 71	John Pearson (NRE9.2)	Sections 4.7 & 7.2
	Impact of main compound and haul road on biodiversity value	Guy Stone (NRE12.2)	Section 6.6
	Need for further consideration of operational vibration on sensitive uses	Lynden S-A (NRE3.2)	
	Need to minimise disruption involved with NCN 11 diversion	Geoff Hilling (NRE2.2)	Section 10
	Mechanism in order required to limit number of car parking spaces	Geoff Hilling (NRE2.2)	Section 10
	Council's engineer has requested further info	Sue Brocken (NRE5.2)	Section 10.2
	Objection to extent of land within HP required for setting out and provision of footpaths and cycleways	David Jones (NRE8.2)	Section 7.2
	Use of ss.9 and 10 TWA 1992 in relation to reconfiguration of existing paths and networks	To be addressed in legal submissions	
	Objection to temp land take and use for spoil storage of open space	John Pearson (NRE9.2)	Section 7.2
	Exchange land to be laid out and made available ahead of use of HP	David Jones (NRE8.2) John Pearson (NRE9.2)	Section 5.4; Sections 7.2 & 4.5
	Need for an AIA and AMS	John Pearson (NRE9.2)	Sections 4.7 & 7.2
	New crossing of Busway to be provided before existing connection lost	John Pearson (NRE9.2)	Section 7.2

OBJ 24 – SCDC	More information about the BNG proposals must be submitted  Insufficient detail about the landscape proposals to provide unreserved assurance of their success	Guy Stone (NRE12.2) & John Pearson (NRE9.2) John Pearson (NRE9.2)	GS Sec. 6.7 & JP Secs. 4.7 & 7.2 Section 7.2
	Need for parameter plans to show max building footprint and single storey height for RSC	John Pearson (NRE9.2)	Section 7.2
	Matters to be set out in COCP re construction noise	Simon Taylor (NRE4.2) Taylor & John Pearson (NRE9.2)	ST 10.6 & JP Sec. 7.2
	Further discussion required about AQ assessment	John Pearson (NRE9.2)	Section 7.2
	Connectivity/NR to work with other campus stakeholders in masterplan review	Geoff Hilling (NRE2.2)	Section 10
	Minimise duration and disruption re NCN 11 diversion	Geoff Hilling (NRE2.2)	Section 10
	Works affecting Scheduled Monument must have support of Heritage England	Jenny Wylie (NRE 7.2)	Section 6.4
OBJ 25 - Mark Chaplin	Object to conclusions of Public Open Space assessment	David Jones (NRE8.2)	Section 6.4