



Rebuttal Evidence to OBJ-14 (Cambridge Past Present and Future)

**The Transport and Works (Inquiries Procedure)
Rules 2004**

January 2022

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1 INTRODUCTION

- 1.1 This rebuttal evidence has been prepared on behalf of Network Rail (“NR”) to the Proof of Evidence prepared on behalf of OBJ-14 – Cambridge Past Present and Future, which concerns OBJ-14-1 evidence of James Littlewood.
- 1.2 It is not intended that this rebuttal proof should address further points that witnesses for NR have previously covered in their evidence; however, cross-references to relevant paragraphs of those witnesses’ proofs of evidence are made where appropriate.
- 1.3 It is intended that this rebuttal proof should be a composite response to those issues raised by OBJ-14. In this respect, for cross-examination purposes the name of the NR witness who is responsible for each aspect of this rebuttal proof will be given at the beginning of each section below.
- 1.4 This rebuttal proof sets out the points raised by OBJ-14 in the evidence identified above. For each of these sections, the point is summarised in plain font, with any quotations shown in italics. This is followed by NR’s response, preceded by the name of the witness making responsible for that part of the rebuttal. Within each sub-theme, there may be several points, each of which is dealt with separately in turn, and with the witness identified as described.

2 OBJ-13-1 Proof of James Littlewood

2.1 Point 1 – Request to further reduce temporary land acquisition in the Park

Response by Andy Barnes (Construction)

- 2.1.1 Section 3.1 of Mr Littlewood’s Proof of Evidence concerns the amount of temporary land identified in Network Rail’s draft TWAO for construction purposes and whilst recognising that the area has been reduced by Network Rail, he requests that the area is reduced further. In Section 3.3, he repeats that request.
- 2.1.2 In Section 6 of my Proof of Evidence (NRE1.2), I have described the location, size and purpose of compounds to the west of the railway including CC2 which will service work to the new Down Loop line and CC3 within the Hobson's Park which is required to construct the new station building.

2.1.3 In para 399 of my Proof of Evidence, I clarify that the area of land identified in the Environmental Statement was based on a proposal to use surplus excavated material in landscaping forms across the park. Temporary land was identified to facilitate construction of this landscaping. More recent proposals have reduced this ambition and limit the area of the park requested in the Deposited Plans, (NR22). In Section 3.1. Mr Littlewood's Proof of Evidence, he refers to an area of 35% of the area of the park. This was circa 170,500m². The most recent assessment is that by disposing surplus material off site, the area of Hobson's Park required is circa 57,750m². That represents a reduction of roughly two thirds and is the minimum space required to construct the works and reinstate the park on completion.

2.1.4 I conclude that the area requested amounts to no more than is required to construct the new station and track works along with the adjustments proposed within the park

2.2 Point 2 – Substation location

Response by Andy Barnes (Construction)

2.2.1 Section 3.2 of Mr Littlewood's Proof of Evidence addresses the availability of land to the east of the railway for use for construction purposes.

2.2.2 In Section 7.16 of my Proof of Evidence (NRE1.2), I have recognised that Network Rail considered the use of alternatives to its proposed eastern construction compound, CC1. Construction compounds that are remote from the footprint of the works, east of the railway were not preferred, reduce the efficiency of construction activities and would serve to generate construction traffic on campus roads and the Dame Mary Archer Way roundabout. There is no scenario where space alongside the footprint of the proposed works is not required.

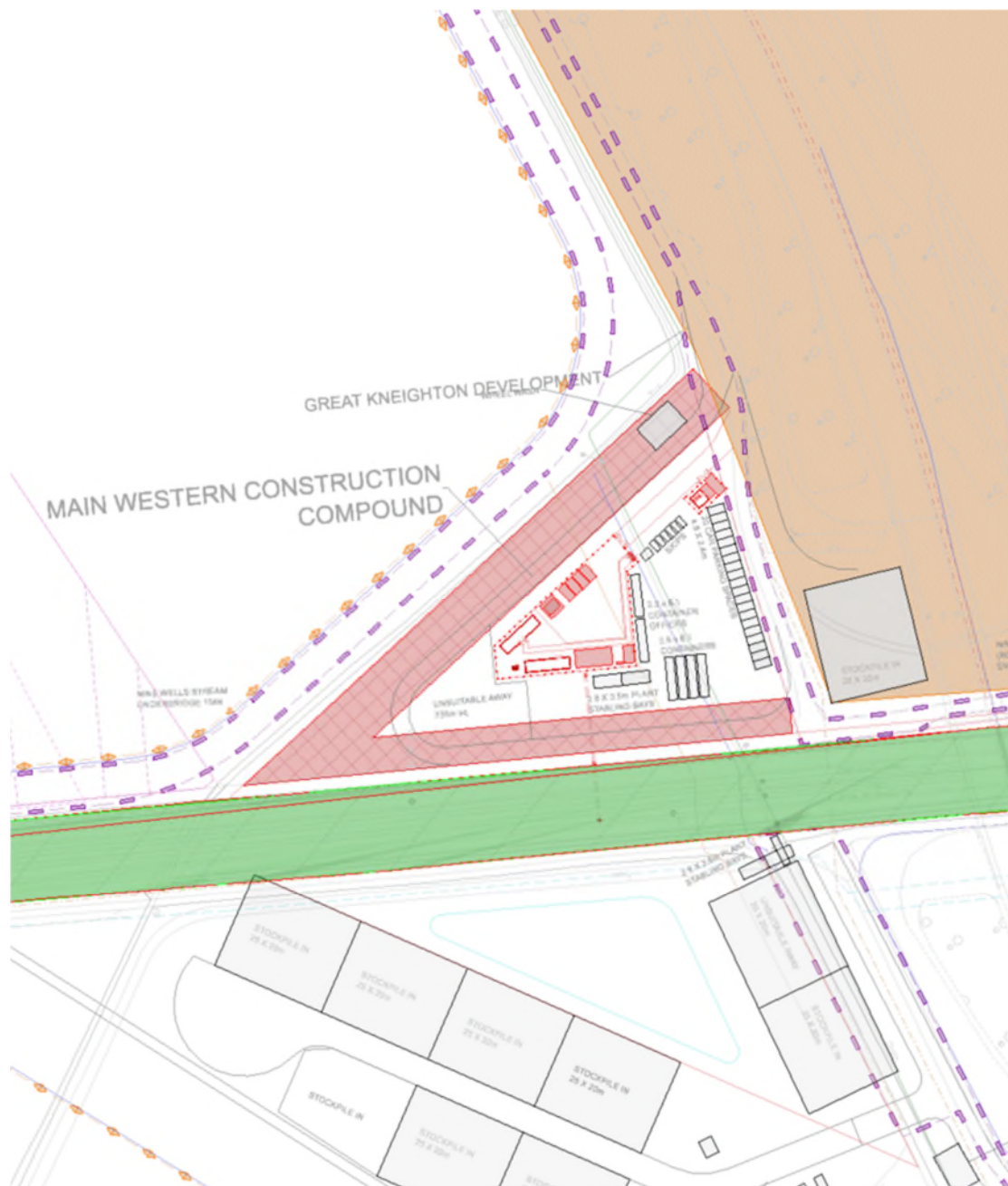
2.2.3 Point 3 – Request for condition

Response by Andy Barnes (Construction)

2.3 Section 4 of Mr Littlewood's Proof of Evidence concerns the location of the proposed Rail Systems Compound and landscaping works.

- 2.3.1 In Section 5.3.8.9 of my Proof of Evidence (NRE1.2), I explain the need for a new 315kVA DNO substation and DNO cubicle to provide power supplies to points heating and junction lighting in Nine Wells area and north of Shepreth Branch Junction. In addition, I have explained that an amount of new railway apparatus is required to support the revised infrastructure layout. Additional systems are required in a secure enclosure alongside the railway to accommodate:
- a. Transformer,
 - b. Principal Supply Point (PSP) and Building,
 - c. Points Heating Cabinet,
 - d. Signalling Equipment Building,
 - e. Telecoms Equipment Room,
- 2.3.2 Accommodation for these items is perhaps best characterised as containerised single story modular buildings and equipment cabinets
- 2.3.3 A location has been selected that will allow occasional maintenance activities including the replacement of components that will be serviced by plant with lifting capability such as HIAB. The location is also selected to allow the effective landscaping of the compound to minimise its visual impact.
- 2.3.4 In respect of the suggestion that the compound could be moved closer to the railway, the compound is located such that its presence doesn't encumber the simultaneous construction of the works, nor the ability to co-locate a strategic construction compound in the same area whilst avoiding public utilities crossing this site. These constraints dictate the proposed position of the Rail Systems Compound.
- 2.3.5 I have prepared figure 1 to demonstrate the complex space proofing work for the Rail Systems Compound and CC2. The Rail Systems Compound must be constructed within a busy construction compound, laid out with safety in mind to service works on the adjacent railway. When the construction compound is removed at the end of the project, this leaves the RSC as close to the railway boundary as was practically possible.

Figure 1 – Rail Systems Compound within CC2 During Construction



2.3.6 In Paras 245 and 246 of his Proof of Evidence, I stated that the CSIE Project continues to integrate rail systems proposals with interfacing Network Rail re-signalling projects to seek opportunities to minimise infrastructure requirements within the Rail Systems Compound. This could obviate the requirement for the equipment in Para 236, however, the DNO will always be required in this location. However, if the interfacing schemes are delayed or

deferred, the CSIE Project must deliver its own rail systems solution centred around the Rail Systems Compound as described.

2.3.7 I conclude that the Rail Systems Compound is located as close to the remodelled railway as practically possible.

Response by John Pearson (Planning)

2.3.8 Network Rail believe that the proposed planning conditions (No. 26, Detailed design approval: Other elements of the proposed development and No. 29, Hard and Soft Landscaping) and deemed parameter plans provide an envelope within which the detailed design of the electricity sub-station and railway systems enclosure can be brought forward and approved by the local planning authority. As a result, there is no requirement for further conditions in respect of this matter.