

References for Network Rail's Evidence

Following exchange of evidence and rebuttals, this document serves as an outline of where the points raised in the Secretary of State's Statement of Matters of 27 October 2021 are principally addressed in the evidence (including rebuttal evidence) of Network Rail. This document does not intend to give exhaustive references to each paragraph where a relevant matter is discussed, but is intended to facilitate navigating Network Rail's evidence and the principal areas where a given matter is addressed.

Network Rail's intention is to provide closing submissions which are structured by reference to the headings set out in the Statement of Matters.

For ease of reference a table is provided that indicates which rebuttals respond to which Objector's proof:

Objector	Rebuttal
OBJ06 (CUH, Cambridge University Hospital)	REB01
OBJ08 (UoC, University of Cambridge)	REB02
OBJ09 (MRC, Medical Research Council)	REB03
OBJ14 (CPPF, Cambridge Past Present and Future)	REB04
OBJ22 (SCT, Smarter Cambridge Transport)	REB05
OBJ23 (CCiC, Cambridge City Council)	REB06
OBJ24 (SCDC, South Cambridgeshire District Council)	REB06 (to which REB07 refers)

1. The aims and objectives of, and the need for, the proposed Cambridge South station ("the scheme"). The justification for the proposals in the draft TWA Order, including the anticipated transportation, environmental and socio-economic effects of the scheme.

NRE11.2 Lewis Wingfield, Section 6 and 7.
NRE9.2, John Pearson, Sections 3 and 4.
NRE2.2 Geoff Hilling, 2.1.20 onwards (transport benefits)

See also:

REB05 (SCT), **REB01** (CUH), Sections 4.33 onwards (re forecasting)
REB02 (UoC), Section 5 (Re Planning)
Outline Business Case, **NR20**

2. The main alternative options considered by NR and the reasons for choosing the preferred option set out in the Order.

NRE11.2 Lewis Wingfield, Section 4.
See also **NRE1.2** Andy Barnes, Section 5.

3. The likely impact of the exercise of the powers in the proposed TWA Order on local businesses, residents, Cambridge University, Cambridge Biomedical campus, Cambridge University Hospital, and the Medical Research Council, including any adverse impact on their ability to carry out their business or undertaking effectively and safely and to comply with any statutory obligations applying to their operations during construction and operation of the scheme. Consideration under this heading should include:

See generally, the ES (**NR16**) and appendices

(a) Impact of the closure of Dukes and Websters Level crossing.

NRE6.2 John Prest

(b) impacts on the local road networks, including access arrangements, and the blue light routes for emergency traffic and impacts on parking provision and pedestrian routes.

NRE2.2 Geoff Hilling, Sections 7 and 8; **REB01** (CUH)

Parking provision and Access:

§2.1.10 onwards,

REB01 (CUH) Section 2.10 and 2.18

Blue light routes:

§9.1.25;

REB01 (CUH), Section 2.1 and 4.1

Pedestrian routes:

§9.1.134

(c) provision of cycle access and parking and on cyclist's safety.

NRE2.2 Geoff Hilling, Sections 7 and 8, and 9 (see §§20, 32, 88 and 116).
See also **REB01** (CUH), Section 2.23, 4.46

(Matter 3 continued)

(d) How the project would align with other forms of public transport and sustainable modes of travel.

NRE11.2 (Lewis Wingfield), Section 7.6; Geoff Hilling **NRE2.2**
See also
REB01 (CUH), Section 2.23

(e) Impact from construction and operation including in relation to new cabling, and positioning of cranes.

See generally, **NRE1.2** Andy Barnes; and on cranes, Sections 6.7 and 7.5

(f) The effects of noise, dust and vibration during construction and operation

Noise:

NRE1.2 Andy Barnes, Sections 7.18 and 6.10.3;
Simon Taylor **NRE4.2**.
See also **REB03** (MRC)

Dust:

NRE1.2 Andy Barnes, Sections 6.10.4 and 7.17

Vibration:

NRE3.2 Lynden Spencer-Allen, Sections 5 and 6
See also **REB03** (MRC), **REB02** (UoC), Sections 3, 6 and 7

(g) the effect on drainage during construction and operation

NRE1.2, Andy Barnes, Section 4.7
NRE5.2, Sue Brocken, Sections 7 to 9 (and **REB01** (CUH), Section 3.1; **REB03** (MRC), Section 3)

(h) Whether the proposal would give rise to electro-magnetic interference

NRE13.2 Rasheed Hameed, Sections 5 and 6. See also **REB02** (UoC), Section 6

(i) The effect of the proposal on biodiversity including biodiversity net gain

NRE12.2 Guy Stone, Section 5. **NRE9.2** John Pearson, Section 4.7

(Matter 3 continued)

See also **NE REB06**, Sections 2.1 – 2.4 (on BNG); and 2.5 – 2.8 (on Corn Bunting), Sections 4.1 to 4.2

4. Impact on Hobson’s Park Nine Wells Local Nature Reserve

Biodiversity

NRE12.2 Guy Stone, Section 5.3.2

Cultural Heritage

NRE7.2 Jenny Wylie

5. The impacts and interaction of the scheme with future planned developments including at Cambridge Biomedical Campus and proposed public transport schemes such as Cambridge South East Transport.

NRE2.2, Geoff Hilling, §§2.1.11, 9.1.34 and 9.1.40;

NRE11.2 Lewis Wingfield, Section 7.5 onwards

6. The effects of the scheme on statutory undertakers, statutory utilities and other utility providers, and their ability to carry out their undertakings effectively, safely and in compliance with any statutory or contractual obligations and the protective provisions afforded to them.

NRE10.2 Bill Simms, §6.10 onwards

7. The adequacy of the Environmental Statement submitted with the application for the TWA Order, having regard to the requirements of the Transport and Works (Application and Objections Procedure) (England and Wales) Rules 2006. This should include consideration of:
the impacts of noise and vibration;

See references provided for Matter 3.

NRE3.2 Lynden Allen-Spencer, Section 6;

NRE4.2 Simon Taylor, Section 7.

See also REB03 (MRC) and REB02 (UoC), Sections 4 and 7
ES, Chapters 5 and 6

drainage;

NRE5.2, Sue Brocken, Section 5; See also REB05 (MRC, REB02 (UoC) Section 3.

NRE1.2 Andy Barnes, Section 4.7

ES, Chapter 18

the impacts of dust and dirt from construction;

NRE1.2, Andy Barnes, Sections 6.10.4 and 7.17

ES, Appendix 7.3 (Construction Dust Assessment)

the impacts on trees, hedgerows, and existing plants;

NRE9.2 John Pearson, Sections 4.5 to 4.7; and

NRE12.2 Guy Stone,

See also NRE **REB06** (CCiC), Section 3.10 and 4.3
ES, Chapter 8

biodiversity, including biodiversity net gain;

NRE9.2 John Pearson, Section 4.7,

NRE12.2 Guy Stone, Section 5;

ES, Chapter 8

Control and storage of spoil during construction.

NRE1.2 Andy Barnes, Sections 6.4 and 7.30.

Matter 7, continued

Cumulative impacts

8. The impact of the development on the Scheduled Monument – the site revealed by aerial photography W of White Hill Farm, Great Shelford. National Heritage List 1006891

Construction: **NRE1.2**, Andy Barnes, Section 6.9

Operation: **NRE2.2**, Geoff Hilling, Section 2

NRE7.2, Jenny Wylie;

NRE10.2 Bill Simms, §§6.6-6.8

9. Having regard to the criteria for justifying compulsory purchase powers in paragraphs 12 to 15 of the MHCLG “Guidance on Compulsory purchase process and the Crichel Down” published on 29 October 2015 (as amended on 16 July 2019):-

(a) whether there is a compelling case in the public interest to justify conferring on NR powers to compulsorily acquire and use land for the purposes of the scheme.

NRE11.2, Lewis Wingfield, Sections 6 and 7. See also **NRE10.2**, Bill Simms, Section 6.

See also David Jones **NRE8.2** (on open space)

(b) whether the purposes for which the compulsory purchase powers are sought are sufficient to justify interfering with the human rights of those with an interest in the land affected (having regard to Human Rights Act);

NRE10.2, Bill Simms, Section 8

(c) whether there are likely to be any impediments to NR exercising the powers contained within the Order, including the availability of funding;

NRE11.2, Lewis Wingfield, Section 8. See also REB02 (UoC), Section 2.2 and 2.3.

Matter 9, continued

(d) whether all the land and rights over land which NR has applied for is necessary to implement the scheme

NRE10.2, Bill Simms, Sections 5 and 6;
NRE1.2, Andy Barnes, Section 5

10. The conditions proposed to be attached to the deemed planning permission for the scheme.

NRE9.3 John Pearson, Appendix A

11. Whether all statutory procedural requirements have been complied with.

Separate confirmatory statement to be supplied.

12. That it is appropriate for the Secretary of State for the Department for Levelling Up Housing and Communities to grant a certificate for the compulsory purchase of Open Space Land under Section 19 of the Acquisition of Land Act 1981.

See **NRE8.2** David Jones;
NRE1.2 Andy Barnes, Section 6 and §399 onwards
See also **REB 04** (CPPF), Sections 2.1 and 2.2

Note: The Section 19 Certificate application is unopposed.

