



# **Addendum to 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-14-1 Proof of James Littlewood**

- 2.1 Point 1 – Paragraph 5.1 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.**

### Response by David Jones (Open Space)

- 2.1.1 Mr Littlewood's confirmation that he has no objection to our proposal for replacement land is welcomed.
- 2.1.2 As noted in paragraph 5.2.19 of my Proof of Evidence in relation to the area of land to be permanently acquired within Hobson's Park, I have stated that, *'in view of the proximity of this POS to the adjoining operational railway corridor, the presence of a maintenance track running through the site and is separation from the wider area of POS limits the ability of the public to use it.'*
- 2.1.3 In terms of the proposed exchange land, the indicative landscape layout (Drawing Ref. 158454-ARC-00-ZZ-DRG-EEN-000076) submitted as part of the request for deemed planning permission provides for a slightly increased area of replacement POS within a wider and more open landscaped recreational area. This includes a relatively narrow frontage to the railway line to the east, with screening from Addenbrooke's Road to the north and a mix of proposed native tree and scrub planting around the railway systems compound to mitigate views from within the exchange land site, as well as from Public Rights of Way and Hobson's Park.

- 2.2 Point 2 – Paragraph 5.2 There are other development schemes proposed for this area, including for a new busway and East-West Rail. These schemes will have a cumulative negative impact and there is an opportunity for them to work together to create a cumulative beneficial impact by combining 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 enable a collective approach to mitigating harm.**

### Response by David Jones (Open Space)

2.2.1 There is at present no certainty that the development schemes referred to for the area will proceed and currently neither promoter has submitted applications for the necessary consents to be secured. No assessment has been undertaken regarding the cumulative impacts of the East-West Rail scheme as part of this Project. As each of the other projects are brought forward they will need to consider the cumulative impact of their proposals in conjunction with the CSIE Scheme.