



Report to the Secretary of State for Transport and the Secretary of State for Levelling Up, Housing and Communities

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an Inspector appointed by the Secretary of State

Date: 4 October 2022

TRANSPORT AND WORKS ACT 1992

TOWN AND COUNTRY PLANNING ACT 1990

ACQUISITION OF LAND ACT 1981

**THE NETWORK RAIL (CAMBRIDGE SOUTH INFRASTRUCTURE
ENHANCEMENTS) ORDER 2021**

**REQUEST FOR A DIRECTION UNDER SECTION 90(2A) OF THE TOWN AND
COUNTRY PLANNING ACT 1990 FOR DEEMED PLANNING
PERMISSION**

**APPLICATION FOR CERTIFICATE IN RELATION TO ACQUISITION OF OPEN
SPACE**

Inquiry Opened on 1 February 2022 and Closed on 10 June 2022
File Ref: DPI/W0530/21/20

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List of Abbreviations used in this Report

1981 Act	Acquisition of Land Act 1981	
AIA	Arboricultural Impact Assessment	
AMB	Anne McLaren Building	
AMS	Arboricultural Method Statement	
AQMA	Air Quality Management Area	
AZ	AstraZeneca	
BCR	Benefit to Cost Ratio	
BPM	Best Practicable Means	
BNG	Biodiversity Net Gain	
BoR	Book of Reference	
CAM	Cambridge Autonomous Metro	
CamLP	Cambridge Local Plan	
CBC	Cambridge Biomedical Campus	
CBCManCo	CBC Estate Management Company Limited	
CC	Construction Compound	
CoC1	Countryside Cambridge One	
CoC2	Countryside Cambridge 2	
CCiC	Cambridge City Council	
CCoC	Cambridgeshire County Council	
CGB	Cambridge Guided Busway	
CIGGBS	Cambridge Inner Green Belt Boundaries Study	
CLP	Construction Logistics Plan	
CML	Cambridge Medipark Limited	
CoCP	Code of Construction Practice	
CPP	Construction Phase Plan	
CPPF	Cambridge Past Present and Future	

CSET	Cambridge South East Transport	
CIGBBS	Cambridge Inner Green Belt Boundary Study	
CSIE	Cambridge South Infrastructure Enhancements	
CTMP	Construction Traffic Management Plan	
CUH	Cambridge University Hospital	
DCO	Development Consent Order	
DfT	Department for Transport	
DNO	Distribution Network Operator	
EA	Environment Agency	
EIA	Environmental Impact Assessment	
EMC	Elector Magnetic Compatibility	
EMI	Electro Magnetic Interference	
ES	Environmental Statement	
EWR	East West Rail	
FRA	Flood Risk Assessment	
GCP	Greater Cambridge Partnership	
GCSP	Greater Cambridge Shared Planning	
GJT	Generalised Journey Time	
GRIP	Governance for Railway Investment Projects	
HCT	Hobson's Conduit Trust	
HoTs	Heads of Terms	
HR	Haul Route	
LLFA	Lead Local Flood Authority	
LMB	Lab of Molecular Biology	
LNR	Local Nature Reserve	
LWA	Land and Works Agreement	
mppa	Million passengers per annum	
MRC	Medical Research Council	

MSCP	Multi Storey Car Park	
NPPF	National Planning Policy Framework	
NERC	Natural Environment and Rural Communities Act 2006	
NPS-NN	National Policy Statement for National Networks	
NR	Network Rail	
OBC	Outline Business Case	
PAVA	Public Address/Voice Alarm	
PDFH	Passenger Demand Forecasting Handbook	
ROGS	Railways and Other Guided Transport Systems (Safety) Regulations 2006	
RSC	Railway Systems Compound	
SCDC	South Cambridgeshire District Council	
SCLP	South Cambridgeshire Local Plan	
SCT	Smarter Cambridge Transport	
SFRA	Strategic Flood Risk Assessment	
SoCG	Statement of Common Ground	
SOBC	Strategic Outline Business Case	
SoS	Secretary of State	
SOST	Secretary of State for Transport	
SSW	South Staffordshire Water	
SWDS	Surface Water Drainage Strategy	
TAG4	Transport Analysis Guidance UNIT M4, Forecasting and Uncertainty	
The Guidance	MHCLG Guidance on Compulsory Purchase Process and Criche! Down Rules	
TPO	Tree Preservation Order	
TPP	Tree Protection Plan	

TRA	Trumpington Residents Association	
TSCSC	Transport Strategy for Cambridge and South Cambridgeshire	
TWO	Transport and Work Order	
TWAO	Transport and Works Application Order	
UoC	University of Cambridge	
VC	Vibration Criteria	
WSI	Written Scheme of Investigation	
XX	Cross Examination	
ZoI	Zone of Influence	

Footnotes in the Report provide references to documents as well as points of information and clarification.

CASE DETAILS

THE NETWORK RAIL (CAMBRIDGE SOUTH INFRASTRUCTURE ENHANCEMENTS) ORDER 202[]

REQUEST FOR A DIRECTION UNDER SECTION 90(2A) OF THE TOWN AND COUNTRY PLANNING ACT 1990 FOR DEEMED PLANNING PERMISSION

APPLICATION FOR CERTIFICATE IN RELATION TO ACQUISITION OF OPEN SPACE

- The Order would be made under sections 1 and 5 of the Transport and Works Act 1992
- The deemed planning permission would be granted by a Direction under section 90(2A) of the Town and Country Planning Act 1990 (the 1990 Act).
- The application for the Order and deemed planning permission was made on 18 June 2021 and was subsequently amended before and during the Inquiry.
- The application and supporting documents are available on the following website: <https://www.networkrail.co.uk/running-the-railway/our-routes/anglia/improving-the-railway-in-anglia/cambridge-south-station/>
- The Inquiry documents are available on the following website: <https://gateleyhamer-pi.com/en-gb/csie/inquiry-documents/>
- The Order and the deemed planning permission would authorise Network Rail Infrastructure Ltd to construct, maintain, and operate a new station in South Cambridgeshire and associated improvements to the West Anglia Main Line, together with the compulsory acquisition of land and rights to land and the use of land temporarily in connection with the works.
- There were 13 objections to the Order outstanding at the close of the Inquiry.

Summary of Recommendations:

THE NETWORK RAIL (CAMBRIDGE SOUTH INFRASTRUCTURE ENHANCEMENTS) ORDER 202[]: That the Order, subject to modifications, be made.

REQUEST FOR A DIRECTION UNDER SECTION 90(2A) OF THE TOWN AND COUNTRY PLANNING ACT 1990 FOR DEEMED PLANNING PERMISSION: That deemed planning permission be granted subject to conditions, for the works that are the subject of the Order.

APPLICATION FOR CERTIFICATE IN RELATION TO ACQUISITION OF OPEN SPACE: That the Certificate under section 19 and under section 28 of the Acquisition of Land Act 1981 (the 1981 Act) be granted.

1 INTRODUCTION

- 1.1 The Applicant is Network Rail Infrastructure Limited (hereafter referred to as Network Rail), a regulated statutory undertaker that owns and operates the rail infrastructure network of Great Britain. Network Rail's (NR) purpose is to deliver a safe reliable and efficient railway. It does so by licence granted by the Office of Rail and Road, the terms of which require NR to secure the improvement, enhancement and development of the rail network in a timely, economic and efficient manner.
- 1.2 The Draft Order provides for NR to construct and operate the authorised works to build Cambridge South Station which would provide a gateway into the Cambridge Biomedical Campus (CBC). The Project comprises three principal elements: the creation of a new station and related track works; junction improvements at Shepreth Branch Junction; and a new connection between existing lines at Hills Road (to improve the southern access to Cambridge Station).
- 1.3 Additional elements of the Cambridge South Infrastructure Enhancement (CSIE) Project include the stopping up of two level crossings and their replacement with a new accommodation bridge; a new railway systems compound containing a substation, signalling and telecommunications equipment, within a fenced enclosure; four supporting Distribution Network Operators supplies; the provision of supporting infrastructure; drainage works; hard and soft landscaping; and ancillary infrastructure such as fencing, lighting and electrical connections.
- 1.4 The request for a direction that planning permission be deemed to be granted relates to the development sought to be authorised by the Order and proposed drawings.¹
- 1.5 Pursuant to an application dated 23 August 2021 and made under ss.19 and 28 of the Acquisition of Land Act 1981, NR has sought a certificate from the Secretary of State for the Department for Levelling Up Housing and Communities (SoS) that the land it proposes to provide in exchange for public open space being permanently acquired is no less in area and is equally advantageous to the public who use that land.² The SoS for Levelling Up, Housing and Communities has indicated that they are minded to grant the Certificate sought.³
- 1.6 A number of changes were made to the Order prior to the commencement of the Inquiry and further changes were made during the course of the Inquiry. These are summarised at Section 4 below. The final version of the submitted documents are the Draft Order (INQ 80), Explanatory Memorandum (INQ 72), Book of Reference (NR08-1), Deposited Plans and Sections Rights of Way Plans and Open Space Plans (NR09-1), and Planning Direction Plans (NR13-1).

¹ NR12 & NR13

² NR21

³ NRE 11.2 Paragraph 3.4.2

- 1.7 An Environmental Statement⁴ (ES) has been undertaken and reported in accordance with the Transport and Works (Applications and Objections procedure) (England and Wales) Rules 2006 as amended (the TWA Rules).⁵
- 1.8 The ES was published with the Order in June 2021. The ES comprises three volumes: a non-technical summary, a main text and appendices and figures, drawings.⁶ It is supported by a Code of Construction Practice (CoCP).⁷ Part A of the CoCP seeks to ensure that the likely significant construction effects reported in the ES will either be avoided or mitigated. It sets out:
- The context and underlying principles of environment management for the works;
 - The principal obligations when undertaking the construction of the proposed Development;
 - The guidelines to be used during construction and how they will be mandated and applied by the contractual arrangements between NR and the Main Works Contractor;
 - The details of, or references to, the construction phase mitigation measures and plans to be approved by the Local Authority, as appropriate.
 - Compliance with legislation, standards and guidance
- 1.9 Part B of the CoCP will be developed during the detailed design stage. Its objective is to provide a documented procedure to ensure the relevant environmental issues are effectively managed and adequately implemented on site.
- 1.10 Greater Cambridge Biodiversity Supplementary Planning Document was adopted by South Cambridgeshire District Council on 7 February 2022 and by Cambridge City Council on 11 February 2022. The parties were provided with an opportunity to comment on this document by the Adjournment Note dated 28 February 2022.⁸

Statement of Matters

- 1.11 On 27 October 2021 the Department for Transport (DfT) issued a Statement of Matters pursuant to rule 7(6) of the Transport and Works (Inquiries Procedure) Rules 2004⁹. The Statement sets out the matters about which the SoS particularly wishes to be informed for the purposes of their consideration of the applications by NR for the Order and Deemed Planning Permission.
- 1.12 In relation to the applications for the TWA Order and deemed planning permission the matters are:

⁴ Contained at section B of the Core Documents

⁵ B-03

⁶ NR16

⁷ NR16 Appendix 02.4

⁸ INQ 63

⁹ INQ 01

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.

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

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 includes:

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

(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.

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

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

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

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

(g) the effect on drainage during construction and operation.

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

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

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

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.

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.

7. The adequacy of the ES submitted with the application for the TWA Order, having regard to the requirements of the TWA Rule. This should include consideration of:

- the impacts of noise and vibration;

- drainage;
- the impacts of dust and dirt from construction;
- the impacts on trees, hedgerows, and existing plants;
- biodiversity, including biodiversity net gain;
- Control and storage of spoil during construction.
- 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).

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 rules” 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.

(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 the Human Rights Act);

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

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

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

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

12. In relation to the application for an open space certificate:

That it is appropriate for the SoS 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.

The Inquiry

- 1.13 I held a Pre-Inquiry Meeting via the Microsoft Teams Platform on 22 November 2021 to discuss procedural matters relating to the Inquiry. There was no discussion of the merits of any cases for or against the proposals. A note following the meeting was circulated to all parties who had submitted objections or other representations.

- 1.14 The Inquiry opened at 10:00 hours on Tuesday 1 February 2022 at Hilton Hotel Cambridge City Centre, 20 Downing Place, Cambridge CB2 3DT. The Inquiry adjourned on Friday 25 February in order to allow the submission of a number of outstanding documents (INQ 63). Further Adjournment Notes were issued on 7 March 2022 (INQ 64), 5 April 2022 (INQ 76) and 11 May 2022 (INQ 77).
- 1.15 I carried out accompanied site visits on Wednesday 16 and Thursday 24 February 2022. I also carried out a number of unaccompanied site visits during and prior to the Inquiry. The Inquiry was then kept open until 10 June 2022 to enable NR to submit a revised Order, Explanatory Memorandum and other documents that reflected changes made to the Order during the course of the Inquiry, and for Greater Cambridge Shared Planning (GCSP) to comment on the changes¹⁰. The Inquiry was closed in writing 10 June 2022.
- 1.16 Joanna Vincent was appointed as an independent Programme Officer for the Inquiry. Her role was to assist with the procedural and administrative aspects of the Inquiry, including the programme, under my direction. She helped to ensure that the proceedings ran efficiently and effectively but played no part in this Report other than in collating the document lists. Most of the documents are available on the Inquiry website.¹¹ The withdrawn objections remain on the website together with the letters of withdrawal.

Objections

- 1.17 A total of 25 objections and 11 representations to the Draft Order were received by the DfT. Twelve objections were withdrawn either prior to or during the course of the Inquiry. The withdrawal of the objections from CCiC (OBJ 23) and SCDC (OBJ 24) was subject to a number of conditions set out in a Position Statement.¹²
- 1.18 CBC Estate Management Company ('CBCManCo') and Cambridge Medipark Limited ('CML'), were anticipated to withdraw their objections upon completion of their legal agreements. This did not occur, and these objections are reported below.
- 1.19 There are no outstanding objections from any statutory undertaker, or statutory consultee.

Compliance with Statutory Requirements

- 1.20 A Consultation Report was submitted with the applications.¹³ This sets out consultation with key stakeholders and others, as well as the key changes made to the Scheme in response to consultation and engagement.

¹⁰ Greater Cambridge Shared Planning is a shared service for South Cambridgeshire District Council and Cambridge City Council

¹¹ <https://gateleyhamer-pi.com/en-gb/csie/>

¹² INQ 24 & INQ 25

¹³ NR07

- 1.21 At the Inquiry the Applicant (NR) confirmed that it had complied with its obligations under the Transport and Works (Inquiries Procedure) Rules 2004 and submitted an affidavit document to demonstrate compliance.¹⁴ No one has disputed this compliance. I am satisfied that all the necessary notices of the Inquiry have been posted.
- 1.22 The Book of Reference details the plots to be acquired, whilst the interests to be acquired are detailed on the deposited plans. There is however a concern that these documents have not been updated to reflect changes made during the course of the Inquiry. This matter is discussed at Section 4 below.

This Report

- 1.23 This Report sets out a brief description of the land and surroundings covered by the Draft Order, Deemed Planning Application and other consents sought, as well as an overview of the cases for the Promoter, supporters, objectors and those making representations, and my conclusions. A list of abbreviations used in this Report is given at the start of the Report. Appendices comprise lists of Inquiry appearances and documents and a schedule of planning conditions in the event that the SoS directs that deemed planning permission be granted.
- 1.24 I make recommendations to the SoS on the applications for the TWAO and Deemed Planning Permission and the Certificate in relation to acquisition of open space.
- 1.25 Although CCiC and SCDC withdrew their objections during the course of the Inquiry, they submitted positions statements. I have taken these, together with other information submitted by the Councils, into account in reaching my conclusions and making recommendations. The position statements raise relevant material considerations, and they are reported below.¹⁵
- 1.26 Various documents including the Draft Order were amended during the course of the Inquiry. In some instances these are included as amendments to the Core Documents as well as Inquiry Documents. For the avoidance of doubt and to ensure that my recommendation and any subsequent decision is based on the correct documents I have used the Inquiry document reference in preference to the Core Document Reference.

2 SITE AND SURROUNDING AREA

- 2.1 The site lies to the south of Cambridge between Trumpington and the CBC. The site boundary covers an area of approximately 46.5ha. and lies within and adjacent to the existing railway corridor from Hills Road overbridge in the north and Shepreth Branch Junction to the south. The proposed Development is located in the administrative areas of CCiC and South

¹⁴ INQ 01

¹⁵ See Sections 9 & 10 and INQ 24, INQ 25

- Cambridgeshire District Council. The southern part of the site is also located within the Parish of Great Shelford.
- 2.2 The site is generally flat and contains the existing railway line. It is centred around Hobson's Park and the adjacent area to the east that includes the University of Cambridge Anne McClaren Building and the AstraZeneca site that is currently under construction. Addenbrookes Bridge carries the Cambridge Guided Busway (CGB) and lies immediately to the north of Hobson's Park. The CGB links Cambridge railway station, Addenbrooke's Hospital and the park and ride site at Trumpington, via housing on the Clay Farm site. Francis Crick Avenue runs parallel to the railway line.
- 2.3 The CBC lies to the east of the site. It is the largest centre of medical research and health science in Europe and combines world-class biomedical research, patient care and education on a single site. It accommodates four hospitals, including Addenbrookes Hospital and the Royal Papworth Hospital, with a further two hospitals planned or under construction. There are also a number of research/scientific buildings within the campus.
- 2.4 The majority of the western portion of the proposed Development site lies within Hobson's Park which includes Hobson's Park Nature Reserve and comes within the Green Belt. Hobson's Park extends under the Nine Wells Bridge (also known as Addenbrookes Road) and adjoins arable farmland which contains a Scheduled Monument, part of which comes within the site. The area immediately to the north of the CGB largely lies outside of the site and is due to be laid out as an Active Recreation Area serving the newly built housing and housing under construction to the east.
- 2.5 Hobson's Brook is located close to the western boundary of the site. It rises in Nine Wells Spring, a Local Nature Reserve, and flows generally northwards and parallel with the railway line. Downstream of its crossing with Long Road, the watercourse splits into Hobson's Conduit and Vicar's Brook. Hobson's Conduit supplies water to the Cambridge University Botanic Garden and the City of Cambridge further downstream.
- 2.6 Within the site boundary and surrounding area, there is a range of transport infrastructure in the form of roads, the CGB, railway lines and cycle paths. Public footpaths, permissive paths and cycle routes also cross the area.
- 2.7 The northern area of the site is bordered by Long Road Sixth Form College on the east and St Mary's School to the west. Both of these sites include a number of mature trees that form a distinctive tree belt. Some of these trees are safeguarded by a Tree Preservation Order (TPO).
- 2.8 At Shepreth Branch Junction, residential properties lie along the east of A1301 Cambridge Road and adjacent to Davey Crescent. There are two Grade II Listed Buildings, Four Mile House, located west of Cambridge Road on the north of the railway and De Freville Farmhouse located west of Cambridge Road on the south side of the railway.

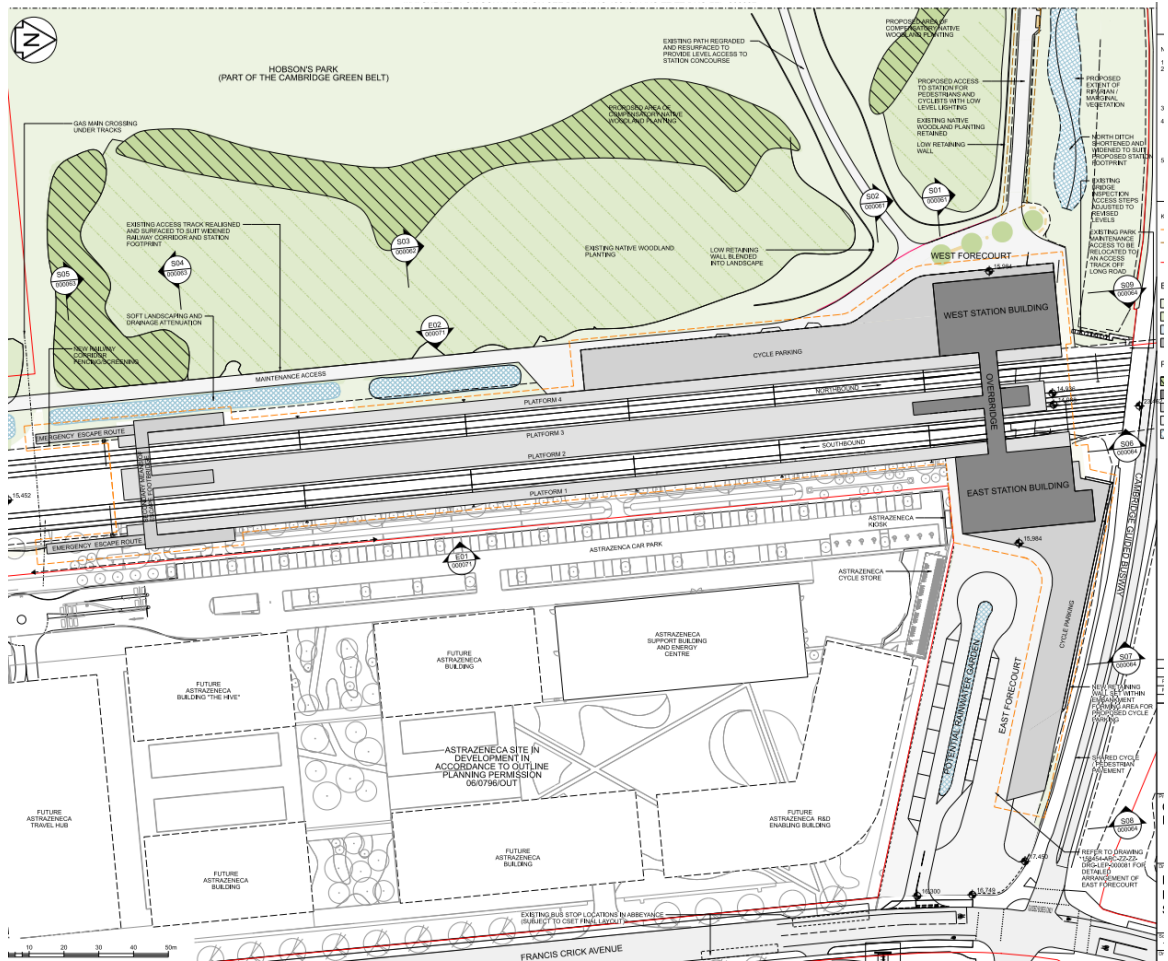
Site Boundary Plan



3 OUTLINE OF THE ORDER SCHEME, THE ORDER and APPLICATION

The Order Scheme

- 3.1 The aim of the CSIE scheme is to provide the infrastructure necessary to deliver a new station adjacent to the CBC whilst maintaining capacity and improving the capability of the network. It comprises three main components, a new Cambridge South station; junction improvements at Shepreth Branch junction; and a new connection between existing lines at Hills Road to improve the southern access to Cambridge Station.
- 3.2 The proposed station would be located just to the south of the CGB, with the eastern entrance serving the CBC, and the western entrance serving the surrounding residential area. The proposed development comprises the construction of a new railway station with four passenger platforms including a shared island platform. The two-storey station building includes an eastern building and a western building. The eastern building will house the ticket office, staff accommodation and a retail unit, with views of the concourse and forecourt. There will be designated waiting areas, information boards and ticket machines. Public toilets (including a fully accessible 'Changing Places' WC) will be directly accessible from the concourse, beyond the gate line. The western building will accommodate similar facilities, as well as the plant, including a substation and back-up supply.
- 3.3 Vehicular access to the eastern entrance would be limited to taxis, drop-off, Blue Badge holders and staff. Five bays are proposed for Blue Badge holders; three bays for drop-off by private cars and three bays for drop-off by taxis. The eastern access will be facilitated by modifications to the CGB and roads and crossings to the east of the railway.
- 3.4 The western entrance would be located within Hobson's Park. Access from the western side would be provided by a shared pedestrian and cycle link within the park. There would be no vehicular access to the western side of the proposed station. A pedestrian link across the CGB would link Hobson's Park to the Active Recreation Area to the north.
- 3.5 In order to facilitate and encourage access by sustainable modes, access for pedestrians and cyclists (together with maintenance and emergency vehicles) is from both sides. A segregated pedestrian and cycle track will be provided through Hobson's Park to facilitate connectivity with Trumpington to the West. It is proposed to provide a total of 1000 cycle parking spaces split between the eastern and western entrances of the station.
- 3.6 Improvements to Shepreth Branch Junction are necessary to maintain the current levels of operational performance, which require an increase in the line speed from 30mph to 50mph. The junction will be remodelled to incorporate a larger radius curve within an extended double junction. The works also include the installation of safety screens on the existing footbridge, works to existing railway embankments, relocation of the GSM-R mast, and the creation of a small railway maintenance area.



Proposed Station and platforms (Plan number 158454-ARC-ZZ-ZZ-DRG-LEP-000051)

- 3.7 Works at Hills Road Junction include the extension to the existing Shunt Spur and its connection to the main line. The purpose of these works is to provide flexibility around the existing Cambridge Station in order to maintain operational performance following the opening of the new Cambridge South station (where existing trains will then stop). Without these interventions (including increasing the line speed at Shepreth Junction and the additional signalling works) the performance would not be able to be maintained. These works are covered by permitted development rights and do not form part of the application for a direction for deemed planning permission, although they were subject to environmental assessment.
- 3.8 Additional elements of the CSIE Project include the stopping up of two level crossings – Duke’s No. 2 and Webster’s – and their replacement with a new accommodation bridge to the west of the railway; a new railway systems compound in the Nine Wells area, containing a substation, signalling and telecommunications equipment, within a fenced enclosure; four supporting Distribution Network Operators supplies; the provision of supporting infrastructure such as overhead line electrification; modification of existing

signals and associated cabling to allow a new layout to be installed; new telecommunications facilities; power cables to serve the railside and station infrastructure; reconstruction of Tibbets Culvert to minimise flood risk and provision of additional sustainable drainage for the railway infrastructure and modification of several existing culverts to receive new track layout; landscaping, both hard and soft, across the CSIE Project; and ancillary infrastructure such as fencing, lighting and electrical connections.

The Order

- 3.9 The Draft Order (NR02) authorises NR to construct and maintain the scheduled works (the CSIE Project), and ancillary works such as the installation of electrical equipment and signalling, and landscaping, within the limits of deviation (Articles 6 and 7). It also sets out the limits of deviation (Article 7). Article 8 authorises the stopping up of the level crossings. Articles 9 to 11 authorise NR to alter the layout of streets, to execute street works, and to stop up streets. NR may also construct new highways, provide access to works and use private roads for construction and operation. NR may discharge water, survey and investigate land and undertake protective works to buildings.
- 3.10 The Draft Order would allow NR to compulsorily acquire land and to acquire rights for the CSIE Project, including temporary acquisition of land for construction of the Scheme (Articles 19, 22 & 25). The Order would also permit the temporary use of land for maintenance and access purposes (Articles 26 and 27).
- 3.11 Modifications to the Order were made in January 2022 (NR02-1), February 2022 (INQ 52-1), March 2022 (NR02-2/INQ 68), May 2022 (INQ 71) and June 2022 (INQ 80). An updated Explanatory Memorandum was also submitted (INQ 72). These modifications are discussed in Section 4 below.
- 3.12 The most recent documents in relation to the Order are INQ 80 (the Order) and INQ 72 (the Explanatory Memorandum). Updated Deposited Plans and Sections Rights of Way Plans and Open Space Plans were submitted in January 2022 (NR09-1).
- 3.13 Whilst the Order has been updated, the most recent versions of the Deposited Plans and BoR are NR09-1 and NR08-2 respectively. These have not been updated to reflect all of the changes to plots within Schedules 3 and 4 of the Order. The inconsistencies arising from this could at best give rise to confusion, or even have significant consequences for these landowners.
- 3.14 Not all references to the deposited plans or BoR within the Order would be impacted by the failure to make these changes. The Articles most likely to be impacted would be:
- Article 2 interpretation which defines the deposited plans and sections as well as the BoR. These definitions are relied on in subsequent Articles.
 - Article 19 (1) - The Power to acquire Land. Paragraph (a) permits the acquisition of *"so much of the land shown on the deposited plans as lying*

within the limits of deviation and described in the book of reference as may be required for the purposes of the authorised works”;

- Article 40 requires the certification of the deposited plans and BoR.
- Schedule 12, Part 6 of the Order provides Protective Provisions for Cambridgeshire County Council in respect of the CGB and refers to the Deposited Plans and the BoR.

Should the SoS be minded to approve the TWAO they may wish to request updates to the Deposited Plans and an updated BoR in the interests of clarity and precision.

The application for Deemed Planning Permission

- 3.15 The request for a direction that planning permission be deemed to be granted relates to the development sought to be authorised by the Order. The application for Deemed Planning Permission was accompanied by Planning Direction Drawings and a statement of proposed conditions.¹⁶
- 3.16 The Planning Direction Drawings were updated by NR13-1. A schedule of these changes is set out at INQ 67.
- 3.17 The proposed conditions were updated to address representations from several parties and to secure changes to the scheme. The conditions were further updated following the close of the Inquiry, in the light of discussions with GCSP. The most recent conditions are at INQ 69 are considered under SoM 10.

The Open Space Certificate application

- 3.18 An application dated 23 August 2021 was made under sections 19 and 28 of the Acquisition of Land Act 1981.¹⁷ NR has sought a certificate from the SoS that the land it proposes to provide in exchange for public open space being permanently acquired is no less in area and is equally advantageous to the public who use that land.
- 3.19 Delivery of the CSIE Project necessitates both the permanent acquisition of an area of existing open space within Hobson’s Park and the grounds of Long Road Sixth Form College, and permanent new rights over existing open space.
- 3.20 In order to compensate for the land being permanently lost, NR proposes to provide replacement open space to the immediate south of Hobson’s Park. Access to the Exchange Land from the existing park (which is currently precluded by Hobson’s Conduit), is intended to be secured through the provision of both a farm accommodation bridge to the west (which will be sufficiently sized to accommodate the farm traffic that currently uses the level crossings proposed for closure) and a pedestrian footbridge to the east that would link it to the existing park.

¹⁶ NR12

¹⁷ NR19

4 MODIFICATIONS TO THE ORDER and DEEMED PLANNING APPLICATION

Modifications to the Order

- 4.1 As referred to above, there have been a number of modifications to the Draft Order since the submission of the application. These include changes to the Articles within the Order and changes to the land to be acquired. There have also been changes to the Planning Direction Drawings. Since these changes have been iterative, this section of the Report considers only the most recent version of the Order (INQ 80) and other relevant documents relative to the Draft Order submitted with the TWAO. There have also been updates to the BoR (NR08-1) and the Deposited Plans and Sections Rights of Way Plans and Open Space Plan (NR09-1).
- 4.2 A schedule of changes to the Order was submitted (INQ 52-2) although there were further significant amendments following the submission of this document. The most recent Draft Order is INQ 80.
- 4.3 There are numerous changes to individual plots within Schedule 3 and Schedule 4 of the Order in relation to the acquisition of Land and Rights. For the most part these concern the deletion of Plots and are therefore consistent with the CPO Guidance which requires all the land and rights over land which it is intended to acquire to be necessary to implement the Scheme.
- 4.4 It is recommended that these changes are accepted.
- 4.5 Other modifications include within Schedule 8 the deletion of Addenbrookes Road footpath leading to Hobson's Park. This would be a beneficial change and it is recommended that this modification be accepted.
- 4.6 There are minor changes to wording to the Protective Provisions for Hobson's Conduit Trust (HCT) at Schedule 12 Part 4. These have arisen from discussions with HCT and they do not object to the changes.¹⁸ There are also minor changes to the Protective Provisions for Cadent Gas and Cambridgeshire County Council in respect of the CGB. Both parties have withdrawn their objections to the Order and the amendments are considered to be acceptable.¹⁹ It is recommended that these changes should be accepted.
- 4.7 The more substantive changes relate to Articles 11, 35 and 36. Article 11 concerns the temporary stopping up of streets. Paragraph 5(a) within requires the street authority to be consulted prior to stopping up. It has been amended to include a requirement to consult St Mary's School in relation to Long Road access track. This would help to address the concerns of St Mary's School (OBJ 19) and it is recommended that this modification be accepted.
- 4.8 Article 35 concerns Planning Permission and supplementary powers. The proposed modification adds paragraphs (4), (5), (6), (7), (8), (9), and (10).

¹⁸ INQ 56-1, 56-2 and 56-3

¹⁹ OBJ 12-W & OBJ 18 -W

Paragraph (4) adds a further power in relation to works to trees subject to a TPO. It is recommended that this modification be accepted. The implications of the Order for trees, including those protected by TPOs is discussed at SoM 3.

- 4.9 Paragraph (5) provides that conditions imposed on extant consents for AstraZeneca (AZ), University of Cambridge (UoC), Countryside Cambridge 1 (CoC1) Countryside Cambridge 2 (CC2), and CBCManCo/CML shall have no effect within the Order limits. Paragraph (6) sets out that should the implementation of the CSIE project prevent any development permitted by the AZ permission (whether or not within the Order limits) from being carried out in accordance with any of the AZ conditions there is deemed to be no breach of the planning conditions concerned and that no enforcement action may be taken. Paragraph (7) makes similar provision in relation to the UoC. In both instances the planning permission and conditions concerned are clearly defined within the Order at paragraph (10). The conditions relate to the implementation and management of structural landscape and landscaping within the plots.
- 4.10 The acquisition of land by NR and implementation of the CSIE Project makes it impossible for AZ and UoC to comply with the requirements to provide a landscaped buffer of a specific size on their retained site. This was the subject of objections from both parties.
- 4.11 INQ 54-1 sets out NR's position in relation to Article 35. However, at the time the note was drafted Article 35 only referred to AZ and UoC. NR state that the drafting has been designed to ensure that the clause is engaged only where the carrying out of any works pursuant to the deemed planning permission actually prevents development being carried out in accordance with those conditions, as opposed to making it more difficult, or less convenient. Moreover, the use of the expression "To the extent that" means that if development in accordance with the AstraZeneca conditions can be carried out in part, the recipient of that permission will still be required to comply with them so far as remains possible.
- 4.12 NR state that the reason that paragraphs (6) and (7) are engaged in relation to development that is both within the Order Limits and outside is that works carried out by the NR within the Order Limits would prevent compliance with the AZ and UoC conditions on land that falls outside of the Order Limits but within the redline area of the AZ and UoC planning permissions.
- 4.13 Paragraphs (8) and (9) relate to CoC1 and CoC2, as well as CBCManCo/CML. The exemptions for these parties only apply within the Order land. A copy of the CoC1 and CoC2 permissions was requested but was not provided. The exemption within paragraph (8) refers to a single condition, Condition 11. Although I have not had sight of it GCSP confirm that it does not object to the exemption proposed.²⁰ Since the exemption only applies within the Order land and the GCSP, the authority with

²⁰ INQ 70-0 Paragraph 10

responsibility for enforcing conditions is satisfied, on balance the inclusion of this condition within Article 35 is considered to be acceptable.

- 4.14 Together the conditions on the CBCManCo/CML permissions cover matters such as surface water drainage, ground water, foul water, the submission of a Construction and Environmental Management Plan, landscaping and structural landscaping, compliance with a Site Wide Nature Conservation Management Plan, and pedestrian and cycle connections. Any failure to comply with these conditions is limited to the area within the Order land and all of these matters, including the manner in which they would integrate with the CBC and Hobson's Park are addressed by the TWAO.
- 4.15 NR state that the drafting has also been agreed by AA and UoC as regards their respective permissions.²¹ It also advises that a similar approach has been taken within some Development Consent Orders (DCO) under the Planning Act 2008. In the cases referred to by NR the DCO provided that conditions of an earlier planning permission that are rendered impossible to discharge by a later DCO are to have no effect.
- 4.16 The City Council does not object to Article 35 in so far as it relates to AZ, UoC, CoC1 and CoC2. This is on the basis that the impact of the waiving of enforcement rights in relation to these permissions and the specified conditions has been assessed and mitigation has been secured through the Design Principles document secured through the planning conditions and the Tree Mitigation Scheme secured through the draft Section 106 Agreement.²²
- 4.17 In the most recent version of the Order the 'no breach of conditions' clause only applies to development in relation to the authorised works and to CoC1, CoC2, CBCManCo/CML land within the Order limits. On this basis CCiC withdrew its objection to the inclusion of paragraphs (8) and (9) within Article 35. It is therefore recommended that this modification be accepted.

Deemed Planning Application

- 4.18 The most recent Planning Direction Drawings are at NR13-1, whilst a schedule of the changes is provided at INQ 67. A number of the changes seek to amend the red line boundary to reflect the reduced land take. The more significant changes are to the eastern station area where the vehicular access has been amended to improve the interface with the Cambridge South East Transport (CSET) Project. The attenuation basin has been replaced with underground tanks and the extent of the cycle parking has been increased.
- 4.19 The changes to the forecourt arrangements assist with the integration of the scheme with the CSET project and also help to mitigate the effects of the scheme on drainage. These matters are discussed in more detail under SoM 3(g). Overall the proposed modifications are considered to be beneficial to the proposal and it is recommended that they be accepted.

²¹ INQ 33 Paragraphs 6.5.6 & 6.5.7

²² INQ 70 & INQ 81

- 4.20 Notwithstanding this, the plans are inconsistent in respect of the extended cycle parking area. Plan Number 158454-ARC-ZZ-ZZ-DRG-LEP-000051/ P02 has been updated as in the Schedule, however these changes are not reflected on other plans, including the Illustrative Station Layout Plans²³ or the Indicative Landscape plan²⁴. Whilst it is appreciated that these plans are for illustrative purposes only, the Plan 158454-ARC-ZZ-ZZ-DRG-LEP-000051/P02 refers to Plan 158454-ARC-ZZ-ZZ-DRG-LEP-000081 in relation to the detailed layout of the station forecourt. Therefore, for the avoidance of doubt, the SoS may wish to seek amendments to the other plans prior to granting Deemed Planning Permission.
- 4.21 There is also a change to the proposed secondary means of escape. This would be located towards the end of the platforms and would provide an alternative exit from the station to either Hobson's Park, or the AZ site in the event of an emergency. The change reconfigures this area, but the impact on Hobson's Park and the AZ site would be similar to that originally proposed and the assessment within the ES. Neither AZ or CCiC object to this change and it is recommended that it be accepted.
- 4.22 The other significant change is the relocation of the attenuation basin that was to be located on the eastern side of the railway south of Addenbrookes Road. This has been relocated in order facilitate better integration with the CSET project and two alternative drainage ponds would be provided on the opposite side of the railway line close to the proposed Railway Systems Compound. No party has objected to this change. It would be beneficial to the accommodation of the CSET project, which is in itself would be beneficial in that it would add to the sustainable transport options within the CBC and the Cambridge Southern Fringe Housing. It is therefore recommended that this modification be accepted.
- 4.23 In addition to the changes described above, the updated land use and landscape parameter plan 158454-ARC-ZZ-ZZ-DRG-LEP-000101/P02, indicates additional areas of structural vegetation to compensate for the loss of landscaping on the AZ and UoC sites. It is recommended that these changes be accepted in order to a achieve consistency with other plans and evidence submitted to the Inquiry.
- 4.24 I am satisfied that none of these changes would alter the nature of the proposed development and that no party would be prejudiced by them.

5 PUBLIC TRANSPORT SCHEMES AND FUTURE PLANNED DEVELOPMENTS

- 5.1 There are a number of other significant transport projects that have the potential to impact on the CBC as well as other planned developments some of which are currently under construction.

²³ 158454-ARC-ZZ-ZZ-DRG-LEP-000081/P02, 158454-ARC-ZZ-ZZ-DRG-LEP-000082/P02, & 158454-ARC-ZZ-ZZ-DRG-LEP-000083/P02,

²⁴ 158454-ARC-00-ZZ-DRG-EEN-000075/P03

Transport Projects

5.2 The Transport Assessment considered a number of planned transport improvements within Cambridge and South Cambridgeshire that have the potential to decrease vehicular traffic on the CBC road network. The schemes include:

- Cambridge South East Transport (CSET);
- Greenways and Chisholm Trail;
- West of Cambridge Package including:
 - Cambridge South West Park and Ride;
 - Expansion of Trumpington Park and Ride;
- Cambourne to Cambridge; and
- Cambridge Autonomous Metro (CAM).

The table below shows the potential impact of these schemes on highway trips to the CBC.

Table 5.4 Impact of Planned Transport Improvements

Potential Scheme	Impact on highway trips to the CBC
CSET	-1,293 trips
Greenways and Chisholm Trail	-370 trips
West of Cambridge Package – bus service only	-55 trips
Cambridge South West Park and Ride	-1,932 trips
Expansion of Trumpington Park and Ride	-66 trips
CAM	-125 trips
Total	-3,841

From Transport Assessment (NR16 Appendix 17.2 page 33)

- 5.3 The total impact of the Planned Transport Improvement Schemes on highway trips to the CBC is estimated to result in 3,841 fewer one-way vehicular trips to the CBC per day factored to 203 using the patient and staff growth figures. The two most significant schemes are the CSET and the East West Rail link.
- 5.4 The CSET project aims to provide better public transport, walking and cycling options, improving journey times linking communities and employment sites. The project is promoted by the Greater Cambridge Partnership, the local body for a City Deal with central Government, to bring vital improvements in infrastructure, supporting and accelerating the creation of jobs and homes.

- 5.5 Phase one is currently under construction and includes short term measures in relation to road safety, walking, cycling and bus priority measures along the A1307 between Haverhill and Cambridge. It is not expected to be impacted by the CSIE project.
- 5.6 Phase 2 includes a new Mass Rapid Transit route between the A11 and the CBC via Sawston, Stapleford, Great Shelford with onward connection to the city centre. It includes a new segregated public transport route from the A11 to the CBC and a new travel hub near the A11/A1307 junction.
- 5.7 The public transport route would be entirely off-road only interacting with other traffic at junctions. The new segregated route is likely to form part of the proposed CAM. At the CBC the route would run on prioritised public transport lanes on Francis Crick Avenue, connecting to the CGB and enabling services to continue to the proposed South Cambridge station and Cambridge City Centre. A new segregated path for walkers, cyclists and horse riders would be built alongside the new public transport route on the West side of Francis Crick Avenue heading north.

Sawston Greenway

- 5.8 Sawston Greenway is a proposed off-road route for cyclists, pedestrians and equestrians connecting Sawston to Cambridge. The Sawston Greenway proposal overlaps with and forms part of the CSET Phase 2 project on Francis Crick Avenue. The scheme involves widening NCN Route 11 to 3m, with a grass verge to one side for equestrian use; a new 3m wide, two-way shared-use path separated from Francis Crick Avenue by a grass verge, replacing the existing on carriageway cycle lane; and a new Long Road/Robinson Way roundabout with segregated pedestrian and cycle paths and direct connection to onward routes.

CAM

- 5.9 A trackless, autonomous metro network is being considered for Cambridgeshire including connections from Mildenhall, Haverhill and Trumpington Park & Ride via the CBC, through the City centre to St Neots, Alconbury and Waterbeach New Town. The route would cover 88 miles and would be designed with frequent services and include underground corridors beneath the city centre, allowing passengers to cross the city in under 12 minutes.
- 5.10 It is anticipated that the full CAM network will be delivered over the next decade, with sections of the network operating as the phases are completed. Of the three elements, the City Tunnel Section will be entirely segregated. The initial elements of the surface routes will be segregated along the majority of the route, and in limited circumstances will run in a dedicated (AM-only) lane on existing roads, with no interface with general traffic.
- 5.11 The Transport Assessment states that no details were available regarding the proposed design and routing of CAM near the proposed station. It is

understood that the current proposal is for Phase 2 of CSET to be integrated in the CAM scheme.²⁵

Figure 5.3 CAM – Indicative Map



East West Rail

- 5.12 East West Rail is a proposed new rail link, which would connect communities between Oxford, Milton Keynes, Bedford and Cambridge. The Project is being delivered in stages. Trains are already running between Oxford and Bicester, and it is intended to have trains running the full length of the line between Oxford and Cambridge by the end of the decade. The preferred route has been selected and it is anticipated that an application for Development Consent will be submitted.

Future Planned Developments

- 5.13 The Transport Assessment considered traffic generation and the distribution of a number of committed developments was reviewed to assess if traffic generated by them should be added to the future baseline.
- 5.14 The identified committed developments for the purposes of establishing the future baseline are as follows:
- *Cambridge Biomedical Campus.* The 70-acre development of the CBC will see the completion of AZ's Global Research and Development Centre, together with other developments. Daily trips to CBC by all modes of transport are forecast to increase from approximately 41,000 in 2017 to 67,500 in 2031.

²⁵ Transport Assessment paragraph 5.3.28 (NR16 Appendix 17.2)

- *Cherry Hinton Housing Development*. The proposal is for a maximum of 1,200 residential dwellings, a primary and secondary school, community facilities, open spaces, allotments, landscaping and associated infrastructure.
 - *Newbury Farm* Outline planning permission has been granted for a 230 home development on the south east edge of Cambridge with plans for a new local centre for Queen Edith's.
 - *Netherhall Farm* Outline application for of up to 200 residential dwellings, with associated infrastructure works, including access.
- 5.15 In addition, several recently completed or largely completed developments in the vicinity of the site were identified, based on desktop research and site investigations. The developments include:
- *Clay Farm*. Up to 2,250 dwellings, a secondary and primary school, a local centre with shops, and a community building including a health centre and library on land west of Hobson's Brook. Based on information received from GCSP approximately 90% of the development has been completed.
 - *Trumpington Meadows*. Up to 1200 dwellings within Cambridge and South Cambridgeshire administrative areas. Based on the developer's website approximately 60% of dwellings have been built and sold.
- 5.16 Traffic generated by committed developments within the CBC has been added to the future baseline based on the estimates carried out for the CBC Transport Needs Review report.
- 5.17 The analysis of traffic generation and distribution indicated that traffic from the committed developments outside the CBC would not be entering the CBC in any significant numbers and as such was not considered in the future 2031 baseline for roads within the study area. While there would be a potential overlap on the local road network outside the CBC, between station traffic and traffic associated with the committed developments, it will not be significant and would not have a material impact on the operation of the junction and link capacity.

6 THE POLICY CONTEXT

National Policy Statement for National Networks (NPS-NN)²⁶

- 6.1 Paragraph 1.4 of the NPS-NN confirms that it may be a material consideration in decision-making on applications that fall under the Town and Country Planning Act 1990 or any successor legislation. Paragraph 3.1 states that the need for development of the national networks must be seen in the context of the Government's wider policies on economic performance, environment, safety, technology, sustainable transport and accessibility, as well as journey reliability and the experience of road/rail users. It requires the Minister to take into consideration the requirements of national and

²⁶ D05

local planning policy, including the requirements of agriculture, in making decisions.

- 6.2 In delivering new schemes, the Government expects applicants to avoid and mitigate environmental and social impacts in line with the principles set out in the NPPF and the Government's planning guidance, as well as provide evidence that they have considered reasonable opportunities to deliver environmental and social benefits as part of schemes.²⁷
- 6.3 NPS-NN states that the Government is committed to providing people with options to choose sustainable modes and making door-to-door journeys by sustainable means an attractive and convenient option. In terms of the railway network, it seeks to facilitate improvements that will encourage passengers to use sustainable transport to travel to and from the station.²⁸

The National Planning Policy Framework (The NPPF)²⁹

- 6.4 The NPPF sets out the Government's planning policies for England. At the heart of the NPPF is a presumption in favour of sustainable development, which should be considered through both plan-making and decision-taking. The NPPF advises that significant weight should be placed on the need to support economic growth and productivity and that planning policies should provide for any large-scale transport facilities needed and the infrastructure necessary to support the operation, expansion and contribution to the wider economy.³⁰ It further states that significant development should be focused on locations which are, or can be made, sustainable, through limiting the need to travel and offering a genuine choice of transport modes.³¹

Cambridge Local Plan (2018)³²

- 6.5 The strategic objectives include:
- Contributing to the vision of Cambridge as an environmentally sustainable city, where it is easy for people to make a transition to a low carbon lifestyle;
 - High quality development in terms of design excellence and innovation, addressing the impact of development upon its surroundings and embracing the principles of sustainable design and construction;
 - Protect and enhance the landscape setting of the City, which comprises the Cambridge Green Belt, the green corridors penetrating the urban area, the established network of multifunctional green spaces, and tree canopy cover in the city;
 - Promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting the role of

²⁷ D-05 Paragraph 3.3

²⁸ D-05 Paragraphs 3.15 and 3.18

²⁹ D-01

³⁰ D-01 Paragraph 106

³¹ D-01 Paragraph 105

³² D-06

Cambridge as a world leader in higher education, research, and knowledge-based industries;

- Locate development to help minimise the distance people need to travel, and design development to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport.

- 6.6 Policy 4 states that new development in the Green Belt will only be approved in line with Green Belt policy in the NPPF.
- 6.7 Policy 5 states that development proposals must be consistent with, and contribute to, the implementation of the transport strategies and priorities set out in the Cambridgeshire Local Transport Plan (LTP) and the Transport Strategy for Cambridgeshire and South Cambridgeshire (TSCSC). It also states that CCiC will work with partners to support the implementation of transport schemes that will improve linkages across the region and by doing so increase the use of sustainable transport modes to get to and from Cambridge.
- 6.8 Policy 17 identifies the CBC as an area of major change. It states that development proposals will be permitted where it can be demonstrated that development is required to meet local, regional or national health care needs or for biomedical and biotechnology research and development activities within class B1(b), related higher education and sui generis medical research institutes.

South Cambridgeshire Local Plan (2018)³³

- 6.9 Policy S/2 sets out the objectives of the Local Plan. These include:
- To support economic growth by supporting South Cambridgeshire's position as a world leader in research and technology-based industries, research, and education;
 - To protect the character of South Cambridgeshire, including its built and natural heritage, as well as protecting the Cambridge Green Belt;
 - To maximise potential for journeys to be undertaken by sustainable modes of transport including walking, cycling, bus and train.
- 6.10 Policy S/4 seeks to protect the Green Belt in accordance with the Framework. Policy E/4 supports the expansion of the CBC and sets out criteria for new development within the CBC. Policy TI/2 requires development to be located and designed to reduce the need to travel, particularly by car, and promote sustainable travel appropriate to its location.

³³ D-08

The Transport Strategy for Cambridge and South Cambridgeshire 2014

- 6.11 This focuses on the capacity for sustainable modes of transport and the further measures needed in the sub region between key economic hubs in and around the City, where people live, and where they access services.

Greater Cambridge Emerging Local Plan³⁴

- 6.12 CCiC and SCDC are working together to create a joint Local Plan for the two areas – which are referred to as Greater Cambridge. The aim is to ensure a consistent approach to planning.
- 6.13 The Plan is still at an early stage in the plan-making process and therefore the policies within it do not carry any significant weight in respect of the proposed development.

Transport Strategy for Cambridge and South Cambridgeshire (March 2014)³⁵

- 6.14 Policy TSTSC 7 supports sustainable transport growth and requires new development to provide integrated and improved transport infrastructure. To ensure that people can travel by sustainable modes and that the use of these modes will be maximised.
- 6.15 Policy TSCSC 10 improving rail services seeks to bring forward service enhancements and new infrastructure to increase rail use. It also identifies a future opportunity for a new station at Cambridge South.

Cambridgeshire Local Transport Plan 2011-2031 (July 2015)³⁶

- 6.16 The Long Term Transport Strategy provides a high level framework for strategic transport policies which support sustainable development and continued economic prosperity. It links the delivery of transport infrastructure and services that are required to enable and provide for planned growth to the delivery of that growth.
- 6.17 Amongst other matters it identifies schemes necessary to provide capacity for growth across the transport network as a whole. These include a new station.

CBC Transport Strategy and 5-Year Implementation Plan (2018)³⁷

- 6.18 The Transport Strategy sets out the CBC's role and responsibility for minimising motorised traffic whilst developing, facilitating and promoting more sustainable and healthy travel choices to Campus for staff, patients, business representatives and visitors, who have to access the site from a wide and dispersed area. It identifies the key transport challenges for the CBC. These include limited public transport network, particularly in the early

³⁴ D-98

³⁵ D-10

³⁶ D-18

³⁷ D-29

mornings and evenings and the high proportion of staff, patients, business representatives and visitors living outside of Cambridge resulting in more journeys to CBC by car.

- 6.19 The objectives of the Transport Strategy include facilitating convenient, predictable, and where possible, cost effective travel to, from and around CBC; the development of affordable and sustainable travel linkages for all local community residents needing to access the Campus; and minimising the CBC's environmental impact particularly in relation to the issues of air quality and man-made climate change.
- 6.20 The goals include maintaining and increasing active travel modes and journeys made by public transport, which may also include journeys made by staff with mobility difficulties, and walking and cycling journeys after dark or in poor weather.

7 CASE FOR NETWORK RAIL

Introduction

- 7.1 The ambition of the CSIE Project is to bring a direct rail connection to the CBC. The CBC includes a significant hospital complex, with two major NHS hospitals, and at least two further hospitals – a new children's hospital and a specialist oncology hospital underway. This serves as an important community resource, offering specialist health care and high-quality employment for the Cambridge region and beyond. The wider Cambridge Southern fringe is identified as an area of major change in the local development plan, with land to the West of Hobson's Park outside the Green Belt allocated for significant residential development. Much of that development has come forward (although further building is anticipated).³⁸ Effective transport links are vital to support the CBC's growth potential and that of the surrounding communities.
- 7.2 At the close of the Inquiry the number of outstanding objections has been approximately halved, to 13, with a further three of those expected to withdraw upon completion of legal agreements.³⁹ Significantly, all of the local authorities have withdrawn their objections, with CCiC and SCDC now offering the Project their support, subject to conditions. There were no outstanding objections from any statutory undertaker, or statutory consultee at the close of the Inquiry. Of the 12 remaining objectors not expected to withdraw only three have actively participated in the Inquiry.

The CSIE Project

- 7.3 The CSIE project includes the creation of a new station and related track works; junction improvements at Shepreth Branch Junction; and a new

³⁸ INQ 33

³⁹ OBJ 10 and 11, CBC Estate Management Company and Cambridge Medipark Limited, and OBJ 17 Countryside (Cambridge) 1 & 2. Heads of terms have been agreed, and agreements are in a progressed form.

- connection between existing lines at Hills Road (to improve the southern access to Cambridge Station).
- 7.4 The new station, Cambridge South, would be a two-storey building situated on the West Anglia Main Line, between Cambridge Station in the north and Shepreth Branch Junction to the south. It would have four 250m platforms (with lifts for both people and bicycles), each capable of accommodating stopping and non-stopping 12 car trains. The track layouts would be remodelled in the vicinity of the station, and two additional loops would be installed to serve the four platforms.
- 7.5 The station footprint includes an Eastern building and a western building. The Eastern building would house the ticketing facilities, with views of the concourse and forecourt. There would be designated waiting areas, information boards and ticket machines. Public toilets would be directly accessible from the concourse, beyond the gate line. The western building would reflect the informal park and green corridor setting of Hobson's Park, and would house similar facilities, as well as the plant, including a substation and back-up supply. The height and maximum envelope of the buildings is controlled through the parameter plans.⁴⁰
- 7.6 Vehicular access would be from Francis Crick Avenue. It would be limited to taxis, drop-off, Blue Badge holders and staff. There would be five bays for Blue Badge holders; three bays for drop-off by private cars and three bays for drop-off by taxis on the east, four of which would be served by four EV charging points. The eastern access would be facilitated by modifications to the Guided Busway and roads and crossings to the East of the railway.
- 7.7 A segregated pedestrian and cycle track would be provided through Hobson's Park to facilitate connectivity with Trumpington to the west. Sustainable access to the station would be encouraged through the provision of cycle parking spaces, 20% of which would be secure. The number of cycle parking spaces, as well as the split between the eastern and western frontages, will be determined following a further study.⁴¹ NR consider that the split would reflect the fact that cyclists are expected to access the station from both the east and the west, in broadly similar levels contrary to the expectations of the Trumpington Residents' Association ('TRA').⁴²
- 7.8 The Station would be accessible by all, with step-free access, passenger lifts and WC facilities, and the ability to arrive by vehicle. This is in marked contrast to the only alternative proposed to the station, which would require those who need to access the station by vehicle to continue using Cambridge station to access the CBC. In NR's view this would deprive that category of users of the benefits associated with the new station.
- 7.9 *Improvements to Shepreth Branch Junction* are necessary to maintain the current levels of operational performance, which require an increase in the

40 NR13

41 Agreed with CCiC and CCoC

42 NRE 2.2 Geoff Hillings PoE Paragraph 9.1.22

line speed through that junction from 30 mph to 50 mph in NR's case. The junction would be re-modelled to incorporate a larger radius curve within an extended double junction. The works also include installation of safety screens on the existing footbridge, works to existing railway embankments, relocation of the GSM-R mast, and the creation of a small railway maintenance area.

- 7.10 *Works at Hills Road Junction* include the extension to the existing Shunt Spur and connecting it to the main line. The purpose of these works is to provide flexibility around the existing Cambridge Station in order to maintain operational performance following the opening of the new Cambridge South station. These works are covered by permitted development rights and do not form part of the application for a direction for deemed planning permission, although they were subject to environmental assessment.⁴³
- 7.11 The project also includes the stopping up of two level crossings – Duke's No. 2 and Webster's – and their replacement with a new accommodation bridge to the west of the railway; a new railway systems compound west of the railway line and south of Addenbrooke's Road, containing a substation, signalling and telecommunications equipment, within a fenced enclosure; four supporting Distribution Network Operators supplies; the provision of supporting infrastructure such as overhead line electrification; modification of existing signals and associated cabling to allow the new track layout to be installed; new telecommunications facilities; power cables to serve railside and station infrastructure; reconstruction of Tibbets Culvert to minimise flood risk and provision of additional sustainable drainage for the railway infrastructure and modification of several existing culverts to accommodate the new track layout; landscaping, both hard and soft, across the CSIE Project; and ancillary infrastructure such as fencing, lighting and electrical connections.
- 7.12 NR assert that the timely and safe construction of the CSIE Project will require temporary construction compounds, temporary access roads and haul roads on both sides of the railway. The five construction compounds for the works on Cambridge South Station are split across both sides of the railway, and include three compounds in Hobson's Park. Four further compounds are required for the works on the Shepreth Branch.

The Statement of Matters

Matter 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

43 NRE 9.2 Mr Pearson PoE Section 2.3

- 7.13 The need for the CSIE Project was identified in detail in the Strategic Outline Business Case ('SOBC') and the Outline Business Case ('OBC').⁴⁴ The need arises as a result of a requirement to address:
- a. Indirect public transport accessibility within the Southern Fringe, which generates a reliance on infrastructure within Cambridge City Centre;
 - b. The unacceptable impacts of highway congestion;
 - c. The absence of long-distance public transport opportunities to access the CBC and Southern Fringe, including from international gateways; and
 - d. The constrained parking opportunities within CBC.
- 7.14 Not a single objector takes issue with the identified need for the CSIE Project or its ability to respond to that need.
- Indirect public transport accessibility*
- 7.15 The Southern Fringe area suffers from indirect public transport accessibility, with those residing within or travelling to the area often being dependent upon the use of public transport infrastructure within the City Centre to access it. All rail trips are currently compelled to route via Cambridge station and use alternative modes for their onward trips. Given the scale of development proposed over the next 10-15 years it is considered that this arrangement would be likely to place substantial pressure on Cambridge Station, potentially resulting in overcrowding issues.
- 7.16 Where public transport journeys are indirect, this significantly impacts upon their attractiveness and encourages people to instead travel by private car. This in turn exacerbates the highway congestion issues which are currently prevalent in the County, and which also give rise to the need for the station.
- 7.17 The Southern Fringe is identified as an area of major change in the Cambridge Local Plan (CamLP).⁴⁵ Many of the approximately 3,300 new homes that the CamLP allocated for development have been provided, or are in the course of completion.⁴⁶ This adds further urgency to the need to provide sustainable transport options.
- Highway Congestion*
- 7.18 Commuting journeys in Cambridgeshire are dominated by private car use (estimated at 42.2% in the 2011 census). Only 2.5% of working age residents are believed to commute by train. As a result, highway congestion is a significant problem for Cambridge, with congestion on all radial routes into Cambridge during the morning peak period and in both directions during evening peak periods. This includes congestion on the routes that provide access to the CBC. Existing congestion is expected to be

⁴⁴ C3 & NR20

⁴⁵ D06 Figure 3.5

⁴⁶ INQ 36

exacerbated by continued employment and residential growth in the absence of sustainable transport interventions.

7.19 NR point to CBC Transport Needs Review. This states:

“Whilst economic success [in the CBC] to date has been widely celebrated, it is now contributing to a shortage of housing and significant transport congestion that threatens to choke further economic growth and compromise a high quality of life.”⁴⁷

7.20 As well as creating delays and frustration for transport users, congestion also generates knock-on effects on air quality. CCiC declared an Air Quality Management Area (AQMA) in 2005 that covers the entire city centre, some 1 mile north of the CBC.

Absence of long-distance opportunities into the CBC and Southern Fringe, including to international gateways

7.21 The absence of a direct rail link limits the catchment of the CBC as an employment site. Those seeking to rely on public transport face unacceptably long journey times to the CBC, and those arriving by private car have to either contend with the highway congestion described above, or the parking constraints described below. Table 21 of the OBC describes the cumulative population within generalised journey time ('GJT') bands of up to 60, 90, 120 and 240 minutes.⁴⁸

7.22 In the 'do minimum' scenario (closest to the current baseline), the population within those bands is 169,617 (60mins), 297,815 (90mins), 2,308,232 (120mins) and 19,201,672 (240mins). By contrast, in the with-station scenario, the catchments were increased to 768,534 (60mins, a 4.5 x increase), 2,072,544 (90mins, a 6.9 x increase), 5,554,943 (120mins, a 2.4 x increase) and 28,208,444 (240mins, a 1.4 x increase), bringing a total of more than 9m additional people within the maximum 4hr journey time.

7.23 There is no direct access to any international hub from the CBC. All journeys require an onward journey to Cambridge Central using the local road network. This can take between 9 and 17 minutes by bus, 30 minutes on foot, 15 minutes by bike and 10 minutes by taxi.⁴⁹ This adds to the journey time and is particularly unsatisfactory for those international visitors whose value of time is high, and who are less likely to use sustainable modes of travel for their trip onward trip to/from Cambridge City Station. Overall GJTs for such users are high, being 150mins to Stansted (1 interchange), 245mins to Heathrow (2 interchanges), and 280mins to Gatwick (1 interchange).⁵⁰ International connectivity is considered to be particularly important for the CBC given that it is intended to attract a highly skilled and globally mobile workforce, as well as international visitors.

⁴⁷ NR16 Vol 3, App 17-2, PDF147

⁴⁸ NR20 page 58

⁴⁹ NR6 Vol 3 17-2 page 18

⁵⁰ NR20 Table 1 page 9

Parking constraints

- 7.24 In recognition of the congestion and environmental issues associated with high levels of private car use, there is limited parking availability at the CBC. However, in order for parking constraints to deliver the desired outcome of reduced car use without affecting overall development viability, alternative sustainable forms of transport must be available and need to be attractive to use.

The objectives of the CSIE Project

- 7.25 Five strategic objectives were developed for the CSIE Project:
- a. Improve sustainable transport accessibility to housing, services, and employment within the Cambridge Southern Fringe and Biomedical Campus area, to fulfil existing and future demands;
 - b. Contribute to minimising highway congestion associated with the Southern Fringe and Cambridge Biomedical Campus by increasing the mode share for sustainable transport modes;
 - c. Reduce reliance on Cambridge city centre transport infrastructure for serving the Southern Fringe and Biomedical Campus;
 - d. Be capable of integrating with and enhancing the opportunities presented by Thameslink and East West Rail, to support development of the Biomedical Campus as part of the Golden Triangle life sciences cluster; and
 - e. Increase public transport connectivity between the Cambridge Biomedical Campus and international gateways, in recognition of its international significance.

The performance of the CSIE Project has been scored against each of the above criteria, and has been found to be beneficial in respect of all five objectives, and "*large beneficial*" against four.⁵¹

Transportation benefits

- 7.26 The principal transportation benefits identified are⁵²;
- a. Time travel savings for passengers of nearly 20% of GJT. Due to the wider catchment area there would be a substantial increase in cumulative passenger numbers that would be able to access the CBC within 4hrs. There is currently an untapped potential offered by trains, with trains travelling to Cambridge between the hours of 8 to 9AM remaining 36% unused, increasing the sustainability of the overall scheme.⁵³
 - b. Delivery of sustainable transport access and consequent improvements in highway congestion would be achieved by offering a viable and practicable means of transport to access the CBC and the wider Southern Fringe. The

⁵¹ NR20 Table 3 Page 16

⁵² NRE 11.2 Section 8 & NRE 3.2 paragraphs 2.1.20 -2.1.26

⁵³ NR20 Page 18

station would integrate well with other sustainable modes of transport, with 95% of trips from the station expected to use a sustainable onward mode. It would also ease highway congestion.⁵⁴

The CSIE Project would remove 858 daily vehicle movements from the local road network in its opening year. Were the station to attract more passengers than forecast, this would only serve to increase the number of movements removed from the road as a result of further modal shift.⁵⁵

c. Improvements in international transport connectivity by providing a direct transport link to Stansted and Gatwick and reducing the GJTs by between c.13 – 31% for standard fare passengers arriving at these airports.⁵⁶ It would also provide a direct link from the CBC to St Pancras International and the Eurostar.

d. Reduction in City Centre reliance; and

e. *Integration with other schemes.* The CSIE Project would deliver a significant transport hub close to the CGB and the planned Cambridge South East Transport (CSE) scheme on Francis Crick Avenue. It would also dovetail with further developments, such as East West Rail Phase 3 (EWR).

Environmental benefits

- 7.27 *A modal shift towards sustainable transport* that would reduce reliance on unsustainable modes of transport. Broader environmental benefits include contributing to the decarbonisation of transport, and the Government’s net zero strategies.
- 7.28 *Achievement of Biodiversity Net Gain (BNG).* NR have committed to the achievement of 10% BNG over baseline levels. This would be achieved through a combination of on and off-site measures.
- 7.29 *Socio-economic benefits* Principal among these is the monetised value of time savings for passengers of £3,200,000 per annum.⁵⁷ By providing a substantial enhancement in public transport accessibility to a wide catchment for the CBC, Cambridge South would bring a major, high-quality employment site, with a mixture of both higher and lower skilled opportunities, into the range of the more deprived parts of the wider region, and also open up improved healthcare opportunities to a wider cohort of society. This would accord with the Governments Levelling Up agenda.⁵⁸
- 7.30 The CSIE Project would also likely create 178 full time equivalent jobs during construction, as well as 10 full time equivalent station jobs and 44 jobs in the wider economy during operation.⁵⁹

⁵⁴ NR16 Appendix 17-2 Figure 61

⁵⁵ NRE 2.2 Paragraph 8.1.8

⁵⁶ NR20 Table 22

⁵⁷ NR20 Figure 5

⁵⁸ NR20, page 6 & NRE 11.2 Figure 4

⁵⁹ NR16 page 561 & 565

- 7.31 CSIE Project would enhance the attractiveness of the CBC as a place to work, which, as mentioned above, risks being undermined by poor transport links. DfT figures have estimated that the failure to provide the CSIE Project would reduce Phase 2 development of the CBC by about 20%.⁶⁰
- 7.32 Overall, the CSIE Project is considered to have a 'medium' to 'high' benefit to cost ratio (BCR), with the most recent work suggesting the BCR may be as great as 2.2 (which is 'high').⁶¹ Even the lower estimate of the BCR contained in the Outline Business Case was 1.9, in circumstances where 'high' is 2.0 or greater.

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

- 7.33 The CSIE Project is the product of careful consideration, both against other non-station alternatives and against different iterations of the various stations.
- 7.34 The site is constrained by the Public Open Space and Green Belt to the west, the presence of the CGB to the north, the sensitive uses carried on at the CBC to the east and buried infrastructure such as the high pressure gas main to the south, as well as the local watercourses and other features of interest such as Nine Wells Local Nature Reserve (LNR) and the Scheduled Monument.
- 7.35 No objector to the Project suggests that any non-rail alternatives ought to have been pursued, and only one objector, Smarter Cambridge Transport (SCT) (OBJ22), suggests an alternative design to that promoted by NR, in broadly the same location, but based on an alleged need to serve a far higher (c.9mppa) passenger demand.
- 7.36 The development of the CSIE scheme and consideration of alternatives has taken place within the structured progression of the GRIP framework for the last four years.⁶² The three principal phases that would be referred (the last two of which overlapped), were as follows:
- a. Output definition (GRIP1). This worked to clarify remit with the Department of Transport.
 - b. Feasibility (GRIP 2). Development of concept scope and round 1 of consultation on the location of the station.
 - c. Option Selection (GRIP3) Refinement of infrastructure designs in light of the outcomes from round 1, selection of the station location and round 2 of consultation on the access to the station.

⁶⁰ NR20 page 79

⁶¹ NRE11.1 paragraph 7.1.2

⁶² Governance for Railway Investment Projects - a process to manage and control investment projects to minimise the risks associated with delivering such projects.

Non-station alternatives

- 7.37 The SOBC considers four possible means of delivering the strategic objectives: (i) longer distance direct bus or coach services; (ii) a busway service enhancement; (iii) expanded park and ride sites; and (iv) doing nothing.⁶³
- 7.38 None of the other non-station alternatives delivered any large benefits against the strategic objectives; and none would have facilitated integration with other schemes. The Park and Ride would have adversely impacted the existing congestion problems in the Southern Fringe Area. Moreover, no other option provided comparable cost benefit ratios.
- 7.39 In the circumstances, a station at Cambridge South was determined to be the most effective way of meeting the strategic objectives, in particular because it had the best advantages in journey times and could respond to a larger demand base.⁶⁴ It therefore had large benefits in terms of international connectivity; sustainable transport access; city centre reliance; and integration with other schemes. It was only in highway congestion that it had a moderate beneficial impact, but in this regard it was still ahead of the other options which would have either had only slight benefits or made congestion worse.

Station Alternatives

- 7.40 Three locations were considered: south (close to the Nine Wells Bridge carrying Addenbrooke's Road), north (close to the Addenbrooke's Bridge carrying the Guided Busway Bridge) and Central (between the two bridges). The various options, together with various access arrangements, were then sifted and consulted upon.⁶⁵
- 7.41 An overall majority (55%) of those consulted preferred the north option due to its proximity to the centre of the CBC and possibility for interchange with the CGB, bus stops and interaction with other planned development works. The northern option also has the advantages of the smallest land take requirement, avoids the high-pressure gas main, and retains the greatest level of local support.
- 7.42 The south and Central options did have some advantages, such as the south option being the easiest and least expensive to construct. However, these were ultimately discounted, due in part to their potential impact upon CBC stakeholders such as the University of Cambridge ('UoC') and the desire to ensure that the selected option had as much local support as possible.⁶⁶
- 7.43 The provision of full access to the northern option via routes both from the east and with vehicular access through Hobson's Park was rejected due to the environmental impact on the Green Belt and land take from Hobson's Park. Access solely by the west presented a longer journey time for those

⁶³ C3

⁶⁴ NR20 paragraph 1.5.1.1

⁶⁵ NRE 1.2 Figure 13

⁶⁶ NRE 1.2 page 127

seeking to access the CBC. NR therefore settled on vehicular and non-vehicular access to the east, with access to the west limited to non-vehicular modes.⁶⁷

Matter 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.

- 7.44 When considering such impacts it is necessary to keep in mind the previously identified benefits that the CSIE Project would provide. Having regard to the extent and reach of those benefits, none of the residual adverse impacts identified in the following can be regarded as unacceptable.

Matter 3(a): Impact of the closure of Dukes and Webster's Level crossing

- 7.45 Level crossings are by their very nature dangerous, accounting for nearly half of all catastrophic railway events.⁶⁸ It is NR's policy to seek closure of level crossings.
- 7.46 Duke's No. 2 and Webster's are particularly dangerous crossings insofar as they rely upon users following instructions to phone up the signallers to obtain permission prior to crossing. There is no mechanism to enforce that requirement other than an appeal to good behaviour and warning notices. Neither of the Crossings gives any warning of oncoming trains (e.g. light signals; automatic barriers; or audible warnings) and neither offers the required sighting distances to all users in order to enable them to cross safely, although this is not immediately apparent. The result is two Crossings whose risk per traverse is high, even without the CSIE Project.⁶⁹
- 7.47 The CSIE Project would introduce a new station which would further extend the required sighting distance. It would also add two further lines at Duke's No. 2. Other planned (albeit not committed) development – such as EWR – could add further trains passing over the Crossings. These additions would increase the danger posed by the Crossings (both individually and cumulatively); increase the likely waiting time before being allowed to cross; and widen scope for human error by the signallers when making the call as to when users (who may be in slow moving agricultural vehicles) may cross. NR assessment is that user worked crossings over more than two lines are unsafe. It is for that reason that, all other things being equal, NR would not introduce any such crossings over more than two lines.⁷⁰ The

⁶⁷ NRE 1.2 Figure 13

⁶⁸ NRE 6.3 page 63

⁶⁹ NRE 6.2 page 29

⁷⁰ NRE 6.3 page 71 Table 1

closure of the Crossings is justified on safety terms, and firmly rooted in NR policy.

- 7.48 The public do not have a right of way over these crossings. Rights are enjoyed only by the Authorised Users, being St John's College (OBJ01) and their tenant farmer, Messrs Webster, although in practice it is only the tenant farmer who makes use of the crossings. The nature of the rights the authorised users enjoy over the Crossings are set out in INQ 40. In essence, the Crossings provide private rights restricted to authorised users for agricultural use.
- 7.49 A Deed dated 1851 between NR's predecessor and St John's, required NR to construct and maintain Webster's as an 'accommodation work' to compensate St John's for the severance of its land by the railway authorised by the Eastern Counties Railway Act 1844 ('the 1844 Act'). Consistent with this, by the 1851 Deed the railway company did not grant St John's a general private right of way over Webster's, but the less extensive right to an 'accommodation work'. This is a crossing that could be used only for the purposes for which it was initially conferred, or which could have been in the reasonable contemplation of the parties at the time, and no greater use. In the present case, the use of the land served by the accommodation works at the time of the 1844 Act was for the purposes of agriculture (as indeed it remains today) and the right to use Webster's is limited accordingly.
- 7.50 The nature of the crossing is an agricultural accommodation work rather than a general right. This is further confirmed by a (comparatively) recent agreement with St John's from 1973 to widen Webster's Crossing, which explicitly refers to it as an "*agricultural accommodation level crossing*".
- 7.51 The deed for Duke's No. 2 has been lost. NR submits that, in the absence of any evidence to the contrary and in light of the obligations placed upon NR's predecessor by the 1844 Act to provide accommodation works but no more, the same rights apply to Duke's No. 2. It would be surprising if Duke's No. 2 – constructed on the same line at a similar time to Webster's – would have had a different arrangement. Such a position is consistent with the case law identified in Note 4.⁷¹
- 7.52 The Scheme would provide an alternative access to the agricultural land to the west of the railway through the provision of a farm accommodation bridge at the western end of the Exchange Land, just off Addenbrooke's Road.⁷² In legal terms, the rights that the Authorised Users would be granted over the farm accommodation bridge would be no less than those that they currently enjoy over the Crossing. The accommodation bridge thus provides for all existing users of the Crossings and in NR's view St John's objection to contrary effect is without merit.

⁷¹ INQ 40

⁷² Work No. 11, shown NR9.1, Sheet 6 and Sheet 9; NR13, PDF21, DRWG53

- 7.53 The closure of the level crossings would avoid harm to the Authorised Users through the provision of the farm accommodation bridge at the western end of the Exchange Land, just off Addenbrooke's Road.
- 7.54 NR assert that in practical terms, the alternative access would offer a markedly improved user experience when compared to the present arrangement. In particular, users would no longer have to phone up in advance to the signallers; they would no longer have to wait in order to access the farmland on the other side of the railway; and, most importantly, would no longer have an open and dangerous interface with the rails.
- 7.55 With the accommodation bridge, the Websters would continue to have three means of accessing their land. In addition to being able to do so via the local road network and the accommodation bridge, they can also access it (i) on foot via the Webster's footpath which would be retained as part of the CSIE Project and (ii) through the Hectare.⁷³
- 7.56 NR believe that it is not strictly necessary for NR to provide an alternative access under section 5(6) of the TWA as explained in INQ 44 due to the absence of a general right of way, but, the alternative access being provided plainly meets the s5(6) tests of a suitable alternative because it not only facilitates the same type and extent of access, but because it is also unencumbered (in terms of providing unrestricted access at any time of the user's choosing) and far safer than the existing crossings. No objector has taken issue with the safety case for the closure of the crossings, or the principle of their replacement with an accommodation bridge. St John's complaint (OBJ01) relates to the extent of the rights granted over the accommodation bridge and securing that bridge. NR view this as unfounded, as set out in their submission.

Matter 3(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

- 7.57 The CSIE Project is anticipated to have a net beneficial effect on the local road networks by reducing the amount of trips required by private car.⁷⁴ This is a benefit in itself and also translates into a benefit for the pedestrians and cyclist as a result of the increased road capacity.

Local road networks and pedestrian routes

- 7.58 The impacts upon the local road network from the construction and operation of the CSIE Project were fully assessed and described in the Transport Assessment and Chapter 17 of the ES.⁷⁵
- 7.59 During the construction phase, access to the site is to be obtained via five identified access points, seven site access roads, and the working areas either side of the railway are to be served by haul roads, all of which would

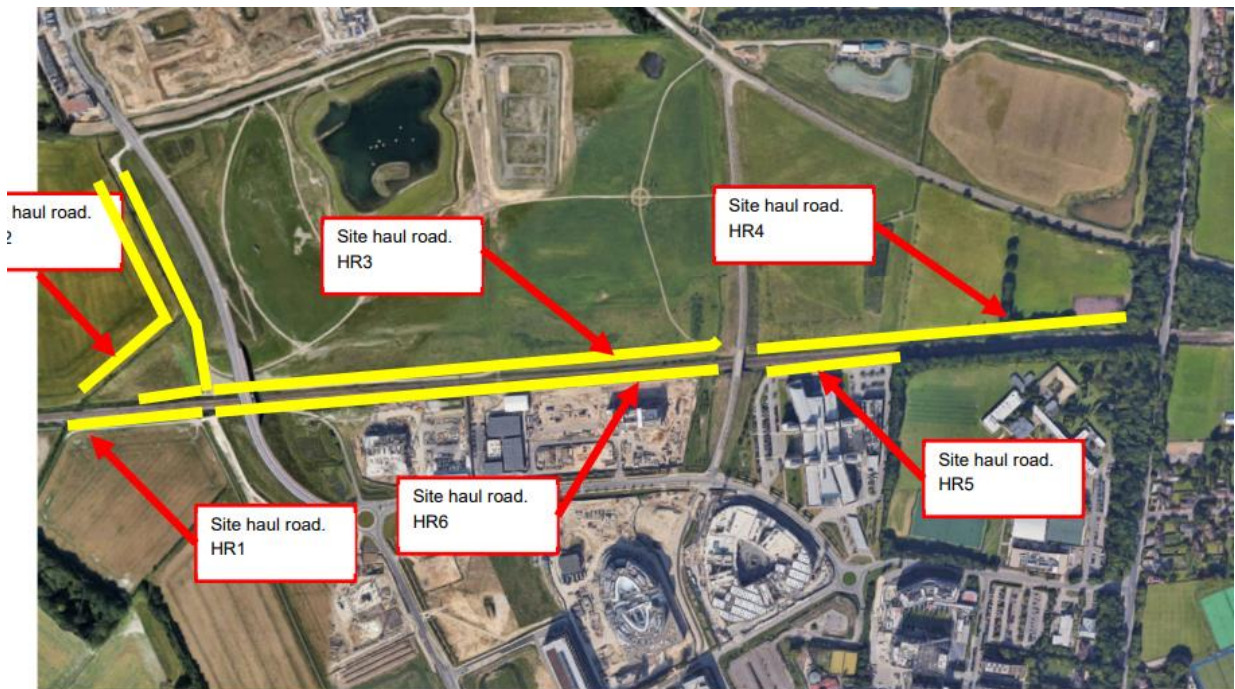
⁷³ NR13 page 11, NR15 Figure 2-6 and INQ 40

⁷⁴ NRE2.2, paragraph 8.1.3

⁷⁵ NR16 Page 572

serve to keep the majority of construction traffic away from the local road network.⁷⁶

Proposed Haul Roads Station Area



- 7.60 The CoCP would be secured by condition. Part A of the CoCP imposes general construction traffic mitigation measures, and Part B requires the submission, approval and implementation of (amongst other things) Construction Travel and Construction Traffic Management Plans.⁷⁷
- 7.61 For construction, the estimated vehicle construction movements were estimated per access point and compared to the future 2023 baseline (the peak construction year). None of the estimated total vehicle movements exceeded the 10% threshold increase, and would at most result in a 6.6% increase, and in many cases far lower.⁷⁸ However, three roads would exceed that threshold for Heavy Goods Vehicle movements (Addenbrooke's Road, Francis Crick Avenue and A1309 Hauxton Road), and were subject to further assessment. That assessment included consideration of the impacts of the estimated travel levels on pedestrian and cyclist journey times and amenity, and on users of public transport. None of the impacts on those three roads were considered significant.⁷⁹
- 7.62 A small number of objectors, including CUH (OBJ06) expressed concerns about the impact of the construction phase on their assets, and recommended the adoption of a Code of Construction Practice and a Construction Traffic Management Plan. After being provided with further

⁷⁶ NRE 1.2 page 84

⁷⁷ NR16 Section 4.5 & 1.2

⁷⁸ NRE 2.2 Table 7.2

⁷⁹ NRE 2.2 Tables 7.3,7.4 & 7.5

details on those documents, as well as further commitments on wayfinding and construction signage, CUH has withdrawn its objection.

- 7.63 Similarly, concerns about the potential impact of damage caused to the private road network by construction vehicles have been addressed through commitments offered by NR to inspect and repair the affected CBC roads during the construction period, and to pay a defined maintenance contribution that continues during the operational period. On the basis of the agreed heads of terms which included these commitments, the CBC Estate Management Company (OBJ10) and Cambridge Medipark Limited (OBJ11) did not consider it necessary to appear at the Inquiry, and their formal withdrawal remains expected. Therefore the CSIE Project can be delivered in a way that respects the existing developments in the CBC.⁸⁰
- 7.64 During the operational phase, the additional trips likely to be generated by the station have been calculated by reference to a modal split agreed with CCoC, the Highway Authority. The Scheme would result in an overall daily reduction of 858 vehicle movements.⁸¹ This translates into a benefit passed on to pedestrians and cyclists, as reflected in the Transport Assessment.⁸²
- 7.65 The expected shift towards sustainable modes of transport from the station has been fully accounted for. Substantial improvements are planned to accommodate the increase in pedestrians and cyclists. These include:
- a. Widening of the existing crossing on the southern arm of Francis Crick Avenue;
 - b. Widening the shared use cycle path on the west side of Francis Crick Avenue from the north of the CGB;
 - c. Widening the existing crossing across the CGB connecting Trumpington and Hobson's Park;
 - d. Provision of a new segregated pedestrian and cycle path through Hobson's Park;
 - e. Provision of cycle and pedestrian access to the station from both east and west, with accompanying cycle parking;

High quality signage would be provided to act as effective wayfinding, secured through the agreement with CUH.⁸³

Access

- 7.66 In addition to the access to the west via a segregated path, and the pedestrian and cycle access measures described above, pedestrian access to the south is provided on the west side of Francis Crick Avenue, and to the

⁸⁰ OBJ10 and OBJ 11 were not withdrawn and the original objections are relied upon.

⁸¹ NRE 2.2 paragraph 8.1

⁸² NR16 Vol 3 Appendix 17-2

⁸³ NRE-REB-01 Paragraph 2.31

north (onwards to Royal Papworth hospital) from the station forecourt. Vehicular access for those who need it, including taxi users, private car drop-offs and blue badge holders, as well as staff, is provided via a simple priority junction with Francis Crick Avenue on the east side of the railway, which leads on to the station forecourt. The capacity of the pedestrian and cycle infrastructure, as well as the taxi and vehicular drop-off areas, has been tested for up to 6mppa and been found to perform acceptably.⁸⁴

- 7.67 Access for emergency and maintenance vehicles is also provided for. This is accommodated on both sides of the railway, using the "maintenance" track on the west and the station forecourt on the east.

Blue light routes for emergency traffic

- 7.68 These routes are addressed in the heads of terms agreed with CUH. The key point is that during the construction period, five days' notice of any traffic management on blue light routes that might affect response time would be given.⁸⁵ CUH has withdrawn its objection, indicating its satisfaction with the proposed arrangements. The CSIE Project may even result in a beneficial impact on the Blue Light Routes due to the overall reduction in reliance on the local road network. CUH would be consulted on the Construction Travel Plan, the Construction Logistics Plan and the Construction Traffic Management Plan prior to submission to the local planning authority, to ensure that any adverse impacts on the Blue Light Routes can be identified and eliminated at the earliest stages.⁸⁶

Impacts on parking provision

- 7.69 The limited parking provision reflects the status of the station as primarily a destination station, with onward journeys carried out using sustainable modes of transport. It amply covers the anticipated 36 vehicular trips in peak hours by providing disabled parking, taxi bays and pickup/drop-off bays as well as trips associated with up to 6mppa.⁸⁷ The existing car parks within the CBC charge £20 for any stay longer than 8 hours and this would act as a deterrent for their use as *de facto* park and ride facilities. The prospect of increased parking pressure arising from the Project is therefore unlikely.
- 7.70 The existing road network in the CBC has enforcement measures (including ANPR) and neighbouring residential areas are either unattractive due to the long walking distances or have existing parking restrictions. In any event, to ensure that any unexpected impacts can be identified and addressed, NR has committed to carrying out monitoring sought by CUH during construction and contributing towards monitoring infrastructure during operation, in respect of matters including whether vehicular access to the station is causing congestion on Francis Crick Avenue or unauthorised waiting/parking on the Blue Light Routes.⁸⁸ That monitoring is the subject of

⁸⁴ INQ 51

⁸⁵ NRE-REB-01 Paragraph 2.5

⁸⁶ INQ 9

⁸⁷ NR16 Appendix 17-2, Table 6.8 & INQ 51

⁸⁸ REB-01 Paragraph 2.6

agreement in the heads of terms between the parties, based upon which CUH withdrew its objection.

Matter 3(c): provision of cycle access and parking and on cyclists' safety

- 7.71 A bespoke cycle path to the west of the station through Hobson's Park would be provided. Cyclist safety would be ensured by segregating the pathway between pedestrians and cyclists on the west. On the east, a further pathway would be provided next to the Astra Zeneca development.⁸⁹ Cycle parking spaces would be provided, in a split and number to be determined based on further studies. NR has additionally committed, in its agreed heads of terms with CUH, to providing cycle repair tools at the station, to further support cycle journeys.
- 7.72 The NCN11 cycle path may have to be temporarily diverted during construction, in part because of the temporary land take for Construction Compound 1 (CC1). It is recognised that this is a well-used cycle path, and as such every effort would be taken to avoid diversion if possible. However, the diversion is not likely to be materially longer than the existing route.⁹⁰ Through the selection of the northern station location, NR has been able to avoid the permanent diversion of NCN11, as would have been required for the southern and Central options. Overall, the CSIE Project makes ample, high quality and safe provision for those wishing to access or egress the station by bicycle.

Matter 3(d): How the project would align with other forms of public transport and sustainable modes of travel

- 7.73 The station serves primarily as a destination and a gateway to the CBC. It is expected that 95% of the patrons of the CSIE station would use modes other than car (public transport, walking and cycling) to access their onward destination. Over two thirds of passengers' true destination would be the CBC which is a short distance away.⁹¹ The northern location of the CSIE Project was chosen to maximise the possibility of combining rail with sustainable onward modes of transport, including walking, cycling, and using the local bus network. Even Mr Leigh for SCT accepts that of the three options considered, the selected location provides the best access to bus services (both existing and proposed) and that no better access can be provided without demolition of the Guided Busway Bridge.⁹²
- 7.74 Pedestrian and cycle access is predicted to account for the majority of the journeys to the CBC – some 74%.⁹³ Access to bus services, both the CGB and regular services, is also appropriately provided for, for the minority of passengers (11%) expected to choose it. The main demand for bus services is likely to be from the CGB, which is 250m from the station entrance - a three-minute walk - where 8 to 9 buses per hour link the campus to

89 NR16 Vol 3 Appendix 17-2 page 118

90 NRE 1.2 Section 6.8

91 NR16, Vol 3, App 17-2, Fig. 61

92 February 17, Day 14, AM

93 NRE 2.2 Table 8.1

Trumpington and beyond. The bus interchange would be facilitated by widening the pedestrian access. There are further 'regular' buses (Service U) available at the stop on the east side of Francis Crick Avenue, 200m, or a two-minute walk.⁹⁴

- 7.75 There is no planning policy requirement for bus stops be provided within a specific distance of a station. Mr Leigh referred to the Government's Williams-Shapps Report and the Bus Back Better Strategy, neither of which are adopted policy but which it is accepted are capable of being material considerations. However, in practice neither of these is prescriptive as to bus station accessibility from train stations either. The highest either of these documents puts it is that rail stations 'should' be 'hubs' for connecting services.⁹⁵ Whether it is possible or appropriate for a station to be a 'hub' will depend on the particular location. NR assert that absent an unnecessarily large-scale intervention such as that proposed by Mr Leigh, turning Cambridge South into such a 'hub' is not possible given the site constraints (specifically the CGB), nor would it be appropriate given the likely demand for the station in general and for bus services in particular.⁹⁶
- 7.76 As Mr Hilling explained during Cross Examination in his view, it is appropriate for such facilities to be provided within a reasonable walking distance (400m) and time, and the bus stops are well within that distance. Neither of the local planning authorities, nor the highway authority have complained about the adequacy of the bus interchange facilities, nor has any operator. In all the circumstances, it is considered that the CSIE Project provides good (and certainly acceptable) integration with buses.
- 7.77 The delivery of the proposed CSET Project would only further improve public transport accessibility, with the proposed stops being located just south of the eastern station access.⁹⁷ NR state that integration with CSET and other schemes such as EWR have been taken into account (see Matter 5).

Matter 3(e): Impact from construction and operation including in relation to new cabling and positioning of cranes.

- 7.78 The construction and operation impacts of the CSIE Project were fully assessed in the ES and are discussed in greater detail (by reference to the relevant subject matter areas) below under Matter 7. The CSIE Project has been sensitively designed to fit within existing constraints and contains a number of in-built mitigation features. The remaining mitigation is comprehensively addressed in a suite of conditions, which include the requirement to submit a CoCP for approval by the Local Planning Authorities and adhere to the same once approved. The parties listed in Note 1 and Note 2 would be consulted prior to submission, and all other concerned stakeholders would be able to submit their comments as part of the consultation process for approval.⁹⁸

⁹⁴ NR16 Vol 3, Apd 17-2, Table 4.1

⁹⁵ INQ 7 Bus Back Better at page 32

⁹⁶ INQ 58, at [2]

⁹⁷ NRE 3.2, paragraph 9.1.185

⁹⁸ INQ 9 & INQ 17

7.79 The position of individual Campus stakeholders with specific needs is protected through existing and proposed legal agreements, as would be identified in the Schedule of Commitments to be submitted. Whilst the precise detail of many of these agreements is confidential, the SoS has already been informed about the scope of many of these in the evidence submitted (including the Rebuttal evidence) and in the Statement of Common Ground agreed with the UoC.⁹⁹ The agreements reached have facilitated the withdrawal by those parties of their objections, most of which focussed on potential construction phase impacts. If the individual parties are content with the position reached, then it is submitted that there is no basis for residual concern on the part of the SoS.

7.80 In relation to the specific matters identified by the SoS under this matter, which are not covered under Matter 7, the position is as follows :

Cabling

7.81 New cabling has not been identified as posing any particular risks or issues for the CSIE Project, save in relation to potential impacts from electro-magnetic interference ('EMI'), which is addressed below, under Matter 3h. A more pertinent issue for the construction phase is the risk associated with working around buried services. Such risk is however well known to and well understood by NR, and it has a suite of standards within its business processes to manage this risk. Normal site practice includes verifying the actual position of utilities and using non-intrusive techniques such as Ground Penetrating Radar.¹⁰⁰ 'Dial before you Dig' arrangements would also be documented within Work Package Plans prepared by NR's Main Works Contractor following NR's Business Processes. Any activities to break the ground are undertaken within a Permit to Excavate and any overhead cables around the site would be 'goal posted'.¹⁰¹

7.82 The presence of the High-Pressure Gas main has heavily influenced the development of engineering proposals and the selection of the preferred option. Detailed discussions have taken place with Cadent to agree protective measures including monitoring arrangements, which have been included within the Draft Order and allowed Cadent to withdraw its previous objection (OBJ12). Therefore, neither existing or new cabling is expected to give rise to any unacceptable adverse impacts.

Cranes

7.83 Cranes would be required as part of the construction, and their location is set out in NRE1.2, Figure 52. Subject to detailed lift planning and construction methodology, the largest crane required (a telescoping crane, used when the railway is closed) is illustrated in NRE1.2, Fig 53. Multiple smaller city cranes would also be required. Lifting operations next to the railway are highly sensitive and tightly regulated by best business practice,

⁹⁹ INQ 33

¹⁰⁰ NRE1.3, Appendix D, Fig 58

¹⁰¹ NR1.2 page 288

which NR would uphold throughout construction. No significant adverse effects arising from the operation of cranes have been identified in the ES.

Matter 3(f): The effects of noise, dust and vibration during construction and operation

- 7.84 The impacts of the CSIE Project on noise, dust and vibration have been fully assessed in the ES. All aspects of noise, dust and vibration are submitted to an effective enforcement regime which shall be agreed with the local planning authority prior to construction commencing. Appropriate stakeholders would be consulted prior to submission for approval. No Campus stakeholder to the east of the railway in the CBC with specialist needs and sensitive equipment - such as the Medical Research Council (MRC) and UoC - continues to object to the CSIE Project on these grounds.
- 7.85 Receptors are already subject to, and tolerate, an existing source of noise and vibration from the railway which, in the case of the particularly sensitive stakeholders in the CBC, has already been taken into consideration in the development and layout of their buildings. If vibration and noise can be controlled so as to be no greater than they are currently, then it must be accepted that significant adverse effects from the CSIE Project would not arise. This analysis is in line with the "agent of change" principle in the NPPF. As Mr Taylor explained in evidence, the agent of change principle is a strict test in that it applies the onus on the agent of change - here NR - to eliminate all unreasonable noise (and vibration) impacts.
- 7.86 Secondly, the presence of the existing railway has allowed for more precise identification of both the level of noise and vibration to which the railway gives rise, as well as how vibration waves and noise propagate into the CBC, and how particular buildings respond to them. This adds further confidence to the conclusion that noise and vibration from the CSIE Project would not adversely affect the CBC.

Noise

- 7.87 The baseline noise survey methodology was agreed in consultation with CCiC and SCDC Environmental Health Officers. The assessment included construction noise and construction road traffic, and all operational noise (from traffic, road and rail, including the increased speed and additional tracks, and the public address/voice alarm ('PAVA') system). The baseline was established by assessing eleven receptors representing a mix of residential and non-residential receptors near the site, which were then modelled with commercial noise software to give values for the day, evening and night.¹⁰²
- 7.88 The assessment was conducted on the basis of a worst-case scenario. During construction, it was assumed that all plant would be running 100% of the time with concurrent construction stages. This situation is unlikely to apply in practice. The measures for the noise levels of the equipment was taken from a DEFRA study in 2004. In oral evidence, Mr Taylor explained

¹⁰² NR16 paragraphs 5.2.13, 5.2.14, 5.2.16 and Table 5-12

that, as a result of these factors, the model would overpredict 99% of the time, and that the assessment was “*very robust*”. Correction factors were applied to ensure that the model was calibrated with measured baseline noise levels.

- 7.89 Significant residual adverse effects from construction noise were predicted during both the day and night for a small number of locations in proximity to the Station Road and Hills Road areas. The receptors affected include both residential and scientific research receptors.¹⁰³ However, the impacts identified would arise for only very short durations and would be associated with temporary activities such as concrete breaking, which would occur only on a small number of occasions (a matter of days) during the construction period. For over 98% of the construction period, no significant adverse impacts would be expected to be encountered.¹⁰⁴ No significant residual effects were predicted during operation.
- 7.90 NR believe that all noise was considered to be manageable through the adoption of Best Practicable Means (BPM), appropriate construction methods and the implementation of a noise monitoring regime. That included the noise generated by the noisiest construction works, which are breaking out the pile caps.¹⁰⁵
- 7.91 The methods to be utilised as BPM include the use of continuous flight augers rather than vibratory piling for the OLE gantry works; daily inspection of equipment, and the use of modern equipment that is no noisier than the baselines used in the 2004 DEFRA study mentioned above. There would also be real-time noise assessment which would provide automatic text alerts to nominated stakeholders and construction personnel so that action can be taken to prevent exceedance.
- 7.92 The appropriate measures would be secured through the detailed CoCP, upon which UoC would be consulted on prior to submission for approval by the local planning authorities. The assessment presented in the ES did not address the effects of noise upon equipment and/or laboratory animals within the UoC’s Anne McLaren Building (AMB) and the MRC’s Lab of Molecular Biology (LMB). Impacts of noise upon both sensitive imaging equipment and lab animals were raised as a concern in the objection of the UoC and impacts on lab animals was also raised by MRC.
- 7.93 In response to the concerns expressed, additional assessments were carried out and presented to those parties, both in a suite of technical notes (included in the evidence of Mr Taylor (pp.24-43)).¹⁰⁶ The conclusion of these assessments was that, applying BPM, no significant adverse effects would be experienced by either the imaging equipment, or lab animals in either building, and that in fact, the significant effects previously identified in relation to those buildings would not be experienced *within* those buildings (predicted noise levels being lower than existing maximum noise

¹⁰³ NR16 Table 5-14 & Table 5.15

¹⁰⁴ NRE4.2 paragraphs 9.10 – 9.17.

¹⁰⁵ NRE4.2, Table 10.4

¹⁰⁶ NRE 4.3 & NRE 4.2, Section 10

events). The ES did not therefore fail to report any likely significant effects from the Project.

- 7.94 These results were the subject of discussion with both MRC and UoC, both of whom have now withdrawn their objections. At no point were any additional likely significant effects beyond those reported in the ES identified, confirming the adequacy of the assessment carried out.

Vibration

- 7.95 Vibration has the potential to result in adverse effects on residential accommodation (affecting human response and quality of life), on hospitals, and stakeholders in the CBC who have sensitive equipment.¹⁰⁷ The CSIE Project gives rise to new sources of vibration during construction owing to the works themselves, and during operation because of the increase in lines, line speed, and the additional switches and controls required on the lines.
- 7.96 The receptors that were assessed in the ES comprise residential receptors (near Shepreth Branch and west of Hobson's Park), a school (Hills Road Sixth Form), research facilities (Cancer UK, MRC, AMB, ABCAM and UoC) and a hospital (Royal Papworth Hospital).¹⁰⁸ All residential receptors were considered moderately sensitive, and the CBC stakeholders high. Consultation also took place with the CBC stakeholders as had been requested, and baseline locations were aligned accordingly. Residential facilities and the school were assessed using BS5228-2 method and hospitals in accordance with the relevant NHS guidance (HTM08-01).
- 7.97 The research facilities were assessed with a bespoke measuring system that considered the sensitivities of their particular equipment. The particular 'Vibration Criteria' ('VC') curve requirements for MRC, UOC and AZ were agreed with the stakeholders. This included VC levels at VC-B and VC-D for the MRC LMB and VC-A and VC-C for UoC AMB.¹⁰⁹
- 7.98 Full details of the assessments are contained in the ES.¹¹⁰ A pessimistic approach was taken to the assessment of vibration. VC curves do not take account of the duration of the vibration. This is important in the context of construction and railway-induced vibration, where the passage of a train or construction activity may give rise to short periods of vibration and where averaging over a longer period might artificially reduce the impact. Consequently, the ES assessed vibration over short periods of a second. NR asserts that this ensures that vibration is overestimated and mitigated rather than underestimated.¹¹¹
- 7.99 Only three receptors were predicted to have significant effects. These were:

¹⁰⁷ NRE3.2 paragraph 2.2.3

¹⁰⁸ NR3.2 Figure 2

¹⁰⁹ NRE 3.2, Section 5.1

¹¹⁰ NR16, Appendices 6.2 & 6.3

¹¹¹ NRE2.3, paragraph 5.2.2

- a. Residential receptors near Shepreth Branch Junction construction works, in circumstances where large earthworks operations are undertaken within 30m of a residential receptor (one property) or where vibratory piling is used;
 - b. At the UoC AMB, where construction phase activity was anticipated to give rise to significant effects; and
 - c. At the MRC LMB, where construction was identified as giving rise to significant effects, and a potential for significant effects in the operation phase.
- 7.100 In relation to the Shepreth Branch effect, vibratory piling is to be avoided via the CoCP unless it can be carried out at sufficient distance to avoid significant effects or where it is unavoidable. In the event that it is unavoidable, such piling is not expected to last longer than two days and can be managed through the giving of notice. This same procedure can be used for the one property affected by the earthworks. Furthermore, appropriate piling methods could considerably reduce any vibration and avoid altogether any adverse effects on those residential areas.¹¹² This mitigation, which may be capable of reducing the effect, is to be secured through the CoCP Part B.
- 7.101 As a result of concerns expressed about these proposals by the UoC and MRC, further work was undertaken to refine the assessments undertaken and liaison with both parties ensued.¹¹³ As a result of this work, NR has been able to satisfy those stakeholders that no significant adverse effects from vibration would arise. There are now also binding legal commitments in place with both parties that ensure that their vibration requirements are met and both objections have accordingly been withdrawn.
- 7.102 As a result, the SoS can be satisfied that no significant adverse effects from vibration will be experienced by any of the sensitive CBC stakeholders, and that the only remaining significant effect on the Shepreth Branch properties will be a matter of days in duration and managed through appropriate communication. Again, at no point were any additional likely significant effects beyond those reported in the ES identified, confirming the adequacy of the assessment carried out.
- 7.103 All of the above is confirmed by the UoC in the recent Statement of Common Ground, where it stated that "based on the...commitments and undertakings, NR and the UoC hereby confirm to the Inspector that no further grounds for objection remain in respect to noise and vibration".¹¹⁴

Dust

- 7.104 Dust is primarily an issue during construction, which will involve the excavation of a significant volume of earthworks. In his evidence Mr Barnes

¹¹² NRE3.2 paragraph 6.2.6

¹¹³ NR3.2 Section 6.3 and 6.4

¹¹⁴ INQ 33 paragraph 6.1.5

provides a list of tried and tested mitigation techniques to reduce any impacts from dust.¹¹⁵ This includes active monitoring of particulate matter, covering stockpiles, and water bowsers and sprinkler systems.

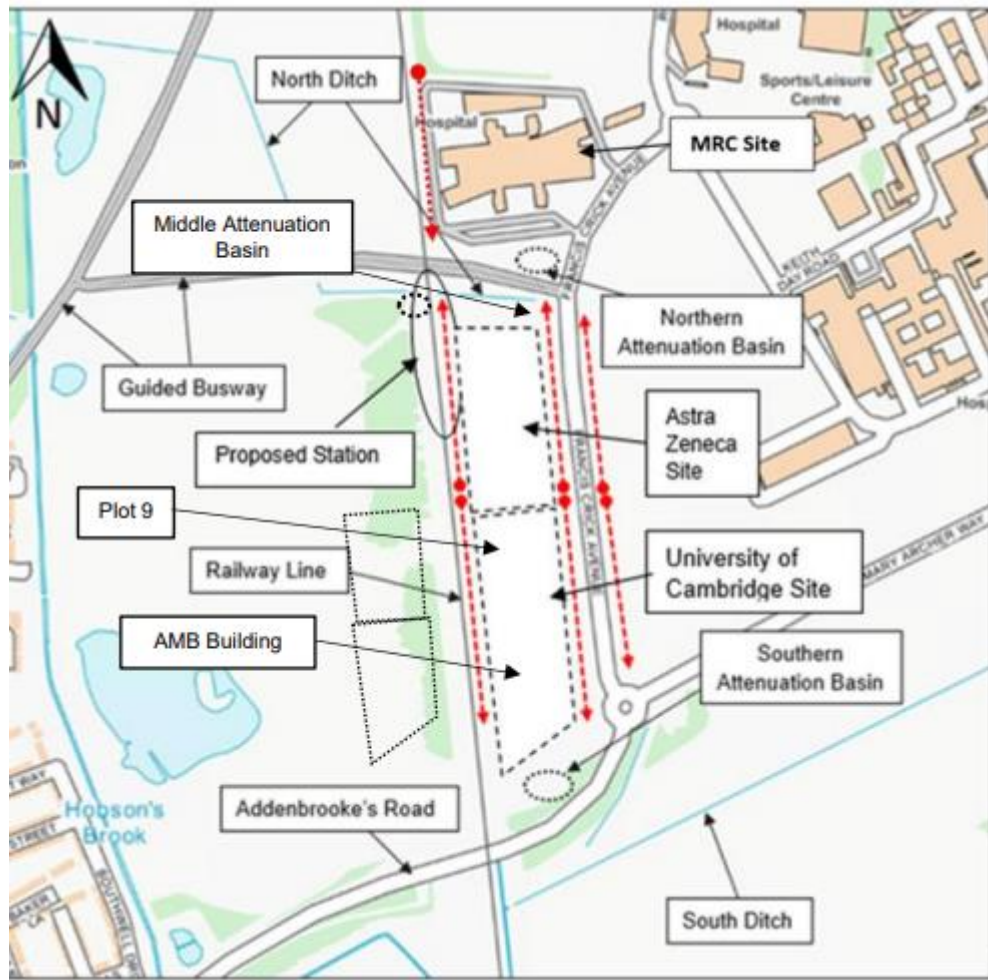
- 7.105 These methods are secured by the CoCP and include a dust management plan based on accepted international standards to mitigate against particulate matter. NR states that it will also provide a materials management plan which will make provision for the storage of excavated material and a Construction Traffic Management Plan which will contain site specific controls in consideration of potential nuisance from dust. This will ensure, based on techniques with a demonstrated track record, that the dust will be effectively managed.
- 7.106 The ES included a specific Construction Dust Assessment but, in view of the mitigation proposed and secured, did not report any likely significant effects upon any receptor arising from dust, with impacts being 'negligible' during both construction and operation.¹¹⁶ NR state that the only objector to raise a concern about the impact of dust emissions was the MRC, who have particularly stringent air quality requirements. The MRC has however been able to withdraw that objection on the basis of a legal agreement which provides for NR to pay for the replacement of air filters where they are affected by an increase in particulate matter.

Matter 3(g): The effect on drainage during construction and operation

- 7.107 The CSIE Project is located within the Hobson's Brook catchment. Downstream of its crossing with Long Road, the watercourse splits into Hobson's Conduit and Vicar's Brook. Hobson's Conduit supplies water to the Cambridge University Botanic Garden and the City of Cambridge further downstream. Vicar's Brook discharges to the River Cam approximately 2km downstream of the Long Road crossing and 4km downstream of Nine Wells.
- 7.108 The key drainage routes within the site boundary are the North Ditch and the South Ditch, both of which comprise culverted and open channel reaches and discharge to Hobson's Brook. The North Ditch drains a large proportion of the existing hospital site, whilst the South Ditch receives discharges of attenuated surface water runoff from the CBC, as well as runoff from a small, rural catchment to the southeast of the CBC site.
- 7.109 All of these drainage features mentioned are the responsibility of CCiC and Hobson's Conduit Trust ('HCT'), both supporters of the Project. The HCT benefits from a number of covenants with CBC owners and occupiers, which impose requirements upon discharges from premises on the CBC as regards both water quality and surface water run off rates, with the latter being limited to 2l/s/ha (litres per second per hectare). The only exception to this run off rate is that in place for Francis Crick Avenue, where the allowable rate is of 3 l/s/ha based on a 1% annual chance storm event.

¹¹⁵ NRE1.2 Section 6.10.4

¹¹⁶ NR16 Vol 3 appendix 7.3



Existing Surface Water Drainage Features (red dash lines indicating swales/ditches)

- 7.110 Further drainage features of the CBC include a range of SuDS and three attenuation basins. The North and Middle attenuation basins discharge to the North Ditch, and the south to the South Ditch. The CSIE Project will mainly impact on the existing drainage features to the northern part of Francis Crick Avenue (and therefore on the North and Middle attenuation basins).¹¹⁷
- 7.111 The drainage proposals for the station involve the creation of an entirely separate and self-contained drainage system for the station development, which will ultimately discharge to Hobson's Brook. In greater detail:
- a. South of the station, the initial proposal was to discharge to a pond south of the South Ditch (and then on to Hobson's Brook). As that land may be required for the CSET guided busway, the proposal is to relocate the pond to the west side of the rail corridor, with a connecting channel underneath the railway lines. Discharge will ultimately still be into South Ditch at 2l/s/ha.

¹¹⁷ NRE5.2 Fig 2-5 Catchment area FC2

- b. West of the Station, water is collected and discharged into the North Ditch, with a discharge rate of no more than 2l/s/ha. The North Ditch will be culverted in this location, to connect to the existing Hospital culvert under Francis Crick Avenue.
- c. East of the station, water will be discharged into a sub-surface storage tank, with a flow control chamber limiting it to no more than 2l/s/ha.
- 7.112 The station itself will be constructed on the Mid-Attenuation Basin. That basin will be relocated within the station forecourt, to provide an equivalent attenuation volume. The volume will also account for the loss of the AZ swales and UoC swales.
- 7.113 Surface water management is the subject of an outline surface water drainage strategy ('SWDS'). This sets out the key principles to be employed by NR in the management of surface water, which include ensuring that it respects and is sympathetic to the existing drainage network, and that it does not increase surface water runoff rates above existing rates.¹¹⁸
- 7.114 During construction, the CoCP will require adherence to best practice measures for ensuring the protection of water quality. Specific measures will be provided in CoCP to ensure that the topsoil on the CC1 and CC2 compounds will not be disturbed so as to prevent pollution in the nearby Nine Wells Nature Reserve.
- 7.115 The ES identified the potential impacts as arising during the construction stage from matters including pollution, excavation and dewatering, and an increase in surface water flood risk resulting from an increased impermeable area. During operation the potential impacts identified were from accidental pollution, changes in flow conveyance/local hydraulics, and increase in flood risk. No residual significant effects were identified as being likely to arise in respect of any of the receptors during either construction or operation.¹¹⁹
- 7.116 NR explain that although there have been some modifications to the detail of the design proposed, none of these impact upon the principle of the drainage assessed within the ES, which is to discharge (ultimately) to Hobson's Brook at an attenuated rate of 2l/s/ha and to employ SuDS for the purpose of providing attenuation and water quality management. NR advise that no likely significant effects upon water resources and drainage have been identified by any party subsequent to the production of the ES.
- 7.117 In view of the Project's partial location in Flood Zone 3, it was necessary for detailed flood risk modelling to be carried out, subject to the guidance of the Environment Agency (EA). The Flood Risk Assessment (FRA) describes flood risk to the CSIE Project site from a range of sources and the measures proposed to manage this risk over the lifetime of the development.¹²⁰ EA initially objected to the Draft Order on the basis that further analysis of

¹¹⁸ NR16 Appendix 18.2, Section 6.3

¹¹⁹ NR16 Table 18-11 & NRE 5.2 Tables 8-1 and 9-1

¹²⁰ NR16 Appendix 18.2

North Ditch was required. Further work was undertaken, including confirmation of the storm flows within the watercourse during storm events and up to the 1 in 1000-year event. This demonstrated that peak flows for that extreme event are 0.132m³/s, which is well within the design capacity of the proposed culvert (2.5m³/s). The EA subsequently withdrew its objection based on its satisfaction with the further information provided.

- 7.118 NR submits that the environmental information establishes that there would be no out-of-bank flooding in all modelled scenarios, including making a substantial 40% allowance for climate change over the lifetime of the project. The site is at lower risk of fluvial flooding than the Environment Agency Flood Map would suggest. In view of those findings, no mitigation measures to control fluvial flood risk during operation were found to be necessary.¹²¹
- 7.119 Following submission of the TWAO, the potential implications of the proposed development upon drainage during construction and operation generated the greatest level of third-party interest. Notwithstanding this, there was an absence of objection from the Lead Local Flood Authority (LLFA), the positive support for the Project from the HCT, and the early withdrawal of the EA's objection.
- 7.120 There are a number of potential interactions between the CSIE Project and existing drainage features benefitting CBC stakeholders, as described in NRE 5.2 (Section 6.5) and the rebuttals to the evidence of MRC and UoC.¹²² Mrs Brocken's evidence also described how those interfaces are to be managed, without affecting storage volume enjoyed by those parties, and without risking them being put in breach of their obligations under the HCT covenants.¹²³
- 7.121 NR state that at the close of the Inquiry the majority of objections which raised drainage as an issue were withdrawn.¹²⁴ Of the remaining objectors who raised drainage concerns, OBJ10 CBC Management Company and OBJ 11 Cambridge Medipark Ltd, their substantive concerns have both been addressed through the Heads of Terms agreed between the parties. TNR submit that the only outstanding drainage concern is therefore the generalised concern raised by the Pemberton Trustees (OBJ15).
- 7.122 NR believe that in view of all of the above, the SoS can be satisfied that effects upon drainage and the water environment would be acceptable.

Matter 3(h): Whether the proposal would give rise to electro-magnetic interference

- 7.123 NR accept that the CSIE Project has the potential to give rise to EMI, in particular because of the increase of the number of tracks from two to four

¹²¹ NRE 5.2, Section 9.2

¹²² NRE-REB-01, Section 3; NRE-REB-02, Section 3; NRE-REB-03, Section 3

¹²³ NRE 5.2, Sections 6.6-6.10; NRE-REB-02, paragraph 3.1.14

¹²⁴ OBJ 03, OBJ 06, OBJ 08, OBJ 09, OBJ 18, OBJ 23 & OBJ 24

and the increase in power demands for the station.¹²⁵ This risk arises because the torque needed to propel the train relies on a current which can induce currents in conductive materials, which in turn can affect scientific research institutions in the CBC and hospitals through impacts on sensitive imaging and other equipment. This was a particular concern to the UoC and the MRC.

- 7.124 The potential for effects to arise was identified within the ES, which also identified the means by which they were to be mitigated: through the carrying out of a bespoke Immunisation Study, and the subsequent implementation of specific mitigation measures identified therein. The scope of the Immunisation Study was described in the evidence of Mr Hameed and adjustments were made to it to accommodate the particular needs of stakeholders including the UoC.¹²⁶ The Study will carry out a detailed assessment of the electro-magnetic environment within the vicinity prior to and post construction. NR states that it will use bespoke, pessimistic assumptions as to the effects of the CSIE Project to ensure that the precise extent of any impact on the third-party assets are fully understood and set out the mitigation required to neutralise any such impacts. NR submit that the Immunisation Study now makes provision for all measurements sought by the UoC, including Mr McAuley's (UoC) request for Quasi-DC magnetic fields at frequencies between DC and 50Hz to be assessed.¹²⁷
- 7.125 The required mitigation will be implemented in accordance with a specification identified through the Immunisation Study. As explained by Mr Hameed, the methods used for controlling EMI are tried and tested techniques in which there is a high degree of confidence. They include simpler techniques such as burying relevant cables deeper or changing the materials used, to more advanced electrical earthing strategies and the use of Faraday cages. NR explained that its consultants have a past track record of success with such measures in cases that were much more challenging than the CSIE Project.¹²⁸ These include the Crossrail project, which came within 27m of the Francis Crick Institute, and doubled the voltage to 50kV, and tripled the current which was able to be successfully protected.
- 7.126 NR submits that whilst the Immunisation Study will ensure any impacts that arise are addressed, a number of features of the CSIE Project make it less likely that extensive mitigation will be required. These include the facts that the CSIE Project will have no impact on the voltage which will remain at 25kV; the traction power system outside of the new Cambridge station will not undergo any major changes; and while one side of the loop will be brought closer to the CBC, when the train approaches that loop it will be travelling slower (either because it is stopping at Cambridge South or because it is approaching a station).
- 7.127 NR state that none of the parties who raised EMI concerns persist in their objections. The UoC has confirmed that it has no concerns in relation to

¹²⁵ NRE13.2 paragraphs 3.2.6 & 3.2.7

¹²⁶ NRE13.2 paragraph 6.1.7

¹²⁷ OBJ08/W3-3 paragraphs 2.9 & 2.10

¹²⁸ NRE13.2 paragraph 5.5.12.

electro-magnetic interference after NR entered into a legal agreement committing it to not increasing any electro-magnetic interference.¹²⁹ NR state that a similar commitment was accepted by the MRC. It believes that together with all of the above, the withdrawal of the objections by these institutions demonstrate that the SoS can be satisfied that there will be no unacceptable impacts arising from residual EMI.

Matter 3(i): The effect of the proposal on biodiversity including biodiversity net gain

Potential effects

- 7.128 Both the construction and operational phases have the potential to impact upon biodiversity, both directly and indirectly.¹³⁰ The potential for these impacts to give rise to adverse effects has been considered in relation to a range of receptors, of national, regional and local importance.¹³¹
- 7.129 The baseline assessment was undertaken on the basis of a baseline understanding of the relevant features derived from a full suite of survey work carried out in accordance with industry best practice. This included specific assessments for Great Crested Newts, Water Vole, and Breeding and Wintering Birds amongst others.
- 7.130 Mitigation has been built into the construction of the CSIE Project through good practice set out in the CoCP Part A and as part of the Project's design. This includes:
- a. Detailed pre-commencement surveys to identify any protected species, the appointment of an Environmental Clerk of Works, storage and replanting of wildflower grassland and precautionary methods of working.
 - b. Design features including habitats creation to replicate areas of woodland, scrub and semi-improved grassland. Part of the habitat creation will be provided on site, with the remainder provided off site as described below. All hedgerow and ditch habitat loss will be provided on site. Habitat enhancement will also be provided (bat boxes and bird nest boxes).
- 7.131 During operation, the effects of the CSIE Project are mitigated by features including a lighting plan approved by the local planning authority, and designated pedestrian and cycle paths through Hobson's Park (to avoid recreational disturbance).
- 7.132 NR state that with one exception, the CSIE Project is not anticipated to have any significant adverse effects upon biodiversity features of interest. That exception relates to the loss of mature broad-leaved semi-natural woodland during construction (0.26ha) lost to facilitate access to the track, and the loss of broadleaved plantation woodland in Hobson's Park (0.45ha).¹³² The significance of the effect identified is due to the length of time that it takes

¹²⁹ INQ 33 Section 6.2

¹³⁰ NRE 12.2 Paragraphs 2.2.12-2.2.13

¹³¹ NR16, Table 8-4 & Table 8-5

¹³² NR16 paragraph 8.5.27

for replacement woodland to mature. The woodland to be lost in Hobson's Park is however mostly recently planted, and will be replaced by an additional 0.84ha of woodland. The CSIE Project also results in additional river and hedgerow units on site (without taking into account the overall 10% biodiversity net gain). In the long term, this is predicted to result in a slight beneficial effect.

- 7.133 NR submit that no significant habitat loss, degradation or fragmentation or effects on species were identified within the ES. A number of objectors to the CSIE Project, including CCiC, raised concerns about potential effects on Nine Wells Local Nature Reserve ('LNR') and upon ground-nesting birds, in particular corn-bunting. NR's addresses these comments under Matter 4.
- 7.134 In relation to corn buntings, as Species of Principal Importance in England, effects upon the birds and their territories has been carefully assessed. NR consider that there would be no likely significant effects even on the conservative assumption that the site has 20% of the county's territories. NR submit that more recent data – which still likely underestimates the county-wide number – suggests only 6 or 7% of the territories are within the Order land.¹³³ This view was reached based on mitigation including noisy construction activities being carefully controlled to avoid the March to September breeding season.
- 7.135 CCiC was however particularly concerned about the loss of, or displacement of the birds from, favourable weedy habitat and their preferred song posts (on the overhead lines along the railway), and from increased pressure on territories as a result of the more intensive use of the reduced area of Hobson's Park available for use during construction. In order to address these concerns, NR proposes to use the Exchange Land (principally being acquired to replace the permanent loss of open space) to support corn bunting populations in the construction phase (during which time that land will not be accessible to the public), and to provide alternative posts from which they may sing.
- 7.136 In addition, NR proposes signage to mitigate dog-related and other recreational pressure on birds in Hobson's Park, as will fenced exclusion zones where appropriate.¹³⁴ The Exchange Land (with high song posts and weedy borders) represents a substantial improvement in habitat terms over the current state of the land (which is an intensively managed arable field) for corn bunting and skylarks. NR state that the Exchange Land will also be suitably planted to provide foraging and cover for brown hares. CCiC has confirmed, that subject to this mitigation it no longer maintains its objection to the CSIE Project which is now considered to be consistent with CamLP Policy 70.¹³⁵
- 7.137 NR submits that the continued presence of corn bunting on the site, despite over ten years of construction in the area, confirms the resilience of the bird populations and their ability to successfully re-colonise the area. Finally, the

¹³³ NRE12.2, Table 3

¹³⁴ REB06, pages 7-10

¹³⁵ OBJ23 Withdrawal, paragraphs 12-14

RSPB commented that the development is not likely to affect any designated site or priority species.¹³⁶

Biodiversity Net Gain

- 7.138 NR state that it is intended that the CSIE Project will deliver net beneficial effects upon the environment through the delivery of 10% BNG. Natural England does not object to the CSIE Project and NR states that it has positively "*welcome[d] the proposed approach to minimising impacts to the natural environment*".¹³⁷
- 7.139 NR submits that there is no statutory obligation to provide BNG as the relevant provisions of the Environment Act 2021 are not yet in force. Nor is there any development plan or national policy requirement to provide any particular level of BNG. NR has agreed to provide 10% BNG on a voluntary basis. While the CSIE Project would increase both the hedgerow and river biodiversity units on site, the overall loss of biodiversity (7.57%) will be compensated for through both on-site and off-site means, with the latter being proposed to be achieved through the purchase of additional units from CCoC in respect of a site at Lower Valley Farm.¹³⁸ NR explain that this is a strategic site for habitat creation, and will be under the care of CCoC, who will provide long-term maintenance.
- 7.140 NR states that both relevant local planning authorities now agree (based on the further information provided in REB06 and its appendices) that due to the constrained nature of the site, on-site provision of all units is not possible. CCoC additionally note that the proposals will lead to "*genuine and demonstrable gains*" for biodiversity.¹³⁹
- 7.141 The delivery of the units will be secured by planning condition and through an option agreement to be entered into with CCoC. The conditions require the submission of an updated BNG calculation to ensure that the 10% secured reflects the final baseline assessment of habitats being lost, and the ultimate detailed design of the Project.

Impact on Trees

- 7.142 The CSIE Project is required in an area which has the benefit of considerable tree cover, both mature and recently planted. Some of the trees within the Order Limits are protected by Tree Preservation Orders ('TPOs') or are within a Conservation Area and so benefit from particular protection. Many of these trees are in woodland belts in or along the railway, and due to the nature of the works required to or near this fixed linear feature, it is inevitable that some will be lost.
- 7.143 Trees provide benefits to both biodiversity, landscape character and visual amenity. Consequently, it was necessary to fully assess the implications of tree removal in the chapters relating to those topic areas. Details of the

¹³⁶ NR16 Table 8-2

¹³⁷ NRE12.2 paragraph 5.3.2.7

¹³⁸ NRE12.2, paragraph 4.4.1.2 & REB06, Appendices,

¹³⁹ INQ 24 paragraph at 3-7 & INQ 25 paragraph 3-4

assessment of the loss of structural vegetation within the landscape and visual chapter of the ES were provided to the Inquiry and the effects of the assessment of such loss for biodiversity was described in the evidence of Mr Stone.¹⁴⁰ NR state that no statutory consultee objected to the Order application on the basis of the inadequacy of any such assessment.

- 7.144 The ES identified a significant adverse effect in relation to the loss of broad-leaved mature woodland.¹⁴¹ NR propose that this would be mitigated by providing like-for-like replacement through the BNG commitment, but a short-medium term effect arises due to the length of time it takes for such replacement woodland to grow back.¹⁴² It states that this is factored into the BNG metric, which reflects the fact that it will take in excess of 32 years for the replacement woodland to become mature.¹⁴³ NR submit that in the long term, the CSIE Project will result in a net benefit in overall tree provision.
- 7.145 CCiC's tree officer, Joanne Davies, has had some concerns about the level of information she has received about tree loss. NR has provided an Arboricultural Impact Assessment (AIA), at an earlier stage than it would otherwise have done given that detailed design is not yet concluded.¹⁴⁴ NR state that the AIA found that the vast majority of the arboricultural features are of low quality, with 182 of the 201 individual trees and 53 of the 66 groups falling within that category.¹⁴⁵ No ancient woodlands or veteran trees have been identified. NR suggest that of the 282 arboricultural features surveyed, only 42 will be fully or partially impacted by the CSIE Project (namely, 21 individual trees, 15 groups of trees and 6 hedgerows).¹⁴⁶ Substantial parts of the existing woodland would be maintained.¹⁴⁷
- 7.146 In her oral evidence to the Inquiry, Ms Davies considered that further assessment of individual tree stems was required in relation to Groups 149, 151 and 14. She expressed uncertainty as to whether the tree loss will be as limited as described. NR's arboricultural consultant confirms that the approach taken in the AIA is consistent with the requirements of the relevant British Standard ('BS')¹⁴⁸; is of a level of detail that is typical and appropriate for a project of this type at this design phase; that a precautionary approach to assessment has been undertaken in accordance with the BS requirements, and that successful mitigation is considered likely to be achievable, given the tried-and-tested measures available.
- 7.147 NR state that the Draft Order secures mitigation for any impact on trees through planning conditions. NR will be required to prepare and submit for approval an Arboricultural Method Statement (AMS) and Tree Protection

¹⁴⁰ INQ 22 & NRE12.2, paragraph 6.6.2.1

¹⁴¹ NR16 paragraph 8.5.28

¹⁴² NRE12.2 5.2.4.6

¹⁴³ NRE-REB-06-01, Appendix B Page 13

¹⁴⁴ INQ 13

¹⁴⁵ INQ 13-1 (Table 2 & paragraph 6.5.1

¹⁴⁶ INQ 13 Table 5

¹⁴⁷ NRE-REB-06-01, Appendix A

¹⁴⁸ BS 5837:2012

Plan (TPP). A proposed AMS is included in Appendix C to INQ 13, and will govern the supervision of works, the protection of trees, and the retention of an arboricultural consultant. NR has also committed to making good any damage caused by the CSIE Project on trees in accordance with the proposed conditions.

- 7.148 Policy 71 of the CamLP provides that development which involves felling, significant surgery and potential root damage to trees of amenity or other value will not be permitted *'unless there are demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity value of the trees'*.
- 7.149 NR explain that CamLP Policy 71 requires a planning balance. It falls to be determined by reference to the benefits to which the development under consideration would give rise. It submits that the benefits to which the CSIE Project gives rise are so substantial that they will clearly outweigh any loss to trees and their amenity value.¹⁴⁹ Whilst NR does not consider that more trees are likely to be lost than described in the AIA, even if they are, the proposed development is compliant with Policy 71 on that basis alone.
- 7.150 NR submit that in view of all of the above, the SoS may be satisfied that the implications of prospective tree loss have been adequately assessed within the ES; that mitigation for any tree loss as might occur are well-controlled through the proposed conditions; and that the long-term implications of the Project for trees would be positive. For this reason, NR considers that the loss of trees should present no bar to either the grant of the Draft Order or the deemed planning permission.

Matter 4: Impact on Hobson's Park and Nine Wells Local Nature Reserve

- 7.151 NR state that the potential impact on Hobson's Park has been recognised from the inception of the project. The SOBC recognised that the land to the west is Green Belt and parkland. The northern location for the railway station enjoyed considerable support in part because it had the potential to have the least impact on Hobson's Park.¹⁵⁰ Moreover, the northern option was preferred on the basis that it could be most visually contained in the Green Belt as it would fit in between existing or approved developments. NR explain that the constraints posed by Hobson's Park have been factored into the CSIE Project, which is designed to integrate within that park setting.
- 7.152 NR submit that the CSIE Project's sensitivity to Hobson's Park is also due to the constructive dialogue with a number of residents' and other associations who have sought to protect Hobson's Park. Both Cambridge Past Present and Future (CPPF) and TRA praised the fruitful and constructive relationship they have had with NR. These are, as far as NR is concerned, on-going relationships with NR committing to ongoing review – particularly in relation to land take in Hobson's Park.

¹⁴⁹ INQ 24 Paragraph 36

¹⁵⁰ NR7, Table 5

- 7.153 The CSIE Project will, during the construction and operation phases, have some adverse effects on the park, including by reason of temporary and permanent land take. NR explains that it is not possible to construct a linear project without construction compounds either side of the railway, or to maintain the project without additional infrastructure support on public open space.¹⁵¹ Notwithstanding this, NR believe that the CSIE Project would preserve the value of Hobson's Park in the long term.
- 7.154 NR submit that the recreational value of Hobson's Park would be maintained. The temporary land take during construction has been reduced by roughly two-thirds from that initially required, with an area of 425,054 m² out of a total park area of 482,880 m² (approximately 88%) remaining open for public use and enjoyment).¹⁵² In addition, as noted by Mr Wilson for CCiC, given that construction is due to start at the earliest in Spring 2023 any recreational pressure caused by the temporary land take will be partly offset by the opening of the Active Recreational Area to the north of Hobson's Park.
- 7.155 In the operational phase, the land take is considerably reduced – just 20,439m² or 4.2% of the total park area.¹⁵³ In line with statutory and policy requirements, the CSIE Project will deliver the Exchange Land as compensation for the permanent open space being lost. The area of the Exchange Land is marginally greater than the land being acquired and will have some recreational and biodiversity advantages than the land it replaces.¹⁵⁴
- 7.156 NR states that the landscape value and visual amenity of Hobson's Park is also preserved. During the construction phase, this would be through the implementation of considerate construction practice secured through the CoCP, including measures such as: appropriate construction fencing and site hoarding; measures to limit artificial site lighting; restricting temporary stockpile heights and locating them (as well as construction parking and other visually obtrusive activities) away from sensitive receptors where possible; the protection of existing structural vegetation and the reinstatement of anything removed.¹⁵⁵ With these measures in place, the impacts on the landscape character and visual amenity of Hobson's Park and its users have been assessed by NR as moderate/minor. NR believes that given the moderate sensitivity of the receptors identified, the resultant effects are not significant.¹⁵⁶
- 7.157 In operation, the indicative design for the station (which includes a biodiverse green roof) suggests that it would help to soften the existing abrupt boundary between the CBC to the east of the railway and the park setting to the west. It will also be the subject of a hard and soft landscaping scheme aimed to further integrate the building with the park, the discharge

¹⁵¹ See matter 9 (a)

¹⁵² NRE8.2 paragraph 5.2.3 & INQ 17, paragraph 11

¹⁵³ NRE8.2 paragraph 5.2.15

¹⁵⁴ See Matter 12

¹⁵⁵ NRE 8.2 paragraph 5.27

¹⁵⁶ NRE 8.2 paragraphs 5.28-5.29

of which will require compliance with the approved Design Principles document and be subject to the approval of CCiC.

- 7.158 NR's Design Principles relevant to the protection of, and integration with, Hobson's Park include the following:
- a. Design Principle 3.7E, "[...] the design of the station needs to maintain and serve as a visual amenity to both sides of this emerging urban context each side of the Green Belt"
 - b. Design Principle 3.7F "The layout of the station will seek to integrate and connect with the landscape setting of Hobson's Park and its watercourses by creating a visually and biodiversity enriching design."
 - c. Design Principle 3.7J "The development's external form, roofscapes and materiality to reflect the semi-naturalised character and landform of the park."
 - d. Design Principle 3.7S "The landscaping scheme shall enhance the area between the new path (Work no. 4) across Hobson's Path [...] and the existing Cambridge Guided Busway with, for example, new tree and shrub planting, ponds and wildflower meadows, in order to enhance the environmental value of this part of open space and in doing so provide screening to the guided busway."
- 7.159 If planned upgrades to the signalling in the Cambridge Area do not precede the CSIE Project in time, a Railway Systems Compound (RSC) is required to the east of the Exchange Land (but to the west of the railway), in order to service the power and other technical needs of the railway. Mr Barnes explained the locational requirements for the RSC which included the need for 360 degree access for maintenance and safety purposes. A DNO cubicle will be required in any event, and should the RSC be required it would be sympathetically landscaped to screen views of it. NR has undertaken to liaise with TRA on this point.¹⁵⁷
- 7.160 The overall impacts of the operational phase of the Project on the landscape character and visual amenity of Hobson's Park have been assessed as moderate/minor, affecting receptors of moderate sensitivity, and consequently not significant.¹⁵⁸ CPPF make a generalised complaint about the increase in noise on Hobson's Park from the station. NR state that the ES shows that the noise increase would be just 0.4dB and would be imperceptible about the existing noise climate.
- 7.161 The effects on the *biodiversity value* of Hobson's Park are as described under Matter 3(i) above. NR submit that there are no significant adverse effects identified save in respect of the broadleaved and plantation woodland as previously described.
- 7.162 *Nine Wells LNR* is a statutory site outside the Project's redline boundary. The site was scoped out of the biodiversity assessment on the basis of the

¹⁵⁷ INQ 10 paragraph 7.4.3

¹⁵⁸ NR16 paragraphs 13.5.40-13.5.4, 13.5.63-13.5.69

absence of impact pathways for hydrological effects to occur, and the distance that would obviate the risk of air quality effects.¹⁵⁹ It was considered in the context of being a habitat for certain species including Great Crested Newts (in relation to which no significant adverse effects were identified). In its Scoping Response, Natural England in fact explicitly commended “*the proposed approach to minimising impacts to the natural environment including locally designated sites such as Nine Wells Local Nature Reserve and Hobson’s Park, watercourses and hydrology*”.¹⁶⁰

- 7.163 Although the TRA initially expressed some concerns about the potential for the CSIE Project to impact upon the LNR, in the light of further information about the minimum distance between the construction area and the LNR, the TRA withdrew that aspect of its objection.¹⁶¹ CPPF now stands alone in objecting on the grounds of impacts on Nine Wells LNR. In the absence of any concern expressed by the relevant statutory consultee or any of the local authorities about the conclusions reached in relation to Nine Wells NR believe any residual concern is without foundation.
- 7.164 *Heritage*: The Nine Wells LNR contains the grade II listed Nine Wells Monument. The Monument is surrounded by a dense woodland screen. There exists no visual relationship between the Monument and the elements outside the Nine Wells Nature Reserve (including Hobson’s Brook). It will not be possible to see the CSIE Project, or any of its compounds, from the Monument. Any noise from the CSIE Project makes no contribution to the setting. It will, in any event, be noted that the noise at the Nine Wells LNR has been assessed to *decrease* as a result of the CSIE Project.
- 7.165 It is NR’s view that the CSIE Project would have an “*extremely limited*” impact on the Monument.¹⁶² That Monument will continue to stand as an important reminder of the origins of Hobson’s Brook and the City of Cambridge as a whole, nestled in the thick woodlands of the Nine Wells Local Nature Reserve and removed from the outside world.

Matter 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

- 7.166 The fifth strategic objective for assessing the alternatives was “*integrating and enhancing Thameslink and East West Rail opportunities*”. The CSIE Project was assessed as “*large beneficial*” against that metric, unlike all other alternatives considered, which would have had a neutral effect.¹⁶³ An advantage of the northern location for the CSIE Project was the easy integration with CSET bus stops.
- 7.167 NR is seeking the powers in the Draft Order solely for the purposes of the CSIE Project. East West Railway (EWR) and CSET are separate projects

¹⁵⁹ NR16, Table 8-6, PDF233),

¹⁶⁰ NRE12.2, [5.3.2.7]).

¹⁶¹ INQ 10, [6.2.3]).

¹⁶² NRE7.2 paragraph 6.3.6

¹⁶³ C3 Table 3

being promoted by other entities, and in relation to which there are no fixed dates for any applications. Nonetheless, having regard to the stage those schemes have reached, the interfaces between them and the CSIE Project are well understood, and the CSIE Project has been appropriately tailored to account for them.

CSET

- 7.168 NR entered into an agreement with CSET to ensure that there is no conflict between the two projects.¹⁶⁴ The CSIE Project has been designed to ensure that CSET can be “fitted in” to the overall scheme, but it is not required to come forward in order for the CSIE Project to be successfully delivered. They are separate projects, which can mesh together if needed. INQ 17, Annex 1 summarises the interaction between the two projects. The agreement between CSIE and CSET identifies common plots, establishes an overarching principle of collaboration and co-operation (including between respective contractors), and sets up meetings every three months to discuss the interface. There have also been substantial modifications to the CSIE Project to accommodate CSET.¹⁶⁵ This includes modifications in relation to matters such as drainage, as both projects had initially intended to use the same land parcel for water discharge, but since then the CSIE Project has made alternative drainage arrangements and has relocated an attenuation pond to the west of the railway to accommodate those arrangements.¹⁶⁶
- 7.169 Other specific interactions between the two schemes are identified in Mr Barnes’s evidence (NRE1.2). These include easier access to the AZ buildings as a result of planned improvements by the CSET project and convenient access to the proposed CSET bus stops on Francis Crick Avenue from the station forecourt.¹⁶⁷
- 7.170 Both projects anticipate using a stretch of land east of the railway, northwest of the Nine Wells Local Nature Reserve: CSET’s proposed route bisects that land and CSIE requires the land for its Main Site Compound CC1.¹⁶⁸ However, if the CSIE Project remains on track, it will likely be finished before that area is required for CSET. In any event, the agreement provides for collaboration between the two projects to ensure both projects can proceed.

EWR

- 7.171 EWR Connection Stage Three is still in consultation.¹⁶⁹ The possibility of EWR coming forward has been a constraint factored in since the early design stages. There is no suggestion that the CSIE Project would give rise to any technical impediments to the delivery of the EWR. A model Indicative

¹⁶⁴ INQ 17 Annex 1

¹⁶⁵ NRE1.2 paragraph 252(b)

¹⁶⁶ NRE5.2 pages 24 & 26 and section 6.8

¹⁶⁷ NRE1.2 Para 252

¹⁶⁸ NRE1.2 Figure 49

¹⁶⁹ INQ 14

Train Service Specification showed that the CSIE Project and EWR could dovetail in NR's view. Indeed, some of the works proposed by the CSIE Project, such as the closure of Duke's No. 2 and Webster's Crossings, would be beneficial for EWR. More broadly, the CSIE Project may increase appetite for EWR services by adding an additional station on the line.¹⁷⁰

- 7.172 NR states that the CSIE Project has at its heart an aim to facilitate access to the CBC. It has, from the beginning, sought to take advantage of collaboration with other schemes. These schemes and the CSIE Project stand to benefit from each other insofar as they are all delivered.

Matter 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.

- 7.173 A list of statutory undertakers and other like bodies having or possibly having a right to keep equipment or having the benefit of easements on, in or over the land within the Order Land is provided in the General Entries section of the BoR.¹⁷¹ The evidence of Mr Barnes details the known public utilities affected by the Project, and provides an assessment on the likely impact on each utility.¹⁷² Planning for the limited number of diversions required for the CSIE Project is underway and the principle of continuity of service provision will be recognised wherever possible.
- 7.174 Article 42 and Schedule 12 of the Draft Order set out protective provisions for various undertakers. Part 1 contains general protective provisions for electricity, gas, water and sewerage undertakers. Part 2 contains provision for the protection of electronic communications code networks; Part 3, protections for drainage; Part 4, protections for HCT; Part 5 protections for Cadent Gas Ltd; Part 6, protections for CCoC in respect of the CGB; and Part 7 protections for South Staffordshire Water ('SSW'). Although there is some variation in the detail, in broad terms the provisions prevent NR from acquiring or interfering with an undertaker's apparatus arbitrarily, require NR to comply with the specific provisions as to notice of, and liaison in relation to, proposed works affecting relevant apparatus, and require NR to pay the reasonable expenses and costs of the undertaker incurred in relation to requests for inspection, alteration, removal or protection of apparatus as part of the works.
- 7.175 Of the 17 statutory undertakers listed in the BoR, two made representations in relation to the Draft Order, and a further two issued objections. In respect of the representations, National Grid confirmed that the Draft Order would not interfere with their statutory functions, and HCT (which has statutory responsibility for drainage) offered its express support.¹⁷³ Of the objectors, Cadent Gas and South Staffordshire Water (SSW) have both

¹⁷⁰ NRE11.2 paragraph 6.3.3

¹⁷¹ NR08-2

¹⁷² NRE1.3 Appendix D

¹⁷³ REP06 & SUP02

since withdrawn, subject to the protective provisions as now amended (in the case of Cadent) or included (in the case of SSW) for their benefit within Schedule 12.

- 7.176 Based on the above, NR and its property expert, Mr Simms, do not consider that the Draft Order would have any material or unacceptable impact upon 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.

Matter 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 matters identified as 7a- 7g].

The legislative requirements

- 7.177 The Order application is accompanied by a detailed ES which assesses all likely significant effects of the CSIE Project, both alone and in combination with other projects.
- 7.178 The requirements that any application for a Transport and Works Act Order must satisfy in relation to the provision of environmental information are set out in the TWA 1992 and the Transport and Works (Application and Objections Procedure) (England and Wales) Rules 2006 (as amended) ('the 2006 Rules'). Section 13B of the TWA 1992 requires the SoS to reach a 'reasoned conclusion' in relation to the likely significant effects of the proposed works on the environment. In reaching that reasoned conclusion, the SoS must take into account the 'environmental information' (s.13B(3)) and may only determine an application for an EIA order where he has taken into account the EIA information and has reached an up to date reasoned conclusion (s.13B(1) and (4)).
- 7.179 An 'EIA Order' is defined in s.13A(4) as one which is for development in a class listed in Annex II to the EIA Directive which, by virtue of its nature, size or location, is likely to have significant effects on the environment, as in the present case. EIA Information is defined in s.13A(3) as including the ES (s.13A(3)(a)) and also:
- a. "any other information which the SoS reasonably requires for the purpose of reaching a reasoned conclusion (see section 13B)" (s.13A(3)(b)); and
 - b. "any representations made by any person about the environmental effects of the proposed works or other projects" (s.13A(3)(c)).
- 7.180 The requirements imposed upon the ES itself are set out in the 2006 Rules. Per Rule 11 the ES is required to include (inter alia):
- a. "a description of the likely significant effects of the proposed works on the environment";

b. a "description of any features of the proposed works, or measures proposed to be taken in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment"; and

c. "a description of the reasonable alternatives studied by the applicant, which are relevant to the proposed works and their specific characteristics [etc]".

7.181 Rule 11 also requires the ES to:

a. be prepared by competent experts and based on the most recent scoping opinion (if any); and

b. to contain "any additional information specified in Schedule 1 relevant to the specific characteristics of the proposed works or type of proposed works and to the environmental features likely to be significantly affected".

7.182 NR assert that the question of whether an ES is adequate is a matter for the decision-maker, subject only to review by the Courts on public law grounds. An ES need not report on every possible environmental effect; it need report only on those which are significant. Moreover, case law further establishes that, although decisions on planning applications are required to be made based on full information about the likely significant effects of a project upon the environment, the ES itself will not necessarily contain all of this information. The consultation and publicity procedures during which further representations can be made are an integral part of the EIA process and the information arising from those procedures will form part of the environmental information that the decision-maker must take account in coming to their conclusion.

Compliance with the legislative requirements

7.183 NR submitted a scoping request with a Scoping Report to the Department for Transport in December 2020. The Scoping Report was itself the product of extensive consultation with relevant stakeholders, including Natural England, Historic England, and the local planning authorities. A Scoping Opinion dated 22 February 2021 was issued. As required by Rule 11, the ES was prepared by competent experts in accordance with the Scoping Opinion provided. Given the outline nature of the planning permission sought, the ES was based on an approach that assessed the reasonable worst case likely effects and identified broad means of mitigation, which are secured in the usual way, through parameter plans and conditions. The ES identified all likely significant effects arising from the proposed works, in relation to all scoped-in topic areas.

7.184 NR state that a number of Campus stakeholders previously suggested that the ES is inadequate because it failed to provide a level of detail typically available at detailed design stage, or because of a perceived failure to assess certain impacts.¹⁷⁴ Three of those parties have since withdrawn those objections, and the remaining parties (OBJ 10 and 11) have accepted the

¹⁷⁴ OBJ06, CUH (on transport modelling assumptions only); OBJ08 UoC; OBJ09 MRC; OBJ 10 and 11 on cumulative effects with CSET

explanation provided in relation to the scope of the cumulative assessment with CSET, did not appear at the Inquiry, and are expected to withdraw in view of having agreed heads of terms. It is to be noted that in the SoCG agreed with the UoC, it has now explicitly confirmed that “[it] consider[s] that the Secretary of State has sufficient information to reach a reasoned conclusion about the likely significant effects of the CSIE scheme upon the environment”.¹⁷⁵

- 7.185 NR submit that given the wealth of environmental information that can be drawn upon the SoS is well able to reach a ‘reasoned conclusion’ in respect of the effects of the Draft Order.

Findings of the ES

- 7.186 The overall approach in the ES is to (i) identify sensitive receptors (ii) identify the possible impacts upon that receptor, (iii) assess the magnitude of harm to that receptor, determining whether that receptor will have a significant adverse effect and (iv) propose mitigation to address any such effects. The mitigation is, by and large, secured through the suite of planning conditions, which includes the CoCP.
- 7.187 The local planning authorities are required to approve that CoCP, which will be the subject of an application and consulted upon in the normal way. If it fails to satisfy them that a particular effect is not adequately addressed, construction may not proceed. In addition, specific elements of that Code will be consulted on prior to submission as outlined in Note 1 and the Code can be enforced as a planning condition.¹⁷⁶
- 7.188 NR states that the ES finds very few significant adverse effects from the CSIE Project. They are limited to the following:
- a. Noise, but only on certain receptors during construction, as described in relation to Matter 3f above;
 - b. Vibration, but only on certain residential receptors, and MRC and UoC receptors, during construction (and in the case of the MRC LMB, operation);
 - c. Cultural heritage, but only during construction on the Scheduled Ancient Monument, also described under Matter 8 below) and on the nearby non-designated cropmark complex.
 - d. Impact on broad-leaved woodland also described under Matter 3(i) above); and
 - e. Loss during construction a total of approximately 7.5ha (based on available mapping) of Best and Most Versatile (Grade 2) land in agricultural use.
- 7.189 The expert witnesses have, in any event, explained how and why the significant adverse effects that do arise are acceptable in context.

¹⁷⁵ INQ 33 paragraph 6.7.1)

¹⁷⁶ INQ 09 & INQ 10

- a. Noise is addressed in Matter 3(f). Impacts identified would arise for only very short durations on a small number of occasions such that for over 98% of the construction period, no significant adverse impacts would be expected to be encountered.
 - b. Vibration is also addressed in Matter 3(f) and all stakeholders have been satisfied that, as a result of further work, the effects can be acceptably managed through appropriate mitigation.
 - c. The impact on the Scheduled Monument is addressed in Matter 8. The most sensitive part of the Monument in the north-western part is not affected by the CSIE Project, which will preserve the monument according to a written scheme of investigation.
 - d. Broad-leaved woodland is addressed in Matter 3. It will be affected not due to any particular feature of the CSIE Project but because of the length of time it takes for the replacement trees to mature. The effect is therefore confined to the short/medium term. The trees taken will be fully replaced off-site, together with an additional number of trees to achieve a 10% BNG. This is assessed to provide a significant benefit in the long term.
 - e. Following the restoration of land required temporarily, the permanent loss of BMV (Grade 2) land would be reduced to approximately 4.5ha. In view of the wider sustainability and other benefits of the CSIE Project, this loss is considered acceptable and consistent with local policy. It will be noted that no party has questioned that conclusion.
- 7.190 NR submits that no significant adverse effects have been assessed as being likely to arise in relation to the following areas of interest to the SoS:
- a. Drainage (matter 7(b));
 - b. Construction dust and dirt (matter 7(c));
 - c. Hedgerows or existing plants (matter 7(d));
 - d. Biodiversity (matter 7(e));
 - e. Spoil (matter 7(f));
 - f. Cumulative effects (matter 7(g)).
- 7.191 Of these matters, adequacy of the information provided was only put in issue by any objectors in relation to vibration, drainage and cumulative effects (specifically, consideration of the Project together with CSET). The claims made in relation to drainage and vibration (by UoC/MRC) have since been withdrawn, and the claim in relation to cumulative effects is no longer pursued.¹⁷⁷
- 7.192 Details of the substance of the assessments for matters 7(b)-(e) above have been provided under Matter 3, including comments on the adequacy of

¹⁷⁷ OBJ10 & OBJ11

the vibration and drainage assessments. A summary of the position in relation to the outstanding areas, 7(f) and (g) (including in respect of the adequacy of the cumulative assessment) is provided below.

Matter 7(f): Control and storage of spoil during construction

- 7.193 Control and storage of spoil is assessed in the ES, principally in Chapter 14.¹⁷⁸ Excavated material from construction would be targeted for fill and landscaping. Any spoil will be stored in carefully segregated piles. Site levels are managed to allow for "cut and fill". In particular, excavations on the eastern side of the railway would be considered for the softer landscaping on the western side. The largest compound, CC1, would be used to store as much spoil as possible to facilitate that reuse of spoil.¹⁷⁹
- 7.194 It will not be possible to store all spoil onsite. Spoil would have to be transferred off site and vehicle movements for such have been assessed. The CoCP will require the contractor to remove any spoil or debris deposited on the highway during construction. No likely significant effects have been predicted as a result of the storage or handling of spoil during construction. The proposed conditions include a soil management plan which will govern the disposal and storage of spoil. CCiC has agreed with the wording of the condition.

Matter 7(g): Cumulative impacts

- 7.195 The ES systematically assesses the impacts of the CSIE Project both during construction and operation against a core list of committed and proposed development. The committed projects for the inter-project assessment include all residential applications proposing 10 or more houses (if submitted in the last 5 years within 2km); 50 or more houses, commercial or transport infrastructure of 5000m² or greater (if within 2 to 3.5km); mixed-use and employment applications of 5000m² or greater (if submitted within the last 5 years within 2km); and all infrastructure projects (in the last 5 years within 2km). The 48 projects concerned have been identified in NR16, Vol 3, Appendix 2.3.
- 7.196 CSET is identified as project 37 and been systematically assessed for cumulative effects throughout the ES (save in relation to scoped-out topics). NR notes that in relation to cumulative transport effects:
- a. It was not considered possible to assess cumulative vehicle movements at the time of the ES, given that "*the [CSET] scheme [had] not progressed sufficiently enough*". A high-level assessment was however undertaken once further information became available.¹⁸⁰ No significant cumulative effects were identified; and
 - b. No cumulative assessment of the impact on pedestrian, cycle and public transport demands on crossings and interchanges was undertaken. This is because the CSET scheme would involve a complete replacement of the

¹⁷⁸ NR16 Chapter 14 Paragraph 14.4.16 & Chapter 17 paragraph 17.4.24

¹⁷⁹ NRE1.2

¹⁸⁰ NR E.2 paragraphs 9.1.51-9.1.55

relevant junctions and infrastructure and as such a cumulative assessment would be meaningless.¹⁸¹

- 7.197 This approach has been accepted by the parties who raised cumulative impacts with CSET (CUH and CML/CBCManCo). In addition, the Protocol agreement with CSET sets out a general duty on both parties to liaise and co-operate with each other and has specific duties for the management of mitigation and overlap sites. This will further ensure that any potential cumulative impacts/effects can be adequately addressed.
- 7.198 Some environmental impacts, by their very nature, do not engage cumulative effects with those (or any projects), and/or were scoped out in the Scoping Report, with which the SoS agreed. The impacts scoped out include Climate Change Chapter 9 (for which the intra-Project effects are assessed, as opposed to the inter-Project effects) and Chapter 10 (for which only the greenhouse gas emissions from the CSIE Project is assessed) and Chapter 12 Ground Conditions and Contamination, because the cumulative effects were scoped out in the Scoping Report.
- 7.199 In view of the foregoing, NR believe that the SoS has more than sufficient information before him to reach a reasoned conclusion in relation to the cumulative effects of the Project.

Matter 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

- 7.200 The Scheduled Monument is a cropmark complex of rectangular enclosures, likely from the Iron to Roman age. The Scheduled Area as a whole has high archaeological potential. NR has committed to applying to the SoS for Scheduled Monument Approval under the 1979 Act.¹⁸²
- 7.201 NR has, in consultation with Historic England and the Cambridge Historic Environment Team, undertaken extensive investigation of the asset. That includes a desk-based analysis, a trenching analysis where 10 trenches were dug around the Scheduled Area and a geophysical survey to map the features of the Scheduled Monument.
- 7.202 The baseline for the ES assessment included all designated heritage assets within 1000m of the site boundary, and all non-designated heritage assets within 500m of the site boundary. Many were scoped out from assessment due to the lack of possible impacts from the CSIE Project. Only two receptors were assessed to have significant adverse effects as a result of the construction of the CSIE Project. This included the Scheduled Ancient Monument.
- 7.203 As a Scheduled Monument, its significance is high and CSIE Project construction works (namely the use of haul roads, in particular haul route (HR7) and associated construction traffic) would have a major effect on the

¹⁸¹ NRE 2.2 paragraphs 9.1.40-9.1.41

¹⁸² NR10

asset.¹⁸³ Those works would have a direct physical impact on the shallow remains, particularly if the area became very wet due to heavy rain. This major magnitude on an asset of high significance amounts to a significant effect.

- 7.204 The value of the Scheduled Monument lies more than 30cm underground. That value, or indeed the Monument itself, is not visible or appreciable from above ground. A thin sliver of the Scheduled Area to the east, adjacent to the railway, would be impacted by the CSIE Project during the construction phase when haul road HR7 would be required. The real heritage value of the asset, the remains in the northwestern area, is situated away from the railway and proposed haul road. This would not be affected by the CSIE Project.
- 7.205 The setting of the Scheduled Monument has undergone considerable change from developments, including the railway to the east and commercial garden centre developments on the west. That setting is limited and makes very little contribution to its significance overall. Historic England agree that the CSIE Project will result in less than substantial harm to the asset.¹⁸⁴ NR submit that such limited harm is amply justified by the benefits of the CSIE Project and will be appropriately mitigated by the planning conditions.
- 7.206 These include:
- a. Preservation by record of the asset. This will enhance the knowledge and understanding of the Iron and Roman ages. The Written Scheme of Investigation which secures such preservation will be submitted for approval by the local planning authority prior to construction of the CSIE Project. Historic England will be consulted as part of that application.
 - b. The CoCP will make provision for, amongst other things, accidental finds during construction.
 - c. The very limited impact on the setting of the Scheduled Monument (which is of limited relevance to the significance of the Scheduled Monument as a whole) will be mitigated by amenable soft and hard landscaping.
- 7.207 NR states that Historic England praised it for its collaborative approach to this heritage asset and "*acknowledge[s] that design has sought to avoid encroachment and impacts on the White Hill Farm Scheduled Monument, and its setting, as far as possible*".¹⁸⁵
- 7.208 NR's view is that while the CSIE Project will result in a significant effect upon the Monument, this nonetheless equates to less than substantial harm, and the opportunity is being taken to ensure that lessons can be learnt and recorded from this asset. The records of the asset it makes will add a new chapter to this Scheduled Monument's history and enhance contemporary understanding of the distant past.

¹⁸³ NRE1.2 Figure 48

¹⁸⁴ REP07

¹⁸⁵ REP07

Matter 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 Cichel Down" published on 29 October 2015 (as amended on 16 July 2019)

Matter 9(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

- 7.209 The need for the CSIE Project to support the growth in the Cambridge Southern Fringe and the CBC is set out in detail under Matter 1 above, and the benefits it provides are also described there. NR submit that it is the combination of that significant need, and the benefits that would flow from addressing it, that gives rise to the compelling case in the public interest, justifying the temporary and permanent powers that NR seeks to acquire over the Order Land.
- 7.210 NR state that the CSIE Project achieves these important benefits with limited impact on homes and livelihoods. No residential properties are required to be acquired, and only a single home has been identified as being likely to experience environmental effects (from vibration, for a matter of days). No businesses are to be relocated or threatened, and no buildings will be demolished. NR assert that anyone with any experience of infrastructure planning in an urban or urban fringe environment will attest to the rarity of this.
- 7.211 NR believe that without this Project, there would be further congestion in the city centre, the growth of the CBC (and with it the expansion of the important research that it undertakes) would be threatened, and the vision of the local authorities to provide significant quantities of sustainable, accessible residential development in the Southern Fringe would be hampered. Mr Simms' opinion as to whether the Draft Order was justified was: "*yes, without a shadow of a doubt*". The Inspector and SoS are invited to reach the same conclusion.
- 7.212 A compelling case can also only be made out where compulsory acquisition is being used as a last resort, although the Guidance acknowledges that planning for compulsory purchase in parallel with negotiations is legitimate and appropriate.
- 7.213 In the present case, attempts to acquire by agreement have been undertaken with all affected landowners, as described in both the Proof of Mr Simms and as updated in his oral evidence.¹⁸⁶ Although acquisition of a number of interests remain outstanding, NR advise that discussions are well advanced with many, which is evidenced by the fact that only five affected landowners remain objectors to the CSIE Project. This includes CBCManCo, CML and CoC1 & CoC2, where Heads of Terms have been agreed and full agreements are well advanced.¹⁸⁷ The remaining two landowner objectors

¹⁸⁶ NRE 10.2 Section 9

¹⁸⁷ OBJ10, OBJ11 and OBJ17. These Objection have not been withdrawn.

are St John's and the Pemberton Trustees, and discussions are active with both.¹⁸⁸

- 7.214 It is always NR's preference to acquire land by agreement, and as such these efforts will continue after the close of the Inquiry. The Guidance has therefore been complied with in both letter and spirit.

Matter 9(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);

- 7.215 The compelling case for the CSIE Project is set out above. NR believe that there is a compelling case that justifies any interference with Article 1 which grants a qualified right to property. A person may be deprived of their possessions where justified "*in the public interest*". As detailed in the proof of Mr Simms the aims proposed by the CSIE Project comfortably sit within that public interest.¹⁸⁹ States are afforded a particularly wide margin of appreciation to pursue infrastructure projects to the benefit of the general public. He noted the words of the Strasbourg Court, urban and regional planning policies are, *par excellence*, spheres in which the State intervenes, particularly through control of property in the general or public interest.¹⁹⁰ In this case the broader public interest in terms of access to the sustainable transport opportunities offered by the CSIE Project; to the medical care provided at hospitals in the CBC; and to the high quality and accessible housing in the Cambridge Southern Fringe – can legitimately be pursued through the Draft Order.

- 7.216 The Draft Order incorporates with necessary modifications the Compensation Code. Where the appropriate conditions are met, this ensures that interested parties who are deprived of their property and suffer loss as a consequence of the exercise of the powers in the Order are compensated. This includes provision for parties whose land is depreciated by the construction of the Project but where no part of that land is acquired by NR. Any person seeking compensation will have the right to have it determined by an independent Tribunal, represented by lawyers of their choosing. This ensures full and effective opportunity for any disappointed interested party to vindicate any property rights, consistently with Article 1 of Protocol 1.

- 7.217 Therefore NR believe that the CSIE Project is a proportionate interference with such rights, justified by law in the public interest.

Matter 9(c): whether there are likely to be any impediments to NR exercising the powers contained within the Order, including the availability of funding

- 7.218 No impediments to the delivery of the CSIE Project pursuant to the powers that would be conferred by the Order are known to exist. Planning would be

¹⁸⁸ OBJ01 & OBJ15

¹⁸⁹ NRE11.2

¹⁹⁰ *Gorraiz Lizarraga and Others v Spain* (App. No. 62543/00) (27 April 2004), [70].

addressed through the grant of deemed planning permission. All of the conditions proposed and agreed with the local planning authorities are considered to be reasonable and capable of being discharged. The detailed design of the Project is well underway, with the contractor appointed and ready to commence works following the grant of the Order powers.

- 7.219 NR has, throughout the design of the Project, been supported by the DfT. The Government in its March 2020 Budget confirmed that it would, subject to planning, *“build a new rail station at Cambridge South, improving connectivity to the world-leading research facilities of the Cambridge Biomedical Campus – the largest cluster of medical and life sciences research in Europe”*.¹⁹¹ The SoST approved the OBC for the project in April 2021, and has further confirmed in writing that funding will be met from the Department’s Rail Enhancements Budget subject to a value for money analysis.¹⁹² The Project is therefore considered to be fully funded.

Matter 9(d): whether all the land and rights over land which NR has applied for is necessary to implement the scheme

- 7.220 The land proposed to be acquired, and other powers sought under the Draft Order are described in NR08-2 and illustrated on the Deposited Plans contained in NR09-1.¹⁹³ Mr Barnes has confirmed that the land shown in the Deposited Plans has been developed around the engineering proposals for the Project, as described in his Proof of Evidence. He has further confirmed that the land identified in the Order application is appropriate and necessary to deliver the CSIE Project. No objector to the Inquiry has made a case that any individual plot of land in respect of temporary or permanent powers sought is not in fact so required.
- 7.221 The land included within the proposed permanent land take includes the land on which it is intended to construct the RSC. It may be that certain elements of the RSC are not required owing to network-wide signalling upgrades.¹⁹⁴ If so, this may present an opportunity for NR to reduce the extent of the RSC and the related land take, and it has committed to doing so.¹⁹⁵ However, absent the advance delivery of those signalling improvements, all of the land sought for the RSC’s delivery remains required.
- 7.222 The permanent rights are sought over land to facilitate later maintenance (as well as access for the same), and to enable NR to grant rights to third parties that will enable them to access and egress from the station over otherwise private roads, to access and egress to/from the Exchange Land, and to use the farm accommodation bridge in substitution for the level crossings. Without the grant of such rights the new station will neither be able to be used nor maintained, the Exchange Land will not be able to be

¹⁹¹ NR11.2 paragraph 8.2.4

¹⁹² NR05

¹⁹³ See Section 4 regarding the need for these plans to be updated

¹⁹⁴ NRE1.2 paragraph 245

¹⁹⁵ INQ 10 paragraph 7.4.3

lawfully accessed, and no usable alternative to the Crossings will be delivered.

- 7.223 Objections to land take have principally centred around the extent of temporary possession proposed within Hobson’s Park. The compounds are required to assist with construction either side of the railway line.¹⁹⁶ The temporary land take required in the northeast part of Hobson’s Park is further illustrated and justified in INQ 19.
- 7.224 NR state that every effort has been made to reduce the size of that temporary land take. To date, the main Hobson’s Park compound has been more than halved, and what would have been CC5 is no longer being pursued. The TRA rightly characterise the former reduction as “*significant progress*”.¹⁹⁷ Mr Barnes and the appointed contractor do however both take the view that the CSIE Project cannot reasonably be constructed with any further reduced land take than that now proposed. Nevertheless, NR has committed to keeping the position under review, and will endeavour to reduce land take in a piece-meal fashion, and return any land not required for construction purposes as soon as is reasonably possible. This is secured by the proposed planning conditions and the submission of construction plan and phasing details.¹⁹⁸

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

- 7.225 The conditions proposed to be attached to the deemed planning permission for the scheme have been substantially agreed with the local planning authorities. These were further discussed extensively in the conditions session of the Inquiry with Ms Charlotte Burton of CCiC and SCDC. As a result, a further version, taking on board the additional points raised by both Ms Burton and the Inspector, has now been submitted.¹⁹⁹
- 7.226 The only condition meriting specific mention at this point is that which requires NR to enter into a Section 106 Agreement with CCiC. Such conditions are not commonplace, but nor are they proscribed. The National Planning Practice Guidance is clear that a negatively worded condition making such provision may be appropriate in exceptional circumstances.²⁰⁰
- 7.227 In the present case, the exceptional circumstance arises because NR intends to deliver offsite mitigation but does not presently have an interest in the land required for it. NR has however confirmed that it will do so following the securing of an option agreement with the CCoC, which option agreement is unlikely to be secured before the close of the Inquiry. Subject to receipt of a promised letter from the CCoC, CCiC is satisfied that NR will soon have the necessary interest in land and that, as such, exceptional circumstances exist to justify the imposition of a condition requiring entry

¹⁹⁶ NRE1.2 Figures 49, 50 & 52

¹⁹⁷ INQ 10 paragraph 7.2.1

¹⁹⁸ INQ 24 & 26

¹⁹⁹ INQ 50-1

²⁰⁰ Paragraph: 010 Reference ID: 21a-010-20190723.

into a Section 106 agreement to secure the offsite mitigation at that point.²⁰¹

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

- 7.228 The relevant procedural requirements have been met, as set out in the statutory declaration of Michele Vas of Dentons UK and Middle East LLP.²⁰² (INQ 01).

Matter 12: That it is appropriate for the SoS 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.

- 7.229 As a consequence of NR's proposal to permanently acquire land and rights over existing public open space, a certificate is sought pursuant to ss.19 (for land permanently acquired) and 28 (for land over which permanent rights are sought) of the Acquisition of Land Act 1981 ('the 1981 Act').

The provisions of the 1981 Act

- 7.230 Part III of the 1981 Act provides that the compulsory acquisition of open space requires Parliamentary approval, unless the SoS certifies (so far as relevant to the present case) that the applicant has provided Exchange Land "*not being less in area and being equally advantageous to the persons*" (s.19(1)(a) 1981 Act).
- 7.231 Likewise, s.28 and Schedule 3 (entitled "acquisition of rights over land by the creation of new rights") provide that Parliamentary approval for the acquisition of new rights over land will also be required, unless the Secretary of State certifies (so far as relevant to the present case) that "*the land, when burdened with that right, will be no less advantageous to those persons in whom it is vested [...] than it was before*" (Schedule 3, paragraph 6(1)(a), 1981 Act).
- 7.232 There is no statutory requirement to provide Exchange Land, or otherwise to seek a certificate, in respect of land which is subject to temporary use only.

NR's application

- 7.233 By an application dated 23 August 2021 the scope of which was clarified in a letter dated 25 January 2022, NR sought a certificate (i) under s.19 in respect of the open space that it seeks to permanently acquire (namely, a small portion of Hobson's Park and a thin sliver of land adjacent to Long Road Sixth Form) and (ii) under s. 28 for the open space over which it seeks permanent rights (namely, plots 002, 008 and 008a).²⁰³

²⁰¹ INQ 24 paragraphs 8-10

²⁰² INQ 01

²⁰³ NR21 & INQ 2

7.234 The SoS indicated that he was minded to grant the certificate sought, and the application was subsequently publicised. Since confirmation that REP11 (Mr Meed) was not in fact an objection to the certificate sought, the application has been unopposed.²⁰⁴ Nonetheless, NR sets out below its summary reasons why the certificate sought should be granted.

Why the certificates should be granted

7.235 NR is required to provide Exchange Land for the permanent acquisition of an area of existing open space amounting to a total of 20,742 m² within Hobson's Park, and the grounds of Long Road Sixth Form College. The proposed permanent land take within Hobson's Park equates to 4.2% of its overall area, and less than 1% of the public open space within the border between the grounds of the Long Road Sixth Form College and the railway.²⁰⁵

7.236 An area of existing arable land to the immediate south of the existing boundary to Hobson's Park, and South of Addenbrooke's Road is proposed to be acquired for the purpose of providing the Exchange Land.²⁰⁶ NR state that the location of Exchange Land reflects a considered approach, which has been described and reviewed by Mr Jones.²⁰⁷ Only one objector to the Project, Mr Chaplin suggested that any specific parcel would be preferable.²⁰⁸ Even CCiC recognised that EL4 is the most appropriate location for the Exchange Land.²⁰⁹

7.237 The Exchange Land is marginally bigger than the public open space land take and consequently satisfies the statutory requirement that it be 'no less in area' than the land being lost. The test of being 'equally advantageous' is also satisfied, by reference to its quality, accessibility and usefulness. As to quality, the Exchange Land is to be subject to landscape enhancement and subject to a condition requiring the submission of details, with a view to ensuring wider community and amenity benefit to users of the park. This landscape has, in itself, wider beneficial impacts on the area in terms of softening views.²¹⁰ This will ensure that the landscape delivered within the Exchange Land is at least equivalent, if not better, than that which is being lost.

7.238 As to *accessibility*, although the area of land to be provided is separated from the area of the existing park by the Brook, two direct pedestrian connections will be created into the Exchange Land from the existing park, at both the eastern (and western ends (forming part of, but segregated from, the farm accommodation bridge shown on the same plan) of the Exchange Land.²¹¹ NR submit that as to usefulness, the land being provided

²⁰⁴ INQ 12

²⁰⁵ These percentages are taken from the extent of public open space on Hobson's Park as indicated in the CamLP. This is detailed in Note 2 INQ 20, paragraph 11

²⁰⁶ Plot 092 shown in Sheets 3 and 6 of the Deposited Plans, NR9.1

²⁰⁷ NRE8.2, Table C

²⁰⁸ OBJ25

²⁰⁹ OBJ23

²¹⁰ NRE8.2 paragraph 5.4.12

²¹¹ Shown as a future footbridge on the updated plans, NR13 DRWG54

is equally, if not more, advantageous to the persons who use the public open space taken. The land being taken from the Sixth Form College is a thin sliver of woodland to the east of the railway, with no practical public open space function.

- 7.239 As for the land within Hobson's Park, it is predominantly a thin corridor of land adjacent to the existing railway and the bridge carrying the CGB, as well as a piece of land to the south of Addenbrooke's Road for the RSC. NR state that viewed in isolation, that land currently enjoys only a limited amenity value, as the land is bordered by a railway line, and the strip of land to the west of the railway is severed from the remainder of Hobson's Park by an embankment which acts as both a physical and visual barrier. Its replacement with a consolidated, accessible tract of land which will be sympathetically planted and integrated into Hobson's Park is considered to provide an area that is capable of providing at least as much, if not greater, utility for recreational users of the park over the current position. It will be noted that CCiC now consider the Exchange Land capable of being "*equal or better quality*" as required by CamLP Policy 67.²¹² CCiC will have the final word on whether the Exchange Land is indeed of equal or better quality, as they are required to certify that that land is of a satisfactory quality before the land is vested (see Article 36(4) of the Draft Order).
- 7.240 At the time the Order application was made, the Draft Order provided for the Exchange Land to be laid out for use by the public prior to first use of the Works (i.e. station opening). In their evidence, CCiC sought the delivery of the Exchange Land in advance of temporary possession being taken of the areas of land within Hobson's Park.²¹³ As at the close of the Inquiry, a compromise position which is mutually acceptable to NR and the Councils has been reached. The timing is set out in Article 36 of the Draft Order.²¹⁴ The Exchange Land will be laid out for public use by the time any of the existing open space is vested.²¹⁵
- 7.241 For completeness, NR note that, in addition to not being required by the 1981 Act prior to the permanent acquisition of the open space which is being replaced, the provision of the Exchange Land at an earlier date is not practically possible in this case. It would create potentially dangerous interactions between the construction works (which include the construction of an accommodation bridge on EL4, and access to the Railway Systems Compound to the east of EL4) and the public seeking to use that Exchange Land.²¹⁶ NR would therefore have to provide different Exchange Land pending the availability of EL4. It considers that this would significantly delay the proceedings, by about 1 to 2 years while the consulting process is recommenced, detailed drawings are prepared and fresh compulsory purchase proceedings are initiated. In addition, it would conflict with the proposal to use the Exchange Land to provide mitigation for any potential effects upon corn buntings. As evidenced by their withdrawals, the Councils

²¹² INQ 24 paragraph 22

²¹³ OBJ-23-W2/ paragraph 4.1.2(k)

²¹⁴ NRE8.2 paragraphs 5.4.13-14

²¹⁵ INQ 52-1 Article 36(3)

²¹⁶ NRE8.2 paragraph 5.4.15.

are understood to accept this position, and CCiC has made this clear in terms at INQ 24.

- 7.242 The permanent new rights which are sought over Plots 002, 008 and 008a are required to provide NR with rights of access to the Exchange Land (together with the ability to grant such rights to others) and for maintenance purposes.²¹⁷ The use of these Plots by NR and third parties for access purposes will not result in the exclusion of any person who currently uses the land or put them to any material inconvenience. Indeed, no person has suggested that it would. Consequently, the land when burdened with the new rights, will be no less advantageous to those persons in whom it is vested and other persons, if any, entitled to rights of common or other rights, and to the public, than it was before.

THE PLANNING CASE FOR THE CSIE PROJECT

- 7.243 In addition to the powers sought in the Draft Order, NR has applied for deemed planning permission under section 90(2A) Town and Country Planning Act 1990, which provides that on making a TWAO, the SoS may direct that planning permission be deemed to be granted for the works in the Order. The test to be applied to this application is the same as on a Town and Country Planning Act, namely that the application must be determined in accordance with the local development plan unless material considerations indicate otherwise.
- 7.244 The SoS has not specifically sought advice on the compliance of the CSIE Project with the development plan or other planning policy. A full assessment of the planning position has however been provided through the written and oral evidence of Mr Pearson, which should be considered together with the revised conditions.²¹⁸ The submissions below seek only to draw to the SoS's attention NR's position on the key planning issues arising in this case.

The Local Planning Context and the Principle of Development

- 7.245 NR submit that the CSIE Project is firmly anchored in the local development plan. At a high level, the Draft Order responds to the broader strategic aims of the CamLP and the South Cambridgeshire Local Plan ('SCLP') to promote accessible transport and support Cambridge's role as a world leader in higher education, research, and knowledge-based industries. They provide as follows:
- a. CamLP, Strategic Objective 10: promote and support economic growth in environmentally sustainable and accessible locations, facilitating innovation and supporting Cambridge's role as a world leader in higher education, research, and knowledge-based industries, while maintaining the quality of life and place that contribute to economic success;

²¹⁷ NR confirmed the plots which were subject to the application made pursuant to s.28 and Sch.3 in a letter dated 25 January 2022

²¹⁸ NRE 9.2, NRE 9.3 & INQ 50-1

b. CamLP, Strategic Objective 13: be located to help minimise the distance people need to travel, and be designed to make it easy for everyone to move around the city and access jobs and services by sustainable modes of transport

c. SCLP, Policy S/2(a): To support economic growth by supporting South Cambridgeshire's position as a world leader in research and technology based industries, research, and education; and supporting the rural economy;

d. SCLP, Policy S/2(f): To maximise potential for journeys to be undertaken by sustainable modes of transport including walking, cycling, bus and train.

- 7.246 More specifically, the need for the CSIE Project is expressly recognised in the TSCSC 2014 which identifies a longer-term opportunity for a new rail station at Cambridge South, as part of an overall strategy to strengthen employment hubs and high-tech clusters in Cambridge and South Cambridgeshire.²¹⁹ While the TSCSC is not a local development plan document it is mentioned in terms in the CamLP in Policy 5 which requires development proposals to be consistent with the TSCSC and the priorities set out therein.
- 7.247 Likewise, the Cambridgeshire Local Transport Plan 2011-2031, to which the SCLP cross-refers, identified the need for a new rail station at Cambridge South.²²⁰ Its replacement, the Cambridgeshire and Peterborough Local Transport Plan identifies Cambridge South Station as a priority transport scheme.²²¹ That Plan recognises the considerable rise of rail usage in the area, and seeks to provide a range of schemes to encourage this trend. This includes a station at Cambridge South that will "*significantly improve access to the Cambridge Biomedical Campus from the region and beyond*". The advantages of this station are expressly recognised, and they include reduction of congestion in the City Centre, modal shift, and support of high-quality employment opportunities in the CBC.
- 7.248 NR believe that further material considerations weigh strongly in favour of the CSIE Project. They include its contribution to sustainable transport modes, the support of high-quality employment at the CBC, and provision for the committed housing developments to the west of the site. These aims – environmental, economic, and socio-economic – are at the heart of the local development plans, as well as national planning policy more generally. The CSIE Project makes a substantial contribution towards all three and is therefore firmly rooted in the local development plan.
- 7.249 Both local planning authorities recognise that the CSIE Project would "*support the objectives of*" the local development plan and have supported the principle of the CSIE Project.²²² Indeed, of the 25 original objectors, not a single one has called into question that principle.

²¹⁹ D10 page 5-4

²²⁰ D18 page 4-107

²²¹ D9 paragraph 2.42

²²² OBJ23 page 2 & OBJ24 page 4

Green Belt Policies

- 7.250 Chapter 13 of the NPPF seeks to protect Green Belt land, which, on the CSIE Project, is a large corridor between the railway in the east and the residential developments to the west. Inappropriate development within the Green Belt is by its nature harmful and should not be approved save in very special circumstances.²²³ Development is not inappropriate if it is a local transport infrastructure which can demonstrate a requirement for a Green Belt location and preserves its openness and does not conflict with the purposes of including land within it.²²⁴ The CSIE Project meets both criteria. It is therefore not inappropriate development, and its approval is consistent with the Green Belt policies. This is considered in depth in NR18 and summarised in Mr Pearson's evidence (NRE 9.2 paragraph 4.4.1).
- 7.251 NR consider that the design of the station has carefully taken into account the Green Belt context within the Design & Access Statement.²²⁵ Vehicular access is provided to the east alone, which reduces the need for land take and visual intrusion on the western side. It submits that the Design Principles will ensure that the final design is sympathetic to the park context and will reduce any sense of visual clutter from the CSIE Project.²²⁶
- 7.252 The CSIE Project constitutes local transport infrastructure. It also requires a Green Belt location, as it seeks to provide transport benefits to the CBC. The existing rail line, established in the 19th Century, is adjacent to the Green Belt. NT state that providing the station further afield would make the station less attractive for those walking or cycling to the CBC, and fundamentally undermine the benefits that it seeks to provide.
- 7.253 The CSIE Project preserves the openness of the Green Belt and does not conflict with any of the purposes of the Green Belt.
- 7.254 The purpose of the Green Belt was extensively considered in the Cambridge Inner Green Belt Boundaries Study ('CIGGBS') which considered 16 qualities that contribute to the performance of the Green Belt. The CSIE Project, which lies within areas 9.1, 9.2 and 10.2 of the CIGGBS, was considered against those 16 qualities, and it was found that no qualities would have more than a minor conflict.²²⁷ Indeed, some of those qualities – including a city of human scale easily crossed by foot and bicycles; a soft green edge to the city; and character and structure of the landscape – were found to be enhanced by the CSIE Project, which would improve foot and cycle paths through Hobson's Park and provide a sympathetic design consistent with the overall landscape features.
- 7.255 NR state that while some qualities of the green corridor would be adversely impacted, this would be due to the novelty of the station in the green corridor.²²⁸ However, less than 10% of that corridor would be affected, and

²²³ NPPF paragraph 147

²²⁴ NPPF paragraph 150

²²⁵ NR15

²²⁶ INQ 21 paragraph 3.1B & INQ 24 paragraph 45

²²⁷ NR18 Tables 3 & 5

²²⁸ NR18 paragraph 7.2.11

would not be intervisible with the historic core of Cambridge. The only Green Belt quality to be adversely impacted is the “*well-designed edges to the city*”, but the existing visual landscape is dominated by substantial developments in the CBC, with further developments underway, and Nine Wells Bridge. In NR’s view the CSIE Project would in fact reduce visual discordance by providing sympathetic landscaping around the Railway Systems Compound, softening Nine Wells Bridge.

- 7.256 The *openness* would not be compromised. The works at Shepreth Junction (in sub-area 9.1) do not involve any new built form or vertical encroachment, and the works to the south of Addenbrooke’s Road (in the north western part of sub-area 10.2) would only include slight widenings to the track. The station building itself (in sub-area 9.2) would, while having a minor impact on overall openness, be limited to a small part of the Green Belt where there is already established development in the CBC to the east. NR state that only a small part of the approach to the City would be impacted by the CSIE Project, which would also provide overall benefits in softening any sense of sprawl on the corridor from developments in the CBC to the east and residential developments on the west. In NR’s view, on balance, the change is not considered to be harmful to openness.
- 7.257 NR submit that if it is not accepted that the CSIE Project meets the two criteria within the NPPF, it is eminently capable of satisfying the general test in paragraph 147 NPPF, namely that “*very special circumstances*” exist to outweigh any harm by reason of inappropriate development and planning permission should be granted in any event. These circumstances comprise the very significant planning and transportation benefits that the CSIE Project would deliver, and the need for it to be located adjacent to the CBC in the Green Belt to deliver those benefits.²²⁹

Flood Risk

- 7.258 The flood risk tests imposed through national planning policy are the sequential test, and the exception test at paragraphs 162 and 164 of the NPPF. The vast majority of the CSIE Project lies in Flood Zone 1, but there is a small area in Flood Zone 2 (in Hobson’s Park, set back from the railway) and a small area in Flood Zone 3 (to the west, near the forecourt).²³⁰
- 7.259 *The sequential test.* NR submit that it is not possible to locate the CSIE Project in any other reasonably available site. That is because the transport benefits that the CSIE Project is intended to deliver would be negated if it were provided away from the CBC. The sequential test is passed as there are no appropriate alternative sites in lower risk Flood Zones.
- 7.260 *The exception test.* The CSIE Project constitutes “*essential infrastructure*”, and, as such, the exception test applies as it is (partly) in Flood Zone 3. That test involves establishing (i) whether the station would provide wider community benefits that outweigh flood risk and (ii) that the development would be safe for its lifetime taking account of the vulnerability of its users,

²²⁹ NR14 paragraph 6.3.7

²³⁰ NR16, Appendix 18-2 Figure 3

without increasing flood risk elsewhere, and, where possible, reduce flood risk overall. Mr Pearson, in oral evidence, explained that the benefits of the station overwhelmingly justify the potential increase in flood risk.

- 7.261 Point (ii) is covered in detail in the ES and discussed above in Matter 7(b).²³¹ In short, all sources of flooding were assessed to be a low risk, with some higher isolated risks of surface water flooding which is adequately dealt with by appropriate mitigation measures detailed in the Strategic Flood Risk Assessment (SFRA). The SFRA showed that hydraulic modelling demonstrates that the proposed development will be safe with respect to *fluvial* flood risk from the North Ditch as no out-of-bank flooding is predicted in the modelled events, including when climate change is taken into account; and *surface water* runoff from the proposed development would be managed in line with national and local policy requirements through the implementation of the Surface Water Drainage Strategy.
- 7.262 NR concludes that the CSIE Project is compatible with flood policy. Neither the EA nor the LLFA contest this, and no other party to the Inquiry suggests otherwise.

Other Material Considerations

- 7.263 *Provision of open space.* The provision of replacement open space for that taken by permanent land take is discussed above in relation to Matter 12. The requirements of the 1981 Act do not materially differ from local and national planning policy. The Exchange Land provision is compatible with those policy requirements. This is now accepted in terms by CCiC.²³²
- 7.264 The impact of the CSIE Project on trees has been covered in detailed under Matter 3 and Matter 7(d) above. Under Policy 71 of the CamLP felling will not be permitted unless “*there are demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity value of the trees*”. Two experts before the Inquiry gave evidence on whether the planning balance contemplated in that policy would be met by the CSIE Project. Both experts – Mr Pearson for NR and Ms Burton for CCiC and SCDC – stated that their professional opinion was that any loss of the amenity value of trees was amply justified by the planning benefits of the CSIE Project.²³³
- 7.265 *Design and Access* has been covered in Matters 3(a) to 3(d). The access to the CSIE Project will ensure equitable access to a wide range of users, including persons with a disability. NR believe that amenable cycle and pedestrian paths are provided through Hobson’s Park to the west, and modifications are proposed to the existing local road network to facilitate the increase in bicycles and pedestrians. NR has engaged extensively with TRA on their proposed alternative access to the station on the west, however consistent with the requirements of both the CCoC and CCiC (the latter of which has moved on from the different position previously

²³¹ NR16 Appendix 18.2

²³² INQ 24 paragraph 22

²³³ NRE9.2 paragraph 4.7.25

advanced in its evidence, to return to the position it adopted at the pre-application stage), it is proposed to remain with the designs as originally proposed, noting that those designs respect the existing location of the path.

- 7.266 *Provision of electric car charging points.* Following discussion with CCiC, charging points will be provided for electric cars. This will ensure consistency with Policy 82, as well as the air quality improvements contemplated by Policy 36 of the CamLP.

OBJECTIONS

- 7.267 NR's response to the remaining objections and representations is reported with the relevant objections.

CONCLUSION

- 7.268 The CSIE Project is a timely intervention design to support a cornerstone of the UK's science-based industries. It unlocks the potential for development in the Southern Fringe and supports an internationally significant hub for high-quality employment. Without it, the existing congestion problems are set to continue and worsen; access to international hubs will remain awkward; and the sorely needed transition to sustainable transport modes will not come forward. If no one has challenged the need that underlies the CSIE Project it is because it is self-evident.
- 7.269 The CSIE Project is also the product of careful, sustained and thorough planning. NR submit that its effects have been minimised so far as possible, and it respects – and in some respects enhances – the existing constraints at the site, integrating well into the park context to the west, and providing a new amenity/biodiversity area to the south of Addenbrooke's road.
- 7.270 The CSIE Project is a much-needed and arguably long-overdue scheme, which should be allowed to proceed without delay. Consequently, NR respectfully commends the Draft Order and the deemed planning application to the Inspector and the SoS.

8 THE CASE FOR CAMBRIDGE CITY COUNCIL

- 8.1 CCiC withdrew its objection to the CSIE Project by letter dated 10 February 2022 and conditionally supports the application, subject to the conditions discussed within its Position Statement.²³⁴ It also participated in the conditions session and the discussion in relation to the Order.
- 8.2 The Council's original objections are set out in Proof of Evidence of Ms Burton, Mr Wilson and Mr Belcher.²³⁵ The Council's position evolved during the course of the Inquiry on the basis of additional information and further explanations from NR. The comments summarised below represent the position at the close of the Inquiry and are based on the Position

²³⁴ INQ 25

²³⁵ OBJ 23 W1/1, W2/1 & W3/1

Statement(INQ 24), submissions in relation to the revised Design Principles Document (INQ 21-1), Updated Planning Conditions (INQ 50, INQ 69, INQ 74), the draft S106 Agreement (INQ 65, INQ 73), and the revised Draft Order (INQ 68, INQ 71, INQ 80).

On Site Biodiversity and Mitigation

- 8.3 The Council has reviewed the additional information submitted by the applicant and is content that the proposed habitats are appropriate and, subject to detail secured through the proposed condition(s), can be established and maintained to deliver the proposed on-site post-intervention habitat units. The Council is also content that the proposed on-site BNG maximises the potential on-site habitat creation and enhancement options and is therefore appropriate.²³⁶
- 8.4 The BNG metric calculations assign a 'Good' condition to Hobson's Park habitat baseline to reflect the fact that these relatively recent habitats are developing in line with the management plans secured by planning conditions for the adjacent development sites. The prescription of 'Good' status within the BNG metric baseline takes into account any potential loss of habitat mitigation for previous schemes and therefore negates the need (as the Council had proposed) for a 20% BNG requirement for the scheme to accommodate this risk.²³⁷
- 8.5 The letter from CCoC does not provide the City Council with sufficient assurance/comfort that BNG has been secured on Lower Valley Farm (INQ 62). However, CCoC no longer considers it to be practical or appropriate to include CCoC as a party within the Section 106 Agreement. The Council is satisfied that details of any offsite biodiversity net gain provision could be secured through an appropriate planning condition, which would allow provision at Lower Valley Farm, or an acceptable alternative site and has suggested amendments to condition 13 to secure this objective.²³⁸

*Construction and operational impacts on corn bunting and skylark*²³⁹

- 8.6 The additional information within Mr Stone's Proof of Evidence reduces, but does not negate, the concerns set out in Mr Belcher's Proof of Evidence and that appropriate mitigation for the impact of the proposed construction and post-construction impacts is required.²⁴⁰ The Council agrees that corn bunting and skylark territories have persisted in the area during previous developments but remains concerned that without mitigation the population may still suffer cumulative impacts from the proposed scheme and recreational pressure.
- 8.7 The Council supports the proposed mitigation measures during and post construction, including the use of the proposed Exchange Land to provide replacement habitat during construction. It acknowledges that this means

²³⁶ INQ 24 Paragraph 3

²³⁷ INQ 24 Paragraph 4

²³⁸ INQ 70 -0 Paragraphs 4-5

²³⁹ INQ 24 Paragraphs 11 -14

²⁴⁰ NRE12.2 paragraph 6.6.1

that the proposed Exchange Land will not be available for recreational use as mitigation for the temporary loss of part of Hobson's Park during construction. However, on balance, the Council considers this to be acceptable due to the need to provide appropriate ecological mitigation. In weighing up this balance, The Council acknowledges that the Active Recreation Area to the north of the CGB is expected to be made available for use within the next year, which will provide additional public open space for recreation and provide some mitigation for the temporary loss of part of Hobson's Park.

- 8.8 Subject to the proposed conditions to secure an Ecological Method Statement, and a Landscape and Ecological Management Plan, the Council's objections on these grounds are withdrawn.
- 8.9 The area of land within the proposed Exchange Land which is proposed to be made available for replacement breeding habitat during construction must be available in a condition suitable for breeding birds, prior to disturbance of existing habitats by development. The Council will not approve the discharge of a planning condition for the Ecological Method Statement if the land cannot be made into a suitable condition in time for the breeding season.

Future maintenance and management of Hobson's Park, the Active Recreation Area, and the proposed Exchange Land and mitigation measures in relation to biodiversity and open space²⁴¹

- 8.10 The Applicant's rebuttal evidence commits to entering into an agreement with the Council with respect to contributions towards maintenance for the new landscaping in Hobson's Park in order to make the development acceptable in planning terms. The Council has met with the Applicant to discuss HoTs for a Section 106 Agreement. Officers have advised that contributions towards the items listed below would be required and would be costed based on the detailed landscaping scheme secured via planning condition:

1. Additional costs of maintenance:

- a. biodiversity and recreational maintenance costs for both Hobson's Park and the proposed Exchange Land
- b. cycle path (if adopted by City Council)
- c. pedestrian paths
- d. maintenance access from Long Road
- e. station access from Addenbrooke's Road – (if to be maintained by City Council)
- f. lighting, bins, seating, signage.
- g. new bridges
- h. additional drainage costs
- i. public art

²⁴¹ INQ 24 Paragraphs 15-18

2. Inspections during construction (monthly/fortnightly visits)
 3. Monitoring costs
- 8.11 The Council withdraws its objection subject to the imposition of a planning condition to secure a Section 106 Agreement and agreeing Heads of Terms with the Applicant.
- Landscaping and biodiversity features of the proposed Exchange Land; and details of an accessible and safe crossing point on Addenbrooke's Road to demonstrate that the permanent loss of open space can be satisfactorily replaced in terms of quality, quantity and access with an equal or better standard than that which is proposed to be lost ²⁴²
- 8.12 The landscaping and biodiversity features of the proposed Exchange Land have been addressed in the comments above under point 2 and are now acceptable.
- 8.13 Regarding the accessibility of the proposed Exchange Land, the Applicant has reviewed access into this area and proposes to secure the delivery of the 'potential future footbridge' across Hobson's Brook as shown on proposed deemed planning consent drawing ref. 158454-ARC-ZZ-ZZ-DRG-LP-000054. This will ensure access to the Exchange Land more easily from underneath Nine Wells Bridge providing a safe route from the main park to the Exchange Land without needing to cross Addenbrooke's Road. The details will be secured through the proposed conditions referred to above.
- The area of land and the duration for which the temporary acquisition of land is required during construction works to demonstrate that there are material considerations that outweigh the temporary loss of open space²⁴³
- 8.14 The Applicant provided a plan showing an indicative arrangement for the station compound in Hobson's Park via email on 28 January 2022 with an accompanying narrative justifying the area required. The indicative plan shows the retention of existing trees and some of the existing footpaths within the site compound area, which the Council supports. The plan also shows the layout of spoil areas, materials and machinery storage areas, and welfare and parking provisions. The Applicant has, verbally, explained to the Council the requirements for the site compound to store large volumes of materials and machinery, and to accommodate up to 300 workers on site at one time in order to make efficient use of the short periods of railway closure to carry out the works.
- 8.15 The station compound will have a significant detrimental impact on Hobson's Park in terms of the temporary loss of open space of recreational and environmental importance so as to give rise to a conflict with Local Plan Policy 67. However, the Council acknowledges the constraints of the proposed development site and the construction programme, the temporary nature of the impact, and the benefits of the scheme. These are considered

²⁴² INQ 24 Paragraphs 20-22

²⁴³ INQ 24 Paragraphs 23-26

to be material considerations which outweigh the conflict with Local Plan Policy 67.

- 8.16 The Council considers that, if it were possible to reduce the size of the working area then this should be required to reduce the loss of open space and that a review of the size of the working area should be secured by way of condition 10 through the submission of construction programme details and a phasing plan for the site compounds to be submitted as part of the Code of Construction Practice Part B.

An acceptable Arboricultural Implications Assessment to assess the extent of tree removal required at Long Road Sixth Form College to accommodate the development, and the impact on other co-dependent trees ²⁴⁴

- 8.17 The area of land required along the eastern side of the railway line in the grounds of Long Road Sixth Form College has been reduced in the revised deposited plans (NR-09-1). However, the proposals still require a triangle of wooded land, approximately 100 metres in length and 7 metres wide at its widest, to be temporarily acquired to facilitate access from the MRC car park to 'the northern most extent of the proposed new Up Loop line.'
- 8.18 The trees within the grounds of Long Road Sixth Form College have been identified as a group of Beech and Hornbeam. The assessment of the impact on the group has been based on canopy area, stating that the canopy area requiring removal will be 920 square metres out of a total canopy cover of around 6,500 square meters for the group, representing a loss of 14% canopy cover. The methodology has assumed an even spacing throughout, however, as acknowledged by NR the spacing seems to be quite sporadic. The true extent of canopy loss will depend on the size of canopy of individual trees removed and not the area of land required for the development.
- 8.19 Furthermore, the assessment is limited to the impact on the canopy area and does not take account of the varying maturity and quality of the trees within the group. Without a detailed assessment of the impact on individual trees, it is also not possible to assess the indirect impact of any tree loss on co-dependent trees resulting from wind damage. The woodland strip is only about 20 metres wide and is dominated by trees of similar age that have established as a single canopy. The trees are therefore co-dependent and rely on their neighbours to withstand wind forces. The potential loss of trees on the leading western edge would expose the retained trees that form the eastern edge of the strip to the prevailing winds from the south-west. The sudden change in wind loading is likely to result in significant additional losses, potentially resulting in harm and/or damage to the retained trees. Therefore, in addition to the direct loss of trees within the area of temporary land acquisition, there is likely also to be an indirect loss of other trees within the group, resulting in further loss of amenity and biodiversity value.

²⁴⁴ INQ 28-41

- 8.20 While any lost trees within the area could be replaced, such replacement trees could take upwards of 32 years to regain the amenity benefits provided by the existing trees. Until a detailed AIA showing the impact on individual trees has been provided, the impact on trees cannot be properly assessed. As a result, the Applicant has failed to demonstrate that the proposals would not have a significant impact on biodiversity and amenity as a result of the direct and indirect loss of trees by way of felling, wind damage, significant surgery and potential root damage.
- 8.21 The amenity value of the trees is described in the ES as 'local', however the trees are clearly visible from Hobson's Park, Addenbrooke's Road, Nine Wells Bridge and the CGB and they contribute significantly to the character and appearance of the Green Belt. In the absence of adequate information in respect of the likely nature and extent of tree loss, the Council has assumed that there could be a significant amount of tree loss, greater than has been assumed in the AIA and including, possibly, the entire width of at least part of the tree belt in the location concerned (due to the potential impact from wind damage).
- 8.22 On balance, however, as a result of the reduction in the area of temporary land acquisition and the other matters set out in the AIA, the Council now considers that the potential future impact on the trees – in terms of both potential direct and indirect impacts – is outweighed by the public benefits accruing from the proposal, in accordance with Local Plan Policy 71, subject to mitigation being secured to minimise the impact on the retained trees and to provide appropriate replacement planting.
- 8.23 An acceptable AMS and TPP must be secured via the deemed planning conditions. Replacement planting must be provided following the return of the land temporarily acquired back to Long Road Sixth Form College.
- The proposed routes south of the guided bus route and the land separated / isolated by any new cycle and walking routes to the station²⁴⁵
- 8.24 On 19 January 2022, the Applicant provided a plan showing an alternative alignment which runs alongside the Cambridge Guided Busway for part of its length, before diverting southwards where the embankment begins and heading towards the new station. The County Council's cycling officer raised concerns about the proximity of cyclists to the busway route given the predicted traffic generation and recommended a separation between the cycle route and the busway route in the interests of cycle safety. Furthermore, both the Council's landscape officer and the County Council's cycling officer raised concerns that a desire line from the western end would be created along the route currently proposed.
- 8.25 The Council has considered this advice and has weighed this against the detrimental impact of the disaggregation of this area of public open space on its recreational use. The Council considers that the alignment originally proposed and shown on the proposed plans is preferable subject to the impact of the path on the park, in terms of the surfacing, lighting and

²⁴⁵ INQ 23 Paragraphs 42-44

planting scheme. The details of this would be secured through the proposed landscaping condition and would require the path to be adopted by CCiC rather than built to the Highways Authority's adoptable standards. It will be necessary to secure financial contributions towards the ongoing maintenance of the path through a Section 106 Agreement, and the Council notes the support in principle from NR to make contributions.

Replacement planting to mitigate loss from AstraZeneca (AZ) and Cambridge Biomedical Campus (CBC)

8.26 The structural planting on the AZ and UoC sites was secured through conditions on the outline consent for the CBC to mitigate the visual impact of the campus development on the surrounding area particularly Hobson's Park and the Green Belt. Some of this structural planting would be lost as a consequence of the Project and there would be limited opportunity for replacement planting on the AZ site. The Applicant provided a plan showing possible replacement planting within Hobson's Park and proposed two additional Design Principles (Ref. 3.7P & Q in Appendix C to NRE9.3) comprising:

3.7P Green Fencing: The proposed landscape design will seek to incorporate a living green fence between the AstraZeneca car park and the Cambridge South Station.

3.7Q Structural Planting: To include replacement planting Within Hobson's Park for the structural planting lost on the western boundary of the railway adjacent AZ. This will include:

- 20 No. large trees
- 44 No. small trees
- 2 No. bat boxes
- 4 No. bird boxes

8.27 The Council supports these proposals as acceptable mitigation for the loss of structural planting on the AZ site. The Council withdraws its objection subject to conditions to secure a landscaping scheme compliant with the Design Principles as amended with the addition above, and implementation of the planting within an agreed timetable.

*Amendments to the Draft Order*²⁴⁶

8.28 The Council is satisfied that the Applicant's landscaping proposals provide adequate mitigation in respect of the boundary landscaping between the railway and the CBC and that this provides appropriate replacement mitigation for the mitigation previously required pursuant to Conditions 42 and 45 of the outline consent for the CBC.

8.29 The City Council confirms the Order drafting relative to the AZ, UoC CoC1, and CoC2 permissions. The City Council confirms the amendments to

²⁴⁶ INQ 24 Paragraphs 54-57, INQ 70 and INQ 81

definitions of 'the AstraZeneca permission' and 'the University permission'. This is on the basis that the impact of the waiving of enforcement rights in relation to these permissions and the specified conditions has been assessed and mitigation has been secured through the Design Principles document, the planning conditions and the Tree Mitigation Scheme secured through the draft Section 106 Agreement.²⁴⁷

- 8.30 The City Council requested that a planning justification be provided for the request from CBCManCo/CML for the City Council to similarly waive its enforcement rights under the CBCManCo/CML permissions. Having considered NR's response and the information contained within it seeking to justify the inclusion of the CBCManCo/CML permissions within Article 35 of the draft Order (referred to therein as "the CBC/CML permission 1" and "the CBC/CML permission 2"), the City Council is satisfied to remove its objection to the inclusion of the CBCManCo/CML permissions, subject to the exemption from enforcement action against any breaches of the CBCManCo/CML conditions applying only to development in relation to the authorised works and only within the Order limits, as drafted in the final version draft TWAO submitted on 31.05.2022 (INQ 80).²⁴⁸

*Note on the Clay Farm S106 and need for a Deed of Variation*²⁴⁹

- 8.31 The City Council agrees the text of the Clay Farm S106 Note as submitted by the applicant.

Schedule of Alterations which outlines the main changes between NR13 and NR13.1

- 8.32 The applicant has confirmed that the outfall flow rates and flood storage capacity in respect of the amendments to the drainage proposals have not been affected by the relocation of the drainage ponds. The applicant has also confirmed that the drainage design will be subject to further consultation with the drainage officer, LLFA and HCT as well as all the CBC stakeholders. The drainage design will be subject to discharge of the relevant planning condition.²⁵⁰
- 8.33 The amendments to the indicative landscape plans shows the location of specimen tree planting to reflect the replacement AZ and AMB landscaping. On the basis that these are indicative plans and are not included on the list of plans for approval within the deemed planning consent, the Councils are content with these annotations, noting that the Design Principles document introduces some flexibility to ensure the replacement tree planting that comes forward through the discharge of conditions and the Tree Mitigation Scheme within the S106 Agreement is appropriate and provides appropriate mitigation for the landscaping to be lost.

²⁴⁷ INQ 70 Paragraph 10

²⁴⁸ INQ 81 Page 1

²⁴⁹ INQ 70 Paragraph 15

²⁵⁰ INQ 70 Paragraph 16

- 8.34 Similarly, the location of the proposed corn bunting song posts on the indicative landscape plans also show indicative siting with the detail to be secured through the discharge of condition.
- 8.35 NR has not provided a specific response to the matters raised by CCIc since the objection was withdrawn subject to conditions. Any relevant points will be addressed below.

9 THE CASE FOR SOUTH CAMBRIDGESHIRE DISTRICT COUNCIL

- 9.1 SCDC withdrew its objection to the scheme by letter dated 10 February 2022 and conditionally supports the application, subject to the conditions discussed within its position statement and that of CCIc.²⁵¹ Both Councils also participated in the conditions session and the discussion in relation to the Order. The Council's original objections are set out in Ms Burton's Proof of Evidence (OBJ-24-W/1). The main points from SCDC's position statement are summarised below.
- 9.2 The Council's objections were summarised by reference to a conflict with Local Plan policies HQ/1, NH/2, and NH/4 in terms of the impact on biodiversity and existing trees. The Council is content that the proposed habitats are appropriate and can be secured through the proposed landscaping condition 29. The potential loss of existing trees has been reduced as a result of the reduced area of temporary land acquisition required at Long Road Sixth Form College, although the Council shares the concerns of CCIc about the assessment of the impact on those trees and the Arboricultural Implications Assessment that has been provided by the Applicant. The Council is also content that the proposed on-site BNG maximises the potential on-site habitat creation and enhancement options and that it is therefore appropriate to seek offsite BNG provision for the remaining habitat units.
- 9.3 SCDC's position as to BNG is as set out by CCIc above. [8.3-8.5]
- 9.4 NR has not provided a specific response to the matters raised by SCDC since the objection was withdrawn subject to conditions. Any relevant points will be addressed below.

10 THE CASE FOR OBJECTORS WHO APPEARED AT THE INQUIRY

- 10.1 The response of NR to the outstanding objections is set out at paragraphs 368 – 449 of NR's closing submissions (INQ 61) and within the evidence of various witnesses. A schedule of the objections and where NR's response to these objections, as well as those in Section 10 of this Report, is appended to Mr Wingfield's Proof of Evidence (NRE11.3).

10.2 OBJ-07 Objection by Trumpington Residents Association

- 10.2.1 TRA issued an amended proof of evidence on 2 February 2022 to reflect

²⁵¹ INQ 24 & INQ 25

issues identified in the SoCG with NR. TRA's evidence to the Inquiry focused on those matters where there is still disagreement between the parties.²⁵²

10.2.2 Hobson's Park is important to the residents of Trumpington and Cambridge. It is an essential Green Belt link in the "River Corridor -Hobson's Brooke/Vickers Brook" which is "a defining character of Cambridge".²⁵³ Hobson's Park was created in mitigation for the substantial land taken out of the Green Belt in the 2006 Cambridge Local Plan to provide for the Southern Fringe developments. While there is strong support for the CBC there is very strong feeling among residents against any diminution of that mitigation, either temporary or permanent, to meet the CBC growth needs. While significant progress has been made in discussions with NR to reduce this harm a number of concerns remain. These are set out in the SoCG and are summarised below.

10.2.3 *Purpose of the Station* By letter dated 19 November 2021, NR stated:

"The proposed station at Cambridge South is a destination station primarily intended for those travelling to the Biomedical Campus. Parking is limited at the station so those wishing to use it will need to arrive on foot or by bicycle."

On this basis TRA support the development of the proposed station.

10.2.4 *Proposed Shared Use Path to the Western Station Building* TRA requested that this section of the proposed segregated path be aligned to the north of North Ditch. TRA accept the rationale put forward by NR and no longer maintain this aspect of their objection to the TWAO application.

10.2.5 *Proposed Pedestrian Access to the Western Station Building* TRA previously requested that NR install specific measures to prevent misuse of this path by cyclists to access the western station building. NR and TRA have agreed that the more appropriate solution is to correctly sign the main cycling routes with appropriate way finding signs and install 'no cycling' signs on the other points of entry into the park.

10.2.6 NR has also agreed this with CCiC and CCoC, the relevant statutory bodies. NR commit, subject to approval of the discharge of planning condition application by the Local Planning Authority, to install the way finding signs and 'no cycling' signs prior to the Cambridge South station being opened.

10.2.7 *Maintenance track within the western boundary of Hobson's Park* NR clarified its requirement and proposed use of the maintenance access in the letter to TRA dated 19 November 2021, stating that NR maintains its proposals in respect of the right to access the western side of the station via the route delineated as Land Parcel 008 on the Deposited Plans (NR9) with the TWAO application.

10.2.8 TRA confirm that they no longer object to this element of the proposed scheme on the basis that specifically only "localised maintenance activities

²⁵² OBJ 7 -W & INQ 10

²⁵³ Landscape Character Assessment 203 pages 28,41-43 and D-6 Cambridge Local Plan Policy 4

to be undertaken on an ad hoc basis” and “no permanent surfacing will be installed, due to the infrequent nature of the requirement to access the station for maintenance purposes.

- 10.2.9 *Compensation For Loss of Hobson’s Park Land – Access to Exchange Land* TRA requested that the “Potential future footbridge” shown at the eastern end of the Exchange Land is provided by NR as part of the development and that this is made a condition of the Order and deemed planning permission. Subject to a suitable condition TRA confirm that they no longer object to this element of the proposed scheme.
- 10.2.10 *Adverse Effect on Nine Wells Local Nature Reserve* TRA raised a concern about the proximity and impacts of the proposed temporary construction compound (CC1) south east of Addenbrookes Road to the Nine Wells Local Nature Reserve.
- 10.2.11 NR clarified that the minimum distance between the proposed temporary construction compound (CC1) and the Nine Wells LNR is 75m not 30m. NR also confirmed that National Cycle Network Route 11 would be temporarily diverted round the edge of CC1 with the diverted route having the same width as the current route. TRA confirm that they no longer object to this element of the proposed scheme based on the additional clarifications provided by NR.

TRA Outstanding Objections to the Proposed Scheme

- 10.2.12 *Temporary adverse effects on Hobson’s Park* TRA is relieved that now only 17% of Hobson’s Park is to be acquired by NR for the construction of the CSIE project. We have been told that the primary purpose of the station is to serve the growing needs of the CBC and therefore when the station is being built, the campus, which is still under construction, should take the strain rather than Hobson’s Park. TRA remains concerned at the disparity in size between the construction compound for the western station building and the compound on the eastern campus side of the railway line. If activities planned for the western compound are for a purpose other than construction of the western station building, we wish to scrutinise and if necessary, challenge them.
- 10.2.13 *Proposed shared used path to the western station building: the part of the path from the CGB to the embankment with Addenbrookes Bridge* We object to the proposal that the shared use path to the western station building should be about 50 metres into the park rather than running alongside the CGB shared use path. As proposed the Scheme would deny access to a 50-metre-wide strip of the park between the two footpaths which the public now use in significant numbers for passive recreation purposes. Although the land would remain, at peak times the public would have to cross a path busy with fast moving cyclists and walkers intent on getting from point A to B. The tranquility of the park would also be disturbed due to the number of cyclists and walkers crossing it that do not do so now.
- 10.2.14 We understand that NR do not object to moving the path to the north to run alongside the guided bus way path as shown on INQ 08. The issue appears to be which council, City or County, will take responsibility for

adopting the path and paying for its maintenance. The decision should be determined in the public interest which is to have unfettered use of the park.

- 10.2.15 To be clear, TRA's alternative is that the shared use path to the western station building should run alongside and be distinct from the CGB path to the CBC campus; with, if necessary, a suitably designed barrier in between to ensure distinct capacity for and safety of both, and suitable interconnections between the paths for the convenience of cyclists and walkers. TRA request that their alternative is adopted as part of the Order.
- 10.2.16 *Cycle parking at the western station building* The prime purpose of the new station is to serve the needs of the growing CBC. Therefore the access needs of the station, including cycling should be met on the campus side and not on the western side adversely affecting Hobson's Park. The need for some cycle parking at the western side of the station is accepted but this does not justify half of the cycle parking which would have an unfair adverse effect on Hobson's Park and its users.
- 10.2.17 The intrusive nature of the proposed cycle parking also conflicts with NR's stated intention that the Hobson's Park entrance to the station would sit discreetly in the corner of the park.²⁵⁴ The cycle parking would be at the same level as the station platforms and therefore would be visible. TRA request that the number of cycle spaces at the western side is reduced to 300 or less plus 20 spaces for larger size bicycles, and that obtrusive 2 tier racks are not provided. The CUH NHS Foundation Trust has asked that 70% of the cycle parking spaces be provided on the eastern side of the station, TRA support this request.
- 10.2.18 *Electricity substation and rail systems enclosure* The proposal would place this facility in the direct line of sight from the southern part of Hobson's Park at the Cambridge City edge to White Hill (the first part of the Gog Magog Hills) and directly alongside Hobson's Brook. This is the wrong place to put the enclosure and it is also unnecessary to locate it here. An alternative site near the railway line would take it out of the line of sight and away from Hobson's Brook. This would also have the added advantage of reducing the length of the high voltage and signalling cables that would run from the compound directly to the railway corridor.
- 10.2.19 As set out in the SoCG, NR are reviewing the design and location of the enclosure and will provide TRA an update once the review has been concluded.
- 10.2.20 *Transport Context Highways And Public Transport* The technical requirement that each project must plan on the assumption that the others will not proceed leads to frustration for residents. The combined proposals of NR for the station, the Greater Cambridge Partnership CSET and the CBC for the campus result in 1 bus stop on Francis Crick Avenue southbound. There is no guarantee that ordinary buses will be able to use the stops on the dedicated bus way. This is not acceptable. It is imperative that there are

²⁵⁴ NR15 Figure 5-11

adequate bus interchange facilities serving the station particularly given the GCP intention to introduce an improved bus network next year that will be well connected with the station and the CBC.

- 10.2.21 TRA has asked NR to secure satisfactory assurances with the other two parties to this matter that the station will have adequate bus interchange facilities. The Inquiry may wish to include the provision of essential bus interchange facilities for the station by the applicant incur in cooperation with relevant bodies as a condition of granting the order.
- 10.2.22 TRA accept that NR does not have direct responsibility to provide bus stops on Francis Crick Avenue to serve the station. However, TRA maintain that it is not acceptable that at present the combined proposals of NR for the station, the GCP for CSET, and the CBC for the Campus result in one bus stop on Francis Crick Avenue southbound on the opposite side of the road from the station on the other side of the dedicated guided busway as well as the two carriageways - and there is no guarantee that ordinary buses will be able to use the stops on the dedicated busway.

NR Response to TRA Case

- 10.2.23 The TRA's initial objection raised a number of areas of concern. Following engagement between the parties, six of these areas were resolved to the TRA's satisfaction. Five areas of concern remain, relating to: the impact on Hobson's Park; alignment of the segregated path through Hobson's Park; cycle parking provision; the location of the RSC; and the adequacy of bus interchange facilities.
- 10.2.24 Mr Plank of the TRA expressly praised NR's collaborative approach, and repeatedly emphasised that their relationship had been open, constructive and very helpful. Due to factors such as the construction requirements for the Project, and the constrained nature of the site itself, it cannot accede to all of TRA's requests. Moreover, some areas (such as cycle parking provision) are matters over which different stakeholders disagree, and in relation to which NR has to act to satisfy the widest interests.
- 10.2.25 *The adverse impact on Hobson's Park*. The justification for the compound in Hobson's Park is explained by reference to INQ 18 which provides a breakdown of anticipated land use. That land take has been identified by the contractor, based on its known requirements, and the identified requirement to preserve in situ as much of the existing landscaping and vegetation in that area. It will be observed that scale of the land take is in substantial measure driven by this.
- 10.2.26 The evidence of Mr Barnes, who has reviewed the contractor's proposal, is that, given that works are required to be undertaken on the west side of the railway, all of the land outside the protected vegetated area is required for their safe and efficient construction, and in particular, for ensuring the separation of people and plant.
- 10.2.27 Contrary to Mr Plank's assumption, NR is not compelled to take the proposed temporary work site on the west as a result of pressure from the east. The worksite is there because it needs to be there. Acting in good

faith, NR has reduced the scale of the land take sought so far as possible at this stage, but it can do no more.

- 10.2.28 *Alignment of segregated path through Hobson's Park.* TRA's proposals have been carefully considered and are illustrated in INQ 08. NR was prepared to implement those alternative proposals. Ultimately, however, CciC and CcoC do not support the segregated path realignment, and as such it cannot be unilaterally pursued by NR, as Mr Plank fairly conceded. In the event, the proposed segregated path 25m south of the guided busway at the northern extent of Hobson's Park builds on an existing path, and will assist with providing the accessibility benefits and modal shift that are integral to the CSIE Project's success.
- 10.2.29 *Cycle provision.* The distribution of cycle provision will be determined by a further study to ensure that the cycle parking responds to the needs of the station and its users. Mr Plank accepted that this will be subject to approval by the local planning authority, who will ensure that unacceptable effects on the park do not arise. It is not accepted that because the station seeks in large measure to benefit the CBC that the cycle parking should automatically be skewed towards the east; rather, the cycle parking should respond to the actual needs of the users, based on representative trip distributions (and subject to approval by the local planning authority). Subject to further studies, that split is currently 48% to the west and 52 % to the east. The suggestion made by TRA that users seeking to go west or arriving from the west should make use of parking spaces on the east is not a reasonable one, and may cause congestion for users of the shared use path that crosses over the railway alongside the guided busway.
- 10.2.30 *Location of the Railway Systems Compound.* TRA does not object to the principle of a RSC, nor does it propose that it moved to an entirely different location; its preference is to see it relocated closer to the railway within the existing plot. Mr Barnes gave evidence explaining why, in his view, the RSC will likely have to stay where it is presently proposed, which included the requirement for 360° access to the DNO cubicle, a safe working area and access around it, and landscaping.
- 10.2.31 Notwithstanding this, NR is committed to keeping the precise location of the RSC within that plot under consideration, and it may be that only a compound of a smaller size is required if other signalling infrastructure upgrades precede the Project. Ultimately, however, if the multiple needs cannot otherwise be accommodated within the plot as Mr Barnes anticipates, or if the upgrades are not forthcoming within the right timescales, the RSC will have to be built as proposed.
- 10.2.32 *Bus interchange facilities.* As became apparent during Mr Plank's live evidence, the TRA's complaint is not that NR's proposal fails to provide an adequate interchange with the existing bus stops, but a broader desire to see additional bus services in that location. As Mr Plank accepted, the provision of additional bus stops is not a matter for the rail network operator, but for CcoC and the bus operators. They did not suggest that any such requirement would arise as a result of the new station in their

consultation responses.

10.2.33 The acceptability of the station's interchanges with the existing bus network has in any event been covered above at Matter 3(d).

10.3 OBJ 14 Cambridge Past Present and Future

10.3.1 In principle, Cambridge Past Present & Future supports the new station as a means of reducing car journeys to the CBC. Our main concerns are to ensure that the new station does not negatively impact Hobson's Park, its wildlife and users and that any impacts on the landscape are avoided or adequately mitigated.

10.3.2 Hobson's Park was provided in mitigation for the substantial areas taken out of the Cambridge Green Belt in the 2006 Local Plan. In addition to its considerable amenity for local residents, this green corridor is one of four such corridors in and through the landscape of Cambridge, and serves a city wide, not just a local purpose. Work has been done to enhance biodiversity, right up to the railway line in some places. It includes the successfully established wildlife reserve on the lake and the park now has a flourishing botanical and invertebrate communities which in turn are supporting good populations of birds, including those of conservation concern such as kestrel, corn bunting and skylark. This would be threatened by the temporary construction site and the permanent station and associated access.

10.3.3 We welcome the efforts that NR have made through the optioneering process to try and select options and produce designs that have least impact on the park. However there are still some aspects of the scheme where temporary and permanent impacts could be avoided or more adequately mitigated.

Permanent Adverse Impact on Hobson's Park

10.3.4 The western station building includes a large area of glass frontage which faces out to Hobson's Park, but at night, when the inside of the station is illuminated the converse will be true – resulting in light pollution and making the upper storeys of the station very visible. The use of glass frontage is therefore at odds with the lighting strategy and the design strategy, which aim to reduce light pollution and integrate the building into the park landscape.

10.3.5 CPPF supports the green roofs and the use of natural materials although in practice it is non-natural materials that dominate, such as the large area of glass. During the consultation process CPPF highlighted to NR that the western station entrance should be designed to be as much a park building as it is a rail building. The station will have a permanent negative impact on Hobson's Park and this harm to the local community should be offset by providing facilities for park users.

10.3.6 There is opportunity for the design of the building to relate to the park as well as the station. CPPF request that a condition is included which requires the landscaping and seating to the western station entrance to better reflect

its proximity to, and aspect from the park, including addressing light pollution; as well as to serve the needs of park users in order to compensate for the permanent negative impact. People using the park will inevitably seek to use the facilities at the station and as a minimum, visitors should have access to toilets.

Temporary Adverse Effects on Hobson's Park

- 10.3.7 The CSIE project would remove from public use for upwards of two years a significant area of Hobson's Park for construction purposes. NR says there is not sufficient land on the eastern side of the railway to increase the size of the eastern building construction compound and provide for the temporary storage of excavated material.²⁵⁵
- 10.3.8 In other words, there is sufficient land on the eastern side but not the will NR's part to insist by means of compulsory purchase or otherwise that it should be provided in support of the station's construction by the organisations on the CBC. While NR is willing to compulsorily appropriate land from Hobson's Park, which is adversely affected by the proposed station, it is not willing to compulsorily acquire land from organisations on the Campus for whose benefit the station is to be built.
- 10.3.9 The park's status in the Local Plan and its value to the local community, should give it much greater protection than NR proposes. CPPF ask that the temporary land acquisition proposed in Hobson's Park is further reduced.

Electricity Sub-Station and Rail Systems Enclosure

- 10.3.10 CPPF objects to the proposed location of an electricity sub-station and rail systems enclosure/ compound in the southern part of Hobson's Park south of Nine Wells Bridge in an unduly visible position. This is a strategically important view from Trumpington towards White Hill which forms the first part of the Gog Magog Hills. It will also have a negative visual impact on the Exchange Land. Gog Magog Hills are visible from the bridge, so the compound would be visible from that location as well.
- 10.3.11 CPPF requests a condition be included which requires the location for the electricity sub-station and railway systems enclosure to be moved closer to the railway line, that the heights of these structures are limited and that larger trees are planted for the landscaping in order to help screen it from day one.

Compensation For Loss of Hobson's Park Land – "Exchange Land"

- 10.3.12 CPPF have no objection to this proposal, however, 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.
- 10.3.13 There are other development schemes proposed for this area, including for

²⁵⁵ NR letter to TRA dated 11 January 2021 page 6

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.

10.3.14 During cross examination of NR they confirmed that the Design Guidelines had been drawn up without any community input (they have been drawn up by architects working for NR and City Council officers) and without asking for the views of the users of Hobson's Park. Therefore, it is clear that Design Principles 3.3.1 and 3.3C cannot be achieved without further work on the part of NR to ascertain community aspirations, so that they can be considered as part of the design process.

10.3.15 Toilet facilities are one of the most requested services for park users. Access to toilet facilities enable more people to use parks (especially those for whom toilet access might be a problem) and it enables people to use parks for longer (increases the dwell time) – in other words they make parks more inclusive (another aspiration of the Design Principles). Toilets are usually not provided in parks because of the costs maintaining them, which is why they have not so far been provided for Hobson's Park. CPPF explain that the community aspiration was to have access to toilet facilities at the station, this does not necessarily mean providing an additional toilet or an additional building. A toilet facility would also benefit people who might be waiting to meet/greet rail travellers.

10.3.16 As compensation to the community for the temporary and permanent impacts on their park, CPPF would expect to see some community benefit achieved from the west station building and would like this commitment to be included in the Design Principles or as a planning condition. In CPPF's view this should be access to the station toilets, but CPPF would be happy for NR to survey park users to ask their views in order to inform the design.

NR Response to CPPF

10.3.17 CPPF have raised concerns relating to the Exchange Land, the impact of the RSC on surrounding landscape, the design of the station so that it integrates with Hobson's Park, and the provision of toilets. It should be noted that CPPF take no issue with the principle of the station, on the western side and explained in its evidence to the Inquiry that they support it.

10.3.18 *Exchange land.* CPPF suggests that NR should look to integrate the Exchange Land with other projects, to create one large area of mitigation land. Whilst the sentiment behind the suggestion is understandable, it is unworkable in practice and flawed in law. The projects identified by CPPF as requiring mitigation land in the area are not yet even at the application stage. Consequently, there is no guarantee that those projects will come

forward (and if so which ones and when).

- 10.3.19 Even if they are to come forward at some future stage, NR does not know now what their mitigation land requirements might be, and/or what requirements that land might need to meet. This would depend on what the land was required for (e.g. BNG requirements, habitat replacement, replacement open space/recreational function etc). As such, it is impossible to know now what larger area of land might be suitable for meeting all parties' needs. The practical difficulties associated with finding such a larger (albeit as yet unspecified) area of land are likely to be particularly acute for the CSIE Project, constrained as it is by the Green Belt, development, and a Scheduled Monument to the South of Hobson's Park.
- 10.3.20 NR would not be able as a matter of law or policy be able to acquire land *in excess* of what is required for the CSIE Project, as compulsory purchase powers should be exercised over the minimum area necessary to achieve the project's ends. That would mean that even if NR acquired a portion of some larger site for its own purposes now, neither NR (nor any other public body) would have any power to ensure that the 'remainder' of the Exchange Land came forward as hoped for the other schemes.
- 10.3.21 CPPF did not in its written evidence suggest any tract of land capable of accommodating the additional Exchange Land that would hypothetically be required. The closest site allocation for open space in the CamLP (see Policy SC/1) is south of Granham's Road, Great Shelford (SC/1 2I), which is far in excess of the 400m "short walk" distance from Hobson's Park (see Policy 67) and which was accordingly discounted. The vague suggestion that the Nine Wells Nature reserve could be expanded would not be policy compliant, as it too would be likely to be over 400m away from Hobson's Park. Nor – unlike EL4 – does it have the accessibility advantage of being directly adjacent to it.
- 10.3.22 *Impact of RSC on Landscape*, CPPF point to a "strategically important" viewpoint towards the Gog Magog Hills that would be adversely impacted by the RSC. However, as CPPF rightly accepted in cross-examination, there is no such strategically important view. The relevant viewpoints for the Landscape and Visual Impact Assessment were agreed with GCSP, and no viewpoints south of Addenbrooke's Road towards the Gog Magog Hills were to be assessed.²⁵⁶ The ES quotes from the landscape assessment used for the CamLP (the CIGBBS), and notes that the area (Sub-area 9.1) is flat before rising towards the Gog Magog Hills. Nonetheless it concludes that "there are no key views in the vicinity".²⁵⁷ Furthermore, the landscape impacts of the RSC were found to have only a "very small" change on the views and visual amenity given its small scale. The need for the RSC to be in the location presently proposed (subject to review) has been addressed above in relation to the TRA objection.
- 10.3.23 *Design of the station*. Contrary to CPPF's suggestions, the station has been designed with the park setting to the west in mind. The Design Principles

²⁵⁶ NR16, Appendix 13.1, PDF4 shows the six viewpoints, which were agreed with GCSP

²⁵⁷ NR16 paragraph 13.3.39

will ensure that the station faithfully reflects the contrasting park-urban settings, and integrates well within the broader landscape.²⁵⁸ The importance of careful integration with the park surroundings has been recognised since the beginning of the project.²⁵⁹ The aim is for the development's external form, roofscapes and materiality to reflect the semi-naturalised character of the park and appear to connect across the railway to the purposeful visual, and green, gaps between the CBC western buildings.²⁶⁰ As CCiC recognised in its "*overall design response to context*" the CSIE Project will bridge the transition between Hobson's Park public open space, which has a focus on the countryside, and the much more urban environment of the CBC.²⁶¹

10.3.24 In any event approval of the detailed design of the building is secured by condition and will be subject to the scrutiny and approval of the local planning authority, who will be an independent arbiter of whether the Design Principles relating to respect for the park have been upheld. There is no reason to believe, at this outline stage, that the CSIE Project cannot ensure that the design integrates well with Hobson's Park. Indeed the contrary is true, as the local authorities have recognised; with the CCiC recognising that the design principles are an "*essential tool*" to ensuring that the CSIE Project integrates with Hobson's Park.²⁶²

10.3.25 *Provision of toilets.* As Mr Pearson explained, there is no policy requirement to provide toilets in a station *outside* the payline. The Councils have not suggested otherwise. Suitable provision is made for the patrons of the station, in the form of a fully-accessible 'Changing Places WC'. Any provision of toilets outside the payline brings with it issues of cost and maintenance, which are matters for the Train Operating Companies and not NR.

10.3.26 There is no suggestion that Cambridge South Station serves as an additional attraction to Hobson's Park, and, as such, there can be no suggestion that such toilets are to be provided as part of a package of mitigation for Cambridge South. By contrast, Hobson's Park *was* brought forward as mitigation for the developments to the west; if such toilets were required to realise the public or mitigation value of the park, they could reasonably have been expected to have been provided at that stage. They weren't – and that may at least in part have been in recognition that Hobson's Park is not a 'formal' park, but instead a wilder space where people can enjoy nature, without the attendant urbanising facilities.

10.4 OBJ-22 Smarter Cambridge Transport (SCT)

10.4.1 SCT is a volunteer-run think tank and campaign group. It was formed in 2015 to advance sustainable, integrated and equitable transport for the Cambridge region. It is run by a team of around 30 people, with a wide

²⁵⁸ INQ 21

²⁵⁹ NR07 page 195

²⁶⁰ NR15 paragraph 3.4.6

²⁶¹ INQ 39-2

²⁶² OBJ23 page 6

range of expertise and interests.

10.4.2 SCT agrees that:

- The forecast rail demand for Cambridge South station has been calculated using standard modelling methodologies, the correct application of which has been independently verified.
- The proposed station configuration is highly constrained by the Guided Busway bridge. All available space to the east of the tracks will be used, leaving none for future expansion.
- The alternative proposal for a larger station, closely integrated with bus stops, would cost more, take longer to deliver, and require longer possessions of the railway.

10.4.3 There are however have a number of concerns about the suitability and/or appropriateness of the modelling.

10.4.4 Standard modelling techniques are not appropriate for Cambridge South station because the CBC is nationally unique in its high concentration of employment and regional hospitals – all potentially within a 15-minute walk of the station. TAG permits the applicant to seek agreement with DfT to use a bespoke demand model. It would not be reasonable nor good practice to design infrastructure on the basis that policies and actions that are uncertain, or not yet supported by funded delivery plans, will not be realised within the lifetime of the infrastructure

10.4.5 In SCT's view the modelling severely underestimates the likely rate of growth beyond 2031 – from 27,000 jobs in 2031 to potentially 40,000 in 2041, even though continued rapid growth is desired and supported by government.

10.4.6 Road capacity constraints in and around the CBC will drive modal choice in the future, as parking capacity constraints already do for staff. Therefore, road capacity needs to be included as an input parameter in the demand model, which currently it is not.

10.4.7 The William–Shapps Plan for Rail White Paper, the National Bus Strategy and the Transport Decarbonisation Plan are material considerations for planning purposes, even if they are not yet backed by detailed delivery plans. They place a responsibility on all stakeholders, including NR, to make reasonable efforts at every opportunity to maximise use of sustainable transport modes, including rail and bus, and to deliver on a clearly stated intent that, "Railway stations should be hubs for connecting [bus] services with high quality stops close to station entrances."

10.4.8 SCT assert that if you accept NR's demand forecast, then you must also conclude that planned growth in staff and visitors to the CBC cannot be achieved, because the demand to travel by car will exceed the capacity of the roads. If you accept that there is a reasonable possibility that the outturn will significantly exceed the applicant's demand forecast, then the applicant should be required to conduct more detailed scenario-testing with input parameters that include both physical and likely policy constraints on road traffic onto the CBC. Those policies include the GCP objective of

reducing traffic by 10–15% on 2011 levels, the Combined Authority's objective of reducing total distance driven across the region by 15%, and the statutory decarbonisation milestones – 68% reduction relative to 1990 levels by 2030, 78% by 2035 and 100% by 2050.

- 10.4.9 As one of the project objectives (NRE11.2 6.2.3.i) is to "*Improve sustainable transport access to housing, services, and employment within the Cambridge Southern Fringe and Biomedical Campus area, to fulfil existing and future demands*", NR must work with all relevant stakeholders, including CCoC, the GCP, the Combined Authority of Cambridgeshire and Peterborough, East West Rail, East West Main Line Partnership, Great British Railways and the Department for Transport, to develop a package of measures to ensure that growth of the CBC can continue within the constraints of the road network, and still achieve targets on road traffic reduction, air quality improvement, and decarbonisation. The output of that exercise will be a significantly higher rail demand forecast and a revised parameter plan for the station access. Those together will require a different configuration and design for the station and its accesses, potentially along the lines SCT have proposed.
- 10.4.10 More demand to use the station equates to higher user benefits, which therefore warrants a higher investment for the same benefit-cost ratio (BCR).
- 10.4.11 Delay in delivering Cambridge South station and disruptions to existing rail services can be mitigated. Cambridge station is connected to the CBC by a congestion-free busway. Diversionary routes are available and may be enhanced with relatively small investment. To minimise delay in delivering Cambridge South station in the event that the Inspector agrees with either of SCT's headline objections, NR should start now to develop and cost an alternative station configuration, along the lines SCT have proposed (and similar to the Abbey Wood Crossrail station, mentioned by Mr Barnes in his oral evidence).
- 10.4.12 The OBC takes no account of the modal shift required to achieve local and national targets for transport decarbonisation or public health (notably, air quality and physical activity).
- 10.4.13 The user benefits of tighter integration between rail and bus services have been overlooked.
- 10.4.14 SCT believe that there is little scope to enlarge the proposed design at a later date should demand grow to exceed the safe and efficient operation. The principal (eastern) station entrance is highly constrained by the eastern busway abutment. The narrow access corridor creates an environment that will be highly conflicted at peak times, when there are large volumes of pedestrian, cycle and motor vehicle movements. Adjacent junctions with Francis Crick Avenue for the busway and station access road will create further conflicts and increase delays for people walking and cycling. Modelling for the Transport Assessment shows that congestion on Francis Crick Avenue will delay buses travelling south from Long Road.
- 10.4.15 The entrance and ticket hall will be hemmed in by the CGB Bridge. There

will be no scope to add additional staircases or lifts between the platforms and the main overbridge connecting the entrances. Nor is there space into which to widen the approach footways, or increase the number of cycle parking spaces on the east side. (Cambridge station has experienced 'growing pains' but, in contrast, has space to expand.)

- 10.4.16 The access arrangement at Francis Crick Avenue is highly conflicted. Potentially large crowds of people arriving and leaving by foot and cycle will have to negotiate a complex crossing of Francis Crick Avenue, which is planned to comprise two general traffic lanes, two bus lanes and two cycle lanes. The main station entrance is some considerable distance from the nearest bus stops. This contravenes government policy and best practice for promoting public transport as an attractive alternative to driving.

Station Integration with Bus Services

- 10.4.17 The bus stops on Francis Crick Ave will be 200m from the station entrance. For someone alighting from the rearmost carriage of a northbound train, the walk to a bus stop would be 450m, taking seven minutes – or considerably longer for someone with reduced mobility. This does not accord with the government's National Bus Strategy guidance or best practice.

- 10.4.18 It would not be reasonable nor good practice to design infrastructure on the basis that policies and actions that are uncertain, or not yet supported by funded delivery plans, will not be realised within the lifetime of the infrastructure.

Proposed Alternative Design

- 10.4.19 SCT, in its submission to the second public consultation, proposed a station design that integrates closely with bus services, provides high-capacity pedestrian links to the east and west, and separate high-capacity cycle links to the east and west, linked directly to a large and extendable cycle park. This is achieved by building the station entrance, ticket hall and cycle parking above the platforms, integrated with a rebuilt busway bridge, also serving as a rail-bus interchange. The footprint of the station would lie almost entirely over NR land and require minimal land take from Hobson's Park. We understand this configuration was rejected on grounds of cost, complexity and other reasons. These reasons included safety issues related to bridge strength and the mix of pedestrian, cycle and bus traffic in a constrained area at height.²⁶³

- 10.4.20 Disruption during construction would be unavoidable, but a temporary bus and cycle diversion via Addenbrooke's Road and Hobson Avenue and, for cycles and pedestrians, Whittle Avenue, would be feasible and not overly burdensome for a few weeks. The supposed complexity of maintenance and safety issues are not explained, and can almost certainly be overcome with an appropriate design and budget. Any concerns about the visual impact may be addressed through the use of sympathetic architecture and

²⁶³ NR 7 page 107

landscaping.

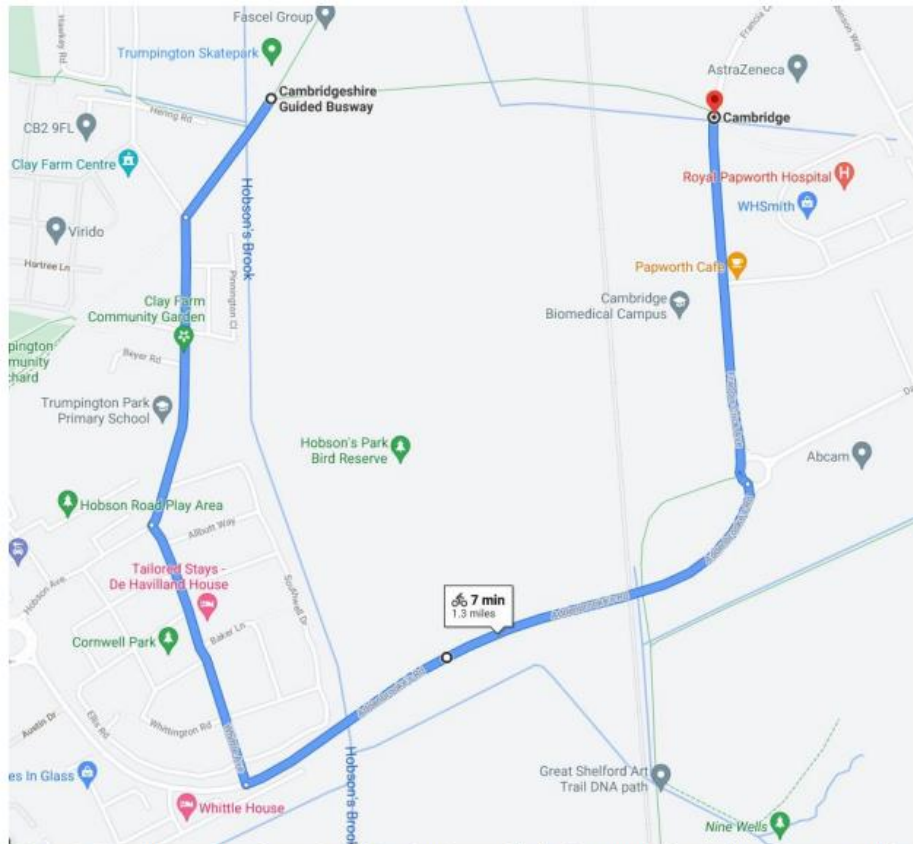


Figure 7: Diversionary route for cycles and pedestrians while the busway bridge is closed. Buses would travel via the Addenbrooke's Rd–Hobson Ave roundabout.

SCT Proof of Evidence (OBJ22-W1/1)

10.4.21 SCT recommend that NR should:

- Build the station ticket hall above the tracks.
- Rebuild the busway bridge connected to, and at the same level as, the station.
- Move the platforms north so that the ticket hall is above the midpoint of the platforms.
- Install back-to-back staircases between the platforms and ticket hall.
- Have the main station entrance on the rebuilt busway bridge, with lift access also provided on each side of the tracks.
- Include a bus station on top of the bridge immediately in front of the main station entrance. As part of rebuilding the bridge, widen the non-motorised user path, segregate it for pedestrians and cycles, and separate it from the busway by a buffer strip.
- Locate the cycle park behind (south of) the ticket hall with its own entrance to the station, and connected directly to the cycleway on each side of the bridge.
- Provide parking bays at ground level only for disabled people, railway workers and deliveries.

- Do not provide a taxi rank or private pick-up/drop-off area. Limit vehicular access to disabled users and railway workers. All train services that stop at Cambridge South also stop at Cambridge station, which will continue to be accessible by taxi and private cars. Therefore, there is no need for provision for car pick-up or drop-off at Cambridge South station.

10.4.22 This would have the following advantages over the proposed station configuration:

- It accommodates a much higher flow of people into and out of the station, and onto and off the platforms.
 - Pedestrian flow capacity between the ticket hall and platforms is doubled without widening the platforms.
 - The furthest walking distance from one end of a 12- or 10-car train to the ticket hall is half that of the proposed station design, or approximately 120 metres less.
 - The walking distance between bus stops and the station entrance is under 20 metres.
 - There is minimal conflict between people walking and cycling to or from the station, as the approach routes are fully segregated from Francis Crick Avenue and the Trumpington busway.
 - The junction of the busway and Francis Crick Avenue can be engineered optimally for buses without creating additional conflicts or inconvenience to people walking and cycling.
 - The footprint of the station is mostly within the boundary of land owned by NR, with minimal incursion into Hobson's Park.
 - The cycle park may be extended relatively inexpensively in the future, entirely above land owned by NR.
 - As vehicle access from Francis Crick Avenue would be used only by disabled station users, railway workers and delivery vehicles, there would be minimal conflict with people walking or cycling, and with bus services.
 - The single-entrance design requires fewer staff than the proposed two-entrance design. For all the reasons given above, SCT believe this option needs to be given serious reconsideration.

that the CSIE Project will address those problems. The only point that divides SCT and NR is whether the CSIE Project should pre-emptively account for the demand calculated by Mr Leigh's "radical" modelling (c.9 mppa), or whether the CSIE Project should, as NR contends, account for the demand calculated by the DfT's approved methodology (2.3 mppa, albeit sensitivity tested for 6mppa). SCT has, to that end, provided a schematic alternative for an over-railway development that it says will cater for their projected demand, and will integrate better with the bus services by providing bus stops within 20m of the entrance.

10.4.24 Mr Leigh's modelling has no policy or other industry support, and that the modelling undertaken in support of the Draft Order is consistent with the methodology mandated by and accepted by the DfT. Indeed, it was undertaken on their behalf. To accept Mr Leigh's alternative would be to impose upon the public purse an overdesigned solution; to fail to take stock of the constraints of the site and the need to provide for equitable access for all, and likely result in greater land take within the Green Belt/public open space of Hobson's Park.

10.4.25 The attitude of "*build it and they will come*" that essentially underlies SCT's approach is inconsistent with both the realities of a Government funded project, where expenditure must be carefully and robustly justified, and compulsory purchase law and practice which – for public interest reasons – requires land take to be no greater than what is required.

10.4.26 SCT's objections covered the following principal points, which NR address in turn: alternative modelling of passenger demand, and an alternative station that would better integrate with the existing transport links. Other detailed points made in relation to the Transport Assessment and other application documents were addressed in detail in the evidence of Messrs Hilling and Wingfield.²⁶⁴

Modelling for passenger demand: inconsistent with DfT policy

10.4.27 Mr Leigh acknowledges that he has no professional experience of modelling demand for railway stations. By contrast, the modelling undertaken on behalf of the DfT was completed by Mott MacDonald, a well-known and well-respected national consultancy with relevant experience to undertake that type of work. As would be expected, Mott MacDonald conducted that modelling in accordance with the requirements of the Government guidance, *TAG UNIT M4, Forecasting and Uncertainty (TAG4)*, adherence to which is explicitly required for all projects intended to be funded and approved by the DfT. That modelling has subsequently been reviewed by the DfT's Centres for Excellence; the DfT has accepted it at SOBC and OBC stage; and that the DfT has committed to funding the CSIE Project on the basis of the forecasts. It has been subject to sensitivity tests, the specification of which were agreed by the DfT.²⁶⁵

10.4.28 Mr Leigh accepts that the modelling work carried out was in accordance

²⁶⁴ NRE2.2 paragraph 9.1.166, NRE2.3 Appendix G, NRE11.2, paragraph 9.8.9) and NRE-REB-05

²⁶⁵ REB-05 page 8

with TAG4 methodology. His view is essentially that the modelling process mandated by it is inappropriate, and that an alternative, bespoke method could and should have been used. At some points, Mr Leigh suggested that TAG4 might in fact allow for the *ad hoc* methodology he has employed. That is incorrect. All DfT funded projects “are required to adhere to the methodology set out in [Section 8.1]”.²⁶⁶ (There are “a small number of circumstances” where alternative approaches can be employed, but even these alternative approaches are set out, being those in TAG4 Section 8.2 or the Passenger Demand Forecasting Handbook (PDFH) and a now-withdrawn guidance document may be more appropriate. Mr Leigh rightly accepted that his methodology did not fit within the alternative methodologies set out in Section 8.2 or the Passenger Demand Forecasting Handbook. This is hardly surprising given what he described as the “radical” approach he took to applying decarbonisation policy in his modelling, which he further described in his own oral presentation as “not [being] approved by the DfT”.

10.4.29 Mr Leigh could point to no other existing Government or industry policy or guidance document that supported his particular methodology. It is entirely novel. Moreover, while he conjectured that there might be other projects that followed a similar unique methodology, he could give no examples. It is respectfully suggested that it is not for the Inspector to determine that the DfT’s modelling methodology, which it accepted has been correctly applied, is wrong, and it would be frankly perverse for the SoST to proceed on the basis that his own department’s forecasting methodology was inappropriate.

10.4.30 Similarly, regardless of whether Mr Leigh is right that DfT policy fails to act on the Government’s commitment to Net Zero or decarbonisations strategies and that the DfT is “*behind the curve*” in this regard, is not a matter for the Inspector to determine. That is a matter for Government itself in a macro-level review of its recommended approach, and not on an ad-hoc, isolated-case basis.

10.4.31 Mr Leigh’s attempt to cast doubt on the forecasts with the suggestion that any modelling is a matter of probability is of course correct. The use of established and consistent methodology helps to ensure that future uncertainties are accommodated in a manner that is both consistent and considered appropriate by Government, albeit with due allowance for the need for case-specific flexibility (as employed in this case, e.g. in relation to increased employment growth during the Plan period).²⁶⁷

10.4.32 NR accepts (as does relevant modelling policy) that rail stations should be stress tested to ensure that they can continue to deliver the transport benefits when the forecasted demand is exceeded, and that has been done. NR has stress tested the station capacity, and that of the related pedestrian and cycle infrastructure for 6 mppa, nearly three times more than the expected 2.3 mppa, and the CSIE Project passed that test. SCT’s core

²⁶⁶ INQ 15 paragraphs 8.1.5 & 8.4.1

²⁶⁷ REB-05 Section 6.2

concern has already been amply taken into account.

- 10.4.33 The Inspector is invited to place no weight on Mr Leigh’s reliance on Cambridge North, which he claimed had already exceeded the forecast demand set out in its business case. He was unable to identify the source material for his claims. NR was not responsible for that project’s business case, and has not been able to confirm whether any forecasts have been exceeded. No evidence is before the Inquiry that suggests that Cambridge North is or will at any point be over capacity.
- 10.4.34 As a sense check, it is worth recalling that Mr Leigh’s estimate of 9mppa would make Cambridge South busier than Oxford or Milton Keynes stations (two extremely busy commuter stations) pre-pandemic. That is inherently unlikely, and Mr Leigh’s overall response, namely that the situation could look very different in 2043 is unconvincing.
- 10.4.35 There was considerable emphasis in Mr Leigh’s presentation upon a “significant error” in Mr Wingfield’s proof relating to his addition of a number of trips estimated to be removed from the highways to the overall estimated forecast demand. However, under cross-examination Mr Leigh properly and swiftly conceded that Mr Wingfield’s error was not that he should have added a larger figure to the overall estimated demand, but that he had treated it as an additional demand at all. Consequently the error was not a significant one and there is no evidence that passenger demand is likely to exceed the 6mppa capacity of the station at any point.
- 10.4.36 Finally, while Mr Leigh refused to answer whether he would prefer the CSIE Project over the “do nothing” scenario on the basis that this was a false dichotomy, the reality is that this is a real choice facing this Inquiry. As Mr Wingfield explained, if the CSIE Project is not consented, there is no guarantee that the DfT will fund another, bigger station in Cambridge South (or indeed the same station in a different funding period).

NR’s view on the alternative: irrelevant in law, flawed in practice

- 10.4.37 NR believe that the alternative proposed by SCT is not in law a relevant consideration for the Inspector. An alternative may only be considered to an acceptable proposal where, in essence, it is an exceptional case where it is appropriate to do so, and where (i) there is a realistic prospect of that alternative coming forward and (ii) that alternative is sufficiently well defined.²⁶⁸ Were it otherwise, the consequences would be stark: decision-makers would “*constantly have to look over their shoulders before granting any planning application against the possibility of some alternative planning outcome, however ill-defined and however unlikely of achievement*”.²⁶⁹
- 10.4.38 The CSIE Project, for the reasons given above, will respond to the predicted passenger demand, forecast consistently with the relevant methodology set out in TAG4. There is not an exceptional case where

²⁶⁸ See *R(oao Mount Cook Land Ltd) v Westminster CC* [2004] P&CR 22 [30]ff; *R(oao Zipporah Lisle-Mainwaring) v Carroll* [2017] EWCA Civ 1315, [15]

²⁶⁹ Mount Cook paragraph 32

alternatives are relevant. In any event, even if it were, the alternative put forward by SCT is vague and inchoate; there is nothing even approaching a rough plan for the station. Mr Leigh described the proposals depicted as 'arbitrary' in some respects. There is, also, no realistic prospect of that alternative coming forward in the event that the CSIE Project is not consented.

- 10.4.39 Leaving that point aside, the alternative is wholly unsuitable. It involves a single station, built on a podium above the railway, with bus stops directly outside it on Addenbrooke's Bridge, and cycle parking on a deck above the station.²⁷⁰ Construction would involve the demolition and rebuilding of the Guided Busway Bridge. That is in and of itself a significant cost (in the region of £30 million) which is unjustified on the methodology accepted by the DfT. Mr Barnes also explained that there would be a number of consequences to SCT's project, from the potential need to demolish further bridges, to signalling challenges, to the need to address potential concerns about fire safety.
- 10.4.40 It would also require diversion of the CGB and a significant extension of the travel time for cyclists and pedestrians during the construction period. The suggestion that this could be achieved within "a few weeks" is not only unsupported but plainly wrong.²⁷¹ Mr Barnes' unchallenged evidence was that partial demolition and reconstruction would take between 6 to 9 months, including multiple closures of the railway. CCoC, who own the CGB, have already made clear that they do not support the alternative.²⁷² There is no realistic possibility of SCT's alternative ever being consented in the absence of that stakeholder's support.
- 10.4.41 The operation of the alternative is equally unsatisfactory. One of the DfT's core requirements for the CSIE Project is the accessibility of the station for all. This is important as a matter of principle – but especially given the proximity of hospitals and likelihood that individuals travelling from international transport hubs will be encumbered with luggage. Mr Leigh suggested that those who could not be accommodated in Cambridge South could simply travel to Cambridge Station and then arrange onward travel to the CBC, as they currently do. It scarcely needs to be pointed out that this somewhat surprising suggestion is fundamentally contrary to aims of Cambridge South as well as those SCT purports to advance.
- 10.4.42 The suggestion that courtesy NHS or CBC bus services be offered to serve the CBC and the hospitals is fanciful. The SCT proposal has no drop-off area, and they would have to be provided from a near-by parking area. They would still not provide the convenience of a taxi point directly outside the station. Nor is it readily apparent whether NHS resources could (or should) extend to providing such courtesy services. SCT simply assume that such a service could be provided to make up for what is, in effect, a shortcoming in the station design. This is yet another illustration of why the

²⁷⁰ OBJ22, page 14 provides a schematic representation

²⁷¹ OBJ22, page 9.

²⁷² INQ 16

proposed alternative is deeply flawed.

Integration with Buses and Cycling: No policy basis

- 10.4.43 While SCT suggest that the busses are a seven minute walk, that is based on the entirely unrealistic assumption that all persons would have to walk from the very last carriage of a 12-carriage train. If it were a real criticism of this station, it would be a criticism of stations all over the country, which have entrance/exit points at one end of the train. It will also be appreciated that no policy requires that bus stops be provided within a fixed perimeter of a station, still less that they be provided within the arbitrary distance of 20m that SCT refers to. Mr Leigh accepted that the proposals for bus interchange did not conflict with planning policy.
- 10.4.44 SCT referred to the Williams-Shapps Report and the Bus Back Better Strategy, neither of which are development plan documents, and neither of which lay down the 20m perimeter that SCT seek to rely on. SCT's drastic remodelling of the station – at great expense to the taxpayer and other constraints in the site – therefore has no policy foundation and would provide only a minimal improvement in terms of bus integration over the CSIE Project which already ensures (as above) good integration with existing bus stops.
- 10.4.45 SCT criticised the amount of cycle parking provided, but in cross-examination accepted that there was no breach of national or local planning policy in respect of the cycling provision. NR has built in a degree of spare capacity for the cycle parking (1000 spaces instead of 800), for a station whose peak capacity is estimated to be 2.3mppa. Yet SCT's proposal – ostensibly for 9mppa – contains only 1600. Mr Leigh's response was that demand for cycle parking is not linear and, that the actual number of cycle parking shown was arbitrary, and more could be provided if the concrete deck were built larger. Mr Leigh accepted that this would mean building something larger than what was actually needed.

Conclusion on the case for SCT

- 10.4.46 NR observed that SCT's ambitions are laudable – maximising public transport opportunities and integration is self-evidently a good thing. But those aims cannot be pursued at any (financial or environmental) cost. The station it proposes is not needed, is inappropriately scaled for its context, and consequently the additional disruption and cost to which it would give rise are unjustified. By contrast, NR's design is based on the DfT's own forecasts, which adopt tried and tested demand forecasting methodology, and have regard to the constraints of both the site and the public purse. SCT agrees it would address the needs that it is intended to serve, and give rise to the benefits claimed. There is consequently no need for the Inspector or the SoS to look beyond it.

11 THE CASE FOR OTHER OBJECTORS

- 11.1 The response of NR to the outstanding objections is set out at paragraphs 368 – 449 of NR's closing submissions (INQ 61) and within the evidence of

various witnesses. A schedule of the objections and NR's response to these objections, as well as those in Section 10 of this Report, is appended to Mr Wingfield's Proof of Evidence (CD NRE11.3).

11.2 OBJ 01 St John's College Cambridge

- 11.2.1 Acquisition of replacement land for exchange open space land Land is to be acquired to mitigate the loss of open space. Four possible sites were considered for the Exchange Land and these were scored accordingly. The scoring appears arbitrary and unjustified. For example, the quality of site EL4 has been scored 3 on the basis that the site is directly south of OS1(Hobson's Park). However there is a significant road between OS1 and EL4. Therefore this should have scored 2 points as per EL1, EL2 and EL3.
- 11.2.2 Similarly, EL4 was given a score of 4 for accessibility on the basis that the site would be directly connected to PL1 (Hobson's Park) via a new accommodation bridge. The new accommodation bridge is designed to provide the landowner with an alternative means of access to replace the two existing level crossings. Without this accommodation bridge the site would have scored the same or less than the alternatives. Therefore as the owner requires an accommodation bridge for future access, this has resulted in them being unfairly scored in relation to the open space requirement which in turn will require a significant area of land being compulsory acquired. The College believe that the scoring matrix should be reviewed by an independent consultant rather than by NR who are promoting the project. This would ensure that the outcome is fair and reasonable.
- 11.2.3 Closure of Dukes and Webster's level crossings and new access arrangements. It is proposed to close to existing level crossings and create a new access from Addenbrooke's Road. The College assert that there are a number of significant issues with this proposal:
- 11.2.4 NR have advised that the College will be granted a right of way from the public highway to the proposed accommodation bridge, with such a right of way being restricted to agricultural use only. St John's College believes that the existing two level crossings are not restricted to agricultural use and NR have been asked to provide evidence of any such restriction. NR have failed to provide such evidence and therefore the new right of access must be unrestricted.
- 11.2.5 No design information has been provided to show the width and specification of the accommodation bridge. Webster's Crossing has no restrictions in the form of the width or weight of vehicles which may use it. The new accommodation bridge must therefore be similarly unrestricted allowing its use by any width and weight of vehicle. The lack of design detail also gives the landowner no comfort that they will have complete control over this alternative access. Should a member of the public park in front of the access then the tenant of the farmland would be unable to obtain access or egress from the land which this serves. Any business cannot be potentially restricted in this way.
- 11.2.6 They believe that there is no design to show how an access will be taken

from the accommodation bridge across the open space land to the retained agricultural land. There needs to be a private unrestricted track linking the two to ensure that firstly such access rights cannot be obstructed by the general public, but secondly to eliminate any health and safety risks which would be created as the result the access road passing over public open space.

- 11.2.7 *Land being acquired for a permanent railway systems compound* An area of land adjoining the footbridge located at Shepreth Branch Junction is being shown to be acquired for a new compound no detail has been provided in terms of why this land is required and how it is to be used and how it will interact with the existing Sustrans Cycleway. Furthermore, rights have been acquired across the land owned by St. John's College to provide a new means of access to this compound. Compulsory acquisition of lands and rights over land should not be granted to NR until they are able to provide detail of what the land is to be used for and why it has to be acquired.
- 11.2.8 Costs The College note that NR are refusing to cover any landowners' costs except those in relation to the claiming of compensation in relation to the scheme. This does not encourage landowners to enter into dialogue with the Acquiring Authority, nor attempt to find solutions to problems as it will give rise to costs for the landowner. In other situations it would be expected that the Acquiring Authority would cover all costs in relation to his scheme other than those incurred in drafting an objection.

NR Response to Objection by St John's College Cambridge

- 11.2.9 The only substantive objections from St John's College have been, first, to ensure the accommodation bridge can safely accommodate agricultural vehicles and, second, to ensure a general right of way over that bridge.²⁷³
- 11.2.10 The accommodation bridge is wider than both the gates at Webster's and Duke's No. 2 and able to accommodate all vehicles currently using the Crossings. There are ongoing discussions with a view to agreeing how access by the Websters (the agricultural tenants) can best be managed. It is likely that (i) the vehicular accommodation bridge will be secured by locked gates with both St John's and the Websters being provided with a key and (ii) users of the Exchange Land using a segregated access adjoining/parallel to the accommodation bridge (not currently shown on the drawings) to access that land. The limits of deviation for those works are broadly drawn so as to allow for room for negotiation on how the accommodation bridge will be provided.²⁷⁴ This will fully address St John's safety concerns, as it will provide segregated access to the Exchange Land.
- 11.2.11 To grant a general right of way over the accommodation bridge would be to extend the rights currently enjoyed by St John's over the Crossings. NR's position is that it is not required to provide for greater rights than currently exist. The extent of rights over the Crossings is a legal matter for legal submission and is summarised at INQ 40 and is addressed above in Matter

²⁷³ INQ 61 Paragraph 426

²⁷⁴ NR09 Sheet 6

3(a).

Acquisition of replacement land for exchange open space land

11.2.12 The Objector has incorrectly interpreted the matrix scoring. The Quality score for site EL4 is shown as 3 (and not 4) compared to a scoring of 2 for sites EL1, EL2 and EL3. The distinction between the two scores as stated under the Quality criterion in Table C is that sites EL1, EL2 and EL3 are located on the east side of the railway line with no direct connectivity to Hobson’s Park or Long Road Sixth Form College grounds.²⁷⁵

11.2.13 EL4 is located directly to the south of Hobson’s Park and to the west of the railway line. A maintenance track separates Hobson’s Park and site EL4. A Quality score of 3 (matching the existing situation) is considered to be appropriate. In any event, I note that reducing the quality score by 1 would not change the overall conclusion that site EL4 is the best performing option.

Railway Systems Compound Land

11.2.14 Plot 098 will be used to congregate railway plant in advance of possessions of the railway to enable rapid access via a Road Rail Access Point at the east of the closed Webster’s Level Crossing. Railway closures are typically overnight. The envisaged interface between the compound and NCN11 would be similar to the existing interface between the User Worked Crossing and the cycle way. This would be a combination of “line of sight” by cyclists and pedestrians and some form of site traffic marshalling to be developed by the Maintenance Organisation during the limited periods of operation of the compound.²⁷⁶

Costs

11.2.15 NR have provided undertakings for reasonable and proper surveyor and legal fees up to an initial capped amount, with the ability to quantify and approve further sums beyond that point.²⁷⁷

11.3 OBJ 02 Chris Pointon

11.3.1 The station is needed given the expansion of the CBC and the likely routing of the East-West rail link via the Southern route into Cambridge. Mr Pointon is concerned that NR has drastically underestimated the required capacity for the station, and consequently the provision for transport links that serve it. He agrees with the views of SCT and questions how NR can disregard their detailed feedback so sweepingly.

11.3.2 Although the Institute for Public Policy Research considers the Government’s recently published decarbonisation of transport strategy to be lacking in encouragement to switch transport modes, one would hope that travel by train will increase proportionately in coming years, so infrastructure investment like Cambridge South Station should err on the

²⁷⁵ NRE 8.2 Paragraphs 6.2.1 – 6.2.9

²⁷⁶ NRE 1.2 Paragraphs 3.45-3.46

²⁷⁷ NRE 10.2 Paragraph 10.3.3

side of over-provision by current standards.

- 11.3.3 Mr Pointon wishes to challenge NR to reconsider their usage estimates, or at least demonstrate the resilience of their design should usage exceed these estimates, before an Order can be granted.

Response of NR to Chris Pointon's Objection

- 11.3.4 Chris Pointon's objection mirrors SCT's objection which is dealt with in full above. NR does not consider that it can deliver a station using public money based on unsubstantiated "hope"; it can only deliver based on what is likely. In any event, the station and the supporting pedestrian and cycle infrastructure can accommodate nearly three times the expected demand, providing reassurance that it will be fit for purpose long into the future.²⁷⁸

11.4 OBJ 03 AstraZeneca UK Ltd and Medimmune Limited

- 11.4.1 By letter dated 28 January AstraZeneca UK withdrew its objection to the Order.²⁷⁹

11.5 OBJ 04 Saba Infra Cambridgeshire Ltd

- 11.5.1 By letter dated 1 February 2022 Saba Infra Cambridgeshire Limited confirmed that it had reached an agreement in respect to the Order, withdrew its objection.²⁸⁰

11.6 OBJ 05 Environment Agency

- 11.6.1 By letter dated 21 September 2021 the EA withdrew its objection.²⁸¹

11.7 OBJ 06 Cambridge University Hospitals NHS Foundation Trust

- 11.7.1 By letter dated 28 January 2022 CuH confirmed that in the light of an Undertaking from NR to enter into a binding legal agreement to give effect to detailed commitments and assurances from NR it withdrew its objection.²⁸²

11.8 OBJ 08 Objection of University of Cambridge

- 11.8.1 The UoC agreed a SoCG with NR.²⁸³ The parties have now reached agreement in respect of Noise and Vibration (in relation to the AMB and research) in the light of the agreement to produce a Construction Phase Plan (CPP), in consultation with the UoC, for the construction of the Works authorised by the Order which are directly adjacent to the AMB site and the associated movement of plant and materials during the construction process together with agreed operational noise and vibration thresholds. Agreement has also been reached on EMI (in relation to the AMB and research) subject to any necessary mitigation. Other areas of agreement include surface

²⁷⁸ INQ 52

²⁷⁹ OBJ 03-W

²⁸⁰ OBJ 04-W

²⁸¹ OBJ 05-W

²⁸² OBJ 06-W

²⁸³ INQ 33

water drainage and highway impacts.

- 11.8.2 The parties have agreed to enter into a Land and Works Agreement (LWA) to secure the necessary mitigation measures in relation to impacts on the AMB and Plot 9. It is agreed that Article 35 of the draft TWAO would provide sufficient statutory protection to the UoC against enforcement action by the Local Planning Authority for any breach of planning control relative to conditions 42 and 47 of outline planning permission 06/0796/OUT (varied by S73 permission 14/2094/S73).
- 11.8.3 The parties agree that on completion of the LWA, no grounds of objections will remain in respect of the University's objection letter. They agree the position of all substantial areas and are in the process of finalising the specific drafting of the LWA based on the agreement.

11.9 OBJ 09 Medical Research Council

- 11.9.1 The Medical Research Council withdrew its objection by email dated 11 February 2022.

11.10 OBJ 10 CBC Estate Management Company Limited (CBCManCo) & OBJ 11 Cambridge Medipark Limited (CML) ²⁸⁴

- 11.10.1 The applicant anticipated that these objections would be withdrawn. The Programme Officer contacted both objectors for confirmation as to whether their objections were withdrawn. Such confirmation was not forthcoming and therefore these remain as outstanding objections to the scheme.
- 11.10.2 CML is the master developer for the two phases to the expansion of CBC. CML retains long leasehold ownership of the Campus infrastructure land, including the private estate roads, public realm and surface water drainage systems. The CSIE Project is likely to overlap with construction of the next building on Phase 2 of the CBC.
- 11.10.3 CBCManCo is the Estate Manager responsible for maintaining the Phase 1 and Phase 2 campus-expansion infrastructure land, including the private estate roads; Francis Crick Avenue and Dame Mary Archer Way. CBCManCo also manages other campus infrastructure, including substantial surface water drainage systems. All passengers for the proposed Cambridge South station will need access over one, or both, of these privately maintained roads. All maintenance costs for the roads, footpaths, drainage, and streetlights are charged to the building owners on the Phase 1 and Phase 2 expansion land, including CUH NHS Foundation Trust.
- 11.10.4 While CML and CBCManCo are supportive of the Scheme in principle, they object to the Draft Order on the ground that the Promoter has not provided a compelling case in the public interest for depriving them of their interests in land and, more widely, on the grounds of adverse effect upon the existing CBC and its planned and permitted expansion, including by placing additional strain on Campus infrastructure. Both CML and CBCManCo recognise the sustainability benefits of a railway station in this location but

²⁸⁴ E09/OBJ 17

it is critical that neither the operation of the existing development (and the infrastructure which serves it) nor the ability to implement the remaining development in a timely manner are impeded or otherwise prejudiced by the construction or operation of the Scheme.

Grounds of Objection

(i) Interference with land

11.10.5 As matters stand, CML and CBCManCo do not consider that it has been demonstrated that acquisition of their land and rights in land, as well as the taking of powers to use land in so far as it affects them, is in all respects necessary to implement and maintain the Scheme.

(ii) Lack of engagement and failure to take reasonable steps to acquire the land by agreement

11.10.6 While CML acknowledges that the Promoter has engaged in consultation with it, these discussions have been largely around the design and positioning of the station and in relation to land referencing rather than a genuine and meaningful attempt to reach an agreement to acquire the land that NR requires from CML. CML is disappointed by the Promoter's stance but remains hopeful that an agreement can be reached should the Promoter wish to engage with it, noting the commitment to engage in this respect set out in the Promoter's letter dated 10 September 2021.

(iii) Impact on drainage systems

11.10.7 CML and CBCManCo remain to be satisfied as to whether the Promoter has included appropriate mitigation to offset the interference with the drainage systems in respect of the land and rights it proposes to acquire both permanently and for temporary construction access, and, whether this would result in breach of CML's contractual obligations with the HCT and thereby adversely affecting CBCManCo's interests.

11.10.8 CML has two drainage ponds situated on the land subject to the Draft Order which appear to need to be relocated or culverted but it is not yet clear how this will be carried out. It is important that the replacement arrangements are put into place prior to the removal of the drainage pond(s) if they are not to remain in place but be culverted.

11.10.9 NR intends to install culverting to one of the ancient ditches (the Northern Ditch) which is fed by CUH NHS Foundation Trust. There is a lack of design detail within the Scheme as to how drainage will be managed. The Campus has no formal drainage rights and easements have been agreed with the Hobson's Conduit Trust to allow for drainage into the Northern and Southern Ditches. If the flow rate exceeds those which have been agreed with the Trust, this will breach those obligations and risk causing flooding.

11.10.10 A review of the Water Resource and Flood Risk chapter of the ES identified several technical deficiencies with the assessment of flood risk

and with the proposed drainage strategy.²⁸⁵

11.10.11 It is noted that protective provisions are contained in Parts 3 and 4 of Schedule 12 to the Draft Order, along with a proposed condition in the application for deemed planning permission. The scope of Part 4 (for the benefit of the Hobson Conduit Trust) is unclear, including whether it extends to the ditches within CML land, but in any event, these provisions do not provide adequate protection for the Campus drainage system.

(iv) Impact on other infrastructure at the Biomedical Campus

11.10.12 The proposals do not adequately mitigate the impact of the Scheme on other infrastructure at the CBC. Most passengers arriving at the station are likely to be either working or visiting one of the businesses, medical facilities or educational buildings and will either walk, cycle or get a taxi to their destination resulting in additional demands on the Campus infrastructure.

11.10.13 The number of drop-off car parking spaces appears to be insufficient for the volume of likely travellers to and from the station. As such, it is unclear how NR intends to avoid people waiting on Francis Crick Avenue and the other main routes within the campus while they await trains to arrive. Such behaviour is likely to create a serious hazard to pedestrians and cyclists as cars will need to pull up in the cycle lane when stopping on Francis Crick Avenue.

11.10.14 Further, during peak times it does not appear that the limited number of spaces will be sufficient and risks queues of traffic, illicit parking within Campus car parks, and potentially dangerous and inappropriate pick off and drop-off locations. There is also no provision for buses to access the station car park directly, meaning passengers arriving by bus will be dropped at the nearest bus stop on Francis Crick Avenue which risks creating further delays and increased danger to pedestrians.

11.10.15 Temporary road closures and diversions during construction works are also likely to have a serious impact and there are particular safety concerns in regard to the impact on the Francis Crick Avenue junction with the CGB during the construction of the new station access road.

11.10.16 The Scheme is also likely to result in many additional cyclists. The 1,000 cycle parking spaces proposed may not be sufficient, based on local experience of demand for cycle parking on the CBC. There is also likely to be an increased impact on the cycleways on the Campus which will require maintenance and may affect the usability of the routes for the Campus occupiers.

11.10.17 Furthermore, there is currently a Traffic Regulation Order (TRO) in place to ensure that the private estate roads are not used as a cut through to Long Road and the city centre. The effects of the Draft Order upon the TRO is unclear. There is wider concern that the limited area for construction will adversely impact the road network. CML and CBCManCo remain to be

²⁸⁵ E05 SoC Appendix 2

satisfied as to whether these impacts have been properly considered by the Promoter.

11.10.18 A review of the Transport chapter of the ES and the accompanying Transport Assessment identified several technical deficiencies with the Transport Assessment and with the proposed mitigation strategy.²⁸⁶ NR provided a response to a number of matters identified in the Review and the latest position of CML and CBCManCo is found at Appendix H1 of Mr Hilling's evidence.²⁸⁷

11.10.19 The mechanisms contained in the Draft Order and in the proposed conditions to the deemed planning permission, in particular condition 10, do not provide sufficient assurance that the issues of concern can, and will be, adequately addressed.

(v) Impact on the ability to bring forward the remainder of Phase 2 of the development

11.10.20 There is concern as the above issues will affect CML's ability to proceed with the remainder of Phase 2 of the development. The Scheme as currently devised will impact on CML's ability to bring forward the multi-storey carpark (MSCP) to replace the Abcam temporary carpark as part of Phase 2. The MSCP is designed to accommodate all parking for all the commercial Phase 2 development. The proximity of the main construction compound to the site of the future MSCP and also the proposed rerouting of the cycle route into this area of the Campus will, in the absence of appropriate arrangements by the Promoter, impede development in this area of the Campus.

11.10.21 More widely, there is simply insufficient information provided by the Promoter as to how the construction of the Scheme would be compatible with the construction of the remainder of the Phase 2 development.

(vi) Cumulative impact

11.10.22 GCP has stated that it is preparing to submit an application for a TWAO to enable it to bring forward its CSET scheme to construct a guided busway route which will run through CBC. The Scheme includes a permanent compound by Addenbrooke's Road which would appear to conflict with GCP's proposals and further, the GCP proposals require the remodelling of Francis Crick Avenue, which land is included within the Draft Order and from which the Promoter will take an access to the Station, to allow the guided busway route to be installed. The Promoter and GCP have not explained how the two schemes will interact and it is unclear whether they have reached an agreement for working in partnership. For this reason, the Draft Order is premature. It is considered on present information that the Promoter's assessment of cumulative impact with the GCP proposals is

²⁸⁶ E05 SoC Appendix 3

²⁸⁷ NRE 2.3 page 113 -130

inadequate.

(vii) Additional infrastructure maintenance costs

11.10.23 The addition of a new station will increase the vehicular movements upon the existing privately owned roads during construction and may increase them during operation. This is likely to require additional maintenance. In addition, the proposed access way into the station located near to the Guided Busway and additional peak hour traffic may result in a need for additional traffic management to regulate the movement of vehicles along Francis Crick Avenue. In so far as NR wishes to take the benefit of the use of the private roads by compulsion, it should also be required to accept the burden of increased maintenance costs and any other costs relevant to their use as authorised by the Draft Order.

11.10.24 Article 14 of the Draft Order only provides for the payment of compensation for loss or damage so that increased maintenance costs attributable to the station's construction and use would fall to be paid by the campus occupiers/building owners under their lease arrangements as shareholders in CBCManCo. It is not equitable that there should be no contribution to on-going maintenance from the Promoter as a new occupier of the campus.

11.10.25 The Promoter should therefore make an appropriate contribution towards maintenance of the campus infrastructure. An undertaking should also be provided for the legal fees in relation to the works which will be necessary to ensure the operational requirements of the services and infrastructure are protected.

(viii) No compelling case

11.10.26 For the above reasons, the Promoter has not provided a compelling case in the public interest for interfering with CML and CBCManCo's interests in land.

NR Response²⁸⁸

11.10.27 At the Inquiry NR advised that it was negotiating agreements with OBJ10 and OBJ11 and had agreed Heads of Terms and that it was anticipated that these objections would be withdrawn.

11.10.28 It also states that the objections have largely been addressed elsewhere. Namely the justification for the Draft Order (SoM 1 and SoM 9); drainage (SoM 3g), roads (SoM 3(a) to (d)); the interaction between the CBC and other modes of transport (SoM 3(d) and SoM 5); and the CSIE Project's impact on the ability to bring forward Phase 2 of the development of the CBC.

11.10.29 Since these Objections are not withdrawn as expected by NR, NR relies on the responses given to the issues raised in its proofs of evidence. NR

²⁸⁸ INQ 61 Paragraph 432

summarise these below.

11.10.30 A response to the Drainage Strategy Review is provided at Appendix A of Sue Brocken's Evidence²⁸⁹ and a response to the Transport Assessment is provided at Appendix H of Mr Hilling's Evidence.²⁹⁰

Extent of acquisition

11.10.31 As part of a series of engagement meetings with CBCManCo, NR has provided explanations in respect of the acquisition of land and rights in land and powers to use land, including provision of a table setting out areas of the CBC estate over which compulsory powers of acquisition are being sought and detailing the extent of acquisition powers and a brief description of the proposed use. NR understand that this explanation is acceptable to CBCManCo.²⁹¹

Lack of engagement to acquire land and rights by agreement

11.10.32 Discussions with the objector are ongoing. Prior to its TWAO application NR held bi-monthly meetings with the objector as part of a wider interface with the CBC. Engagement meetings with CBCManCo, as set out in the Engagement Summary in the Appendix (NRE10.3) have continued. Whilst agreement has not been secured Draft Heads of Terms (HoTs) for the voluntary permanent acquisition of CML's land were issued on 6th January 2022.²⁹²

Concern as to the impact of the CSIE Project on the ability to bring forward the remainder of Phase 2 of the Development

11.10.33 NR will continue to work collaboratively with CML to develop construction methodologies and management requirements to ensure that both parties' projects can be developed concurrently without either having the effect of precluding delivery of the other. These arrangements will be included in a legal agreement that is in the process of being discussed and developed with CML.²⁹³

11.10.34 NR have responded to the objections raised and confirmed the nature of interests affected and the purpose for the temporary or permanent acquisition. NR will continue to engage to resolve and clarify the issues raised.

11.10.35 NR propose to include a mechanism within a separate Land and Works Agreement with both Cambridge Medipark Limited and CBC Estate Management Company Limited to work collaboratively with both parties to ensure sufficient information is available to develop construction methodologies and management requirements so that both projects can be developed concurrently without either having the effect of precluding delivery of the other. NR do not believe there are any areas of conflict

²⁸⁹ NRE 10.2

²⁹⁰ NRE 2.3

²⁹¹ NRE 10.2 Paragraphs 10.9.2 & 10.10.2

²⁹² NRE 10.2 Paragraph 10.9.3 & 10.10.3

²⁹³ NRE 10.2 Paragraph 10.9.4 & 10.10.4

between the projects which cannot be resolved.²⁹⁴

Lack of compelling case

11.10.36 The compelling case for the CSIE Project is dealt with above. NR says it has provided an explanation in respect of the acquisition of land and rights in land and powers to use land, including provision of a table setting out areas of the CBC estate over which compulsory powers of acquisition are being sought and detailing the extent of acquisition powers and a brief description of the proposed use. NR understand that this explanation is acceptable to CBCManCo.²⁹⁵

Impact on drainage systems²⁹⁶

11.10.37 A 1D analysis of the North Ditch has confirmed that there is sufficient capacity within the system to not breach during the 1 in 100 year event plus 40% climate change allowance. The culvert extension will be appropriately sized to convey the existing flows. There would be no loss of flood storage and identical pass forward flows, therefore the post development scenario is considered flood neutral.

11.10.38 The EA have been consulted relating to the culverting of the North Ditch. Following further consultation and provision of additional modelling data, the EA subsequently withdrew their objection.

11.10.39 Discharge from the proposed development as a whole will be attenuated to greenfield run off rates of 2 l/s/ha which will be agreed with the LLFA within the formal ordinary watercourse consenting process prior to construction.

11.10.40 The proposed development has separate discharges for track and station to reduce the risk to all stakeholders, in addition, there are no direct interfaces between the proposed track/ station drainage networks and the existing networks with the exception of a temporary connection during construction from the UoC site.

11.10.41 NR are currently offering commitments in Heads of Terms whereby NR will ensure that they, as a consequence of either accommodation works or permanent works that CBC/ CML are not put in a worse position in relation to drainage flows currently utilised. NR has also given commitments to ensure that the works will not put CBCManCo/CML in breach of any contractual drainage flows they are currently required to comply with and to also engage with them on the final drainage design details.

Impact on Francis Crick Avenue²⁹⁷

11.10.42 The Transport Assessment predicts that vehicular trips would account for 5% of total trips which equates to 36 vehicular trips during the peak hours, or one every 2 minutes. Most drop-offs are likely to involve less than a

²⁹⁴ NRE 9.2 Paragraph 7.2.59

²⁹⁵ NRE 10.2 Paragraphs 10.9.2 & 10.10.2

²⁹⁶ NRE 5.2 paragraphs 10.2.48 – 10.2.54

²⁹⁷ NRE 2.2 Paragraphs 9.1.97-9.1.105

minute dwell time, whilst pick-ups are likely to be limited to 10 minutes dwell time.

- 11.10.43 Given the above, 3 pick-up/drop-off bays and 3 taxi bays will provide sufficient capacity for the predicted level of demand. For this reason, the possibility of vehicles stacking back onto Francis Crick Avenue and impacting upon through traffic is unlikely.
- 11.10.44 The east forecourt of the station is very constrained in terms of available space and needs to accommodate disabled parking, staff parking, taxi bay and cycle parking. No space is available for bus stops in this area.
- 11.10.45 Bus stops are located on both sides of Francis Crick Avenue to the north and south of the station. The existing Guided Busway runs along the northern boundary of the proposed station and includes services to Cambridge city centre and Trumpington Park and Ride. The closest Guided Busway stops in each direction are located outside Royal Papworth Hospital approximately 250m east of the proposed station. The Guided Busway stops have shelters and timetables and serve Guided Busway routes A and D.
- 11.10.46 The Transport Assessment indicated that additional demand for public transport services generated by the station could be easily accommodated by existing bus services along the CGB and Francis Crick Avenue. The pedestrian crossing across the southern arm of the Francis Crick Avenue/Guided Busway junction will be widened which will improve safe connections between the station and local bus stops.
- 11.10.47 In order to minimise potential impacts on users of Francis Crick Avenue and other roads within the CBC, the principal Contractor will ensure that the extent and duration of any required road closures during the construction are limited. Where required, temporary traffic management measures, including the use of traffic marshals, would be employed to address any potential safety concerns and to minimise impacts on other road users.
- 11.10.48 Construction haul roads HR3 and HR 6 would remove most construction traffic from Francis Crick Avenue. Design and mitigation measures designed to minimise negative effects during construction and operational phases are outlined in Section 17.4 of the ES (NR-16). The identified and other relevant mitigation measures will be included in the CTMP which will form part of the CoCP Part B.

*Cycle Parking*²⁹⁸

- 11.10.49 It is predicted that 24% of trips to/from the station will be cycling trips which equates to about 780 return trips per day in 2031. 1000 cycle parking spaces will be provided on both sides of the station which will provide sufficient capacity. Improved cycle links will be provided to access the station.
- 11.10.50 During AM and PM peak hours, on the east (CBC) side, cycle trips to and from the station are predicted to equate to 82 trips per hour, or slightly

²⁹⁸ NRE 2.2 Paragraph 9.1.116-9.1.118

more than one cycle movement per minute. This level of additional demand could be easily accommodated within the existing cycleways on the campus and proposed improvements without material impact on usability of the existing routes, and within the level of proposed cycle parking at the station. NR is currently liaising with Cambridge Medipark Limited regarding potential contribution to maintenance costs and any other costs relevant to infrastructure use in the CBC.

11.10.51 The TRO will remain unchanged with enforcement continuing using the existing ANPR system to ensure that the private estate roads are not used as a cut through to Long Road and the city centre.

*Additional infrastructure maintenance costs*²⁹⁹

11.10.52 Although the station is likely to generate 36 vehicular trips during the peak hours, background traffic is likely to reduce on the CBC road network due to modal shift from road to rail. As such the view that "a new station will undoubtedly increase the vehicular movements upon the existing highway infrastructure" is not correct.

11.10.53 The addition of the extra stage at the Francis Crick Avenue / Guided Busway junction for the station exit arm will result in degrees of saturation which are below the acceptable limit of 90% in all scenarios. The modelling results demonstrate that traffic generated by the proposed station will have minimal impact on the proposed access junction. The proposed CSET scheme would incorporate an alternative station access to the south under priority junction control involving left in left out turning movement, which would have a minimal impact on the operation of Francis Crick Avenue (and which in any event is not an impact of the CSIE Project).

11.10.54 NR agrees in principle with the requirement for a maintenance contribution and has been engaging constructively to come to an agreement on the value of this. This commitment will be included in the agreements being drafted between the two parties.³⁰⁰

*Cumulative impact*³⁰¹

11.10.55 NR are negotiating a Protocol Agreement with GCP to manage the interfaces between the two projects that confirm that both schemes can be delivered concurrently in order to minimise construction impacts on the local area. The agreement also demonstrates how both schemes will interact during operational phases and maximise intended benefits of each scheme. The CSET scheme will involve a complete reconfiguration of the Francis Crick Avenue/ Guided Busway junction and Francis Crick Avenue, as well as the adjacent pedestrian and cycle infrastructure. The final junction layout is to be confirmed by GCP. As such, undertaking a cumulative impact of the CSET scheme for the layout proposed as part of the CSIE Project would be meaningless (because it effectively involves replacing the current arrangements). Therefore, the cumulative impact taking into account both

²⁹⁹ NRE 2.2 Paragraph 9.1.106-9.1.111

³⁰⁰ NRE 11.2 Paragraph 9.8.7.2

³⁰¹ NRE 2.2 Paragraph 9.1.121-9.1.123

schemes will have to be undertaken by GCP as part of their TWAO application complementing each other.

11.11 OBJ 12 Cadent Gas Limited

11.11.1 Protective provisions have now been agreed with NR and the objection is withdrawn.

11.12 OBJ 13 Cambridge Group, Ramblers

11.12.1 As a result of further correspondence and clarification between NR and Cambridge Ramblers the objection was withdrawn by email dated 20 December.

11.13 OBJ 15 Objection of The Pemberton Trustees ³⁰²

11.13.1 The Pemberton Trustees and their associated farming partnerships and other businesses are the owners of and/or occupiers of property near Addenbrookes Hospital, Cambridge Medipark, and Trumpington Meadows, and agricultural land to the south and east of Cambridge. Whilst the Pemberton Trustees are supportive of the proposed scheme, there are various proposals set out in the TWAO application that the Trustees object to. A part of the land is subject to leasehold interest to Cambridge Medipark Ltd, which is the principal developer for CBC.

11.13.2 The Extent of Land Taken Parts of this land are subject either to leases to CML, or opted for leases for future development, for the provision of infrastructure, or for the provision of the Country Park and green environment. The extent of land permanently acquired should be kept to a minimum and The Pemberton Trust object to the extent of property being acquired.

11.13.3 The Nature of Rights Taken The Pemberton Trustees have been provided with an outline arrangement for the permanent acquisition of land and the acquisition of temporary rights. The Pemberton Trustees consider that the rights sought by NR could be achieved through acquisition of rights rather than permanent acquisition of land. They therefore object to the proposed scheme of acquisition.

11.13.4 Infrastructure Limited detail has been provided of the impact on the existing and proposed infrastructure in the form of roads, drains, services, and green infrastructure in the Country Park.

11.13.5 No detailed design has been provided as to the layout of access arrangements from existing roads to the proposed station. There is also impact on the access to future developments. These do not appear to have been taken in to account in the outline layout of the scheme.

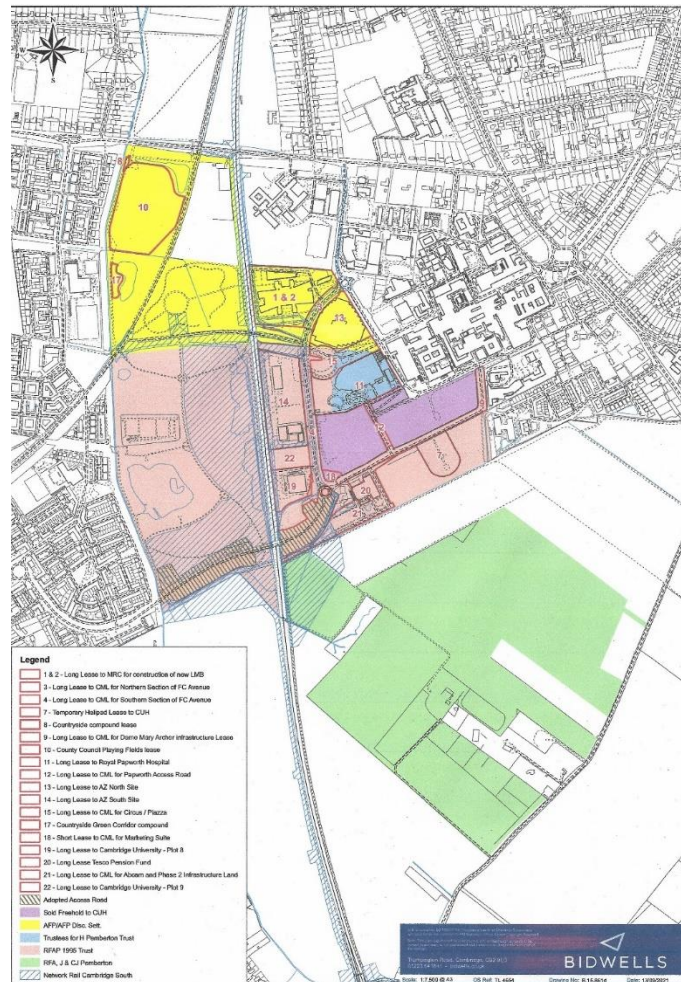
11.13.6 Land drainage – The land take includes open drainage ditches and systems that provide storm water drainage from the existing and proposed developments, the Country Park, and from the surrounding farmland.

³⁰² E08 OBJ15 SoC

Limited detail has been provided as to the nature of the works to be undertaken to maintain that drainage. Without such detail it is considered unsatisfactory to replace open ditches with underground culverts of limited capacity.

11.13.7 Green space and the Country Park – To the west of the railway line, the Medipark development provides for the provision of the Country Park and access for the public to open spaces and the proposed scheme reduces the extent of this, which potentially impacts on the arrangements of future development and the creation of the park.

11.13.8 Farm access – The land and rights to be acquired is on property immediately adjacent to farmland that is in the ownership and occupation of The Pemberton Trustees and its farming businesses. The farmland is situated east of the track and south of Addenbrooke’s Road (shown shaded green). There is an adverse impact on the access to this land and the provision of future access appears to also adversely impact on, or conflict with, the provision of realigned public access and cycleways, which potentially restricts access to the retained farmland. Further detail of a satisfactory arrangement for this access is required.



Pemberton Trustees Statement of Case (E08 OBJ-15)

11.13.9 *Cambridge Guided Bus* The TWAO application for Cambridge South Station is running concurrently with the CSET application for the extension and construction of a guided bus. There appear to be areas of potential conflict over land acquisition, access rights, or temporary acquisition of land for works, and the combined provisions of the Cambridge South Station and the guided bus appear to conflict with existing transport arrangements, much of which is over privately owned roads within the Cambridge Medipark. There appears to be a lack of collaboration and alignment of interests in that separate consultations and schemes are taking place and there is an opportunity for collusion that would create a more beneficial and less damaging transport arrangement.

NR Response to Pemberton Trustees

11.13.10 Their objections focus on the following:

a. Nature, extent and justification for the land and rights taken. This is dealt with generally at Matter 9 and specifically in the evidence of Mr Simms. The nature and extent of the rights taken is set out in detail in NR8 and NR9, and have been explained in a number of meetings between NR and the representatives of Pemberton Trustees. It is necessary to acquire that land and those rights in order to deliver the CSIE Project. Since the Pemberton Trustees' objection, the extent of temporary land take in Hobson's Park has been substantially reduced.

b. Access arrangements, including farm access. Access is dealt with generally at Matter 3(b) and 3(c) and specifically in the evidence of Mr Hilling.³⁰³ The access arrangements through Hobson's Park build on existing paths and provide pedestrian access to the Exchange Land. Greater access is provided to the CBC with enhanced pedestrian and cycle infrastructure. All measures have the support of CCoC, CCiC and SCDC.

c. Drainage. Drainage is dealt with generally at Matter 3(g) and specifically in the evidence of Mrs Brocken.³⁰⁴ Detailed analysis has been conducted of the *drainage arrangements* which show that they will not increase existing flows over the lifespan of the project, with a 40% allowance for climate change. In particular, the ES has provided a 1D model to assess the culverting of the North Ditch, and neither the LLFA nor the EA have any (extant) objections to the CSIE Project.

d. Green space and Hobson's Park. The Pembertons' complaint is dealt with in the evidence of Mr Pearson. The CSIE Project has sought to minimise land take on Hobson's Park and will be providing Exchange Land for the permanent land take on Hobson's Park of marginally greater size and equal

³⁰³ NRE2.2

³⁰⁴ NRE5.2

(if not greater) quality will be provided. It also integrates effectively with existing Green Belt designations to the west.

e. Interaction with CSET. This is dealt with generally at Matter 3(d) and Matter 5 and specifically in the evidence of Mr Hilling. The precise impacts on access to farmland south of Addenbrooke's Road will depend on the detailed arrangements of the CSET project which are not yet available. NR has agreed to work collaboratively with CSET and will engage with Pemberton's Trustees on this point. (NRE10.2, [10.11.4])

11.14 OBJ 16 South Staffordshire Water PLC

11.14.1 South Staffordshire Water withdrew its objection by letter dated 8 February 2022.³⁰⁵

11.15 OBJ 17 Objection of Countryside Cambridge One Limited (CoC1) and Countryside Cambridge Two Limited (CoC2)

11.15.1 CoC1 and CoC2 are supportive of the Scheme in principle. CoC1 and CoC2 are the developers of the Great Kneighton residential development located adjacent to CBC.³⁰⁶ This new community provides 2,550 much needed new homes and includes a new primary and secondary school, a 120 acre Country Park and other informal recreational and play spaces, a community square with retail and leisure facilities served by the CGB and an extensive network of footpaths and cycleways to connect residents to CBC, including Addenbrooke's Hospital, and to the City Centre. The development shares infrastructure with CBC and changes to the drainage and highways infrastructure on the Campus have the potential to adversely affect the residential development.

Extent of land acquisition

11.15.2 It has not been demonstrated that the interference with CoC1/CoC2 rights in land, is in all respects necessary to implement and maintain the Scheme.

11.15.3 The Promoter's proposals involve it taking a large part of the Country Park during the construction phase of the Scheme. The Country Park provides an amenity space for local residents and users of the CBC. The area of the Country Park proposed to be used as a temporary construction compound goes far beyond what is required for the Promoter's proposals and will have an unacceptably detrimental effect on local residents and Campus users.

Impact on infrastructure at and adjacent to the CBC

11.15.4 They have concerns as to whether the Promoter's proposals adequately mitigate the impact of the Scheme on the infrastructure at the CBC, and the potential for associated detrimental impacts on CoC1/CoC2 land and infrastructure.

11.15.5 The proposals would remove the pedestrian and cycle access from the Country Park to the Active Recreation Area under the CGB Bridge. Despite

³⁰⁵ OBJ 16-W

³⁰⁶ Also known as Trum

extensive discussions with the Promoter, the arrangements for the provision of a safe alternative access route are unclear. This alternative access is required for occupiers of the residential development to be able to safely use these Active Recreation Areas and if alternative arrangements are not provided, the Scheme's impact on the existing access would severely reduce the ability of residents to enjoy such spaces.

11.15.6 While there has been some discussion around pedestrian access being taken by crossing over the Guided Busway, these proposals are not suitable to cyclists, wheelchair and pushchair users and others are concerned that the needs of such users are not being properly considered. There are also safety concerns around pedestrians crossing the Guided Busway unless a signalled crossing is provided. It should be noted that there has already been one fatality connected to the Guided Busway and, given the speed at which buses travel along it, there is a risk of further injury should the public seek to cross over it as though it were a normal road. The Promoter will need to satisfy all parties that a safe alternative access can be achieved. The Promoter has, to date, failed to do so.

Impact on drainage systems

11.15.7 We remain to be satisfied as to whether the Promoter has included appropriate mitigation to offset the interference with the drainage systems in respect of the land and rights it proposes to acquire both permanently and for temporary construction access, and, whether there would be a breach of CoC1/CoC2's contractual obligations with the HCT.

Contractual drainage considerations

11.15.8 CoC1/CoC2 understand that the Promoter intends to install culverting to one of the ditches which is fed by the Addenbrooke's Hospital (Cambridge University Hospitals NHS Foundation Trust). There is a lack of design details within the Scheme as to how drainage will be managed. The CBC has no formal drainage rights and easements have been agreed with the HCT to allow for the site to drain into two ancient ditches. If the flow rate exceeds those which have been agreed with the Trust, they believe that these risks causing flooding.

Cumulative impacts with the Greater Cambridge Partnership proposals for the Biomedical Campus

11.15.9 We have been notified by the GCP that it is preparing to submit an application for a TWAO to enable it to bring forward its CSET scheme to construct a guided busway route which will run through the Biomedical Campus and may also have impacts on CoC1/CoC2 land and infrastructure. The Promoter and GCP have not explained how the two schemes will interact.

11.15.10 It is considered on present information that the Promoter's assessment of the cumulative impact with the GCP proposals is inadequate.

NR Response

Extent of Land Acquisition

- 11.15.11 At the Inquiry NR advised that it was negotiating agreements with these objectors and had agreed Heads of Terms and that it was anticipated that these objections would be withdrawn.
- 11.15.12 NR provided a table setting out those areas of CoC1 & CoC2 interests over which compulsory powers of acquisition are being sought, with details of the extent of acquisition powers and a description of the proposed use of the land. In further discussion with CoC1 & CoC2's representatives at a meeting on 20th October 2021, a full explanation of the extent of land acquisition and rights was provided, it is NR's understanding that this explanation is now acceptable to CoC1 & CoC2.³⁰⁷

Absence of a compelling case

- 11.15.13 The compelling case for the CSIE Project is dealt with above in section 5, above, which refers to the proofs of Mr Lewis (NRE11.2) and John Pearson (NRE9.2).³⁰⁸

Impact of the Scheme on the pedestrian and cycle routes

- 11.15.14 A new pedestrian crossing will be provided across the Guided Busway to link Hobson's Park with the Active Recreation Area. This facility is currently in design development in accordance with the Guided Busway Design Handbook and has been discussed with CCoC. The proposed scheme will be subject to technical approval from CCoC and will be subject to a Road Safety Audit, hence it can be assumed that the proposal will be safe. The new crossing will consequently also be suitable for cyclists, wheelchair and pushchair users.³⁰⁹

Insufficient consideration of the impact of the Scheme in combination with other proposals for public transport links to the Biomedical Campus

- 11.15.15 Details regarding the CSET project and how it is proposed to be integrated with the CSIE Project are provided above. Details regarding NR working together with the CSET design team and promoters on integrating and maximising the potential benefits to users of both schemes, including reference to the Protocol Agreement that is in the process of being finalised and which will be shared with Countryside following its conclusion.
- 11.15.16 The CSET scheme will involve a complete reconfiguration of the Francis Crick Avenue/Guided Busway junction and Francis Crick Avenue, as well as the adjacent pedestrian and cycle infrastructure. The final junction layout is to be confirmed by GCP. As such, undertaking a cumulative impact of the CSET Scheme for the layout proposed as part of the CSIE Project would be meaningless (because it effectively involves replacing the current arrangements). Therefore, the cumulative impact taking into account both

³⁰⁷ NRE10.2 Paragraph 10.12.2

³⁰⁸ NRE 10.2 Paragraph 10.12 4

³⁰⁹ NRE 2.2 Paragraph 9.1.135

schemes would have to be undertaken by GCP as part of their TWAO application.³¹⁰

Land Acquisition in the Country Park

11.15.17 This is a similar point to that made by TRA. The latest Deposited Plans (NR22) has reduced the area of temporary land identified by approximately 2/3rds for the reasons given above.³¹¹

Drainage Concerns

11.15.18 In relation to the interference with the existing watercourse referred to as North Ditch (to be culverted), a 1D analysis has confirmed that there is sufficient capacity within the system to not breach during the 1 in 100 year event plus 40% climate change allowance hence providing a system with equal or greater cross sectional area will not impact the surface water drainage network. The culvert extension between the Hospital Culvert and Tibbetts Culvert will be appropriately sized to convey the existing flows. There would be no loss of flood storage and identical pass forward flows the post development scenario is considered flood neutral as reported in the FRA.³¹²

11.15.19 The EA withdrew its objection in relation to the culverting of the North Ditch. Discharge from the proposed development will be attenuated to greenfield run off rates of 2 l/s/ha which will be agreed with the LLFA within the formal ordinary watercourse consenting process prior to construction.

11.15.20 The proposed development has separate discharges for track and station to reduce the risk to all stakeholders, in addition, there are no direct interfaces between the proposed track/ station drainage networks and the existing networks ensuring that the obligations of the existing stakeholders in relation to Hobson's Brook will not be impacted upon.

11.15.21 NR are currently offering commitments in Heads of Terms whereby NR will ensure that they, as a consequence of either accommodation works or permanent works that CoC1 & CoC2 are not put in a worse position in relation to drainage flows currently utilised. NR has also given commitments to ensure that the works will not put CoC1 & CoC2 in breach of any contractual drainage flows they are currently required to comply with and to also engage with them on the final drainage design details.

11.16 OBJ 18 Objection of Cambridgeshire County Council and Greater Cambridgeshire Partnership

11.16.1 By letter dated 31 January CCoC withdrew its objection.³¹³

11.17 OBJ 19 St Mary's School, Cambridge

11.17.1 For Plot 001 the Draft Order indicates "POWERS OF LIMITED TEMPORARY

³¹⁰ NRE 2.2 Paragraph 9.1.138

³¹¹ NRE 1.2 Paragraph 437

³¹² NRE 5.2 Paragraph 10.2.67

³¹³ OBJ 18-W

USE OF LAND" are sought. However, the Draft Order also indicates "ACCESS TO BE STOPPED UP TEMPORARILY". Despite several requests, NR have failed to provide the timescales/dates/proposals/schedules for the temporary stopping up of this access. This access is utilised as athletics facilities for track and field, AstroTurf pitches for hockey, rugby and football, cricket nets, netball and tennis courts. A new pavilion and changing rooms are also soon to be opened. The closing of the access could have a serious detrimental and disruptive impact on the operation of the site as playing fields for St Mary's School, Homerton College and the local community. Seeking alternative arrangements for the provision of these services and facilities had not been envisaged.

11.17.2 For Plot 001 they assert that despite numerous requests NR have failed to provide details on the quantum and nature of the traffic that will be using this road both during and post the construction phase. Whilst NR record the road as a public highway, St Mary's School is subject to an obligation as part of the planning consent for developing the playing fields to significantly upgrade the road at huge expense. It is concerned about the potential damage NR's machinery and vehicles could cause to this road after it has gone to the significant expense of upgrading it.

11.17.3 For Plot 002, a new fence has been constructed on the boundary with NR land. Assurances have been sought from NR that the existing rights of access to maintain the boundary fence from the north side will prevail. This enquiry has been dismissed by NR because it has been unable to identify these specific rights from the documentation it has considered. Clarification is required that for Plot 002 NR are not proposing "Unrestricted Powers to Acquire Land" but seeking "Powers of Limited Temporary Use of land and Acquisition Rights" so that their existing rights of access to repair the fence will prevail.

11.17.4 They say that no information has been provided as to proposed accommodation works.

NR Response to St Mary's School

11.17.5 St Mary's School are limited to plots 001 and 002, principally relating to any proposed periods of stopping up, the potential for damage to be caused to the surfacing of the access road off Long Road, and any accommodation works proposed. No accommodation works are considered necessary or proposed (and the objector has not identified any they consider appropriate). NR has committed to making good any damage to the road surface and NR is liaising with the objector to identify the time(s) at which the temporary stopping up of their access can be accommodated.³¹⁴

11.17.6 NR is not seeking to acquire any permanent or temporary land from St. Mary's. NR will temporarily be using the shared access road (AR3) off Long Road to access the existing railway compound and to access the proposed construction haul road (HR4) that will run parallel to the western side of the railway, running southwards towards Addenbrookes Bridge (the Guided

³¹⁴ NRE 1.2 Section 7.31, paragraph 486; NRE 2.2b paragraph 9.1.152; NRE 2.2 paragraph 9.1.151

Busway Bridge). There is potential for conflicting vehicle movements along AR3 whilst the school playing fields are being used, the arrangements for avoiding conflicts and managing construction traffic movements will be detailed in the Construction Traffic Management Plan (CTMP) and Construction Logistics Plan (ConLP) which are subsidiary plans to the Code of Construction Practice Part B, which is to be submitted for approval by the local planning authority under planning condition 10.³¹⁵

11.17.7 The temporary stopping up would restrict access to and from the St. Mary's playing fields which are accessed from the bottom of AR3. NR understand that St. Mary's have an unrestricted right of access, as the access road forms part of the adopted highway. NR is in consultation with St. Mary's over the timings when the playing fields are in use by St. Mary's and Homerton College, so that NR can develop plans to minimise or avoid the day to day use of the playing fields. We are currently awaiting details of the 2022/23 timetable to assist the development of the CTMP and CamLP mentioned above.

11.17.8 It appears that the Inspector's concern *may* have arisen in relation to modest differences between the evidence of Messrs Barnes and Hilling. The former suggests that the peak construction period will see 6 vehicle movements/day on the access, and that damage is unlikely to be caused to the surface, whilst the latter suggests there will be 9 movements/day, and that there is a risk of damage to the surface.

11.17.9 These differences are immaterial. The difference between 6-9 vehicles/day is likely to be the result of slightly different construction periods being taken (Mr Barnes using a period of 'approximately' 100 days), and would not materially change the intensity of the use of the access.

11.17.10 The existence of a 'risk' of damage (as identified by Mr Barnes) does not mean that it is 'likely'; a risk may still exist even if it is 'unlikely' to materialise. The important point is that even if it does materialise, contrary to Mr Hilling's expectation, the objector will not be disadvantaged because NR will make good such damage in any event.

11.18 OBJ 20 Dave Jackson

11.18.1 Mr Jackson endorses the comments of the TRA.

11.18.2 The size of the works compound on the western side of the track would cause damage to the biodiversity of Hobson's Park, a developing nature reserve, and it would take several years before the results of that damage would be repaired. As noted in the TRA's submission, it is the CBC that would gain most from this station, therefore it seems fitting that the CBC should be used for as much of the temporary compound space as possible.

11.18.3 The station should not be used to reduce reliance on Cambridge Station in the City Centre. One of the major reasons given for the new station is to reduce traffic due to the increase in numbers working and visiting the CBC.

³¹⁵ INQ 75

Encouraging the use of the station by those living in the villages to the south of Cambridge even if taking cars to the park and ride sites would be intolerable as it would bring a significant increase in motorised traffic to an area where there is already too much.

NR Response to Dave Jackson's Objection

11.18.4 Dave Jackson's comments expressly repeat those made by TRA, which are addressed in full above. The substance of Mr Jackson's comments were also addressed in NR's evidence.³¹⁶

11.19 OBJ 21 Richard and Vanessa Price

11.19.1 We accept that a station is probably necessary, but the plans fill us with sadness on two counts: the permanent loss of and damage to parts of Hobson's Park and the very large area of the park being taken during the construction phase. It seems to us that these decisions are dominated by one consideration only - cost. It is cheaper and simpler to take land from the park, permanently, or temporarily during construction, than it is to take it from alternative sites on the east side of the railway.

11.19.2 Hobson's Park is part of one of the green corridors extending from the surrounding Green Belt and countryside into central Cambridge. Studies increasingly show how important these are in supporting biodiversity by permitting wildlife to move from place to place. Secondly, the COVID-19 pandemic has emphasised the importance of places like Hobson's Park for people's mental and physical well-being. The park was created in mitigation for loss of open space to the huge housing developments to the south west of the city. It must be protected.

11.19.3 Richard and Vanessa Price submit that land of the sort found in Hobson's Park is often sacrificed because it costs less to invade it than it does to protect it by placing infrastructure in places where it is more costly. Sadly, there are several examples of this in the proposed plans for the station. These include:

- (i) Extensive cycle parking on the west side of the station in the park when more of it ought to be placed on the east side;
- (ii) A completely new access path to the station along the south side of North Ditch along the fringe of the wood planted by children at Fawcett Primary School in 2012. This new access path ought to be placed along the north side of North Ditch between the busway and the Ditch. This would provide a much better link to the cycle path along the busway and it would significantly reduce the impact on the park.
- (iii) The existing footpath approaching the station from the southwest is being "raised to provide level access into the station". Why is this necessary when level access is being provided by (ii) above? The raised

³¹⁶ NRE1.2 Section 7.32; NRE2. paragraph 9.1.154; NRE12.2 Section 6.5

path would be very intrusive and threaten the wood referred to in (ii) above which is becoming well established now.

- (iv) In the triangle of land south of Nine Wells Bridge and bordered by Hobson Brook to the southwest and the railway line to the east there is a clear example of invasion onto park land to accommodate the new substation and enclosure for railway plant and equipment. Presumably it is cheaper to do this than to find alternative sites for them. This triangle is a crucial part of the green corridor. The new Addenbrooke's Road cuts right across the green corridor but this triangle of land plus the wide-open spaces under the bridge link open spaces south of the road to the park on the north side of Nine Wells Bridge. A better place for the substation and enclosure would be to the east of the railway line somewhere between Nine Wells Bridge and the busway bridge. The "Exchange Land" to the S of Addenbrooke's Road is scant compensation for the losses.
- (v) Construction compounds. These seem to be excessively large. Again, it is clear that these are being placed in the park because it is cheaper and easier to put them there than to find space for them to the east of the railway line. The main western compound and the satellite compound to the south of the busway bridge are both of particular concern. The main western compound occupies the whole of the triangle referred to in (iv) above while creation of the satellite compound will destroy an area of young woodland.

NR Response to Richard and Vanessa Price's Objection

11.19.4 Their concerns also echo some of those made by TRA, which are addressed above. These include:

- a. The placement of cycle parking;
- b. Access to the station through Hobson's Park;
- c. Location of the Railway Systems Compounds; and
- d. Size of the construction compounds in Hobson's Park.

These matters have been addressed above in relation to the TRA objection and also in NR's evidence.³¹⁷

11.20 OBJ-25 Mark Chaplin

11.20.1 I support the provision of a new station at Cambridge South and recognise that there will be some disruption during construction. Nevertheless, I object to the methodology and conclusions of the public open space assessment.³¹⁸ The assessment of potential areas of Exchange Land is flawed in two fundamental respects.

11.20.2 Firstly, the assessment is based on the assumption that all access to Hobson's Park is from the west side. Significant numbers of workers and visitors to the CBC use Hobson's Park, as well as residents of the Nine Wells

³¹⁷ NRE2.2 paragraph 9.1.157; NRE1.2 paragraphs 7.32-7.34

³¹⁸ NR19

Estate. Furthermore, users from the east side of the railway will be severely impacted by the construction of the proposed station including the complete loss of the access route via the zig zag path from nine wells bridge during construction and the permanent loss of recreational land nearest the railway that they used the most. The access track adjacent to the railway line is popular with walkers and runners from the east side of the railway. Only a few park users from the western side are impacted and only if they venture all the way to the railway. For park users from the east of the railway the land at EL4 is feeble compensation for the loss of the land on the eastern edge of the existing park, whereas the land EL2 is closest to the CBC and no further away than the zig zag path at the south end of the existing park.

11.20.3 Secondly the assessment takes no account of the value of time. Exchange land that can be made available during construction is clearly preferable to Exchange Land that only becomes available once construction is completed. In this respect the land at EL2 is clearly preferable to the land at EL4 because adaptation of EL2 for recreational use can begin immediately, whereas the land at EL4 will be affected by the construction access requirements.

NR Response to Mark Chaplin's Objection

11.20.4 Mr Chaplin's objection is limited to the provision of Exchange Land. He suggests that EL2 should have been chosen as the Exchange Land, not EL4.³¹⁹ It will be noted that EL2 happens to be closer to his workplace in the CBC. EL2 is not, however, the best replacement – let alone a suitable one. It is removed from Hobson's Park, on the east side of the railway. It is more than 400m away from much of the land being acquired and is therefore not within a "short walk" (see per CamLP, Policy 67). Further, Mr Chaplin is mistaken when he refers to the "value of time" benefit that might indicate that EL2 provides a suitable replacement. Consistently with the requirements of national policy, the Exchange Land has been assessed bearing in mind its accessibility, its quality and its quantity.³²⁰ (The "value of time" benefit is not a recognised measure of the suitability of replacement open space.

11.20.5 In any event, it is not correct that EL2 provides greater accessibility. Neither EL2 nor EL4 have direct access to the open space being lost, and access to EL2 would require users of the park to cross the busy Dame Mary Archer Way. It would also pose accessibility difficulties for those coming from the west (such as the users of Hobson's Park who live in Trumpington), and it is the advantage to all the users of the park – not just those like Mr Chaplin who would wish to access the Exchange Land from the east – that must be considered. EL2 simply does not provide the favourable accessibility benefits that Mr Chaplin relies on. Considering the factors of quality, quantity and access for all park users (not simply those accessing it

³¹⁹ NRE8.2 Figure 9-9 for an illustration of EL1-EL4

³²⁰ NRE8.2 Sections 5.4 and 6.4

from the east), EL4 is the best option.

12 OTHER REPRESENTATIONS

12.1 Eleven other parties made representations in respect of the TWAO.

12.2 REP 01 Richard Wakeford

12.2.1 Supports the principle of the application but has a number of concerns.

12.2.2 The Design and Access Statement and other documents make no mention or appreciation of the additional demands that 4 calling train per hour in each direction will be made by the EWR (Oxford to Cambridge) plan if it adopts a southern route as is likely. The Design and Access map doesn't even mention the line. Of course, the Oxford connection will be of great value to scientists and health care workers on the CBC site and much used by them, in view of research and other links with Oxford. But many authorities question the adequacy of the station for the present proposals: it will be quite inadequate for enhanced EWR requirements. Please could the design adequacy be re-thought with EWR in mind? He appreciates that this may mean an enlarged station.

12.2.3 Duplication of work and consequent waste if Cambridge South Station and associated works are not integrated with those consequents to the introduction of EWR. Two separate trackwork projects as opposed to a combined one would lead to clear additional costs and double the substantial inconvenience to local people.

12.2.4 Many local residents are appalled at the plans for the extent of temporary land 'take', especially in Hobson's Park, which is quite unnecessary to the lay mind, as are the permanent land take proposals. Hobson's Park was provided towards mitigation of the large new housing developments. A proposed sub-station is planned in an area of wildlife to the south of Addenbrooke's Road Bridge. Whilst not quite 'a haunt of coot and tern', this is a part of a field rich in wildlife, including a home to birds and hares, both of which he sees when out walking. The sub-station could be located elsewhere, ideally under the bridge where there is a large area of waste.

NR Response to Mr Wakeford³²¹

12.2.5 The station is designed in line with HM Treasury Green Book standards for passenger demand, which includes projected demand up to 2043. Peak times have been subject to dynamic pedestrian modelling to ensure that passengers can travel safely through the station. This modelling included alternative scenarios with a significantly higher growth, including an allowance for East West Rail services.

12.2.6 The CSIE Project has been designed to ensure that it does not preclude options for EWR. However, the projects are subject to separate investment decisions, and the proposed TWAO is only for the CSIE Project and not

³²¹ Correspondence between Mr Wakeford and NR is attached at INQ 41

EWR. EWR is in any event not formally committed for delivery.

12.2.7 The proposed land take in Hobson's Park has since been considerably reduced, following input from the contractor.

12.3 **REP 02 J Saunders** supports the station in principle.

12.3.1 Only part of Hobson's Park is currently open to the public – the part that lies south of the Guided Busway and north of Addenbrookes Road. The proposal is to take well over half this area along a site boundary between 100m and 350m remote from the site works. Whilst it is acknowledged construction works need space for their implementation (together with consequential re-landscaping), the amount of space currently being proposed seems inordinately large and unnecessary. Indeed compared to tight city centre sites (say for example, those around recently restored and modernised London termini), it is excessive. Scrutiny of the line for the proposed site boundary suggests it has been chosen for no other reason than to follow a network of pedestrian paths within the park unrelated to and detached from the proposed works. The irrelevance of this boundary is nowhere more evident than along the north side of Addenbrooke's Road where no construction or landscape work is contemplated. They ask for NR to please reconsider the Acquisition Rights (temporary though they may be) and the Planning Permission Site Boundary as currently proposed.

12.3.2 The proposed maintenance track is visually part of Hobson's Park landscape and is enjoyed by walkers, joggers, casual cyclists and even wheelchair users from time to time. The proposals show a Maintenance Access in the same relative location; its accessibility is ambiguous. They ask NR to retain the prevailing universal accessibility - from its start point at Addenbrooke's Road/Hobson's Brook, to its route beneath Addenbrookes Road, on to the concourse in front of Cambridge South Station (west side), and beneath the Guided Busway bridge to the network of paths in the Recreation Area– so that prevailing access is maintained. Given the difficulty of navigating the deep Guided Busway rails for a wheelchair user unrestricted access beneath the Guided Busway and Addenbrookes Road is particularly important.

12.3.3 The compensatory land acquisition proposed is to be applauded, but access to it, as currently shown on the Deemed Planning Permission drawings, is less than satisfactory. Whilst it is acknowledged the layout of paths and landscaping on the compensatory land may be an unresolved detail at this stage, access to the land is a fundamental. A new bridge over Hobson's Brook illustrated on drawing 158454-ARC-ZZ-ZZ-DRD-LEP-000054 is referred to as only 'POTENTIAL FUTURE FOOTBRIDGE' and shows the pathways in the vicinity in broken line. Similarly connection from the maintenance access running south alongside the tracks fades out and is missing altogether.

NR Response to J Saunders³²²

12.3.4 The proposed land take in Hobson's Park has since been considerably

³²² Correspondence between J Saunders and NR is attached at INQ 42

reduced, following input from the contractor.

- 12.3.5 The maintenance access running south alongside the tracks will not be a permanent feature but is a right of access that NR is seeking powers to secure to enable future maintenance of the realigned railway infrastructure. NR does not propose to install a permanent track / roadway through the agricultural field.
- 12.3.6 The potential footbridge in the Exchange Land was subject to negotiation with the landowner and the HCT, and NR has since committed to providing it.

12.4 REP 03 S Patel

- 12.4.1 Mr Patel queried whether there had been an assessment on the potential impact of the proposed station on local stations on the network, including whether there would be an increase in people choosing to leave their cars at local stations and catch a train to Cambridge South.
- 12.4.2 He also wished to know whether there was any modelling to examine the demand, where the demand for the station would come from and if it would be from local stations.

NR Response to S Patel³²³

- 12.4.3 The demand modelling in the business case for the proposed station incorporates changes of demand at other stations, including those in the local area. The Transport Assessment work does not consider how any additional passengers may choose to access other stations. To do so for all stations affected (i.e. all those that would be serviced by services which call at the new station) would be a major undertaking and is not typically done for projects of this scale.
- 12.4.4 How passengers access other stations on the network has not been modelled in the Transport Assessment. Demand modelling carried out for the business case does however include expected station origins and destinations for passengers who would use Cambridge South.
- 12.4.5 It is not proposed that additional parking at local stations be delivered as part of the Project. Station car parks are looked after by the relevant Train Operating Company and are typically expanded where a suitable site exists and a commercial case can be made.

12.5 REP 04 Great Shelford Parish Council

- 12.5.1 The Council are concerned that the temporary roadway (for construction traffic) may impact on an ancient monument. Councillors have requested sight of the Construction Transport Plan for Granham's Road and

³²³ Correspondence between S Patel and NR is attached at INQ 43

Addenbrookes Road.

NR Response to Great Shelford Parish Council³²⁴

- 12.5.2 NR responded on 17 August 2021 (INQ 44), confirming that it was working closely with Historic England and the Cambridgeshire Historic Environment team to ensure that all mitigation proposed is acceptable and noted in relevant planning conditions. The impact of the temporary roadway (both in terms of the roadway itself and the additional construction traffic) on the Scheduled Ancient Monument was further explored in live evidence with Ms Wylie and in her proof (NRE7.2).
- 12.5.3 Her evidence is that the Scheduled Ancient Monument will be impacted by the construction of the temporary roadway as it could impact the remains roughly 30cm below the surface (but this will be mitigated by subjecting the area to investigation prior to construction, and preserving the remains by record); and that the construction traffic itself will not have any substantial impacts beyond that, as the setting of the Scheduled Ancient Monument makes very little contribution to its overall significance (see NRE7.2).
- 12.6 **REP 06 National Grid** confirmed that it had no apparatus in the vicinity of the TWAO and does not object to the Order.³²⁵
- 12.7 **REP 07 Historic England**
- 12.7.1 Historic England's primary concern is the proposed length of the haul road accessing the Shepreth Branch Junction, which runs within the eastern edge of the Scheduled Monument. This is a designated heritage asset of high overall significance, legally protected as being of national importance. Excavations to create the single-track haul road will involve harm to a narrow strip of the designated area of the Scheduled Monument, tight along its eastern boundary where it is defined by the existing railway.
- On the basis of the submitted details of the proposed impacts, the archaeological background; and the proposed mitigation, Historic England would not consider the impact to be such that it would be likely to cause 'substantial harm' to the significance of the monument overall (in the language of the NPPF). However, HE advise that paragraphs 200 and 201 of the NPPF relating to planning balance are relevant.
- 12.7.2 Scheduled Monument Consent will be required for the works. Historic England also advises that minor modifications to the wording of condition 11 on the proposed Deemed Application (NR12) are required to clarify that the commitment is towards archaeological mitigation and investigation rather than just to evaluation works, and that 'development' also refers to the effectively enabling works of construction of haul roads and compounds.

Significance of the Scheduled Monument

- 12.7.3 In the vicinity of the Scheduled Monument, remains are particularly of

³²⁴ Correspondence between Great Shelford Parish Council and NR is attached at INQ 44

³²⁵ Correspondence between National Grid and NR is attached at INQ 45

prehistoric and Roman date. The designated area covers a complex of features identified from cropmarks, and geophysical survey. The north-western portion of the complex comprises sub-square enclosures, previously identified as a villa or large farmstead, with ditches on the same alignments as the enclosures extending to the north and south. A series of northwest-southeast aligned ditched trackways and enclosures extends from the southeast corner of the complex eastwards beyond the scheduled area, indicative of a settlement and field system that has a track accessing from the south east.

- 12.7.4 The proposed haul road runs along the very eastern edge of the scheduled area, away from the concentrated complex in the north-western part of the scheduled area, but closer to the previously mentioned trackways and enclosures. There has been no intrusive archaeological evaluation within the Scheduled Monument to date (although consent is now in principle in place for this). However, the evaluation that has been undertaken provides information that can – in this case - be extrapolated for consideration of the designated area. 'Trench 4' sampled some elements of the cropmark complex where they extended outside of the designated area. The results showed well preserved remains, but beneath a relatively shallow overburden of c0.35m, also indicated by other trenches. The remains in trench 4 also accorded with the geophysical survey, with a roman ditch identified, but they also showed the potential for further ephemeral remains (with a likely Bronze Age ditch identified) which confirms that not all features are likely to have been picked up in non-intrusive surveys. Roman pottery from the ditches was noted to be abraded, which suggests it may have been laying around before it made its way into the ditches; this may demonstrate the different character of this area of the site compared to the complex to the northwest.
- 12.7.5 Historic England acknowledges that the design has sought to avoid encroachment and impacts on the White Hill Farm Scheduled Monument, and its setting, as far as possible. We note the proposed landscaping of the area of land to the north of the monument and proposed screening of the permanent compound, and also note the proposed screening in relation to the approach to the Nine Wells Monument (National Heritage List 1127825). However, as is acknowledged in the ES, the impacts on the Scheduled Monument and non-designated remains associated with it can be assessed as moderate-adverse after mitigation. This is because the haul road will involve severe truncation and removal of remains. Given the shallow depths of the archaeological deposits, the ES concludes that even if track matting was laid over the remains, they would be vulnerable to crushing and compaction, particularly in bad weather. This would represent a significant impact that would be unmitigated through recording. The Planning Statement states that the works affecting the Scheduled Monument will be necessary to implement the proposed development and so, given the shallow depth and vulnerability, a programme of archaeological excavation

and recording is proposed.³²⁶

Relevant Policy

- 12.7.6 The NPPF establishes a presumption in favour of sustainable development in the planning system (paragraphs 7, 8, 10 and 11) which also identifies protection of the historic environment as an important element of achieving sustainable development. Further policy principles relating to the historic environment are set out in Chapter 16 and paragraphs 189, 194, 195, 199, 200, 201, 202, 203 and 206 of the NPPF.

Historic England Position

- 12.7.7 Historic England (HE) believes that overall, the impacts involve a moderate degree of harm to designated remains, although HE would not consider the impacts to be 'substantial harm' to the significance of the monument overall. The area to be affected is a low percentage of the designated area, and, as noted above, it is close to the existing railway, which in places may have impacted preservation. Further, the location means that it represents a transect through the scheduled monument closer to the trackway and field systems rather than through the more complex remains in the north-western part of the scheduled areas. The submission proposes archaeological excavation to mitigate for impacts. Geophysical survey could indicate that there is a lower density of features in the area of the Scheduled Monument to be affected, although there are caveats with relying on a single evaluation technique and, as noted above, other features may be present.
- 12.7.8 The applicant may be able to confirm the discounting of other options for the haul road. We note the presence of the National Cycle Route on the eastern side of the railway, and that construction compounds are required on both sides of the railway as construction traffic cannot cross without significant periods of closure. On the basis of the above, HE do not offer any fundamental objection to the conclusions of the ES and mitigation proposals. The decision would ultimately rest with the SoS for Digital, Culture, Media and Sport. In making a decision, tests of public benefit to justify impacts would be sought. A commitment to making an application for Scheduled Monument Consent is set out in the submission (NR10).
- 12.7.9 HE would support the proposal that an application is made prior to construction of the haul road, given the draft condition relating to archaeological work and the overall commitment to mitigation. However, HE would be happy to comment on a proposed submission, particularly the WSI, and to advise on timings for the consent process. As is acknowledged in the application, there is a risk of archaeological remains being more complex than anticipated. HE would therefore expect a WSI to allow ample time for excavation of archaeological remains between a site strip and construction of a haul road. HE would welcome an outreach programme in any WSI, to widen public knowledge and understanding of the area. In relation to condition 12, HE highlight that a WSI for works in the Scheduled

³²⁶ NR14. Section 6.13

Monument should also be submitted to HE in addition to the Local Authority.

Recommendation

12.7.10 HE advise that it is satisfied that the submission meets paragraph 194 of the NPPF. As noted above, HE advise that paragraphs 200 and 201 of the NPPF relating to planning balances, justifications and public benefit are especially relevant. We would also advise minor modifications to the title of condition 11 on the Request for Deemed Planning Permission (NR12), to clarify that the commitment would be to archaeological mitigation and investigation rather than just to evaluation works. HE would also seek clarification that the commencement of 'development' referred to in the proposed condition includes construction of the haul road and compounds, otherwise the condition may need amending to include preparatory works. HE recommend that impacts upon the grade II listed buildings, non-designated heritage and historic landscape should be discussed with the relevant Conservation and Design Officer and the Cambridgeshire Historic Environment Team.

NR Response to Historic England³²⁷

12.7.11 NR acknowledged HE's response and raised a minor query, which was subsequently clarified (INQ 46). As explained in evidence by Mr Pearson, the change sought by HE has been adopted.

12.8 REP 10 Janet Swadling

12.8.1 Supports the principle of the station and considers that it should be very accessible by local residents as well as users of the CBC. During construction and when completed, every step possible should be taken to reduce additional vehicle traffic in the area, which is already heavily congested, and to minimise disruption to the Country Park and Ninewells.

12.8.2 She does not support the cycle park being on the Hobson's Park side of the track. This needs to be on the actual campus so as not to intrude into the park. Indeed, cycles should be discouraged from use of the park.

12.8.3 Environmentally, she would like to see a lot more trees planted as soon as possible in the park for the climate benefits but also to enable them to mature to screen the station when completed.

NR Response to Janet Swadling³²⁸

12.8.4 NR responded on 17 August 2021 (INQ 48), indicating that it would be happy to facilitate a 'drop-in' session with residential neighbours when further detail on construction methodology and mitigation was available, and inviting Ms Swadling to confirm she was happy to be the point of contact for facilitating such a session. No response has been received.

³²⁷ Correspondence between Historic England and NR is attached at INQ 46

³²⁸ Correspondence between Janet Swadling and NR is attached at INQ 48

12.9 **REP 12 J Meed**

12.9.1 Concerns relate to the use of land south of Addenbrooke's Road as the 'Main Eastern Compound' for storing site materials.

12.9.2 He states that he has been carrying out ecological surveys in the area immediately south of the CBC over the last ten years, and have become aware that the southern slope of the bridge which takes Addenbrooke's Road across the railway line is an important breeding site for a number of invertebrate species. The current plans propose designating this area as the 'Main Eastern Compound'.

12.9.3 In ecological terms, the southern slope of the road bridge provides a small patch of south-facing rough grassland and scrub. A range of flowering plants and grasses flourish there, including chicory, docks, bird's foot trefoil, clover, ragwort, marjoram and yarrow, and a host of invertebrates have become well established, including many species of butterflies, ants, beetles, bees, wasps and flies.

12.9.4 In particular, the area hosts colonies of several butterfly species:

- Small copper – this 'gem' of the butterfly world needs warm dry conditions where it feeds on clover, ragwort and yarrow and lays its eggs on sorrel or dock.
- Brown argus – which feeds on birds-foot trefoil, ragwort, wild marjoram and wild thyme, and whose caterpillars enjoy cranesbills, the wild geraniums.
- Common blue – which feeds on the same plants as the brown argus, and whose caterpillars prefer bird's foot trefoil
- Small heath – which is now a priority species because of the decline in its population. Its caterpillars prefer fine grasses such as meadow grasses.

12.9.5 This patch of grassland also has the densest population of grasshoppers and crickets in the immediate area. Grasshoppers and crickets are the favourite food of labyrinth spiders who spin their funnel webs among the grass stalks. Deep in the labyrinth their eggs can develop in relative safety. This is yet another species that thrives on south-facing grassland.

12.9.6 If site compounds are stored too close to this patch of grassland, this would wipe out these invertebrate colonies, with an impact on the wider ecosystem. The plants and invertebrates in turn provide food for other creatures. The nationally threatened corn bunting and grey partridge breed nearby and visit the area to find invertebrate food for their chicks, while linnets visit to feed on the seeds. Water voles (which breed in Hobson's Brook) make use of the nearby seasonal ditch.

NR Response to J Meed³²⁹

12.9.7 In relation to the compounds south of Addenbrookes Road, NR has

³²⁹ Correspondence between J Meed and NR is attached at INQ 47

confirmed that it is not seeking any rights over the particular plots Mr Meed was concerned with.

- 12.9.8 Surveys have been made (and further surveys are proposed) of the populations of water voles, and NR is planning on managing and enhancing the marginal habitats along Hobson's Brook where it falls within the Project boundary. This will aim to provide higher quality habitats for water vole foraging and burrows.
- 12.9.9 On preservation of hedgerow habitat for farmland birds, the reduction in hedgerow would be re-instated following the works and underplanted with species rich grassland. Further scrub habitat would be created within the triangle of land where the Rail Systems Compound is proposed and within the Exchange Land that is also adjacent to the brook. Wetland features and species rich grassland will also be incorporated into this area. Offsite habitat creation will be required nearby to ensure the 10% biodiversity net gain target is met. These will also include scrub and grassland habitats that will benefit farmland birds. Measures are in place to reduce visual and noise disturbance to farmland birds through hoarding and monitoring of noise and nest localities for corn bunting and skylark during construction.

Hobson's Conduit Trust³³⁰

- 12.9.10 The Trustees are delighted and grateful that Hobson's Conduit Trust has been offered Protective Provisions under the Draft TWAO. They were disappointed with the loss of the proposed new pond to the east of the railway mainly due to the intended alignment of CSET, but look forward to the new pond and other habitat improving drainage features proposed to the west.
- 12.9.11 The water that flows along Hobson's Brook from the vicinity of the CSIE project is joined by other flows including from Granham's Farm spring which flows under the location of the Shepreth Junction improvements proposed as part of CSIE. Once in the City centre the Conduit supplies the listed water features in both the Botanic Garden and Emmanuel College, and in Christ's College, and provides seasonal flow along the listed Runnels in Trumpington Street from the listed and scheduled Conduit Head. Water from the Brook and Conduit also feeds the Vicar's Brook, and runs onto Coe Fen feeding the flows there. These water features are highly valued for their ecology and are under constant public gaze. They are highly prized. It is therefore particularly important that no pollution of any kind should enter the Hobson's Brook and Conduit system.
- 12.9.12 Whilst the City and University have had ownership of Nine Wells, a Local Nature Reserve, for nearly 200 years, and the City manages the Reserve, the Trustees take a constant and very close interest in Nine Wells. Our responsibilities for Hobson's Brook formally begin where it emerges from the Reserve, just to the east of the railway, and continue throughout the

³³⁰ These submissions are based on INQ 56-1, INQ 56-2 & INQ 56-3

Hobson's Brook and Conduit system.

- 12.9.13 The Brook and Conduit receive drainage from both sides of the railway in the vicinity of the CBC and Trumpington. The complex drainage arrangements all lead towards Hobson's Brook, and HCT has a comprehensive set of formal legal arrangements with all relevant entities covering discharges of water into the Brook. Such legally documented arrangements continue to be made every time any new building takes place on the CBC, and we expect to enter into similar engagements with NR in due course.
- 12.9.14 HCT had three major areas of concern arising from the Draft Order. The first was the proximity of approach roads 2 and 6 to the margins of the Brook and its tributary ditches means that the potential for serious damage to the watercourse and its ecology from runoff, and the vibration and noise associated with frequent movement of large vehicles. In addition, Construction Compounds 1 and 2, the Rail Systems Compound and works that will take place in due course to landscape the Exchange Land would be located in close proximity to the Brook.
- 12.9.15 At 2(f) of the Order 'detriment' is defined to include any harm to the ecology of the waterway (watercourse). In order to have an effective set of parameters to measure harm to the ecology of the Brook HCT believe that it would be necessary to specifically benchmark the ecology of the watercourse
- 12.9.16 At Item 10 there is a reference to lighting. The Trustees' concern is with an excess of artificial lighting in the vicinity of the watercourse during construction. We request that the provisions should include an obligation on NR and its contractor to confer with the Trust and its advisors to agree a protocol that will minimise the impact of artificial light on the watercourse, including from the Construction Compounds.
- 12.9.17 Because the Trust is a charity and because previous agreements do not envisage or include the construction of Cambridge South station, the Trust will be obliged to follow the Charities Act procedures for obtaining a Surveyor's Report on the easements to be granted in due course. The cost of such a report, and any payments arising therefrom to the Trust from NR, together with the related legal costs will need to be recognised within NR's budgets for the CSIE project.
- 12.9.18 Any groundwater dewatering and discharge arising from piling activity or the excavation of the proposed lift shafts will require documented agreements from the Trust, and the likely involvement of its expert advisers. HCT would be happy to co-operate promptly in production of these, but would of course expect the costs of their expert advisers to be met by NR. These would not be significant elements of cost within the whole context, but HCT would not want the well-established and accepted principles to be lost. HCT believe that NR is already familiar with the standard documentation that the Trust enters into as Grantor.
- 12.9.19 NR has agreed that the margin covered by the Protective Provision would increase from 5 metres to 16 metres, (rather than the 50 metres that HCT

requested). It is confirmed that the issues raised on behalf of HCT have been fully addressed. The main issues are of course maintenance of water quality and avoiding detriment to the physical state of the Brook, and they are sure that once the Exchange Land is turned into an extension of the park much more sympathetic planting and a more natural treatment of the margins will quickly improve the habitat and biodiversity.

13 INSPECTOR'S CONCLUSIONS

13.1 These conclusions firstly address SoM 1 – 8, and SoM 10-12. They then consider the case for granting deemed planning permission, followed by SoM 9. Finally, I make recommendations in relation to the TWAO, The Exchange Land Certificate, and the Deemed planning permission.

(The references for NR's case in relation to the SoM are provided in NR24). The references in [] refer to earlier paragraphs where appropriate.)

13.2 **SoM 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.**

13.2.1 The scheme is described at Section 3 [3.1-3.9].

13.2.2 The aims and objectives of the Scheme are to:

- Improve sustainable transport access to housing, services, and employment within the Cambridge Southern Fringe and Biomedical Campus area, to fulfil existing and future demands.
- Contribute to minimising highway congestion associated with the Southern Fringe and Cambridge Biomedical Campus by increasing the mode share for sustainable transport modes.
- Reduce reliance on Cambridge city centre transport infrastructure for serving the Southern Fringe and Cambridge Biomedical Campus.
- Be capable of integrating with and enhancing the opportunities presented by Thameslink and East West Rail, to support development of the Cambridge Biomedical Campus
- Increase public transport connectivity between the Cambridge Biomedical Campus and international gateways, in recognition of its international significance [7.15].³³¹

13.2.3 The aims and objectives are consistent with NPSNN. This sets out that there is a critical need to improve the national networks to address road congestion and crowding on the railways to provide safe, expeditious and resilient networks that better support social and economic activity; and to provide a transport network that is capable of stimulating and supporting economic growth.³³²

13.2.4 The need for the Scheme is set out in the SOBC and the OBC. In summary it is due to the indirect public transport accessibility of the CBC and the

³³¹ NR04 Statement of Aims Section 3

³³² D05 Paragraph 2.2

Southern Fringe Area [7.3].

- 13.2.5 The SOBC identified economic, environmental and social benefits arising from the Scheme. It stated that the Cambridge Biomedical Campus is of national significance, and it is therefore essential that it is served by an efficient transport network that provides international connectivity, as well as promoting a quality of life that will allow the Biomedical Campus and Southern Fringe area to compete internationally as a place to live, work and invest.
- 13.2.6 It identified the key existing and future problems for the transport network in the Southern Fringe and Biomedical Campus area and generated a series of five specific objectives for public transport investment. A new Cambridge South station is judged to best meet the objectives set and have the strongest strategic case.
- 13.2.7 The OBC found that a new station has significant potential to contribute to the Government's national policy objectives as set out in HM Treasury's 2020 review of the Green Book:
- Improving public transport journey opportunities therefore promoting a mode shift away from car travel will help move towards Net Zero carbon emissions for travel to and from this major employment and residential catchment area. This modal shift would also improve the Cambridge South area as a place to live and work.
 - Increasing the catchment of the strategically important employment cluster at the CBC would support the Levelling Up agenda, at least for the more deprived parts of the region and improve Equalities and Distributional effects. The Economic Case shows how the overall catchment population would be expanded significantly by the new station, both in absolute terms and relative to the other options discussed in this Strategic Case. Overall it is expected that Gross Value Added would increase by circa £3.9m per annum as a result of the new station, with a significant number of new jobs created.
- 13.2.8 Amongst other matters, the CamLP strategy, and the joint strategic approach with CCoC to growth and infrastructure, seeks to ensure that development within Cambridge promotes sustainable transport that is safe and accessible for all, while also ensuring that the appropriate infrastructure is in place and the need to travel is reduced. The need for the station is identified within the TSCSC and the Cambridge Local Transport Plan. [7.234, 7.235] The provision of the station at Cambridge South is also consistent with the strategic objectives of the CamLP and Policy S/2 of the SCLP which seek to promote sustainable modes of transport. [6.5,6.7]
- 13.2.9 The need for the station is not disputed by any party, although SCT (OBJ 22) and Chris Pointon (OBJ 02), suggest that the required capacity for the station has been underestimated. [10.4.3-10.4.16, 11.3.1 -11.33].
- 13.2.10 The justification for the anticipated transportation, environmental and

socio-economic effects of the scheme are discussed below.

13.2.11 I conclude that there is a need for the CSIE Project and the submitted scheme accords with the aims and objectives as set out in the SOBC and the OBC, and also accords with national and local transport and planning policy in relation to sustainable transport and the rail network.

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

13.3.1 The consideration of alternatives included alternatives to a new rail station and alternative locations for the rail station.

Non-Station Alternatives

13.3.2 The SOBC set out four alternatives

- Busway service enhancement: Increased service frequency and capacity on Cambridge Busway routes that serve Addenbrooke's Hospital, the CBC and the busway towards Trumpington Park and Ride.
- New longer distance direct bus or coach services: Operating between the CBC and other urban centres within the Cambridge travel to work area, such as Bury St Edmunds, Ely, Huntingdon, and St Neots.
 - New Cambridge South rail station and associated rail line improvements: Located on the West Anglia Main Line, between the Southern Fringe development area and the CBC.
 - Expanded Park and Ride sites: Larger car parks and increased bus service capacities at Trumpington and Babraham, with Babraham services operating a loop around the Biomedical Campus.

13.3.3 The SOBC scored each of the options against the scheme objectives using a seven-point scale. The options have also been awarded a red, amber or green rating for deliverability, financial affordability, and stakeholder acceptability risks. This sifting method follows the principles set out in Step 6 of the WebTAG transport appraisal process.

13.3.4 A new station at Cambridge South scored large beneficial effects in terms of international connectivity, sustainable transport access, City Centre reliance and integration with other schemes, However, the financial affordability risk of the scheme was higher than for other options.

13.3.5 The scores for the alternatives within the more recent OBC are broadly similar. The only exception is that the financial affordability risk for the proposed station reduced from medium/high to medium.

Table 3: Option Scoring

Option	1 – international connectivity	2 – sustainable transport access	3 – highway congestion	4- City centre reliance	5 – integrating with other schemes	Deliverability (risk level)	Financial affordability (risk level)	Stakeholder acceptability (risk level)
Busway service enhancement	Slight beneficial	Moderate beneficial	Slight beneficial	Neutral	Neutral	Low	Low	Medium
New longer distance direct bus or coach services	Moderate beneficial	Moderate beneficial	Slight beneficial	Moderate beneficial	Neutral	Low	Medium	Medium
New Cambridge South rail station & associated line improvements	Large beneficial	Large beneficial	Moderate beneficial	Large beneficial	Large beneficial	Medium	Medium / High	Low
Expanded Park and Ride sites	Neutral	Slight beneficial	Slight adverse	Slight beneficial	Neutral	Medium	Low	Medium

Source: Mott MacDonald

13.3.6 It is unclear from the available evidence as to how the weighting between the different criteria or the basis of the assessment for individual criteria has been assessed. The benefits in terms of international travel would appear to be overstated. Stansted and Gatwick Airports already benefit from a direct train service to Cambridge. The CBC is a short journey of about 10 minutes by Taxi or less by the CGB. Both the taxi rank and the bus stop are adjacent to Cambridge Station. Consequently, the difference in journey time, or the difficulty of continuing the journey from Cambridge Station is minimal. Moreover, most international visitors would require hotel accommodation, and in the absence of any provision on the CBC would still need to travel to the city centre.

13.3.7 Nevertheless, there would be significant benefits in terms of sustainable transport, highway congestion, integration with other schemes and a reduction in the need to travel into the city centre. All parties agree, including SCT, that there is a need for the Station. No party suggested that any of the alternatives considered would be preferable. [7.25,7.27,7.28,7.29]

Station Alternatives

13.3.8 The development of the CSIE scheme, and consideration of alternatives has taken place within the structure of the GRIP framework. The most recent stage (GRIP3) refined the infrastructure designs in light of the outcomes from selection of the station location (round 1), and on the access to the station (round 2).

13.3.9 Three locations were considered: South (close to the Nine Wells Bridge carrying Addenbrooke's Road), North (close to the Addenbrooke's Bridge carrying the CGB) and Central (between the two bridges). [7.30]

13.3.10 Separate sifting workshops were held to identify the preferred railway infrastructure layout and the preferred station location. In terms of the preferred railway infrastructure layout the sift process determined a layout with a reduced central island width in combination with an optimised

alignment (adjusted slightly to the east) could:

- Support a track layout which could accommodate four tracks through Addenbrooke's Bridge and which avoided the need to reconstruct the bridge;
- Reduce the land take in Hobson's Park;
- Allow additional signalling sections to reduce the distance between trains and improve railway capacity; and
- Is the preferred station layout.³³³

13.3.11 The consultation in relation to the railway station layout considered a number of options in terms of access from the east and west as well as the location of the station. These were assessed against a number of key criteria. Each location had benefits and disbenefits. These are summarised at table 13 of Mr Barnes's evidence.³³⁴

13.3.12 The sift process concluded that the northern option (North – 2) adjacent to Addenbrooke's Bridge (carrying the CGB) with vehicular access off Francis Crick Avenue on the east side of the railway is the preferred station layout. On the basis of the submitted evidence I have no reason to reach a different conclusion.

13.4 SoM 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 in relation to matters (a) to (i) below

(a) Impact of the closure of Dukes and Webster's Level crossing

13.4.1 The Order proposes to close both Duke's No.2 and Webster's crossing. Alternative access to the agricultural land served by these crossings would be provided to the west of the railway by way of a farm accommodation bridge (Work 11) at the western end of the Exchange Land, just off Addenbrooke's Road. Article 8 of the Order requires the bridge to be provided and open for use prior to the closure of the crossings. [7.42]

13.4.2 NR advise that Duke's No.2 and Webster's are particularly dangerous crossings because they rely upon users following instructions to phone up the signallers to obtain permission prior to crossing. Neither of the crossings gives any warning of oncoming trains. Moreover, neither offers the required sighting distances to all users in order to enable them to cross safely. Therefore although the number of crossings is low, the risk per traverse is high. [7.36]

13.4.3 Both crossings are located on the Cambridge to London line which has a

³³³ NRE 1.2 5.3.7.1

³³⁴ NRE 1.2 page 42

speed of over 90 mph over 2 running lines. Dukes No.2 crossing is an authorised user only crossing with no public right of way. The gates are padlocked to prevent unauthorised use. NR suggests that the use is seasonal and that the crossing is not particularly heavily used.³³⁵ No information to the contrary was submitted to the Inquiry. In addition, the use of Dukes No.2 crossing requires the user to cross a cycleway with an additional set of gates in order to use the crossing.

- 13.4.4 Webster's crossing is located close to Granham's Road where the Addenbrooke/Great Shelford cycleway path runs parallel with the railway. The public right of way over the crossing was removed when the footbridge next to the level crossing was constructed in 2015. The crossing has controlled authorised usage only and is used mainly by farm agriculture and farm machinery.
- 13.4.5 Both national policy and NR corporate policy generally seek to reduce risk. Level crossings are by their very nature dangerous, accounting for nearly half of all catastrophic railway events. It is both NR and national policy to seek closure of level crossings. [7.35]
- 13.4.6 A significant number of trains use this stretch of line, including un-timetabled freight trains. The crossings are predominantly used by agricultural vehicles. These tend to be long and slow moving, so need a relatively long period of time to traverse the level crossing. NR consider that the proposed station would increase the risk at these crossings for a number of reasons. These include a reduction in sighting distances due to the proximity of the station, with the potential to confuse trains that will stop at the station with those that will not. In addition, the increase in the number of lines it would be necessary to cross and the resultant increase in crossing times.[7.36]
- 13.4.7 There can be little doubt that level crossings are inherently dangerous and when accidents occur, they can often be fatal. Moreover, such can have far reaching effects on the network, sometimes causing significant delays. The crossings to be closed are mainly used by an agricultural tenant rather than the general public. Safety is reliant on the user following the necessary protocol and the vehicles crossing tend to be larger slower vehicles.
- 13.4.8 There is an existing safety risk at both of these crossings. This would significantly increase with the CSIE Project if they were to remain in place. The provision of an accommodation bridge as proposed would enable the existing user to access their land with agricultural vehicles via the local road network, which would take about 6 minutes, or 10 minutes during heavy traffic.³³⁶ The land would also be accessible via The Hectare, a small residential close, as well as by foot using Webster's footpath.
- 13.4.9 Whilst the closure of the crossings would involve a longer and less convenient route for the agricultural user of the land either side of the crossings, this would be off-set to a large extent by the convenience of not

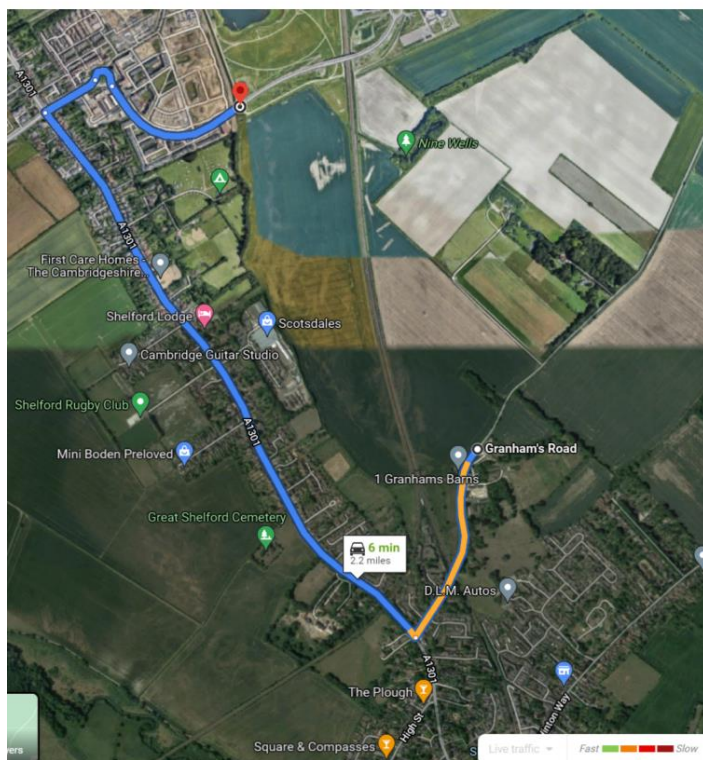
³³⁵ NRE 6.1 paragraph 65

³³⁶ INQ 40 paragraph 10

needing to telephone and wait for permission to cross, as well as the safety benefits that would arise from the closure of the crossings. Therefore, subject to the provision of the farm accommodation bridge, I find the closure to be acceptable. Neither crossing provides a public right of way and they are used mainly for agricultural purposes. Overall, the closure of Dukes No.2 and Webster’s Level Crossings would provide significant safety benefits for the CSIE Project.

13.4.10 There are no objections to the closure of the crossings, however, St John’s College (OBJ 01) raise a number of concerns with regard to the proposed access. It is concerned that details of the width of the accommodation bridge and whether it would have any weight restrictions have not been provided. There is also concern that the access could be obstructed by someone parking in front of the gates. [11.2.5,11.2.10, 11.2.6]

Fig 2a: Timing for Alternative Access Route (non-peak hour weekday)



INQ 40 Figure 2a

13.4.11 The width of the proposed accommodation bridge would be greater than that of the existing crossings and would be suitable for all vehicles that currently use the existing crossings. Discussions between NR and St John’s College in relation to the design and management of this access are ongoing. The farm vehicle access and public access would now be separate. This can be accommodated within the limits of deviation and would be secured at the detailed design stage. Any obstruction to the access would need to be addressed in the same way as obstructions to private means of access. [11.2.10]

13.4.12 St John’s College also believes that the two crossings are not restricted to agricultural use and therefore the new rights of access should be

unrestricted. NR disputes this. INQ 40 sets out the background to the rights NR believe St John's College currently enjoy. It quotes from a Deed dated 1851 in relation to Webster's crossing.³³⁷ [11.2.4, 7.39, 7.40, 7.41]

13.4.13 NR's position is that the works agreed were expressly stated to be an accommodation work, to be carried out by the Eastern Railway Company (or their successors). NR considers that this position is confirmed by a widening agreement, dated 19 January 1973 to enlarge the gates and these works are described as an *"agricultural accommodation level crossing"*³³⁸[7.39]

13.4.14 Webster's crossing appears to have been used predominantly for agricultural purposes since the construction of the railway. Whilst the passages quoted by NR refer to accommodation works, the Deed states that such works are:

"for the better enjoyment protection or accommodation of the adjoining property of the said Master Fellows and Scholars and of the said Peter Grain as such Lessee as aforesaid Save and except one level crossing over the said Railway for the use of the said Master Fellows and Scholars and others their lessees or Tenants thereof at any point to be decided upon by the said Master Fellows and Scholars..."

It also states:

*"the said Company their successors and assigns shall and will make and at all times hereinafter maintain one level crossing over the said Railway at any point that the said Master Fellows and Scholars may elect for that purpose and permit such Crossing to be used at all times for ever hereafter by the said Master Fellows and Scholars their Successors and assign lessees tenants agents servants and workmen with or without horses carts and carriages..."*³³⁹

13.4.15 The original Deed expressly states that it is for the better enjoyment, protection and accommodation of the property. Whilst I am not a lawyer, it seems to me, based on the available evidence, that the original Deed does not limit the use of Webster's crossing to agricultural use. Although the original purpose of the Deed cannot be enlarged, it does not appear to be as narrowly defined as suggested by NR even if the land was used for agriculture at that time.³⁴⁰ Whilst the 1973 widening agreement refers to an agricultural level crossing, no evidence was presented to the Inquiry to indicate that Deed limits the use to agriculture or alter the rights granted by the original Deed.

13.4.16 In terms of Dukes No.2 crossing NR advise that the deeds cannot be located but consider that the rights granted would have been the same as for Webster's Crossing. In the light of the proximity of the two crossings to each other, the fact the parties involved were the same, and that the accommodation works were pursuant to the same Act, this would seem to

³³⁷ INQ 40 paragraph 24 & 25

³³⁸ INQ 40 paragraph 26

³³⁹ INQ 40 paragraph 24

³⁴⁰ INQ 40 paragraph 22

be a reasonable conclusion. However, for the reasons given above, I am not persuaded that the rights enjoyed by St John's College are as narrow as suggested by NR.

13.4.17 NR's position is that if it cannot reach a voluntary agreement with St John's College it will grant rights consistent with its view of the rights enjoyed at present and St John's College would be compensated for any loss it incurs as a result of the loss of rights to use the crossing.³⁴¹ Article 8 of the Order does not specify the precise rights to be granted, however, paragraph 8(4) provides for compensation for the extinguishment of any private right of way, together with a dispute resolution mechanism.

13.4.18 NR also submit that the legal test in respect of the requirement to provide an alternative right of way under s5(6) of the TWA 1992 only relates to public rights of way over land and therefore is not applicable to either Dukes No.2 crossing or Webster's crossing. Whilst this may be the case, it appears that the closure of level crossings and the provision of associated diversions to enable former users of those crossings to cross the railway at another location are matters relating to, and ancillary to, the operation of the transport system, which come within section 1(1) of the TWA. In the absence of an alternative access St John's College land to the west of the railway would be landlocked and this would be a material consideration in relation to the Order and the application for deemed planning permission. However, for the reasons given above the proposed farm accommodation bridge would provide a suitable alternative access. [7.45]

13.4.19 Article 8 (1) and 8(2) of the Order would provide for the closure of the crossings and the extinguishment of rights of way over them. Article 8(3) provides that the new access for authorised users shall be provided and open for use before the existing crossing is stopped up. I conclude that, subject to the provision of the new access, the TWAO would not adversely impact on the existing user of the level crossings or their ability to carry out their business.

(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.

Local Road Networks

13.4.20 The impacts upon the local road network from the construction and operation of the CSIE Project were assessed and described in the Transport Assessment and Chapter 17 of the ES.

13.4.21 CCoC is the Highway Authority for the wider road network providing access to the CBC. Cambridge Medipark Ltd is the developer of the Phase 1 and 2 expansion of the CBC and is responsible for the CBC highway network. Whilst the roads within the CBC, including Francis Crick Avenue, are not adopted by the CCoC, Cambridgeshire Constabulary is responsible for automated enforcement using Automatic Number Plate Recognition (ANPR)

³⁴¹ INQ 40 paragraphs 31 & 32

cameras which are in operation to prevent rat-running through this area.

Construction Effects

- 13.4.22 An assessment of the potential traffic and transport effects of the proposed development during the construction phase was undertaken for 2023, the year when the highest predicted levels of construction traffic are expected to occur. During the construction phase, access to the site is to be obtained via five identified access points, seven site access roads, and the working areas either side of the railway are to be served by haul roads, all of which would serve to keep the majority of construction traffic away from the local road network. [7.48]
- 13.4.23 It is estimated that the CSIE project would add about 224 HGV vehicle movements per day and 516 car/van movements. The majority of these would be at access points AP1 and AP2, located towards the south of the Order land (196 HGVs and 464 cars/vans).³⁴² This would represent a 6.6% increase in total vehicle movements at AP1 and a 5.1% increase at AP2. At most other access points the increase would be less than 1%.
- 13.4.24 However, HGV movements at AP1, AP2 and AP3 would increase by 156%, 70% and 36% respectively. The CoCP Part B would include a Construction Traffic Management Plan (CTMP) prepared by the Contractor in accordance with CCCo guidance. It will provide details of the proposed traffic management of delivery vehicles and other traffic generated during the construction phase and would identify measures designed to avoid and reduce the impact wherever possible between construction site traffic and other road users. These measures would include parking for staff at the two main compounds and a Green Travel Plan for workers and would be secured by way of the planning conditions. These measures would limit the impact on Francis Crick Avenue. [7.50]
- 13.4.25 The ES assessed the effects on the local road network during construction as 'not significant' due to the temporary nature of the effects and the proposed mitigation. I am satisfied that with the appropriate mitigation measures in place the effects on the CBC during construction would be minimised as far as practicable.

Operational Effects

- 13.4.26 The assessment of the operational phase was undertaken for 2031 since this is the year when the CBC is expected to be fully developed and therefore the highest projected passenger numbers using the proposed station will be reached.³⁴³
- 13.4.27 Most of the trips to and from the station are predicted to be to/from Trumpington and the CBC. Cambridge South Station is unusual in that it would be primarily a destination station for people working or visiting CBC and the hospitals. These are mostly within a 15 min walk or 5-to-10-minute cycle ride from the Station. Up to 95% of passengers are expected to use

³⁴² NRE 2.2 Table 7.1

³⁴³ NRE 2.1 paragraph 1.1.11

sustainable travel modes (walking, cycling and public transport) to travel to and from the station.

- 13.4.28 On a typical weekday, there will be an additional 317 vehicular trips (634 vehicular movements) on the road network as a result of passengers being dropped off, picked up and taking a taxi to/from the proposed Station.³⁴⁴
- 13.4.29 Employment growth at the CBC, including hospital staff is predicted to increase by 51% to 26,000 from the 2017 baseline, whilst patient numbers are predicted to increase by 73% to 1,382,800 over the same period. In the absence of any planned interventions the total predicted number of trips by car to the CBC would increase from 28,475 to 46,400 per day by 2031.³⁴⁵ The various planned interventions would reduce the number of one-way vehicular trips by 6,269.
- 13.4.30 Based on the estimates undertaken for the CBC Transport Needs Review report it is predicted that, in 2031, the availability of Cambridge South Station would result in the gross reduction of 1,492 vehicle trips per day on the local road network.³⁴⁶ Taking into account the additional 634 vehicular movements on the road network as a result of passengers being dropped off, picked up and taking taxis to/from the Station, the CSIE Project is predicted to lead to the net daily reduction of 858 vehicular movements on the local road network. Therefore, during operation the proposed station would be likely to have a beneficial effect on traffic on the local road network by comparison with the do-nothing scenario.
- 13.4.31 SCT considers that the growth in employment at the CBC is underestimated and that road capacity will drive modal choice in the future. [10.4.5, 10.4.8] The SCT figures predict a much greater passenger demand by comparison with the NR case. Should the SCT figures be correct the number of trips removed from the road network would be greater than predicted by NR, and the associated benefits would also be greater. [10.45]
- 13.4.32 Vehicular access to the proposed station would be from the east via a new junction with Francis Crick Avenue. There would be five bays for Blue Badge Holders, as well as three bays for private cars, three bays for Taxis. and 4 bays for staff. [3.3, 7.55]
- 13.4.33 Several parties consider the number of taxi and pick up/drop-off bays would be insufficient to meet the demand and could result in cars parking on Francis Crick Avenue giving rise to inconvenience to pedestrians and cyclists as well as congestion to traffic elsewhere on the CBC.
- 13.4.34 NR explain that this is based on the modal share of trips. It is predicted that up to 95% of passengers would use non-vehicular modes of transport to access the station. Of the others 3% would use taxis and 2% would be dropped off/picked up.³⁴⁷ The Transport Assessment finds that there would be 16 trips by private car and 19 by taxi during the peak hours, and that

³⁴⁴ NRE 2.2 paragraph 8.1.5 & 8.1.6

³⁴⁵ NR-16 Appendix 17.2 Section 5.2

³⁴⁶ NR-16, Appendix 17.2 Appendix R & NRE 2.2 Paragraph 9.1.27

³⁴⁷ NRE 2.2 paragraph 8.1.4

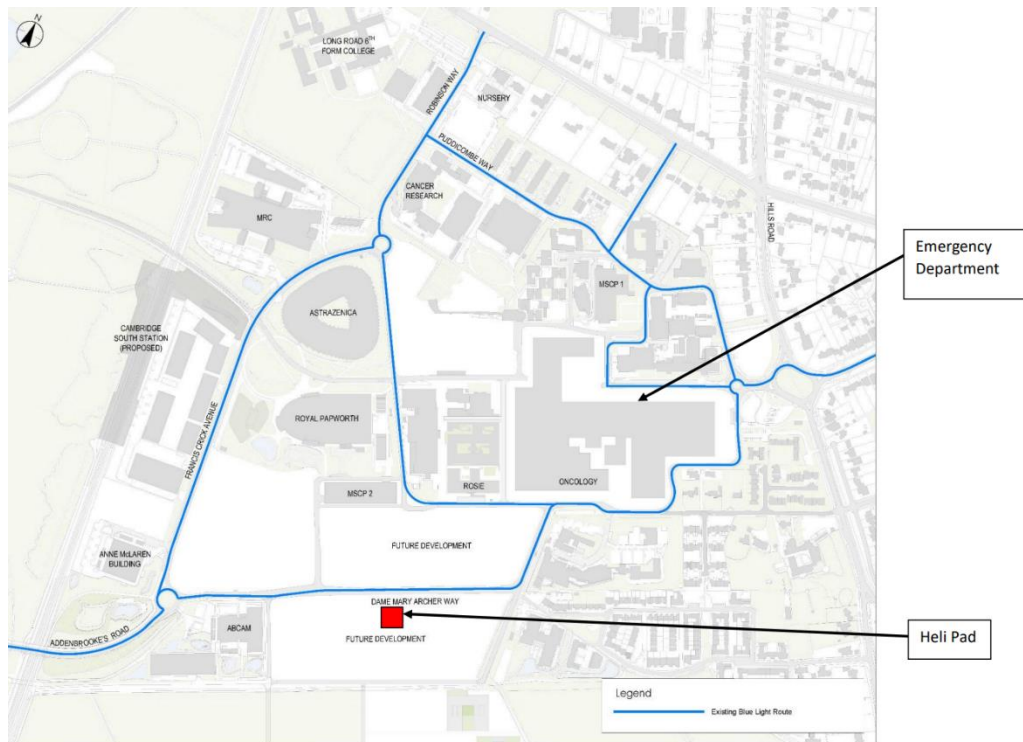
the proposed number of parking bays would be adequate for this purpose. [7.58]

- 13.4.35 Cambridge South Station would not be typical in that firstly it is primarily a destination station for patients, visitors and employees at the CBC, and secondly, unlike many stations the distribution of trips would be likely to have a less pronounced morning and evening peak, since patients and employees at the hospitals are likely to arrive at different times of day.
- 13.4.36 Most taxi trips are likely to be short, taking passengers to and from destinations on the CBC. and I agree with NR that a number of trips are likely to involve both drop-off and pick up. Nonetheless, the 19 peak hour trips by taxi predicted by the Transport Assessment seems to be unduly low, particularly given the number of national and international visitors anticipated. However, NR suggest that the taxi drop-off facility would have sufficient capacity to accommodate 36 trips per hour. I consider this to be a more realistic figure. On this basis, having regard to the nature of the proposed Station, I consider the number of taxi bays to be adequate for the number of predicted passengers.
- 13.4.37 The pick-up and drop-off bays are likely to be primarily used by people living in the Trumpington and Southern Fringe area. The Transport Assessment at Table 6.9 predicts that there would be 16 pickup and drop-off trips during each of the morning and evening peak hours. Although this figure is low, the mode share has been agreed with CCoC, and the majority of passengers are likely to be travelling to the CBC. On the basis of this figure I consider that the number of parking bays would probably be sufficient to accommodate the number of passengers to be dropped off during the morning peak.
- 13.4.38 I am however concerned that there may be insufficient spaces to accommodate the evening peak when passengers are collected by car. The number of predicted passengers would not be spread evenly across the hour but would cluster around the times trains are due to arrive. Moreover, during periods of wet weather, or when trains are delayed or cancelled, there is a realistic prospect that the demand for parking may exceed the spaces available.
- 13.4.39 The concern raised by a number of parties is that these vehicles will obstruct Francis Crick Avenue. NR suggests that when trains are delayed that drivers would park in one of the car parks on the CBC. I consider this to be unrealistic. The closest car park is the Addenbrooke's Hospital car park which is not particularly close to the proposed Station, and given the inconvenience associated with using a multi-storey public car park for a short stay, I do not consider that many drivers would avail themselves of this option. Balanced against this the limited parking provision, together with the high cost of parking and enforcement measures in place, would be a deterrent for those intending to use a car to arrive at the station and park on Francis Crick Avenue. [6.69,6.70]
- 13.4.40 Both the taxi and the pick-up/drop-off capacity have been subject to sensitivity testing. The Station is described as a destination station and the majority of those using it would be staff and patients visiting the nearby

hospitals. It is probable that many passengers would walk to their final destination, particularly since most of the hospitals are within a 10 minute walk of the proposed Station. There will be those that for health or other reasons need to use a taxi and this would be available outside of the station.

Blue Light Routes

13.4.41 There are six existing or proposed hospitals on the CBC, including Addenbrooke’s Hospital and the Royal Papworth Hospital. It is essential that the ‘Blue Light’ Routes remain available and unobstructed during the construction and operation of the station. Direct access to the A&E Departments for ambulance vehicles is of paramount importance, and time critical for patients who are being transported.



Blue Light Routes

CuH Transport Proof of Evidence OBJ6/W3/2 Figure 4

13.4.42 Neither the ES nor the Transport Assessment assess the effect of the project on these routes. CUH originally objected to the TWAO on this basis. However, following an Undertaking from NR to enter into a binding legal agreement to give effect to detailed commitments and assurances from NR it withdrew its objection.³⁴⁸

13.4.43 The measures agreed include that during the construction period, five days notice will be provided of any traffic management measures on blue routes that might affect response time. CUH will also be consulted on the Construction Travel Plan, the Construction Logistics Plan and the CTMP prior

³⁴⁸ OBJ 06 W

to submission to the local planning authority for approval, to ensure that any adverse impacts on the Blue Light Routes can be identified and eliminated at the earliest stages.³⁴⁹ Subject to NR entering into a binding legal agreement and consulting CUH as outlined above, I consider that any adverse impacts on Blue Light Routes could be adequately mitigated. [7.56]

Pedestrians

- 13.4.44 To facilitate access to the station for pedestrians, a number of improvements to the existing infrastructure are proposed. These include widening the existing crossings at the Francis Crick Avenue/Guided Busway junction and providing a crossing across the Guided Busway connecting the Trumpington residential area and Hobson's Park. [7.54]
- 13.4.45 Pedestrian access to the station would be from the east and the west. Pedestrian comfort levels on routes around the station have also been tested using the Pedestrian Comfort Level Guidance and tool commissioned by Transport for London. All routes were found to achieve A+ during the peak hour for 6mppa. [7.55]
- 13.4.46 SCT (OBJ 3) considers the access arrangements for pedestrians to be conflicted due to the complexity of the crossing. A pedestrian access would be provided south of the station access road adjacent to the northern boundary of the AZ site for pedestrians with destinations to the south of the station. A segregated path for pedestrians and cyclists would be provided to the north of the station access and forecourt and would provide access to destinations within the CBC via the widened signalised crossing on Francis Crick Avenue. NR predict that 80% of pedestrian trips from the Station to/from the east would use this crossing, and although the detailed design of the crossing has not been submitted, the proposed arrangements appear to be both logical and practical, and there is no substantive evidence to suggest that they would be unduly complicated.³⁵⁰
- 13.4.47 There is also a concern that due to the proposed layout of the Station that pedestrians in the rear-most carriages would need to walk 450 m to the nearest bus stop. This scenario would only apply to those in the rearmost carriage of a 12-carriage train and is as much a function of the length of the train as the arrangement of the Station. In practice passengers often move to the most suitable carriage for their point of exit. [10.4.16,10.4.17]
- 13.4.48 The western access would include a pedestrian and cycle path through Hobson's Park running approximately parallel to the CGB. A number of parties expressed concern regarding the impact of this on Hobson's Park in that it would effectively prevent a strip of the park (up to about 40 m wide), from being used for recreational purposes, and because the public wishing to move from the southern part of Hobson's Park to the area on the northern side of the CGB would need to cross a path with cyclists and

³⁴⁹ INQ 9

³⁵⁰ NRE 2.3 page 165

pedestrians wishing to access the station.³⁵¹ [10.2.13-10.2.15, 11.19.3]

- 13.4.49 NR considered an alternative alignment for the path (INQ 08). This was not pursued due to concerns from CCoC's cycling Officer and CCiC landscape officer. On the basis of these comments CCiC considered the original scheme to be preferable in terms of its impact on Hobson's Park. The revised alignment would mean that cyclists and pedestrians wishing to access the station, would be in conflict with pedestrians wishing to cross the CGB into the northern part of Hobson's Park, as well as pedestrians and cyclists using the path adjacent to the CGB. The nature of the risk to cyclists from the revised arrangements is unclear from the submitted information.
- 13.4.50 From my observations it would seem that many cyclists travel along the CGB shared pedestrian cycleway at a considerable speed. To add an additional cycleway in this location, would in my view be hazardous to pedestrians wishing to cross the CGB. In addition, the revised alignment would only involve the western part of the proposed pedestrian/cycleway, whereas the eastern part where the distance between the track and the path would be greatest would remain unchanged. I also agree with CCiC Landscape Officer that the alignment proposed by NR follows a natural desire-line and therefore even if the alignment was amended a significant number of people are likely to follow the desire-line. This was apparent at the site where I noted an informal path across the grass in a similar position to that proposed.[8.25]
- 13.4.51 The proposed cycle and walking route to the Station would have a detrimental impact on users of Hobson's Park, and there is potential for conflict between those using the park for leisure and those travelling to and from the Station. Given NR's stated need for cycle access to the Station from the west I find that the alignment proposed to be acceptable. The proposed path would be adopted by CCiC, rather than built to the standards of the Highway Authority. Appropriate lighting, landscaping and surfacing would minimise the visual intrusion into the park and would be secured by condition. [8.24, 8.25]
- 13.4.52 There is an existing maintenance track under the CGB that provides access between the existing part of Hobson's Park and the active recreational area to the north. This was also intended to provide a link between the two areas of the Hobson's Park but would be removed in order to accommodate the CSIE Project, including the station and the track widening. A new pedestrian link would be provided between the two parts of the park to the west of the CGB bridge. [3.4]
- 13.4.53 CoC1 and CoC2 (OBJ 17) and J Saunders (REP 2) are concerned as to the safety of the proposed crossing and its suitability for wheelchair users and those with young children. During my site visits I noted other pedestrian crossings across the CGB, moreover the proposed crossing would be subject to a road safety audit to ensure it was safe for all. On the basis of the available evidence, I am satisfied that the proposed crossing would be safe

³⁵¹ OBJ7, OBJ 21

for all, including those using wheelchairs or with prams and pushchairs.
[11.15.5,11.15.6, 12.3.2]

13.4.54 The proposed link would not be as convenient or tranquil as the existing arrangements. People moving from the southern part of the park towards the area north of the CGB would need to cross the new pedestrian/cycle link within the park as well as the existing pedestrian/cycleway adjacent to the CGB rather than walk under the existing bridge thereby avoiding any interaction with vehicular traffic. Nevertheless, the area occupied by the link is required for the station building and track widening, therefore its retention is not compatible with the delivery of the CSIE project.

13.4.55 This would be a significant and detrimental change in the pedestrian environment, especially for those with young children. The proposed CGB crossing would be safe in highway terms

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

Construction

13.4.56 During construction National Cycle Network (NCN) Route 11 will require temporary diversion to accommodate the need to widen the tracks and connect the main eastern construction compound for the CSIE Project to the lineside for a period of approximately two years. The proposed temporary diversion would be approximately 50m more than the existing NCN Route 11 section.[7.61]

Operation

13.4.57 Segregated cycle and pedestrian access will be provided to the north of the eastern forecourt. The primary access route to the west building will be from a new shared pedestrian and cycle path parallel to the CGB. Part of an existing route from the centre of Hobson's Park will also be adjusted and re-graded to meet the new forecourt. It is proposed to provide 1,000 cycle parking spaces split between the eastern and western sides of the station site. ES assumes that 442 spaces would be provided on the eastern side of the station and 558 spaces on the western side. However, at the Inquiry it was stated that the distribution of cycle provision would be determined by a further study to ensure that the cycle parking responds to the needs of the station and its users. The number and location of cycle parking spaces would be secured by condition.

13.4.58 A number of parties highlighted the need to ensure that there was sufficient provision for cycle parking, particularly on the eastern side of the CBC. There was also concern that the distribution of cycle parking was unduly weighted towards the west which would exacerbate any adverse effects on Hobson's Park.[11.10.16]

13.4.59 The Transport Assessment predicts that by 2031 there would be 6,428 trips on a typical weekday. Based on the agreed modal split, 24% of trips would be by cycle. This equates to 1,565 cycle trips per day (782 two-way

trips).³⁵² On this basis, assuming that each cyclist using the Station would need to park at the Station, there would be a surplus of about 200 cycle parking spaces.

- 13.4.60 Whilst it is noted that the modal share was based on professional judgement and agreed with CCoC, the basis for the unusually high proportion of cycle trips is unclear. The National Travel Survey 2014: Multi-stage trips found that for trips of under 1 mile to a railway station 84% of people would walk whilst only 2% would use methods that include cycling. For trips of over 1 mile, 4% would use such methods.³⁵³ However, cycling rates within Cambridge are higher than other areas. The 2011 Census figures show that 40-45% of people cycle to work for journeys of up to 5 km, whilst in other areas of Cambridgeshire the rate is 12%.
- 13.4.61 There can be little doubt that cycling rates within the Cambridge area are high, however, the census figures include people living with the city and commuting to work and would therefore tend to be higher than those using a cycle to travel to or from the proposed Station. On this basis, the modal split of cycle trips would be expected to be higher than that indicated within the National Travel Survey, but lower than the census figures for Cambridge. Whilst the modal share agreed falls midway between the two figures, I consider that realistically it is likely to be lower, given the particular circumstances of the CSIE Project, including the provision of access for patients to the hospitals.
- 13.4.62 The Transport Assessment states that 74% of total trips are predicted to be to the east and 26 % to the west.³⁵⁴ It assumes that 48% of cyclists would be travelling to the west and 52% to the east. This is reflected in the proposed distribution of cycle parking spaces. It would seem reasonable that a higher proportion of those travelling to and from the west are more likely to leave their cycle at the Station by comparison with those travelling to and from the east where they are more likely to leave their cycles at their destination.
- 13.4.63 Based on the total passenger demand for 2031 (6,428 trips per day) and the predicted origin/destination split, there would be 1,671 trips to the west in total. The east/west split for cycle trips predicted in the Transport Assessment would indicate that 751 trips, equating to 45% of all trips, to the west would be by cycle. This compares to 401 trips that would be expected based on a 24% mode share. This figure would exceed the results in the National Travel Survey by about 40%. Even taking account of the greater propensity for residents in the Cambridge area to cycle, in the absence of any substantive evidence to the contrary, I find this figure to be unrealistic. It would also seem to greatly exceed the provision at other

³⁵² NRE 2.2 paragraph 9.1.22

³⁵³ NR16 Appendix 17.2 Appendix L

³⁵⁴ NR16 Appendix 17.2 Table 6.4

stations given the anticipated number of passengers.³⁵⁵

13.4.64 Having regard to the modal split within the Transport Assessment the number of cycle trips towards the east would represent about 17% of total trips, rather than the 24% indicated in the Transport Assessment. The justification for the magnitude of the difference between the eastern and western destinations is not clear. Notwithstanding this, it is evident that the 442 cycle parking spaces proposed on the eastern side of the station and 558 spaces on the western side would be adequate to meet the demand within the ES, and to allow for future growth.

13.4.65 I therefore conclude that the CSIE Project would be accessible to cyclists and can make sufficient provision for cycle parking on both sides of the railway. It would also maintain adequate access for cyclists during construction. On the basis of the available evidence, it would seem probable that there is an over-provision of spaces, particularly on the western side of the railway. The implications of this for Hobson's Park are discussed below. Condition 22 would provide for the phased installation of cycle parking, while maintaining sufficient space for expansion if required.

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

13.4.67 The Station is primarily a destination station serving the CBC. It is expected that 95% of passengers would use public transport or sustainable modes of travel for their onward journeys. The northern location of the proposed station was chosen to maximise the possibility of combining rail with sustainable onward modes of transport, including walking, cycling, and using the local bus network. [7.6.2]

13.4.68 The integration of the CSIE Project with cycling and walking routes is considered above.

13.4.69 TRA and others are concerned that the CSIE Project would fail to provide adequate bus interchange facilities. SCT submits that the benefits of tighter integration between rail and bus services have been overlooked. It submits that the junctions with Francis Crick Avenue for the CGB and station access road will create further conflicts and increase delays for people walking and cycling. It also considers that the main station entrance is some considerable distance from the nearest bus stops.
[10.2.20,10.4.13,10.4.14,10.4.16,11.18.1]

13.4.70 The main demand for bus services is likely to be from the CGB, which is 250m from the Station entrance. About 8 to 9 buses per hour serve these bus stops and link the CBC to Trumpington and beyond. Access to the bus interchange would be facilitated by widening the pedestrian crossing. The Highway Authority and LPAs are satisfied that the bus interchange facilities

³⁵⁵ Mr Hilling Evidence to the Inquiry: Oxford 8.3mppa 1000 cycle spaces; Cambridge 12mppa 2,800 spaces; Ely 2.4mppa 330 spaces; London Bridge 90mppa 200 spaces; Milton Keynes 7.0mppa 900 spaces.

are adequate.

- 13.4.71 The pedestrian access to the Station would be almost opposite the area where the existing bus stops within the CBC are located adjacent to the signalised pedestrian crossing. Many of those leaving the station are predicted to continue their journey on foot due to the proximity of several employers and hospitals, including The Royal Papworth Hospital, MRC and UoC, less than 5 minutes walk from the proposed Station. Of those who choose to continue their journey by bus, the existing bus stops are a short walk from the Station.
- 13.4.72 There is no planning policy requirement for bus stops to be provided within a specific distance of a station. Whilst neither the Williams-Shapps Report nor the Bus Back Better Strategy are formal adopted planning policy, they are material considerations. These encourage rail stations to be a 'hub' for connecting services.³⁵⁶ The CSIE Project site is constrained by the location of the CGB bridge to the Immediate north (it is proposed to modify the embankment to this to allow sufficient space for the Station forecourt and cycle parking) and the AZ building under construction to the south. To the east lies the Royal Papworth Hospital. Therefore, there is insufficient space to provide a 'hub' as an integral part of the Station. [7.64, 10.4.6]
- 13.4.73 Nevertheless, the existing bus stops on the CBC are a short walk from the proposed Station and would provide for convenient onward travel by bus. Neither of the LPA's, the operators, nor the highway authority have raised concerns about the adequacy of the bus interchange facilities. Moreover, the provision of additional bus stops is not a matter for the rail network operator, but for CcoC and the bus operators.[10.2.3]
- 13.4.74 CML & CBCManCo suggest that the promotion of the bus stop on the eastern side of Francis Crick Avenue could form an integral part of encouraging multi-modal trips. It is suggested that real time information within the station would encourage linked trips outside of the CBC and thereby reduce the impact of development on the CBC.³⁵⁷ Whilst the provision of real time information would be a benefit to passengers and help to encourage sustainable modes of travel, it is a matter of detailed design.
- 13.4.75 Overall, I conclude that the proposal would make satisfactory provision for pedestrians and cyclists travelling towards the CBC and the west, as well as providing convenient and suitable links to bus services. Future integration with the CSET scheme would be considered as part of that scheme and is discussed below.

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

- 13.4.77 NR has assessed the impact of the CSIE Project on existing buried services within the CSIE Project area.³⁵⁸ The presence of the high-pressure gas main that runs across Hobson's Park has influenced the selection of the preferred

³⁵⁶ INQ 7 Bus Back Better at page 32

³⁵⁷ E05 Appendix 3 paragraph 4.4.3

³⁵⁸ NRE 1.3 Appendix D

option. The Order includes protective provisions in respect of Cadent Gas. In the light of these Cadent Gas has withdrawn its objection.³⁵⁹[7.71]

13.4.78 It is intended to identify the precise position of services using ground penetrating radar. NR stated that the risk to buried assets is known and understood and that it has a suite of standards within its business processes to manage this risk. New Cabling has not been identified as posing any particular risks or issues aside from the potential for electromagnetic interference (See 3(h) below). Therefore neither existing or new cabling is expected to give rise to any unacceptable adverse impacts. [7.70]

13.4.79 Cranes would be required during construction. Figure 52 of Mr Barnes evidence sets out the facilities to be provided at each compound, including plant to be provided on site and visiting plant.³⁶⁰ The largest crane likely to be required would be to lift the footbridge in the Station building. This would be used when the railway is closed. Other operations would require smaller telescopic cranes for specific operations as set out in figure 52. The use of cranes has not been the subject of any specific objections and no significant adverse effects were identified in the ES.

13.4.80 I conclude that, subject to the protective provisions within the Order, the impact from construction and operation in relation to new cabling and positioning of cranes would be unlikely to have a significant impact on local businesses, organisations or residents.

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

13.4.81 The impacts of the CSIE Project on noise, dust and vibration have been assessed in the ES. CoCP Part A sets out:

- The context and underlying principles of environment management for the works;
- The principal obligations when undertaking the construction of the proposed development;
- The guidelines to be used during construction and how they will be mandated and applied by the contractual arrangements between NR and the Main Works Contractor;
- The details of, or references to, the construction phase mitigation measures and plans to be approved by the Local Authority, as appropriate;
- Compliance with legislation, standards and guidance.

Construction Noise

13.4.82 The baseline noise survey methodology was agreed in consultation with CCiC and SCDC Environmental Health Officers. The assessment was conducted on the basis of a worst-case scenario. Correction factors were applied to ensure that the model was calibrated with measured baseline

³⁵⁹ OBJ 12-W

³⁶⁰ NRE 1.2 Paragraph 282 Figure 52

noise levels. [7.76,7.77]

- 13.4.83 Construction noise limits are based on the pre-existing ambient noise levels and the sensitivity of the receptor. Noise generated by construction traffic was assessed in accordance with the methodology of Calculation of Road Traffic Noise.
- 13.4.84 The ES identified major effects during the daytime and night-time at a number of locations within the Station Area and the Hills Road Area. Noise not only causes annoyance, but it can also cause serious disturbance such as the loss of sleep. Research by the World Health Organisation has also shown noise to cause measurable health effects. These locations include AZ Academy House and The Belvedere (a residential property) in the Hills Road area where major impacts are predicted (67 dBA compared to existing level of 61 dBA during the day-time, and 73 dBA compared to the existing level of 58 dBA during the night-time).³⁶¹ Mitigation measures proposed would reduce the level to 68 dBA at night time. It is appreciated that this is a worst-case scenario and that these impacts would arise for only very short durations of 2-3 days at a time. They would be associated with temporary activities such as concrete breaking, which would occur only on a small number of occasions (a matter of days) during the construction period.
- 13.4.85 Residents of The Belvedere currently experience relatively high levels of night-time noise, however, the proposed works, although temporary in nature, at night-time they would significantly exceed the already high noise levels by about 15dBA, although this would reduce to 10dBA following mitigation. These night-time works would only during short term overnight railway closures. Even though these exceedances may be of short duration they are likely to interrupt sleep during the nights when they occur. Even with mitigation in place the ES assesses the effect as major adverse. For the residential occupants of The Belvedere, the night-time disruption is likely to be significant, particularly if it occurs for several consecutive days and as such would have the potential for a significant adverse effect on living conditions, and potentially health, dependant on the duration and frequency of the exceedances. [7.78]
- 13.4.86 The CoCP provides that activities outside normal working hours that could give rise to disturbance will be kept to a reasonably practicable minimum. Advance notice of these activities will be sent to affected residents and businesses, in accordance with the timescales to be set out in the CoCP Part B. [7.79]
- 13.4.87 The Main Works Contractor will demonstrate and implement Best Practicable Means (BPM) throughout all work associated with the proposed Development. BPM are defined in section 72 of the Control of Pollution Act 1974 and Section 79 of the Environmental Protection Act 1990 as those measures which are reasonably practicable having regard among other things to local conditions and circumstances, to the current state of

³⁶¹ NRE4.2 Tables 9.1 & 9.2

technical knowledge and to financial implications.

- 13.4.88 The Main Works Contractor will manage construction works under a notification process to be included in the CoCP Part B, and where required, Section 61 agreements (of the Control of Pollution Act 1974). This would include details of any potential noise generating activities which may be required outside of the stated normal working hours for construction and the measures and procedures to be adopted to limit potential nuisance.
- 13.4.89 The Section 61 consent application will set out the monitoring regime to be adopted during the works as the mechanism to validate the predictions made in assessing the noise and vibration generated by the construction activity. The monitoring regime will ensure that compliance with BPM and any consented noise levels are adhered to, and the Main Works Contractor will audit these in collaboration with the local environmental health officers. These measures would ensure that the impacts on residents in particular would be minimised during construction.
- 13.4.90 During the daytime major impacts are predicted at AZ Academy House, the MRC, the AMB and AZ BioMed campus, although with the exception of the AMB these are expected to reduce to moderate after mitigation. At night-time, even after mitigation, the impacts would be major. NR advise that these night-time works would only occur for 1 or 2 hours a night and would be scheduled for no more than 8 days at a time.

Operational Noise

- 13.4.91 The effects of operational noise from traffic, road and rail, including the increased speed and additional tracks, and the public address/voice alarm ('PAVA') system was assessed on the basis of operational noise from different sources. During the operational periods the noise impacts arising from trains would not be significant. [7.78]
- 13.4.92 Suggested Conditions 30 and 31 seek to manage the noise from plant and machinery, and the PAVA during operation.
- 13.4.93 Both UoC (OBJ 8) and MRC (OBJ 9) raised concerns about the impact of noise on sensitive scientific equipment and laboratory animals. Additional assessments were carried out and it was concluded that there would be no significant effects on either the equipment or the laboratory animals. [7.81,7.82,7.83]
- 13.4.94 A SoCG agreed with UoC during the Inquiry sets out that:
- Detailed noise and vibration thresholds and monitoring criteria are agreed.
 - NR will undertake a Construction Phase Plan (CPP), in consultation with the UoC, for the construction of the Works directly adjacent to the AMB site, that includes the proposed noise and vibration monitoring and mitigation

measures to be implemented during construction to ensure no exceedances of Construction Vibration and Noise Thresholds.

- The CPP will be issued to the UoC for approval prior to commencement of construction works within the vicinity of the AMB site.
- The SoCG also sets out undertakings in relation to the design and construction of the loop line track to ensure that Operational Noise and Vibration Thresholds are not exceeded.³⁶²

13.4.95 The CSIE Project would give rise to significant adverse effects in relation to noise during the construction period. Agreements have been reached with a number of parties, including AZ, UoC and MRC as to how such adverse effects would be mitigated and these parties have withdrawn their objections. The Belvedere would be subject to major adverse effects during the night time. The absence of objections from the occupants of this property, does not necessarily mean that they find the level of disturbance to be acceptable, but may be due to the occupants not understanding the implications of construction noise on their living conditions. It is therefore essential that all practical steps are taken to minimise the predicted adverse effects on these residents. The implementation of the BPM and the Section 61 Consent regime would assist with this.

Dust

13.4.96 The project includes a significant volume of earthworks with excavation and processing of materials and importation of engineering fills including track ballast.

13.4.97 Dust is primarily an issue during construction, which will involve the excavation of a significant volume of earthworks. A range of mitigation techniques to reduce any impacts from dust are proposed. These include active monitoring of particulate matter, covering stockpiles, and water bowsers and sprinkler systems.[7.93]

13.4.98 The CoCP requires a Dust Management Plan based on accepted international standards to mitigate against particulate matter. NR will also provide a Materials Management Plan which will make provision for the storage of excavated material and a Construction Traffic Management Plan which will contain site specific controls in consideration of potential nuisance from dust. I conclude that the CSIE project is unlikely to give rise to any adverse effects due to dust.

Vibration

13.4.99 The CSIE Project would give rise to new sources of vibration during construction owing to the works themselves, and during operation because of the increase in lines, line speed, and the additional switches and controls required on the lines. The ES assessed residential receptors, Hills Road Sixth Form College, research facilities at the CBC and the Royal Papworth Hospital. The research facilities were assessed with a bespoke measuring

³⁶² INQ 33 Section 6.1

system that considered the sensitivities of their particular equipment.
[7.84,7.85,7.86]

13.4.100 The predicted significant impacts are limited to the receptors located in close proximity to the construction areas. Significant effects were predicted at:

- The AMB during construction phase;
- The MRC LMB, where construction was identified as giving rise to significant effects, and a potential for significant effects in the operation phase; and
- Residential receptors near Shepreth Branch Junction. [7.88]

13.4.101 The AMB is a highly sensitive facility which operates 24 hours a day, 365 days per year. Disruption to the vibration environment could render the building unusable for scientific research. The specific requirements were established through engagement with the stakeholders and included in the ES. [7.86,7.87]

13.4.102 Potential sources of vibration considered for the AMB include the station construction area, the haul roads to the east and west of the track, and the track and overhead line works to the south of the station area and nearest to the AMB. The UoC and NR have agreed parameters as part of the CPP to ensure that the construction of the CSIE project would not adversely impact on research and other activities at the AMB.

13.4.103 The MRC LMB also requires a criticality of a low vibration environment. Construction vibration has the potential to severely impact the research being carried out if it exceeds the existing very low levels.

13.4.104 In the light of concerns raised by UoC and MRC further work was undertaken. UoC has agreed a SoCG that confirms vibration thresholds during construction and operation. Both parties have now entered into binding legal agreements with NR to ensure that their vibration requirements are met and both objections have been withdrawn. [7.90]

13.4.105 A further assessment of the impact of construction works on residential receptors near to Shepreth Branch Junction shows significant adverse effects would occur where large earthwork operations are undertaken within 30m of a residential receptor or when vibratory piling techniques are used at a greater offset and potentially up to 125m away. NR suggest that due to its proximity to the proposed works one property would be experience levels of vibration to sufficient to give rise to a significant adverse effect.

13.4.106 The vibratory piling is required for the overhead line foundations. It provides benefits in terms of speed of construction, since these works must be carried out while NR has possession of the track. NR state that the use of a Movax has been under consideration which offers the potential for much lower vibration levels and a smaller offset being possible.

13.4.107 Construction vibration will be mitigated through the use of BPM as set out in the outline CoCP. Notwithstanding these measures, on the basis of the

current information it is probable that there would be a significant adverse effect on the occupants of this property. The works are likely to be of short duration (less than 2 days) and the occupants forewarned as to the timings of the works. Although NR consider that these measures would be sufficient to mitigate the adverse impact, I disagree, since the vibration will still occur, although the CoCP would help to minimise the effects.

13.4.108 I conclude that the CSIE Project would be unlikely to have adverse effects on the ability of businesses, MRC, CUH, the CBC or the UoC to carry out their business or undertaking. There would however be significant adverse effects on The Belvedere in terms of noise, and potentially residential properties at Abberley Woods in terms of vibration. These effects would need to be re-assessed once the timetable for the proposed works and the proposed equipment to be used is agreed. The CoCP would help to limit these effects but it is probable that significant adverse effects would persist especially at The Belvedere.

(g) the effect on drainage during construction and operation

13.4.109 The existing drainage network for the CBC is served by a series of Sustainable Drainage Systems (SuDS), ditches and gullies which have been designed to receive and attenuate flows from the wider surface water drainage system of the CBC. Each of the development plots manage surface water locally before discharging to the North or South ditches or one of three attenuation basins. The North Ditch and the South Ditch, both comprise culverted and open channel reaches and discharge to Hobson's Brook. NR state that these drainage features are the responsibility of CCiC and HCT. The HCT benefits from a number of covenants with CBC owners and occupiers, which impose requirements upon discharges from premises on the CBC as regards both water quality and surface water run off rates. [7.96,7.98]

13.4.110 The drainage proposals for the station involve the creation of an entirely separate and self-contained drainage system for the station development, which will ultimately discharge to Hobson's Brook. The station itself will be constructed on the Mid-Attenuation Basin. That basin will be relocated within the station forecourt, to provide an equivalent attenuation volume. [7.100,7.101]

13.4.111 The outline Surface Water Drainage Strategy sets out the key principles for the management of surface water. During construction, the CoCP will require adherence to best practice measures for ensuring the protection of water quality. [7.102]

13.4.112 The design development of the drainage system has continued to evolve following the submission of the application and has taken account of more detailed information from stakeholders. In the light of this additional work the EA withdrew its objection. [7.106]

13.4.113 A significant change to the drainage scheme has been the removal of the pond to the east of the railway line in order to accommodate the interface with the CSET Scheme. The surface water from the east side would be diverted under the track and would be collected in an attenuation pond on

the west side.

- 13.4.114 The platform canopies would be constructed with a green roof. This would reduce the amount of surface water entering the system. A rainwater harvesting tank will collect surface water from the track and Station drainage system for re-use as grey water for use within the main Station building prior to discharging the overflow from the harvesting tank into a new, subsurface geo-cellular attenuation tank situated within the Station forecourt.
- 13.4.115 Surface water from the East Side station forecourt and parking/drop-off area will outfall where possible via a permeable paving system into a rain garden which will aid treatment of the surface water potentially contaminated with oils and salts before discharging into sub surface attenuation storage.
- 13.4.116 The main Station building and forecourt would be constructed on land currently occupied by the Mid-Attenuation Basin. It is proposed to relocate the Mid-Attenuation Basin within the station forecourt providing equivalent storage to the existing basin. The outfall from the relocated basin would maintain the current discharge rate into the section of North Ditch between the Hospital Culvert and Tibbets Culvert.
- 13.4.117 The AZ site immediately to the south of the proposed station is currently under construction. The surface water is proposed to be attenuated by geocellular tanks and swales. The proposed swales run along the entirety of the proposed Up Loop platform. Although the swales are largely outside the boundary of the Order land, the boundary intrudes upon the proposed swale area in order to accommodate the emergency footbridge and access ramp, thereby reducing the storage capacity of the swales. In order to mitigate this incursion, the swales will be extended.
- 13.4.118 The AZ drainage network outfall currently discharges to the North Ditch after combining with the outlet from the Mid Attenuation Basin. The outlet will be diverted around the proposed Station building before discharging into the flow control chamber downstream of the Mid-Attenuation Basin and discharging into the diverted/ culverted North Ditch. This change to the AZ drainage will have no impact on permanent capacity and amount to an adjustment of pipe routing.
- 13.4.119 Haul road HR6 would be located in the position where it is intended to position additional swales. The swales would be installed following the removal of the haul road and the construction of the permanent boundary. NR state that the parties agree that no additional works are required to compensate for the temporary loss of this storage. AZ has confirmed that it has no outstanding objections to the Order being made.³⁶³
- 13.4.120 The position of the swales within the AMB and Plot 9 sites will be impacted by the temporary and permanent proposed land boundaries. The UoC site immediately north of Addenbrooke's Road contains a series of swales along

³⁶³ Obj 3-W

its boundary with the NR land which receive surface water and ultimately discharge into the South Ditch. It is proposed that a temporary haul road would be positioned over the existing swale. To compensate for the temporary loss of surface water storage required to prevent flooding of the strategically important laboratories contained within the AMB site, alternative temporary storage is to be provided within the proposed track drainage network. This would be achieved by increasing the volume of the attenuation pond on the western side of the railway.

- 13.4.121 The SoCG with UoC confirms that in principle the current proposals to mitigate for the impact of the haul road on Plot 9/AMB would provide a basis for ensuring that the UoC is in no worse position in respect of drainage in the temporary or permanent case. It is also agreed that the modelling undertaken for the outline design of these proposals is sufficiently detailed to give confidence that such a scheme can be delivered.³⁶⁴
- 13.4.122 CML and CBCManCo are concerned that any changes to the existing drainage arrangements for the CBC could mean that they are in breach of the contractual arrangements with the HCT. The Pemberton Trustees and CoC1 and CoC2 have also raised concerns about the lack of detail. [11.10.7, 11.13.6, 11.15.7]
- 13.4.123 NR propose commitments in HOTs whereby NR will ensure that CML and CBCManCo are not put in a worse position in relation to drainage flows currently utilised. NR has also given commitments to ensure that the works will not put CML and CBCManCo in breach of any contractual drainage flows they are currently required to comply with and to also engage with them on the final drainage design details. [11.10.42].
- 13.4.124 At the Inquiry I was advised that HOTs had been agreed with CML and CBCManCo, however, these objections have not been withdrawn. Although I have no reason to doubt the position put forward by NR, indeed, it was indicated at the CMC that it was possible that the objections would be withdrawn, in the absence of any substantive evidence to confirm this position it is necessary to assess the concerns raised in the relevant objections.
- 13.4.125 The Statement of Case submitted by CBC ManCo included a Review of the Water Resource and Flood Risk Chapter within the ES.³⁶⁵ Following further information from NR a number of matters raised in the review have been resolved. I therefore focus on the outstanding matters in the Review.³⁶⁶ [11.10.10]
- 13.4.126 The climate change allowance has been agreed with the EA. The North Ditch drains a large proportion of the existing hospital site. The North Ditch is to be culverted to facilitate the construction of the station building and forecourt and CBC ManCo is concerned that the resultant flows may exceed those that have been agreed with HCT. The outfall from the station downside drainage network will discharge into the North Ditch, as will the

³⁶⁴ INQ 33 Section 6.3

³⁶⁵ E05 OBJ 10 & OBJ 11

³⁶⁶ Summarised at NRE 5.2 page 85

attenuation storage that would control discharge flow rate to 2 litres per second per hectare (l/s/ha). [11.10.9]

- 13.4.127 A 1200mm diameter precast concrete culvert is proposed which would connect onto the Hospital Culvert under Francis Crick Avenue and would extend to the west of the rail corridor. The capacity of the culvert would significantly exceed the assessed North Ditch peak flow. The results of the modelling showed that the North Ditch channel has capacity to convey the modelled flows for the 1% annual change flood event plus 40% uplift for climate change (known as the design flood), and no out-of-bank flooding is predicted within the proposed development area. [7.106,7.107,7.109]
- 13.4.128 In the flood event with a 1% (1 in 100) annual chance, inclusive of a 20% uplift for climate change, a flow of 79l/s was calculated for the North Ditch catchment to its confluence with Hobson's Brook. This is equivalent to a runoff rate per hectare of 2.2 l/s/ha which aligns closely to the permissible discharge rate of 2l/s/ha that the development plots within the Biomedical Campus extension have been designed to achieve in this design storm event. The 2l/s/ha discharge rate is adopted to present the greenfield (predevelopment) runoff rate, which is set by the Hobson's Conduit Trust covenants.
- 13.4.129 NR is aware of the permissible on the discharge rates and the drainage strategy has been calculated to ensure that the discharge rate does not exceed the attenuation requirements. [7.102]
- 13.4.130 The hydraulic model of the North Ditch predicts no out-of-bank flooding in all of the modelled events, including those that consider climate change over the development lifetime (currently assumed to be 120 years).
- 13.4.131 No groundwater monitoring has been carried out. NR explain that this is because the Cambridge and South Cambridgeshire Strategic Flood Risk Assessment, combined with the absence of recorded historic groundwater flooding, suggests that overall, the proposed Development site is at low risk of groundwater flooding. However, CML and CBCManCo remain concerned that the new development could influence the behaviour of groundwater and subsequently influence the groundwater in and around third party land such as the CBC site. They consider that a flood management plan should be created to ensure if groundwater flooding were to occur on site, it should be confirmed how the groundwater would be contained within the development site and would not affect third-party land such as the CBC Site.
- 13.4.132 There is no substantive evidence to indicate that the CSIE project would give rise to flooding elsewhere on the Campus. Indeed, the parties that occupy the land closest to the proposed works (AZ, MRC and UoC) are satisfied that their assets would not be at risk of flooding and that any impacts on their existing drainage arrangements would be adequately mitigated, including during construction. The proposals have been amended and refined and further information submitted since these outstanding objections were originally made. The EA, HCT and the LLFA are satisfied with the proposals, subject to the submission of further details. Schedule 12 of

the Order includes protective provisions in relation to drainage (Part 3) and for HCT (Part 4). Whilst suggested conditions 14,15 and 16 require details of the construction and operational surface water drainage strategies as well as an operational surface water drainage scheme. Together these measures would ensure that the CSIE project would not increase flood risk elsewhere, including on the CBC, or exceed the discharge rates agreed with HCT.

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

13.4.133 NR acknowledge that the CSIE Project has the potential to give rise to EMI, in particular because of the increase of the number of tracks from two to four and the increase in power demands for the Station. This can affect scientific research institutions in the CBC and hospitals through impacts on sensitive imaging and other equipment. This was a particular concern to the UoC and the MRC. [7.112]

13.4.134 Due to the proximity of sensitive third parties in the area, NR propose to undertake some additional work in respect of Electro Magnetic Compatibility (EMC). The strategy includes undertaking specific magnetic fields calculations on a wide range of frequencies to determine the theoretical impact of the proposed changes on the electromagnetic environment and undertaking EMC measurements before and after the construction works to enable a direct comparison, check the impact of the changes and the effectiveness of the proposed solutions.

13.4.135 Mitigation will aim to minimise any interference to 'As Low As Reasonably Practicable'. The form and type of actions required in such a circumstance will depend on the nature of EMI and type of equipment in question and would be assessed on a case-by-case basis. Potential interventions include re-locating some of the HV cables, use of shielded cables, use of shielding materials that will reduce the emission of magnetic fields. The mitigation measures proposed use measures that have been proven on previous projects. Mr Hameed, on behalf of NR explained that it has had experience of similar challenges in the past, including the Francis Crick Institute interface with Crossrail 2 and these have been successfully addressed.[7.113]

13.4.136 The SoCG with the UoC confirms that NR commits to mitigating any potential for increased electromagnetic interference from the train and associated HV/MV equipment to be located in close proximity to the AMB. In addition, any exceedance of the environmental limits of the sensitive research equipment or alteration of the existing electromagnetic environment within the AMB or which impacts AMB electrical services will require mitigation and the specific mitigation required must be identified and agreed with the UoC prior to construction. On this basis the UoC confirms that no further grounds for objection remain in respect to EMI.

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

Effects on biodiversity

13.4.137 Both the construction and operational phases have the potential to impact upon biodiversity, directly and indirectly. A Preliminary Ecological Appraisal

for the CSIE Project included a desk-based assessment and an extended Phase 1 Habitat Survey.³⁶⁷ In addition, there were specific assessments for Bats, Great Crested Newts, Water Vole, and Breeding and Wintering Birds amongst others. The findings of these surveys are summarised in the ES.³⁶⁸ [7.117,7.118]

13.4.138 The desk-based assessment identified 11 statutory designated sites and 24 non-statutory designated sites within the search area. Nine-Wells Local Nature Reserve was also identified due to habitat links from the CSIE Project that include hedgerows and Hobson's Conduit. The identified habitats include broadleaved semi-natural woodland, which is a priority habitat under the NERC Act 2006.

13.4.139 The ES provides for mitigation during construction, including through the CoCP Part A. The measures include:

- Limiting light spill on to important biodiversity features;
- Dust suppression measures;
- Minimising noise and vibration effects through the choice of construction methodology, plant and equipment; the timing of works, avoiding works during the more sensitive night-time period;
- Managing surface water runoff and the risk of pollution of local watercourses;
- Pre-commencement surveys to support the detailed design of protected species mitigation strategies, including licensable species such as badgers, water vole, great crested newt and bats; and
- Minimising the land take associated with site compounds, working areas and associated infrastructure.

13.4.140 The ES found that the only receptor likely to be impacted to a significant level by the CSIE Project was an area of broadleaved semi-natural woodland. Other parties raised concerns in relation to Nine Wells LNR, corn bunting, skylarks and brown hares.³⁶⁹[8.3,8.6-8.9, 8.17-8.23, 11,37,12.2.4]

13.4.141 NPSNN states that as a general principle development should avoid significant harm to biodiversity and geological conservation interests. This should be achieved through mitigation and consideration of reasonable alternatives. Where significant harm cannot be avoided or mitigated, as a last resort, appropriate compensation measures should be sought.³⁷⁰

13.4.142 In the case of sites with statutory protection, or species and habitats identified as being of principal importance for the conservation of biodiversity, the SoS should ensure that applicants have taken measures to ensure these species and habitats are protected from the adverse effects of

³⁶⁷ ES Appendix 8.2

³⁶⁸ ES Appendices 8.3-8.8

³⁶⁹ See also OBJ 23 W3/1 Paragraphs 3.11-3.17

³⁷⁰ D5 Paragraph 5.25

development.³⁷¹

- 13.4.143 The NPPF requires development to minimise impacts on and provide net gains for biodiversity. It states that if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused.³⁷² It also seeks biodiversity net gain.
- 13.4.144 At Local level Policy 69 of the CamLP seeks to minimise harm to biodiversity in a similar manner to the NPPF. It requires any replacement habitat to be provided before development commences on any area of proposed habitat to be lost. CamLP Policy 70 seeks to protect priority habitats and species.

Woodland and Tree Impacts

- 13.4.145 The broad-leaved semi-natural woodland referred to in the ES is located to the east of the railway and forms part of a woodland area within the grounds of Long Road Sixth Form College. These trees comprise a band about 20 -25 metres in depth and extend along the boundary with the railway to the boundary with the MRC.
- 13.4.146 An Arboricultural Impact Assessment Report and tree survey was submitted to the Inquiry.³⁷³ The trees concerned are identified as G151. They form an attractive group of about 100 trees and are predominantly beech and hornbeam, about 20 metres in height. The ES states that there would be a temporary loss of about 0.26ha of mature trees, but evidence submitted to the Inquiry suggests that this would now be significantly reduced, following the appointment of a contractor and a more detailed assessment, together with revised access arrangements.
- 13.4.147 The reduction in planned tree loss is welcomed, however, on the basis of the information currently available, the impacts of construction upon this group of trees (Group 151) remains unclear. The AIA states that 902 m² of trees would be removed. This is a significant reduction by comparison with the 0.26 ha within the ES. It is also unclear as to whether this area would include any overhanging canopies.
- 13.4.148 The ES suggests that the tree loss would be small-scale and medium-term. It anticipates that newly planted semi-natural woodland will take in excess of 32 years to become sufficiently established and mature to offset the predicted losses. The ES concludes that the impact would be significant at a Local level.
- 13.4.149 The trees have been plotted as a single group on the submitted survey, and it is unclear which trees would need to be removed and whether there would be any consequential impacts on the root protection area or canopy of trees it is intended to retain. On the basis of the available information,

³⁷¹ D5 Paragraph 5.35

³⁷² D1 Paragraph 179

³⁷³ INQ 13-1,13-2 & 13-3

the extent of the tree loss is difficult to ascertain. The RPAs are likely to overlap and the removal of one tree would be likely to have significant implications for other trees within the group. In practice it is unlikely that the full extent of tree removal can be assessed until works commence. However, more detailed information, such as that sought by CCiC is necessary prior to the commencement of works. [8.19]

13.4.150 It is evident that NR has reviewed its methodology in order to minimise tree loss in this area. Given the size and quality of the existing trees, and the slow growing nature of beech trees, I consider that it is likely to take significantly more than 32 years to mitigate this loss. On the basis of the current information, I conclude that the residual effects of the CSIE Project on this area of woodland would be significant at a local level. Given the proximity of these trees to the railway line, where various works are required, some tree loss is unavoidable.

13.4.151 In addition, the ES states that construction works will also result in the loss of 0.45ha of broadleaved plantation woodland (G117 and G120), the majority of which is recently planted within Hobson's Park. Given the reduction in the size of CC2, and the intention to retain some of the trees within the compound, it is likely that this figure would also be considerably reduced. Nonetheless, these trees show signs of adapting to their environment and given time to mature they are likely to make a significant contribution to the character and biodiversity of Hobson's Park.

13.4.152 The trees adjacent to the CGB are more mature than those within Hobson's Park and form part of a green corridor linking Hobson's Park with the CBC. These come within the area where the station and station concourse would be located so would be removed in their entirety.

13.4.153 Given that the plantation woodland is relatively recently planted, newly planted and/or replanted trees should mitigate any loss within a reasonably short timeframe. It is also planned to plant an additional 0.84ha of woodland within the park to compensate for this loss. The ES concludes that the residual effects would be significant at a Local level, but would become slight beneficial in the long-term, once the new planting has established. Even though there is a reduction in the number of trees to be removed, I agree with this conclusion since some of the more mature plantation trees would be lost and take proportionately longer to replace.

Birds

13.4.154 Hobson's Park Reserve forms part of the green corridor covering 5 ha of land and was designed specifically with target bird species in mind to compensate for the loss of winter farmland habitat arising from the residential development at Clay Farm. The park consists of an area of permanent open water including nesting islands, and a series of shallow scrapes and wet grassland. A number of wetland bird species are known to use the bird reserve, immediately adjacent to the railway.

13.4.155 The majority of the species observed during the Extended Phase 1 Survey were farmland and wetland birds. A total of 55 species were found to be present within the Zone of Influence. Species were generally typical of the

habitats within the Cambridgeshire area but included kingfisher and a number of wetland species associated with the bird reserve and other waterbodies in Hobson's Park. A total of 19 species were either protected or notable species, the majority of which were associated with the grassland, arable or wetland habitat.

- 13.4.156 The general assemblage of breeding birds within the Study Area is considered to be of County value for biodiversity. This is because it supports species that are likely to form an important part of the County assemblage (especially black-headed gull, corn bunting, house martin, skylark and stock dove). The loss or disturbance of these populations would be likely to adversely affect the conservation status and distribution of birds at the County level.
- 13.4.157 The CSIE project has the potential to impact on these species through habitat loss, direct mortality and disturbance, particularly during construction. The ES concludes that subject to mitigation measures, such as minimising vegetation clearance, re-instatement of habitat post - construction, the timing of vegetation clearance and the measures within the CoCP there would be no significant effect on birds.³⁷⁴
- 13.4.158 During construction there would be a significant loss of habitat and disturbance, particularly within Hobson's Park. The construction compound with Hobson's Park has been considerably reduced in size by comparison with that assessed within the ES. It would also retain some of the existing trees, and these may continue to provide suitable habitat for some birds during construction. The Exchange Land will now be provided prior to the disturbance of existing habitats, and the public would be excluded from this area during the construction period whilst the new habitats are established. The delivery of this land would be secured by the Construction Ecological Method Statement (CEMS)(Suggested condition 12).
- 13.4.159 The effect of the loss of broadleaved woodland in the vicinity of Long Road College on effect of this loss on birds does not appear to have been assessed. However, given that only the partial removal of these trees is now proposed the loss of this woodland is not considered to have a significant effect on birds.
- 13.4.160 CCiC and CCoC were concerned that without suitable mitigation, disturbance during construction could lead to the permanent displacement of corn bunting. Corn buntings are a Species of Principal Importance in England. During breeding bird surveys undertaken in 2020, corn bunting were found to hold about 10 territories within the CSIE Project site. The ES assessed the effect of the CSIE project on the birds and their territories and concluded that there would be no likely significant effects.
- 13.4.161 In response to concerns raised by CCiC and CCoC NR's rebuttal evidence identifies areas within the Exchange Land where suitable habitat and song posts would be provided for corn buntings. It is now proposed that this area to be made available for during construction for replacement breeding

³⁷⁴ ES Chapter 8 Table 8.15

habitat, and prior to disturbance of existing habitats by development. [7.123]

13.4.162 Post development, signage will be used to mitigate dog-related and other recreational pressure on birds in Hobson's Park and the Exchange Land, including fenced exclusion zones where appropriate. CCiC has confirmed, that subject to this mitigation secured within the CEMS, it no longer maintains its objection to the CSIE Project which is now considered to be consistent with CamLP Policy 70.[7.125, 8.8, 8.9]

13.4.163 I conclude that, with the agreed and embedded mitigation secured, the impact of the CSIE Project on breeding birds and overwintering birds will be minimal.

Bats

13.4.164 The desk study found previous EPS licences for bats from close to the site. The preliminary roost assessment of the built structures (bridges) within the Site Boundary, identified four of the bridges as having suitable features for use by roosting bats. The dusk emergence and dawn re-entry surveys of the bridges identified a pipistrelle roost on Long Road Guided Busway bridge. The field survey found individual trees within the Phase 1 Habitat Survey boundary.

13.4.165 The transect surveys identified a range of bat species within the Site Boundary, the main species recorded comprised common pipistrelle, soprano pipistrelle, Nathusius' pipistrelle, noctule, brown long-eared bat and myotis species. The bat assemblage within the Study Area was considered to be of County importance.

13.4.166 The railway line is suitable for commuting bats and the presence of scrub/wooded embankments along the track offers good foraging opportunities. This was confirmed during activity surveys. High value foraging habitat is present within the Site Boundary including woodland and woodland edges to the north, and hedgerows, ponds and Hobson's Brook to the west of the proposed Development. The majority of the grassland habitat within the site boundary is semi-regularly mown or arable and therefore has been identified as sub-optimal habitat for foraging bats.

13.4.167 The ES found that the bat assemblage within the Study Area was considered to be of County importance for biodiversity and was an Important Ecological Feature are IEF's for the following reasons:

- They are legally protected under Schedule 5 to the WCA and EPS under Schedule 2 to the Conservation of Habitats and Species Regulations 2017;
- Three of the species recorded are listed as Species of Principal Importance under the NERC Act 2006 (brown long-eared bat, noctule and soprano pipistrelle);
- Four bat species are listed as a Cambridgeshire and Peterborough BAP Priority Species;
- An Annex II species under the Habitats Directive (namely barbastelle bat

was identified foraging although not considered to be roosting on-site; and

Moderate levels of activity were recorded within the Study Area and the population is therefore likely to form a critical part of the County population, such that the loss of the population would be likely to adversely affect the conservation status and distribution of bats at a County scale.³⁷⁵

- 13.4.168 The ES identified that significant effects could arise from habitat loss, direct mortality, disturbance from lighting and habitat fragmentation. It concluded that due to the mitigation measures, including pre-construction surveys, sensitive use of lighting, measures to reduce noise and vibration, and the re-instatement of habitat along the railway, there would not be a significant effect on bats. The reasoning underpinning this conclusion is unclear.
- 13.4.169 Condition 10 requires a lighting management plan and the Construction Ecological Method Statement required by condition 12 includes the identification of "biodiversity protection zones", practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction, and the location and timings of sensitive works to avoid harm to biodiversity.
- 13.4.170 Subject to the mitigation within the ES I consider that the effect of the CSIE Project on bats would be minimised, although some residual harm would remain.

Other species and habitats

- 13.4.171 Brown hare were seen during the Phase 1 Habitat Survey and the Wintering Bird Survey. The arable fields and rough grassland provide suitable habitat for supporting brown hare. There have also been sightings by members of the public. The Exchange Land would be suitably planted to provide foraging and cover for brown hares to compensate for any loss of habitat. [7.125]
- 13.4.172 There is evidence that water vole were present within the Phase 1 habitat survey area and it is considered they are likely to be present. All construction works shall be set back 10m from any waterbodies for which water vole are known or assumed to be present. Areas of retained vegetation shall be fenced off with temporary fencing to avoid accidental damage. NR is planning on managing and enhancing the marginal habitats along Hobson's Brook where it falls within the Project boundary. This will aim to provide higher quality habitats for water vole foraging and burrows. [12.9.8]
- 13.4.173 The proposed Development will result in the permanent loss of 2.69ha of semi-improved neutral grassland, to facilitate the new station within Hobson's Park. There would also be a loss of 0.33ha of semi-improved calcareous grassland at Shepreth Branch Junction due to track widening. In addition, to facilitate works, 0.21ha of semi-improved calcareous grassland and 2.47ha of poor semi-improved grassland will also be temporarily lost as

³⁷⁵ ES Chapter 8 Paragraph 8.53

a result of construction compounds and temporary works areas. Following construction, 4.1ha of good quality semi-improved neutral grassland will be created and 0.18 ha of semi-improved calcareous grassland will be reinstated. Although overall the habitat creation for grassland is less than that lost, the created habitats will be of higher quality. Where possible, the soil seedbank will be preserved and transplanted within new and reinstated areas of grassland creation.

13.4.174 The proposed Development will result in the loss of 250m of species-poor hedgerows to facilitate the construction compound to the south east of Addenbrooke's road. This will be reinstated with native species-rich hedgerows following construction. In addition to this, an additional 120m of hedgerow will be planted to compensate for this loss.

Biodiversity Net Gain

13.4.175 It is intended that the Project will deliver 10% BNG in accordance with the intention of the emerging Environment Act, albeit that is not yet in force for this type of project. While the CSIE Project would increase both the hedgerow and river biodiversity units on site, there would be an overall loss of biodiversity. It is not possible to offset this through enhancements to Hobson's Park since this is managed in good condition for biodiversity.[7.127, 7.128]

13.4.176 Both local planning authorities now agree that (based on the further information provided in REB06 and its appendices) the proposed on-site BNG maximises the potential on-site habitat creation and enhancement and that it is therefore appropriate to seek offsite BNG provision for the remaining habitat units. Due to the constrained nature of the site, on-site provision of all units is not possible. [8.3, 9.2]

13.4.177 NR propose to purchase additional BNG units from CCoC in respect of a site at Lower Valley Farm. This is a strategic site for habitat creation, and will be under the care of CCoC, who will provide long-term maintenance. CCoC has confirmed the allocation of the biodiversity units "subject to County Council Member approval and contractual agreement".³⁷⁶

13.4.178 At the Inquiry, NR proposed to secure the delivery of BNG through a S106 agreement. However, CCiC consider that the letter from CCoC does not provide CCiC with sufficient assurance/comfort that the off-site BNG has been secured. It no longer considers it to be practical or appropriate to include the purchase of BNG units as an obligation within the Section 106 Agreement and proposes modifications to the suggested conditions.³⁷⁷

13.4.179 The suggested condition 13 provides the mechanism for this. I consider the wording of the condition to be appropriate, and I am satisfied that it would enable NR to secure the necessary BNG units either at Lower Valley

³⁷⁶ INQ 62

³⁷⁷ INQ 70-0

Farm, or another suitable location.

13.5 SoM 4. Impact on Hobson's Park and Nine Wells Local Nature Reserve

13.5.1 Although SoM 4 refers to Hobson's Park Nine Wells Local Nature Reserve, I have assumed that the SoS wishes to be informed about both Nine Wells LNR *and* Hobson's Park since these are separate entities.

Nine Wells LNR

13.5.2 The potential effects on Nine Wells LNR arise from potential impacts on biodiversity and cultural heritage. The Nine Wells LNR is located 90m east of the site. It is currently designated for its habitat value. It was previously designated as an SSSI for its freshwater invertebrate interest, however, following a drought in 1976 these species were lost to the site and it was downgraded to a LNR. It is currently being managed with a view to ensuring greater resilience to drought (via a groundwater recharge scheme).

13.5.3 Nine Wells LNR is hydrologically linked to the CSIE Project as it is the source of Hobson's Conduit, which flows from Nine Wells LNR, under the railway to the south of Addenbrooke's Road and joins Hobson's Brook. Notwithstanding this, the site was scoped out of the biodiversity assessment due to the absence of impact pathways for hydrological effects to occur, and the distance that would obviate the risk of air quality effects. NE support this approach.³⁷⁸ [7.151]

13.5.4 Although the TRA raised concerns about the potential for the CSIE Project to impact upon Nine Wells LNR, it no longer objects on this basis following confirmation from NR that the proposed temporary compound (CC1) would be 75 metres from it. [10.2.1]

13.5.5 I agree with the conclusions within the ES that the CSIE Project would not harm biodiversity at the Nine Wells LNR.

13.5.6 The Nine Wells LNR contains the grade II listed Nine Wells Monument. Paragraph 199 of the Framework states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Policy NH/14 of the SCLP reflects national policy.

13.5.7 The Monument is surrounded by a dense woodland screen. There exists no visual relationship between the Monument and the elements outside the Nine Wells Nature Reserve (including Hobson's Brook). It will not be possible to see the CSIE Project, or any of its compounds, from the Monument. Noise at the Nine Wells LNR has been assessed to decrease as a result of the CSIE Project. [7.153]

13.5.8 I agree with NR that the Monument will continue to stand as an important

³⁷⁸ NR16 Chapter 8 page 8-11

reminder of the origins of Hobson's Brook and the City of Cambridge as a whole. The CSIE Project would not harm the setting or significance of the Nine Wells Monument. [7.154]

Hobson's Park

- 13.5.9 Hobson's Park lies to the west of the railway line and was created in mitigation for the substantial land taken out of the Green Belt in the 2006 CamLP for the Southern Fringe developments to the west of the park. It includes an established wildlife reserve on the lake and the park now has flourishing botanical and invertebrate communities. [10.3.2, 10.2.12, 12.9.2-12.9.6]
- 13.5.10 It is clear from many of the representations that it is valued by the surrounding population for its tranquillity, bird reserve and recreational use. At the time of my visits the park was well used, even in winter months and despite the inclement weather. The CSIE project would impact on the park both during construction and during the operational phase. [10.2.2, 10.15.4, 11.13.7, 11.15.1, 11.18.1, 11.18.2, 11.19.1-11.19.3, 12.2.4, 12.3.1, 12.3.2, 12.8.2, 12.8.3,]
- 13.5.11 Hobson's Park is divided into 3 phases. Phase 1 and 2 are located south of the CGB and are laid out for the benefit of informal recreation and a bird reserve. CCiC advise that the Active Recreation Area to the north of the CGB (Phase 3) is expected to be made available for use within the next year. Access between the extant part of Hobson's Park and the Active Recreation Area included a pedestrian link under the CGB. [8.7, 11.15.5]
- 13.5.12 NPSNN states that existing open space and recreational land should not be developed unless the land is surplus to requirements or the loss would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location. It notes the general presumption against inappropriate development within green belts. It notes that linear infrastructure linking an area near a Green Belt with other locations will often have to pass through Green Belt land, but there will remain a need to contribute to the achievement of the objectives for the use of land in Green Belts.
- 13.5.13 In terms of planning policy, the NPPF is clear that inappropriate development is by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Local transport infrastructure that can demonstrate a requirement for a Green Belt location is not inappropriate development.
- 13.5.14 Policy 4 of the CamLP states that new development in the Green Belt will only be approved in line with Green Belt policy in the NPPF. It states that the Green Belt preserves the unique setting and special character of the city and includes green corridors that penetrate deep into the urban and historic heart of Cambridge.
- 13.5.15 Amongst other matters Policy 8 of the CamLP requires development within and abutting green infrastructure corridors and the Cambridge Green Belt to conserve and enhance the setting and special character of the city; promote access to the surrounding countryside/open space, where appropriate and include landscape improvement proposals that strengthen or recreate the

well-defined and vegetated urban edge, improve visual amenity and enhance biodiversity.

13.5.16 The CamLP was informed by the CIGBBS. This advises that Sector 9 which comprises Hobson’s Park and the area to the south of Addenbrooke’s Road plays a key role in the approach to Cambridge from the South along the railway line. It retains open countryside close to the city centre and prevents the sprawl of built development. The study advises that any development within this sector would be likely to give rise to substantial harm to the purposes of the Green Belt and would increase the risk of urban sprawl if development extended into this sector.³⁷⁹



³⁷⁹ D16 page 124

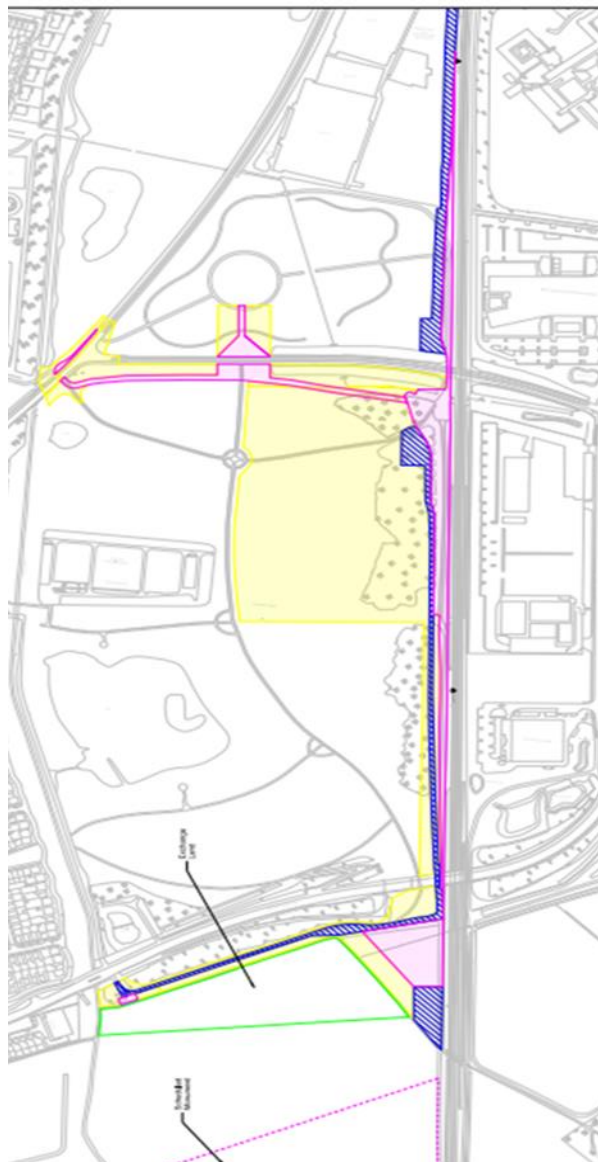
Temporary Effects

- 13.5.17 The ES sets out a number of site wide measures that would assist with mitigating the effects of construction on Hobson's Park. These are set out in the CoCP Part A and further detail would be provided within Part B. The effects on biodiversity are discussed above and are not repeated here.
- 13.5.18 NR proposals have evolved since the submission of the application. In particular, the size of CC3 has been considerably reduced. The proposed layout includes the retention of many of the existing trees rather than their removal and replacement. The ES also included an area of land where it was proposed to use surplus excavated material for landscaping purposes. This is no longer proposed. [7.143]
- 13.5.19 NR state that about 88% of the park would remain available for public use during construction. However, this figure would appear to be incorrect since it only takes account of the area of CC3 and not the other areas of the Hobson's Park that will be required. TRA suggest that the area of Hobson's Park now required is about 17%, rather than the 35% originally proposed. [6.154, 9.2.15]
- 13.5.20 Having regard to the updated BoR I consider that the TRA represents a more reliable assessment.³⁸⁰ However, in practice, the impact is likely to be greater than suggested by a percentage figure, particularly since it is based on the entirety of Hobson's Park, including Phase 3, (the Active Recreation Area) which has yet to be made available to the public. CCiC accepts that the size of CC3 is justified and acknowledges the constraints of the development site and the construction programme. It however considers that due to its detrimental impact on Hobson's Park and the conflict with Policy 67 of the CamLP, that if it were possible to reduce the size of the working area further then this should be done. It suggests that the submission of the construction programme details and a phasing plan for the site compounds in accordance with Condition 10 would allow this to be reviewed. [8.14-8.16]
- 13.5.21 TRA and CPPF remain concerned at the extent of the temporary land take within Hobson's Park and consider that the CBC should take more of the strain, particularly since the primary purpose of the CSIE Project is to meet the needs of the CBC. [9.2.15, 9.3.7,9.3.8]
- 13.5.22 CC3, which represents the most significant temporary land take within Hobson's Park, is to enable the construction of the Station building. Once this compound is established NR anticipate that it would reduce the amount of traffic crossing Hobson's Park from CC1. The need for the extent of CC3 is illustrated on INQ 19. Whilst this remains a substantial area, it does allow the existing trees to be retained and the areas identified on the submitted plan would appear to be reasonably required for a project of the scale proposed.
- 13.5.23 I am sympathetic to the views of TRA and CPPF regarding the need to

³⁸⁰ NR08-2

explore the opportunity to locate the compound on the eastern side of the railway, but it would seem that there is little scope to do so. The AZ site currently under construction extends up to the boundary of the proposed Station concourse. The area to the east of Francis Crick Avenue is occupied by the Royal Papworth Hospital, whilst the areas to the north would be separated from the proposed station by the CGB and are occupied by the MRC and AZ. Moreover, there is a need for a construction compound to be located on the west side to carry out the works in that location. Therefore, whilst the temporary loss of this area is regrettable, I am satisfied that it is necessary to provide a compound in this location. In reaching this conclusion I have had regard to the efforts made by NR to minimise the area of land required and also that that any scope for the further reduction of this area can be addressed by Condition 10.

13.5.24 The land acquisition and rights sought within Hobson's Park is illustrated on the plan below (INQ 59).



- 13.5.25 There would also be a qualitative impact on Hobson's Park. The temporary impacts associated with CC3 and the haul road are likely to endure throughout the construction period. The temporary land take would create a 'pinch point' between CC3 and the allotment site which would provide the only link between the southern and northern areas of the park. The remaining useable areas of the park would for the most part be close to the CC3 and the haul road. This would impact on the tranquil environment that is valued by so many residents and other users of the park.
- 13.5.26 The Active Recreation Area is expected to be available for use within the next year. Subject to the early provision of the CGB crossing this would help to mitigate the loss of open space. It would however, differ in character from the area of park to be used for construction. Moreover, the purpose of the Active Recreation Area is to mitigate the recreational impacts of the Southern Fringe housing, the majority of which has already been delivered and therefore there is an existing need for the recreational space that is due to be delivered.
- 13.5.27 It was intended that the Exchange Land would be made available for public use at an early stage during the construction process. However, due to the need to provide mitigation for corn bunting and sky larks the public will not be able to use this area during the construction period.
- 13.5.28 Visual amenity for users of Hobson's Park would be affected during construction due to the large area of land to be occupied and the associated vegetation removal required, both within the park and elsewhere on the Order Land such as adjacent to the AMB.
- 13.5.29 The majority of Hobson's Park comes within Sector 9.2 of the CIGBBS area. The ES considers this area to be a receptor of moderate sensitivity, since the CBC and the Clay Farm Estate reduce the scenic quality, and because the effects are reversible. It also describes the level of tranquility within the park to be 'small'. For these reasons it concludes that there would be a Moderate / Minor Adverse effect on this receptor of Moderate sensitivity and concludes that it would not be significant.
- 13.5.30 I consider that this assessment fails to have regard to the role of the park within the landscape and its importance to the local community, including residents of Clay Farm, for recreation. Whilst it is enclosed by development to the east and west its role, as stated in the CamLP includes providing a green corridor to the city centre. Although the tranquility of this area is reduced due to the railway, it is not subject to significant road noise or other disturbance and the level of tranquility, including that derived from the bird reserve, greatly exceeds the 'small' attributed to it in the ES. The intrusion of the construction activities would undermine this role, as well as limit the availability of the park for recreation. It would intrude on users both visually, due to the activity and loss of a significant area of the park, as well as through noise and other disturbance, including the construction of the CSIE Project.
- 13.5.31 The measures within the CoCP would go some way to minimising these

effects. Although the land acquisition within the park has been greatly reduced, this must be balanced against the fact that the Exchange Land would not be available for use as anticipated in the ES. The CSIE project temporary land acquisition within Hobson's Park would have a significant adverse effect in terms of biodiversity, tranquility and recreational use, as well as adverse effects on the landscape and visual amenity of the park. I conclude that at a time when the majority of the dwellings within the Southern Fringe are completed and occupied, with the remaining dwellings likely to be delivered in the very near future, there would be a significant, detrimental effect on Hobson's Park. Although this would be temporary and some of the effects would be reversible, it would endure for two or more years, adversely impacting on local residents and those visiting and working at the CBC.

Permanent Effects on Hobson's Park

- 13.5.32 There would be a permanent loss of land within Hobson's Park. The land proposed to be acquired is necessary to locate the western station building, platform, cycle parking and hard landscaping areas and the associated widening of the operational railway corridor to service the new Station. In addition, a new cycle and pedestrian path will be constructed across Hobson's Park parallel to the CGB, with a separate pedestrian footpath projecting north across the guided busway into the Active Recreation Area. A separate rail systems compound is required south of Addenbrooke's Road Bridge also within the confines of Hobson's Park. NR state that the permanent land take requirement is 20,439 m². [7.144]
- 13.5.33 The Exchange Land located to the south of Hobson's Park and extending to an area of about 20,840 m² is proposed to mitigate the loss of the public open space in Hobson's Park and that at Long Road Sixth Form College.
- 13.5.34 A number of parties strongly object to the extent of the land required for the cycle parking. Whilst recognising that the plans are illustrative, it would seem that the cycle parking on the western side of the railway would occupy an area of about 110 m in length and would be about four metres high but 6 -7 metres above the existing ground levels due to the proposed change in level. When taken together with the station building it would represent a significant intrusion into the park. In order to justify such an intrusion and the loss of Green Belt land it is necessary that there is a need for clear evidence that such a level of cycle parking is required.
- 13.5.35 As set out above, based on the figures in the Transport Assessment 45% of all trips to and from the west would be by cycle, and in the absence of any substantive evidence to support it, I find this figure to be implausible. To take land from the park unnecessarily would be unfortunate, as well as contrary to national and local planning policies, including Green Belt policy. Suggested condition 22 would allow for a phased delivery of cycle parking in this area, underpinned by clear evidence of the level of demand. This should ensure that land for cycle parking is not removed from the park unnecessarily. [13.4.67,13.4.68]
- 13.5.36 The proposed arrangements include a new pedestrian/cyclist route to the

western station building. As discussed above, although the area of the park to the north of this route would not be acquired, it would effectively reduce the area available for recreation and introduce a potential conflict between park users and cyclists using this route. [13.4.52-13.4.55]

- 13.5.37 The proposal would also result in the loss of the existing route under the CGB from the part of the park that has already been delivered to the Active Recreation Area. The proposal to grade this path so that it would provide step free access to the Station would mean that the area between the path would be re-profiled to form an embankment. It is intended to landscape and plant this area, but it would further reduce the useable area for recreation. [13.4.56,13.4.57]
- 13.5.38 NR propose to use the existing footpath through Hobson's Park to provide access to the Western Station Building. TRA is concerned that this pathway may be mis-used by cyclists. It has agreed with NR that the main cycling routes will be signed and no cycling signs installed at other points of entry into the park. At the Inquiry NR explained that it intended to acquire rights along this pathway and therefore it would not be enclosed so as to impede pedestrian access across it. Notwithstanding this, the area between the CGB and the proposed path would no longer be available for recreational use and the recreational use of the park would essentially be confined to that area south of the proposed walkway. It is proposed to provide a maintenance track alongside the railway.
- 13.5.39 The most prominent feature within Hobson's Park would be the Station. This would be a two-storey building. Illustrative plans for the proposed Station building are included in the Planning Direction Drawings. These also include parameter plans that limit the horizontal and vertical extent of the proposed building. NR suggest that the design of the Station would soften the abrupt boundary between the CBC and Hobson's Park. However, this view disregards the fact that the two storey Station building, two storey cycle parking and the emergency escape footbridge will all extend into the park itself, as well as removing areas of newly established landscaping. It would represent a significant change in the character and appearance of the park. [7.146]
- 13.5.40 CPPF is particularly concerned about the height and visual prominence of the proposed Western Station building. It seeks a design that reflects its parkland setting. There are a number of practical and functional constraints on the design of the Station, but its external appearance and the precise materials to be used are a matter of detailed design. The Design Principles seek to integrate the proposed Station with the park. Suggested condition 3 requires the development to be carried out in accordance with the Design Principles. Condition 17 requires details of the Station building to be submitted for approval together with a Design Compliance Statement demonstrating compliance with the relevant approved Design Principles. Condition 27 requires details of lighting to be submitted for approval, whilst Condition 29 requires the landscape proposals to accord with the Design Principles.[7.146,7.147]
- 13.5.41 Whilst I agree with CPPF and others that the design of the proposed Station

should reflect its parkland setting, the Design Principles and suggested conditions should together deliver an appropriate detailed design.

- 13.5.42 The other significant feature within Hobson's Park is the RSC that would be located to the east of the Exchange Land. This would be a secure compound to accommodate a transformer, principal supply point and building, points heating cabinet, signalling equipment building and telecoms equipment room. The location was selected in order to minimise the size of cables to power equipment. It would be a temporary workplace from which occasional maintenance activities would be undertaken and includes the necessary parking provision. The precise nature of the proposed buildings has not been confirmed, and it may be that modular units are used. The parameter plans limit the height of any buildings to 4 m above existing levels. [7.148]
- 13.5.43 CPPF and TRA both consider that the proposed location of the RSC is unduly prominent and would block views to and from the wider areas of the countryside, including White Hill and the Gog Magog Hills. CPPF request a condition that requires the RSC to be moved closer to the railway. [10.2.18,10.3.10,10.3.11].
- 13.5.44 Mr Barnes explained that the RSC had very specific locational requirements, but that should some of the rail infrastructure be upgraded prior to the construction of the RSC it may not be required. However, due to the specific technical and functional requirements of the RSC it may need to remain in the position proposed. In this location, due to its utilitarian appearance, the RSC has the potential to intrude on views from Hobson's Park and the Exchange Land, and to further detract from views from the park. Careful design of the buildings, the limitation on the height of the buildings and the provision of landscaping around the site would assist with minimising any adverse effects on views within the park and the surrounding area. [7.148]
- 13.5.45 The area where it is proposed to locate the Station and the AMB on the opposite side of the railway all currently benefit from trees that were planted a number of years ago and now that they are established that are starting to make a significant contribution to the quality of the landscape and help to integrate the buildings on the CBC with the surrounding area. Some of the trees within CC3 would be retained, but many of the previously planted trees would be removed, including those where it is proposed to locate the station and those between the AMB and the railway.
- 13.5.46 Accordingly, when the visual impact of the station, the RSC, the cycle parking, the removal of trees planted to mitigate previous development, and the emergency access bridge are taken into account there would be a significant adverse effect on Hobson's Park. The landscape proposals for Hobson's Park and the Exchange Land would contribute towards mitigating the impacts of the CSIE Project on Hobson's Park but would not represent an enhancement. Moreover, as explained above, the extent of the loss of the trees at Long Road Sixth Form College is uncertain, due to the information available. These trees are prominent in views from Hobson's Park and the CGB and the loss of trees from this area (although significantly reduced by comparison with the scheme as submitted) would add to the

harm to the character and appearance of Hobson's Park.

- 13.5.47 NR suggest that the Exchange Land would provide some recreational and biodiversity advantages for Hobson's Park. It submits that the proposals would soften views to the engineered Nine Wells Bridge structure and to the built-up edge of the CBC, as well as providing a landscape structure to this area of Exchange Land. The ES assessed the overall impacts of the operational phase of the CSIE Project on the landscape character and visual amenity of Hobson's Park as moderate minor, affecting receptors of moderate sensitivity and consequently not significant. [7.149]
- 13.5.48 In my view the ES assessment significantly underestimates both the harm to the character of the park and the visual harm that would arise from the CSIE Project. There would be impacts in the manner in which residents and others would be able to use the park, urban development such as the Station, the RSC, the cycle parking area, and lighting, together with the activity in the park arising from the use of the Station would harm the character of the park. In addition to the introduction of built structures, the loss of trees, including those originally planted for screening would harm the visual amenities of the park. Whilst the Exchange Land would go some way to compensating for the harm to Hobson's Park, on the basis of the available evidence, I do not consider that when balanced against the harm, including the harm to the users of the park that the Exchange Land would be beneficial when considered against the proposals as a whole, or that that the impacts on Hobson's Park would be 'not significant'. [7.149]
- 13.5.49 CPPF suggest that in order to offset the harm arising from the CSIE Project the facilities within the Station should be available to users of the park. In particular, it seeks public access to the toilet facilities, and if possible, to any catering facilities. NR is resistant to this suggestion. It advises that operators prefer to locate such facilities behind the pay line and that there is no policy requirement to provide publicly accessible toilets. Moreover, NR state that there is no suggestion that Cambridge South Station serves as an additional attraction to Hobson's Park, and no justification for the provision of toilets as part of a package of mitigation for Cambridge South Station. [10.2.35]
- 13.5.50 The layout of the Station is a matter of detailed design. Whilst I recognise that the potential operators may have a preference to provide cafe and toilet facilities on the passenger side of the pay line, such facilities are generally available at many stations before passing through the pay line. They would be used by people meeting passengers from trains, or meeting those travelling in the opposite direction, as well as passengers waiting for their train to arrive. Making such facilities available to the public in general would also be beneficial to those visiting the various hospital facilities at the CBC who may wish to visit Hobson's Park, including as a place for quiet contemplation. Overall, I consider that the future operator should be strongly encouraged to make such facilities available are made available to the general public. The provision of public facilities within the station would also help to compensate for the significant harm to Hobson's Park during the construction period and the on-going harm during the operational

period.

- 13.5.51 CCiC is also concerned that the CSIE project could have cost implications for the future management and maintenance of the park. Heads of Terms for a s106 have been agreed with NR to cover the cost of additional maintenance costs, inspections during construction and monitoring costs. Subject to a condition requiring NR to enter into a S106 Agreement, CCiC is satisfied that this matter would be satisfactorily addressed. [8.10,8.11]
- 13.5.52 Overall, I conclude that the CSIE Project would give rise to significant harm to the Hobson's Park during construction and operation. The exchange land, and suggested conditions would assist with mitigating this harm, but there would remain adverse impacts on the character, appearance and use of Hobson's Park.
- 13.6 **SoM 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.**
- 13.6.1 The most significant transport projects are the EWR and CSET. These are being promoted independently of the CSIE Project and there is no fixed date for their submission.
- 13.6.2 The strategic objectives for assessing the alternatives included *integrating with and enhancing East West Rail opportunities*. The CSIE Project was assessed as "*large beneficial*" against this metric, unlike all other alternatives considered, which would have had a neutral effect. [7.15, 7.155]
- 13.6.3 The EWR is still subject to consultation, consequently its precise locational and infrastructure requirements at the CBC are not yet specified. No party submitted any evidence to suggest that the CSIE Project would in any way impede the delivery of the EWR. NR advises that a model indicative train specification showed that the two services could dovetail. Moreover, some of the works proposed by the CSIE project, such as the closure of the two level crossings would be beneficial for the EWR. [7.160]
- 13.6.4 The CSET scheme is more advanced. NR is liaising with GCP and CSET design team to integrate the two schemes and maximise the benefits to potential users. The parties have agreed a Protocol that identifies common plots, establishes an overarching principle of collaboration and co-operation (including between respective contractors), as well as regular meetings.³⁸¹ [7.157]
- 13.6.5 There have been a number of modifications to the CSIE Project in order to accommodate CSET. The most notable of these is the relocation of the drainage pond to the west side of the railway. Other modifications include the relocation of the access to the proposed Station to the south to accommodate CSET and the consequential relocation of the attenuation

³⁸¹ INQ 17 Annex 1

basin.

- 13.6.6 The original Station access in the CSET scheme was not aligned with the early CSIE proposals for the proposed access. This has been relocated to accommodate the CSET project. This also required relocation of the proposed attenuation basin as well as the reconfiguration of the sub-surface and the transport interchange in the station forecourt. [7.157]
- 13.6.7 The CSET proposals include the widening of the pedestrian/ cycle crossing across Francis Crick Avenue which will be beneficial to pedestrians and cyclists using the station and improve connectivity. [7.158]
- 13.6.8 There remain areas of potential overlap between the projects. Both projects anticipate using a stretch of land east of the railway, northwest of the Nine Wells LNR. CSIE requires the land for its Main Site Compound CC1, however CSET's proposed route would bisect that land. Notwithstanding this, the CSIE Project is likely to be finished before that area is required by CSET. The Protocol Agreement provides for collaboration between the two projects to ensure both projects can proceed. Consequently, the CSIE project would be unlikely to hinder the implementation of the CSET project. [7.159]
- 13.6.9 A number of parties raised concerns regarding the interchange facilities between the proposed station and bus services. There is concern that with each party operating independently that there would not be sufficient conveniently located bus stops on Francis Crick Avenue. TRA consider it imperative that there are adequate bus interchange facilities serving the Station. It suggests that a condition be imposed requiring the provision of adequate bus interchange facilities. [10.2.20-10.2.22, 10.4.7, 10.4.17,10.4.18. 11.13.9]
- 13.6.10 It is intended that CSET would provide an improved bus interchange with Cambridge South Station. CSET bus stops are proposed on Francis Crick Avenue just south of the station access. The location of the bus stops is not a matter within the control of NR, but there is no evidence to suggest that the proposed station, or its access, would in any way impede the location of the proposed bus stops or adversely impact on the operation of existing bus services.
- 13.6.11 The location of the Station is very constrained in terms of space. The forecourt area would be heavily used by pedestrians and there is insufficient space to accommodate bus stops within it. The existing CGB runs along the northern boundary of the CSIE site and includes services to Cambridge city centre and Trumpington Park and Ride. The closest CGB stops in each direction are located close to Royal Papworth Hospital approximately 250m east of the proposed Station. The CGB stops have shelters and timetables and serve CGB routes A and D.
- 13.6.12 The Transport Assessment found that the additional demand for bus services arising from the proposed Station could be accommodated by these existing bus services. The CSIE Project proposes the widening of the crossing at Francis Crick Avenue/CGB to accommodate pedestrians,

including those wishing to access the bus services.

- 13.6.13 I conclude that the CSIE Project has taken all reasonable steps to accommodate the requirements for the construction and operation of the CSET Project. It is evident from the Protocol that the parties are aware of potential conflicts between the projects and are working together to ensure that these do not impede the delivery of either project. Whilst a bus interchange facility within the Station would be desirable, the physical constraints of this very restricted site mean that it is not achievable.
- 13.6.14 SCT consider that the scheme fails to optimise the opportunities to integrate bus and train services. In order to address this concern, it proposes the demolition and rebuilding of the CGB bridge. This matter is discussed below.[10.4.19-10.4.22]
- 13.6.15 CBCManCo/CML are concerned that the CSIE Project may impact on its ability to bring forward the MSCP for Phase 2 of the CBC due to the proximity of the main construction compound.
- 13.6.16 NR propose a separate Land and Works Agreement with both CML and CBCManCo and to work collaboratively to ensure sufficient information is available to develop construction methodologies and management requirements so that both projects can be developed concurrently. NR do not believe there are any areas of conflict between the projects which cannot be resolved.[11.10.33]
- 13.6.17 Subject to a suitable Land and Works Agreement between the parties the CSIE Project should not hinder the delivery of the MSCP or the delivery of Phase 2 of the CBC. The SoS may wish to ensure that the necessary agreement is in place prior to approving the Order.

13.7 SoM 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.

- 13.7.1 Details of the statutory undertakers impacted by the CSIE Project are included in the BoR. The likely impacts on public utilities are set out in the evidence of Mr Barnes. Article 42 and Schedule 12 of the TWAO set out the protective provisions for various statutory undertakers. Although there is some variation in the detail, in broad terms the provisions prevent NR from acquiring or interfering with an undertaker's apparatus arbitrarily, require NR to comply with the specific provisions as to notice of, and liaison in relation to, proposed works affecting relevant apparatus, and to pay the reasonable expenses and costs of the undertaker incurred in relation to requests for inspection, alteration, removal or protection of apparatus as part of the works. [7.162,7.163]
- 13.7.2 Both objections from statutory undertakers have been withdrawn following amendments to the Draft Order.³⁸² National Grid confirmed that the Draft

³⁸² OBJ12 & OBJ16

Order would not interfere with their statutory functions, and HCT does not object to the proposal.[12.9.10-12.9.18]

13.7.3 On the basis of the available information, I agree with NR that the Draft Order would not have any material or unacceptable impact upon 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.

13.8 SoM 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, including consideration of:

- **the impacts of noise and vibration;**
- **drainage;**
- **the impacts of dust and dirt from construction;**
- **the impacts on trees, hedgerows, and existing plants;**
- **biodiversity, including biodiversity net gain;**
- **Control and storage of spoil during construction.**
- **Cumulative impacts**

13.8.1 Environmental Impact Assessment (EIA) is an iterative assessment process required for projects that are likely to have significant effects (positive or negative) upon the receiving environment. A main purpose of EIA is to provide the decisionmaker and members of the public with a clear description of what the likely significant environmental effects of a project would be and how they have been assessed. This should be provided within the ES. It is a requirement for the ES to be published to afford the consultation bodies the opportunity to comment on the anticipated likely significant effects of the development. Best practice dictates that public participation/consultation is undertaken at an early stage and that applicants have regard to comments received, adapting the design of the development as appropriate, but it is not a statutory requirement to do so.

13.8.2 Regulation 18 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 establishes the minimum information that is necessary for inclusion within the ES in order for it to be considered as such. It explains that the content of the ES should include a description of:

(a) the proposed development (site, design, size and other relevant features);

(b) the likely significant effects;

(c) any features or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects;

- (d) the reasonable alternatives studied by the applicant, which are relevant to the proposed development and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the development on the environment;
- (e) a non-technical summary of this information; and
- (f) any additional relevant information specified in Schedule 4 (Information for inclusion in environmental statements) which is relevant to the characteristics of the development and the environmental features that are likely to be significantly affected
- 13.8.3 The concern of the Inquiry is with the adequacy of the EIA process as a whole, not just the ES in isolation. As such, additional information submitted to the Inquiry is also relevant.
- 13.8.4 The ES was the subject of a scoping report to the DfT. The scoping report was in itself the product of extensive consultation with relevant stakeholders. The ES was prepared by competent experts in accordance with the scoping opinion. Due to the outline nature of the planning permission sought, the ES was based on an assessment of the reasonable worst case likely effects and identified broad means of mitigation. These are secured through parameter plans and conditions. [7.172]
- 13.8.5 Five parties objected to the adequacy of the ES. Of these three were withdrawn during or prior to the Inquiry.³⁸³ NR has reached agreement with these parties and suggests that these parties were seeking a level of detail that would typically be available at the detailed design stage. However, the various concerns were fundamental to the operation of the services or research undertaken by these objectors. The agreements reached address how the concerns raised would be managed, particularly, but not only during the construction period. In the absence of such assurances there is potential that the CSIE Project could be prejudicial to the hospitals and research facilities on the CBC. [7.68,7.90,13.5.97,13.4.98,13.4.108]
- 13.8.6 There are outstanding objections regarding the adequacy of the ES from CML and CBCManCo. These concern mitigation in respect of drainage, the adequacy of the Transport Assessment in terms of the impacts on private roads on the CBC and the cumulative effects of the CSIE Project and the CSET Project on the CBC. These matters were addressed by way of the flood risk and drainage chapter and the transport chapter of the ES.³⁸⁴
- 13.8.7 Both parties continued to discuss these matters prior to the inquiry. The latest position of each party in terms of the flood risk and drainage is set out at appendix 1 of Mrs Brocken's Proof of Evidence, and transport matters are covered in appendix H1 of Mr Hilling's Proof of Evidence.³⁸⁵

³⁸³ OBJ 06 CUH; OBJ 08 UoC; OBJ 09

³⁸⁴ E 05 Appendices 2 & 3

³⁸⁵ NRE 5.2 and NRE 2.3

Noise and Vibration

13.8.8 The ES found significant effects on certain receptors in terms of noise during construction and vibration on some residential receptors. As explained above, additional bespoke assessments in relation to noise and vibration were undertaken with the UoC and MRC. Both parties are now satisfied that the effects of noise and vibration are capable of mitigation subject to compliance with the relevant conditions. Mechanisms are in place to ensure adherence to the agreed thresholds. I am therefore satisfied that the ES together with the additional information submitted to the Inquiry are sufficient for the likely significant effects to be assessed in relation to noise and vibration.

Cultural Heritage

13.8.9 This matter is discussed in detail under SoM 8. There is clear evidence that the matter has been fully assessed in the ES and HE do not seek any further information or mitigation.

Drainage

13.8.10 The ES set out the likely significant effects in relation to drainage. The assessment was subject to some criticism, including from CML and CBCManCo. Other parties also raised significant concerns regarding drainage. As set out above, the drainage proposals have been modified since the publication of the ES. There remain outstanding concerns from CML and CBCManCo, but these are generally matters of detailed design to be addressed at the GRIP4 stage of the project and come within the scope of the suggested conditions. On the basis of the information within the ES and that submitted to the Inquiry I am satisfied that there is sufficient information to enable an assessment of the likely significant effects in terms of drainage.

Trees Hedgerows and Existing Plants

13.8.11 There are two main areas of broadleaved woodland. The first is within the grounds of Long Road Sixth Form College and the other is within Hobson's Park and the CBC. These trees were surveyed in June 2021 and the AIA was prepared in January 2022. Therefore, the ES did not have regard to either the tree survey or the AIA. It did however, note a significant adverse effect on these trees, and therefore it could be argued that it assessed the worst-case scenario with regard to these trees.

13.8.12 The proposals in this area have been modified and therefore the number of trees to be removed has been greatly reduced. Taking account of the additional information within the AIA and the tree survey, I consider that there is sufficient information to assess the likely significant effect, although for the reasons given above, the precise impact on these trees and the number likely to be removed and/or damaged remains unclear. Therefore, any assessment would need to be on the basis of a worst case scenario. In terms of the other existing trees within or adjacent to the Order land the

loss and mitigation is addressed in the ES. [13.4.157]

Biodiversity

13.8.13 This matter is discussed in detail under SoM 3(i). On the basis of the information within the ES and the additional mitigation measures, including measures in relation to BNG submitted to the Inquiry, I am satisfied that there is sufficient information to enable an assessment of the likely significant effects in terms of biodiversity. The mitigation measures will include the need to secure BNG units outside of the Order land and this is secured by condition.

Control and storage of spoil during construction

13.8.14 Chapter 14 sets out the strategy for the management of spoil during construction. This includes a Site Waste Management Plan which is to be secured by condition. Excavated material from construction would be targeted for fill and landscaping. Site levels would be managed such that the amount of material from cuts roughly matches the amount of fill needed to make nearby embankments. CC1 would be used to store as much spoil as possible to facilitate reuse. The ES proposed that part of Hobson's Park would be used for the storage of spoil. This is no longer proposed and since it will not be possible to store all spoil onsite, some spoil will have to be transferred off site. I am satisfied that the ES provides sufficient information to enable an assessment of the likely significant effects. These measures would adequately mitigate the effects in respect of the control and storage of spoil during construction. [7.193,7.194]

Cumulative Impacts

13.8.15 The ES assesses the impacts of the CSIE Project both during construction and operation against a core list of committed and proposed development. Some environmental impacts, by their very nature, do not engage cumulative effects and were scoped out in the Scoping Report. These areas were agreed with the SoS. [7.184,7.186]

13.8.16 At the time at which the ES was published the CSET scheme had not progressed sufficiently enough to enable an assessment of cumulative vehicle movements. A high-level assessment was undertaken once further information became available. No cumulative assessment of the impact on pedestrian, cycle and public transport demands on crossings and interchanges was undertaken. This is because the CSET scheme would involve a complete replacement of the relevant junctions and infrastructure identified. [7.184]

13.8.17 The Protocol agreement with CSET sets out a general duty on both parties to liaise and co-operate with each other and has specific duties for the management of mitigation and overlap sites. This will further ensure that any potential cumulative impacts/effects can be adequately addressed. [7.185]

13.8.18 I am satisfied that the ES together with the additional assessments and agreements provide sufficient information to enable an assessment of the

likely cumulative effects.

13.9 SoM 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

- 13.9.1 There are 3 Scheduled Monuments within 1km of the Order Land. The only Scheduled Monument that would be affected by the CSIE Project is White Hill Farm. This asset is a cropmark complex of rectangular enclosures, revealed by aerial photography west of White Hill Farm. This asset is partially within the CSIE Project boundary and lies between the Cambridge to London railway to the east and Hobson’s Brook to the west. This is a designated heritage asset of high overall significance, legally protected as being of national importance. [7.190]
- 13.9.2 The Environmental Statement (ES) is supported by the results of a desk-based assessment, geophysical survey and targeted trial trench excavations. The Scheduled Monument covers a complex of features identified from cropmarks, and geophysical survey. The north-western portion of the complex comprises sub-square enclosures, previously identified as a villa or large farmstead. A series of northwest-southeast aligned ditched trackways and enclosures extends from the southeast corner of the complex eastwards beyond the scheduled area, indicative of a settlement and field system.[12.7.3]
- 13.9.3 Scheduled Monuments are designated heritage assets. They are, by definition, of national importance and are protected under the provisions of the Ancient Monuments and Archaeological Areas Act. Any works will require Scheduled Monument Consent from the SoS for Culture, Media and Sport in England. It is NR’s intention to seek such consent. Where works will result in damage to the Scheduled Monument and the application has demonstrated that that damage amounts to less than substantial harm, such consent may be granted where there is an appropriate level of public benefit from the works.
- 13.9.4 NPSNN paragraph 5.131 requires the SoS to give great weight to the asset’s conservation. It provides similar guidance to that within paragraphs 199 and 200 of the NPPF. This states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. The NPPF also advises that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. [12.7.1]
- 13.9.5 Policy 61 of the CamLP directs decision-makers to ensure that applications for development demonstrate understanding of the significance of heritage assets and any potential impacts on their significance along with providing justification for works that would lead to harm or substantial harm to heritage assets. The aim of this policy is to preserve or enhance the

significance of the heritage assets of the City of Cambridge.

- 13.9.6 The construction of the haul road (HR7) would run within the eastern edge of the Scheduled Monument and would cause a direct, physical impact on the portion of the monument and its associated archaeological remains. The recent site investigations (geophysics and evaluation) found that the archaeological features are shallow in nature (0.35m below ground level). This means that the features would be vulnerable to either crushing and/or compaction by heavy vehicles, especially if the area became very wet due to heavy rain, even if a temporary trackway were to be laid on the ground surface. [7.191,12.7.4,12.7.5]
- 13.9.7 The proposed archaeological mitigation would include a programme of strip, map and record excavation to preserve by record archaeological remains impacted by the haul road. The proposed scope, approach and methodology for all archaeological mitigation work would be detailed in a Written Scheme of Investigation which will be submitted to and agreed with the archaeological advisors to CCoC. HE will also be invited to review and comment on the Written Scheme of Investigation as the work relates to a Scheduled Monument. This work will be secured by proposed condition 11 of the deemed planning consent.[7.194]
- 13.9.8 However, as is acknowledged in the ES, the impacts on the Scheduled Monument and non-designated remains associated with it are assessed as moderate-adverse after mitigation. This is because the haul road will involve severe truncation and removal of remains. [7.194]
- 13.9.9 There is also a potential for harm to the setting of the Scheduled Monument due to the location of the RSC. The Scheduled Monument has no visible above ground remains and is located within an area characterised by post-medieval and modern agricultural activity, modern infrastructure, housing and commercial development. The Scheduled Monument's setting to the west has been considerably changed by development, including the railway to the east and the recently developed Scotsdale Garden Centre to the west. White Hill is the highest point within the landscape it is likely that there would have been a visual relationship with the potential roman villa. This visual relationship remains, albeit partially interrupted by the railway line. [7.193]
- 13.9.10 Since the setting of the Scheduled Monument does not make a significant contribution to its significance, any harm would be minimal. It is proposed that landscaping would screen views of the RSC. This would be secured by proposed condition 29 of the deemed planning consent and would mitigate the potential harm to the setting.
- 13.9.11 HE considers that the proposal would be likely to cause less than 'substantial harm' to the significance of the monument overall. I share this view and any harm to the Scheduled Monument should be weighed against the public benefits of the proposal.

13.10 SoM 9. Is addressed towards the end of these conclusions.

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

- 13.11.1 The final version of the conditions suggested by the applicant can be found at INQ 72. The suggested conditions were discussed at a round table session during the Inquiry and the GCSP, amongst others, were present during the discussion. I have also had regard to submissions in relation to conditions from other parties including CPPF and TRA. INQ 72 takes account of matters raised during the discussions at the Inquiry and changes to the Order.
- 13.11.2 I have assessed the suggested conditions in the light of the advice within the NPPF paragraph 56. This advises that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects.
- 13.11.3 The suggested conditions include an interpretation section. I find these suggested interpretations to be generally acceptable. The exceptions are (g) the planning drawings. As explained in Section 4 of this Report, there is an inconsistency within the plans. In addition, the plan numbers reflect the originally submitted plans rather than the updated plans at NR13-1. [4.20]
- 13.11.4 Similarly, the references to the parameter plans within the request for the deemed planning permission (clause (h)) do not reflect the most recent plan numbers.
- 13.11.5 It is recommended that interpretation clauses (g) and (h) be amended to refer to the schedule of plans at schedule 2 of the suggested conditions. In addition, the plans referenced at clause (g) should be updated for consistency with each other.
- 13.11.6 Condition 1 requires the commencement of the development within five years. Condition 2 requires the development to be carried out in accordance with the approved planning drawings. These are listed in Schedule 2 of the deemed planning conditions. However, the approved planning drawings are not defined within the interpretation section. I have therefore amended the wording to refer to "*Schedule 2 Part 1 of these Conditions*" in the interests of precision.
- 13.11.7 Condition 3 requires the development to be carried out in accordance with the Cambridge South Design Principles. This is necessary in order to ensure that the development is of a satisfactory design and has an acceptable relationship with its setting.
- 13.11.8 Condition 4 requires the applicant to enter into a section 106 agreement with CCiC. The planning obligations from NR to CCiC are to pay the maintenance contribution in respect of the Exchange Land; construct Works 4 (the link from CGB to the western Station Building) and 5 (the CGB crossing linking Hobson's Park) and the Tree Mitigation Scheme. CCiC covenants to NR to maintain Works 4 and 5 and to manage the Exchange

Land.

- 13.11.9 Whilst a condition cannot generally require a party to enter into an agreement under s106 of the Town and Country Planning Act 1990, the NPPF is clear that a negatively worded condition making such provision may be appropriate in exceptional circumstances. The exceptional circumstances arise because NR intends to deliver mitigation but does not presently have an interest in the land required for it. The planning obligations within the draft s106 agreement are necessary to make the development acceptable, they are directly related to the proposed development and fairly and reasonably related in scale and kind. It would therefore comply with the Community Infrastructure Regulations. I therefore conclude that the proposed condition is justified, in order to secure the necessary mitigation. [7.214]
- 13.11.10 Condition 5 requires a phasing plan that sets out the sequence of works, details of any phases to which certain conditions will not apply. The conditions concerned are those in relation to soil contamination and remediation, CoCP, archaeological mitigation, investigation and evaluation, Construction Ecological Method Statement, surface water drainage and construction, the detailed design of various elements, the soil management plan, the hard and soft landscaping scheme, the AMS and the tree protection plan.
- 13.11.11 A phasing plan is necessary to ensure that the proposed development comes forward in a suitable timeframe and that all necessary mitigation is provided in a timely manner. It also provides flexibility with the discharge of conditions, and the location of site compounds and indicative duration of works. I consider that this condition is necessary in order to ensure that the impacts of the proposed works are mitigated in a timely manner. Whilst the list of conditions that may not apply to a specified phase is extensive and includes matters that are integral to satisfactorily mitigate the impact of the proposed development, it will be for the LPA to determine whether any specified phase is acceptable without the conditions that apply to the other parts of the scheme.
- 13.11.12 Conditions 6, 7, 8 and 9 together require an assessment of potential contamination, the necessary site investigations, a remediation strategy and timetable, and measures to address any unexpected contamination. Condition 8 requires a completion report in relation to the remediation strategy. These conditions are necessary to avoid any potential harm to human health or the environment as a consequence of the proposed development.
- 13.11.13 Condition 10 requires the submission of the CoCP Part B. As discussed above this is an essential requirement in order to limit and mitigate the effects of the proposed development on the environment during construction.
- 13.11.14 Condition 11 requires a programme of archaeological investigation in accordance with a Written Scheme of Investigation. This condition is necessary in order to protect and/or record any archaeological assets that

may be on the site.

- 13.11.15 Condition 12 requires the submission of an Ecological Method Statement (EMS). This is necessary to ensure that the proposed development adequately safeguards, mitigates and enhances the natural environment. Clause (b)viii requires details of protective fences and barriers but excludes trees from this requirement. Whilst details of tree protection are provided for by Condition 34, I consider that details of the fencing should also be provided as part of the EMS since they are an integral component of the ecology of the area. I therefore recommend that the reference at (b) viii to trees be deleted.
- 13.11.16 Condition 13 requires NR to achieve at least 10% BNG above the existing baseline. It also requires the submission of an Off-site Biodiversity Scheme to meet any onsite shortfall. This condition is necessary in order to comply with local and national planning policies that seek to safeguard and enhance biodiversity.
- 13.11.17 Condition 14 seeks to manage surface water drainage during construction, whilst Condition 15 requires the submission of a surface water drainage strategy and Condition 16 requires a surface water drainage scheme. These conditions are necessary to manage surface water drainage and protect groundwater and biodiversity within the vicinity of the site.
- 13.11.18 Condition 17 requires details of the design of the proposed station building to be submitted, together with a Design Compliance Statement that accords with the Design Principles Document (NR-15-1) and the parameter plans. Condition 18 requires details of external materials to be used for the station building, the cycle parking area and other structures, including the rail systems compound building. Condition 19 restricts the provision of roof top plant. Taken together these conditions are necessary in order to ensure that the proposed development is satisfactory in terms of its appearance having regard to its prominent location and its intrusion into Hobson's Park and the Green Belt.
- 13.11.19 Condition 20 requires a Public Art Delivery Plan. Policy 56 of the CamLP requires attractive high-quality development. Amongst other matters it requires proposals to improve the public realm and to embed public art as an integral part of proposals. Given the location of the proposed Station at the gateway to the CBC, I agree that this condition is necessary in order to contribute to a high-quality public realm and to comply with CamLP Policy 56.
- 13.11.20 Condition 21 requires details of waste storage and recycling facilities which are necessary in the interest of sustainability.
- 13.11.21 Condition 22 requires details of cycle parking for station staff and the public. It provides for the phased installation of cycle parking and does not set a minimum requirement. Given the potential harm to Hobson's Park and the Green Belt arising from the proposed cycle parking it is important that no more cycle spaces than necessary are installed within Hobson's Park. This condition would allow for flexibility in terms of the number of

- spaces provided and would be discharged by the local planning authority.
- 13.11.22 Conditions 23, 24 and 25 all aim to ensure that the building is built to the BREEAM 'Excellent' standard and are necessary to ensure that the proposed Station is energy efficient and in the interests of environmental sustainability.
- 13.11.23 Condition 27 requires details of lighting to be submitted in the interests of residential amenity and to safeguard biodiversity. Condition 28 requires a Soils Management Plan including ground protection measures for areas to be re-instated and used as open space. This condition is necessary in the interest of sustainability and to ensure that the groundworks are acceptable.
- 13.11.24 Condition 29 requires the submission of a hard and soft landscape scheme. This condition is necessary in order to help the CSIE Project to integrate with the surrounding area, mitigate areas of existing planting to be removed and to safeguard the visual amenity of Hobson's Park and the Green Belt. I recommend that the requirement for a BNG Report be deleted since this would be submitted as part of Condition 13.
- 13.11.25 Condition 30 requires details of operational plant to be submitted in order to safeguard residential amenity. For the same reason Condition 31 requires details of the Platform Announcement Sound System to be submitted for approval.
- 13.11.26 Condition 32 requires the provision of 4 electrical vehicle charge points and the provision of charging infrastructure. This is necessary in order to encourage and support more sustainable means of transport.
- 13.11.27 Condition 33 prohibits the placing of excavated material within Hobson's Park other than in accordance with the landscape scheme or the soil management plan. This condition is necessary in order to safeguard the amenity of Hobson's Park and biodiversity during construction.
- 13.11.28 Conditions 34 and 35 require the submission and implementation of an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP). Condition 36 requires replacement planting in the event that any trees to be retained are damaged, destroyed or dies. These conditions are necessary in order to safeguard the trees on and around the site.
- 13.11.29 Condition 37 requires the pedestrian link across the CGB to be provided before the Active Recreation Area comes into use, unless the existing connection remains available. Condition 38 requires access from Addenbrookes Road and Trumpington to Hobson's Park to be retained at all times. It also requires details of the closure of NCN route 11 to be submitted for approval. Condition 39 requires the completion of the footbridge across Hobson's Brook to be completed before the Exchange Land is available for public use. These are all necessary to ensure adequate access for pedestrians and cyclists.
- 13.11.30 TRA requested that a condition be imposed requiring co-operation with other transport providers in respect of bus interchange facilities.

Cooperation between the various transport providers is clearly desirable. The protocol agreement with CSET would assist with delivering this objective. However, a condition requiring cooperation with other providers would not pass the NPPF test of reasonableness or precision, since it would need to specify each provider and would have implications for parties who are not party to this application. Moreover, it would involve land outside of the Order land over which NR have no control. For the reasons given above, I am satisfied that the CSIE Project would allow for suitable interchange facilities with bus services. [10.2.1,13.4.77,13.6.3]

13.11.31 CPPF requested a condition that would require the location of the RSC to be moved closer to the railway line in order to limit their visual prominence. NR have committed to reviewing the location and size of the RSC. It does however have various locational and functional requirements which has informed its proposed location. For the reason given above, I find that such a condition would not be reasonable or necessary. [13.5.44]

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

13.12.1 NR seeks to acquire rights and ownership of land shown on the Order Map, as detailed in the BoR, for the purpose of securing the carrying out of CSIE Project.

13.12.2 NR confirmed that the relevant procedural requirements have been met, as set out in the statutory declaration of Michele Vas of Dentons UK and Middle East LLP. No evidence to the contrary has been submitted. [7.228]

13.13 SoM 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.

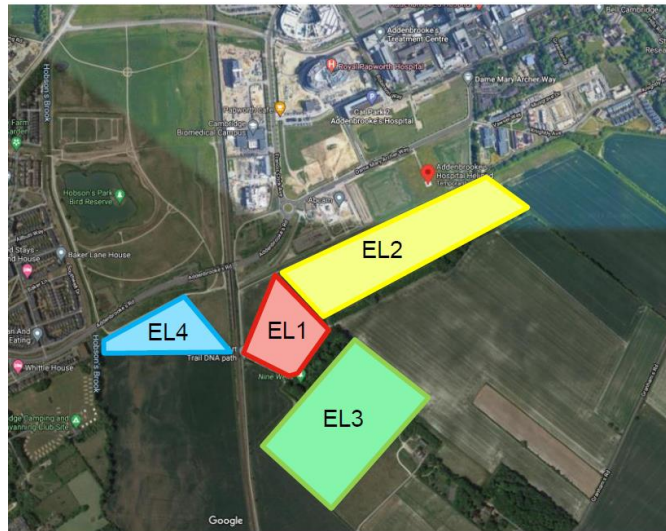
13.13.1 The provisions of the 1981 Act are set out within NR's case. Under the 1981 Act an order which authorises the purchase of open space will be subject to special parliamentary procedure unless the relevant SoS gives a certificate under section 19 of the 1981 Act indicating his satisfaction, that the Exchange Land is being given which is no less in area and equally advantageous as the land taken. [7.230-7.232]

13.13.2 NR sought a certificate under s.19 in respect of the open space that it seeks to permanently acquire under s.28 for the open space over which it seeks permanent rights. The SoS indicated that he was minded to grant the certificate sought, and the application was subsequently publicised. Since confirmation that REP11 (Mr Meed) was not in fact an objection to the certificate sought, the application has been unopposed. [7.233,7.234]

13.13.3 The proposed Development would result in the permanent loss of circa 20,742m² of open space. 20,439m² within Hobson's Park and 303m² POS within the grounds of Long Road Sixth Form College. As compensation for this, 20,840m² of open space (the Exchange Land) POS will be provided as Exchange Land for both sites. This would provide a marginal increase in

area.

- 13.13.4 The Existing Open Space (comprising plots 003, 004a, 004b, 004c, 005a, 006b, 007, 014, 084a, 086) is to be acquired compulsorily on a permanent basis to accommodate the operational activities of the proposed development (including the western station building, platform, cycle and pedestrian path, cycle parking, new hard landscaping, rail systems compound and widening of the railway corridor to service the new station). It is predominantly a thin corridor of land adjacent to the existing railway and the bridge carrying the CGB, as well as an area of land to the south of Addenbrooke's Road for the RSC. In addition, rights are sought over plots 002, 008 and 008a.
- 13.13.5 The Order provides for the temporary acquisition of plots 002, 004, 004d, 004e, 004f, 004g, 005, 006, 006a, 008, 008a, 010, 011, 012, 013, 084, 085, 087 and 090 within the open space.
- 13.13.6 There is a discrepancy between the Plot numbers listed in the Section 19 Certificate application and those set out in the Public Open Space Assessment. In terms of the public open space to be permanently acquired the application letter includes Plot 6b, whereas the schedule within the Open Space Assessment lists 6a. Conversely, the plots listed in the application as being acquired temporarily include Plot 6a, whereas the Open Space Assessment lists Plot 6b. Having reviewed the Updated Deposited Way Plans (NR 9-1) I conclude that references to Plots 6a and 6b within the application letter are correct. In terms of the temporary land take Plot 87 whilst listed in both the Open Space Assessment and the application letter, is not included in the schedule of proposed acquisition on the plans. Whilst this is likely to be an oversight, the deposited plans should be amended to correct this error.
- 13.13.7 The Exchange Land (Plot 092) is shown coloured green on the Open Space Land Plan. It would exceed the size of the open space to be permanently acquired. NR submit that it would be equally advantageous as the existing open space and of at least equivalent quality. It will be accessible to the public for similar recreational and leisure activities as the Existing Open Space being acquired.[7.238,7.239]
- 13.13.8 NR submitted a Public Open Space Assessment. Whilst this does not form part of the ES it adopts a similar methodology. It identified four potential exchange land sites. These were assessed on the basis of quantity, quality, and accessibility. Each criterion was scored from very poor to excellent. EL4 (the Exchange Land) had the highest overall score. This ranged from 'satisfactory' to 'excellent' on each criterion. As well as having a lower overall score the other three options were scored 'poor' or 'very poor' on at least two criteria. A number of parties submit that EL4 is not the most suitable of the sites considered and suggest that the scoring was arbitrary and unjustified.



- 13.13.9 St John's College consider that in the absence of the accommodation bridge the accessibility to EL4 would be comparable to the other plots proposed, and therefore would not necessarily be the preferred option for the Exchange Land. The original access arrangements have been refined since the submission of the application and a segregated public access to the Exchange Land is proposed. This would be provided prior to the Exchange Land being made available for public use. Therefore, on the basis of the current proposals, accessibility to EL4 would be better by comparison with EL1, EL2 and EL3. [11.2.1,11.2.2,11.2.11].
- 13.13.10 Mr Chaplin is critical of the assumption that all access to the park is from the west side. He states that significant numbers of workers and visitors to the CBC, as well as residents of the Nine Wells Estate use Hobson's Park. He suggests that EL2 would be preferable, is closest to the CBC and no further away than the zig zag path at the south end of the existing park. EL2 would be separated from Hobson's Park by the railway and would not provide an extension to Hobson's Park in the same manner as the Exchange Land. It would be a distinct, but separate area of open space. [11.20.2,11.20.3]
- 13.13.11 Hobson's Park was provided to mitigate the recreational needs of the southern fringe housing. Therefore, any replacement open space should be equally accessible to these residents. Sites EL1, EL2 and EL 3 are separated from this housing by the railway and residents would need to use the bridge at Addenbrooke's Road to access these areas. Therefore, they would not be equally advantageous by comparison with the land to be lost.
- 13.13.12 The test under the 1981 Act is not whether there is a preferable location, but whether the intended Exchange Land would be equally advantageous. The Exchange Land adjoins Hobson's Park to the south but is currently separated from Hobson's Park by Hobson's Brook. It is proposed to provide two direct pedestrian connections to the Exchange Land from the existing park. One would be by way of a footbridge across Hobson's Brook and the other would form part of, but be segregated from, the farm accommodation bridge at Addenbrooke's Road. Therefore, in terms of accessibility it would

be equally advantageous to the land lost from the park.

- 13.13.13 Amongst other matters, the Exchange Land is intended to provide mitigation for corn buntings and other species. Due to its location, it could be physically integrated with Hobson's Park. Provided it is appropriately planted, I conclude that it would make equivalent provision for those using the park for recreational purposes as the land to be permanently acquired. The timing is set out in Article 36 of the Draft Order.
- 13.13.14 I therefore conclude that it is appropriate for the SoS for Levelling Up Housing and Communities to grant a certificate for the compulsory purchase of Open Space Land under Sections 19 and 28 of the Acquisition of Land Act 1981 on the basis that the Exchange Land is equally advantageous with the access arrangements secured through the TWAO.

13.14 The Deemed Planning Application

Planning Policy Context

- 13.14.1 The development plan includes the CamLP and the SCLP. Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 13.14.2 The Greater Cambridge Emerging Local Plan is at an early stage in the planning process. Having regard to the advice at paragraph 48 of the NPPF it does not carry any significant weight.
- 13.14.3 The provision of a new station at Cambridge South is not specifically referenced within the CamLP or SCLP but, both documents recognise the importance of sustainable development.

Principle

- 13.14.4 Both Councils support the aim of the CSIE Project to promote connectivity within Cambridgeshire and to facilitate future growth in the area and promote sustainable development. The Project aligns with the Cambridgeshire and Peterborough Combined Authority Local Transport Plan (2020). This supports the vision and strategic objectives of the CamLP to promote sustainable economic growth, respond to climate change, and maximise sustainable transport modes. It also accords with CamLP Policy 5 which supports implementation of the Local Transport Plan, as well as Section 9 of the NPPF which promotes sustainable transport.
- 13.14.5 The CSIE Project would support the CBC and would contribute to the vibrancy of the area. In this respect it would accord with CamLP Policy 17. The western side of the station building, forecourts, landscaping and access across Hobson's Park would be within the Cambridge Green Belt. CCiC agrees that the proposal would be 'local transport infrastructure' for the purposes of paragraph 150 of the NPPF. The need for a Green Belt location is justified due to the location of the CBC and the existing railway line. The CSIE Project is based on the northern option for the station. One of the reasons for selecting this location was that it had the smallest land take requirement and was the most suitable in terms of potential for transport

interchange with the CGB and future transport projects. [7.30-7.33]

- 13.14.6 There is a need for the CSIE Project to extend into the Green Belt, and that the location selected would have the least impact on the Green Belt. I conclude that the CSIE Project, including the location of the western buildings is acceptable in principle, subject to there being no harm to the Green Belt.

Public Open Space

- 13.14.7 Policy 67 of the CamLP precludes the loss of, or harm to public open space other than in specified circumstances. These include satisfactory replacement open space comparable in terms of quality, quantity and access, as well as located within a short walking distance of the space to be lost.
- 13.14.8 The application would result in the permanent loss of open space. This would be replaced by the Exchange Land which slightly exceeds the area of the open space to be permanently acquired. The justification for the location of the replacement public open space is set out at SoM 12. It would compensate for the open space that is proposed to be permanently acquired in terms of area, and subject to the implementation of a suitable landscape scheme it would be of acceptable environmental quality. It would also be appropriately located relative to the space to be lost.
- 13.14.9 However, the impacts on Hobson's Park extend beyond the permanent loss of land. They include the effects on the visual prominence of the proposed station and infrastructure, as well as the activity associated with the station. There would also be significant adverse effects on Hobson's Park during construction. Whilst these are temporary, they are likely to endure for two or more years and would prevent the recreational needs of the southern fringe housing from being fully met.[13.5.9-13.5.52]
- 13.14.10 Whilst the area of Long Road Sixth Form College impacted by the proposal comes within the definition of public open space for the purposes of the 1981 Act, it falls outside the definition within the CamLP.
- 13.14.11 Overall, I conclude, that even with the proposed mitigation, including the Exchange Land the proposal would harm Hobson's Park on a temporary and permanent basis, contrary to Policy 67 of the CamLP.

Biodiversity

- 13.14.12 Policy 69 of the CamLP seeks to protect sites of biodiversity and geodiversity importance. It states that development will only be permitted where it would not have an adverse impact on, or lead to the loss of, part or all of a site identified on the Policies Map. Policy 70 states that proposals that harm or disturb populations and habitats should minimise any ecological harm and secure achievable mitigation and/or compensatory measures, resulting in either no net loss or a net gain of priority habitat and local populations of priority species. Where significant harm to the population or conservation status of a protected species, priority species or priority habitat resulting from a development cannot be avoided, adequately

mitigated, or, as a last resort, compensated for, then planning permission will be refused. This approach broadly accords with the NPPF which also advises that plans should identify and pursue opportunities for securing measurable net gains for biodiversity. [13.4.143]

- 13.14.13 The biodiversity effects of the scheme are assessed at SoM 3(i). The conclusion was that there would be harm to an area of broadleaved woodland, and bats. Mitigation would be secured by way of BNG which is secured by Condition 13. I conclude that subject to the mitigation within the ES and the delivery of 10% BNG the proposal would not give rise to significant harm to biodiversity overall and would comply with CamLP Policies 69 and 70.[13.4,150, 13.4.170]

Trees

- 13.14.14 CamLP Policy 71 states that development will not be permitted which involves felling, significant surgery and potential root damage to trees of amenity or other value, unless there are demonstrable public benefits accruing from the proposal which clearly outweigh the current and future amenity value of the trees. It also requires appropriate replacement planting, where felling is proved necessary. This matter is considered at SoM 3(i). It is concluded that the effects on the trees within Long Road Sixth Form College would be significant at a local level. However, given the proximity of these trees to the railway line, where various works are required, some tree loss in this area is unavoidable. Therefore, the harm arising from the loss of these trees must be weighed against the public benefits of the CSIE Project. [13.4.145-13.4.150]
- 13.14.15 The effects on other trees would be significant adverse but would reduce to slight beneficial over time. I therefore consider that the loss of these other trees would be adequately mitigated in accordance with Policy 71.

Air Quality

- 13.14.16 CamLP Policy 36 seeks to avoid significant adverse effects on health, the environment or amenity from polluting or malodorous emissions, or dust or smoke emissions.
- 13.14.17 The applicant's modelling of vehicle emissions associated with the peak construction phase predicts a small increase in concentrations of both the pollutants Nitrogen Dioxide (NO₂) and Particulate Matter - PM₁₀, at the junction between Addenbrooke's Access Road and Shelford Road. Given that the modelled concentrations are significantly below objective levels and this increase is temporary no mitigation is required.
- 13.14.18 The Air Quality Assessment concludes that the development once fully operational will lead to a 'reduction of operational air quality effects' and concludes that no mitigation is required. The provision of electric vehicle charging points (EVCPs) in a minimum of 4 of the 9 car parking spaces would make a small contribution towards improving air quality overall. I conclude that the CSIE Project would not have an adverse effect on air

quality and would not conflict with Policy 36 of the CamLP.

Noise and Vibration

- 13.14.19 CamLP Policy 35 seeks to avoid significant adverse effects on health and quality of life arising from noise and vibration, including during construction. It requires any adverse effects to be minimised through appropriate reduction and/or mitigation measures secured through the use of conditions or planning obligations.
- 13.14.20 The noise and vibration effects arising from the CSIE Project are considered at SoM 3(f). There would be significant adverse effects in relation to noise during the construction period. Subject to the agreed mitigation there would be unlikely to be adverse effects on MRC, CUH, the CBC or the UoC. Residents of The Belvedere would be subject to major adverse effects during the night time and these would not be fully mitigated. Balanced against this the noise would be of a relatively short duration and the Section 61 Consent process and the CoCP would provide some protection to these residents. [13.82-13.8.90]
- 13.14.21 In terms of vibration, there is a potential for an adverse effect on a property at Abberley Woods, but NR advise that this would be re-assessed once the timetable for the proposed works and the proposed equipment to be used is agreed. Therefore, there may be scope to avoid these effects. [13.4.106-13.4.107]
- 13.14.22 The noise and vibration management secured by Condition 10 would ensure that any adverse effects are minimised. Notwithstanding this, the proposal would give rise to adverse effects in terms of construction noise contrary to Policy 35.

Sustainable Transport

- 13.14.23 CamLP Policy 80 supports development that prioritises access by walking, cycling and public transport. There can be little doubt that this approach underpins the entire CSIE Project.

Drainage

- 13.14.24 CamLP Policy 31 seeks to manage surface water through SuDS and minimise run-off. Policy 32 aims to ensure that developments are safe from flooding and do not increase flood risk elsewhere. Drainage is considered at SoM 3(f).
- 13.14.25 The proposals have been amended and refined and further information submitted since these outstanding objections were originally made. The proposals include an allowance for climate change and take account of the permissible discharge rates to Hobson's Brook. The LLFA and the EA no longer maintain an objection to the proposal. Conditions 14, 15 and 16 would ensure that the necessary detail is provided, and that the CSIE project would not increase flood risk elsewhere, including on the CBC campus, or exceed the discharge rates agreed with HCT. [13.4.109-13.4.132]
- 13.14.26 I conclude that the CSIE Project would comply with Policies 31 and 32 of

the CamLP.

Heritage

13.14.27 CamLP Policy 61 requires proposals to preserve or enhance the significance of the heritage assets; demonstrate a clear understanding of the significance of the asset and of the wider context in which the heritage asset sits; and provide clear justification for any works that would lead to harm or substantial harm to a heritage asset. Paragraph 200 of the NPPF requires clear and convincing justification in respect of any harm to, or loss of the significance of a heritage asset. It also states that substantial harm to, or loss of assets of the highest significance, including scheduled monuments, should be wholly exceptional.

13.14.28 As set out at SoM 8 there would be harm to the White Hill Farm scheduled monument arising from the construction of haul road 7. The mitigation has been discussed and agreed with HE and would include a programme of strip, map and record excavation to preserve by record archaeological remains impacted by the haul road. This work will be secured by proposed Condition 11 of the deemed planning consent.[13.9.7]

13.14.29 There would be harm to the significance of the monument overall, but this, as agreed by HE would be less than 'substantial harm'. This harm must be weighed against the public benefits of the proposal. [13.9.11]

Character and Appearance

13.14.30 CamLP Policy 55 requires development to respond positively to its context and to draw inspiration from the key characteristics of its surroundings to help create distinctive and high-quality places. Policy 56 seeks attractive, high quality, accessible, inclusive and safe places. Policy 57 requires high quality new buildings that amongst other matters have a positive impact on their setting in terms of location, height, scale and form, materials and detailing, ground floor activity, wider townscape and landscape impacts and available views. Policy 59 states that external spaces, landscape, public realm, and boundary treatments must be designed as an integral part of new development proposals and coordinated with adjacent sites and phases. The NPPF states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

13.14.31 CPPF raised concerns about the appearance of the Station in relation to Hobson's Park, and several parties were concerned at the extent to which the infrastructure necessary to support the use of the Station, including, but not only, the cycle storage, would extend into Hobson's Park.

13.14.32 The Design Principles document sets out similar aspirations to the above policies. Adherence to the Design Principles document is secured by Condition 3, whilst Conditions 17,18 and 19 address the design of the Station and the materials to be used. Condition 29 requires details of the hard and soft landscaping proposed. Together these conditions would

ensure that the design and appearance of the proposed station would respect the Context of Hobson's Park.

- 13.14.33 Overall I conclude that the CSIE Project has the potential to relate positively to its setting and establish a high quality public realm. In this regard it would comply with CamLP Policies 55,56,57 and 59. Notwithstanding this, there would be significant harm to the character and appearance of Hobson's Park during construction and operation. This matter is considered at SoM 4. [13.5.9-13.5.52]

Benefits

- 13.14.34 The proposal would make a significant contribution to sustainable transport and would support rail connections across Cambridgeshire and East Anglia. It would encourage a modal shift towards sustainable transport, reducing reliance on unsustainable modes of transport, as well as improving connectivity. It would also help relieve traffic congestion in the local area by supporting the development of environmentally- sustainable transport in Cambridge, thereby contributing to broader environmental benefits such as the decarbonisation of transport, and the Government's Net Zero Strategy.[7.26,7.27]
- 13.14.35 The CBC is an international centre of excellence for patient care, biomedical research and healthcare education. It plays a local, regional and national role in providing medical facilities and medical research. The delivery of the CSIE Project would reinforce this role and contribute to its further growth and sustainability.

Green Belt

- 13.14.36 The proposal represents 'local transport infrastructure' for the purposes of paragraph 150 of the NPPF. I found above that the need for a Green Belt location is justified due to the location of the CBC and the existing railway line. In order for local transport facilities to not come within the scope of inappropriate development paragraph 150 of the NPPF requires that it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it.
- 13.14.37 The siting of a two-storey station building within the Green Belt, together with the RSC, cycle storage and various engineering works would significantly reduce the openness of the Green Belt. It would also conflict with the purposes of the Green Belt as set out at paragraph 138 of the NPPF, in that it would fail to safeguard the countryside from encroachment and extend the urban use of the CBC into the Green Belt. I note that NR has sought to minimise the land take within the Green Belt, nevertheless the proposal would constitute inappropriate development.
- 13.14.38 The NPPF states that substantial weight should be given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other

considerations.

13.14.39 I have identified harm to Hobson’s Park, limited harm to the scheduled monument, harm arising from noise and vibration, harm to the broadleaved woodland, as well as harm to the Green Belt by reason of inappropriateness and loss of openness. Balanced against this, there are very considerable public benefits that would be provided by the station. These benefits, taken together with the geographical need for the location of the Station within the Green Belt due to the position of the existing railway line, together outweigh the harm to combine to provide very special circumstances to justify the harm to the Green Belt.

Conclusion on Deemed Planning Application

13.14.40 The proposal would harm the character, appearance and recreational value of Hobson’s Park. A reduction in the number of proposed cycle parking spaces would assist with minimising this harm. Although there would be harm to the scheduled monument, with the proposed mitigation this would be towards the lower end of less than substantial and when balanced against the very considerable public benefits of the proposal I consider that the harm is outweighed.

13.14.41 Having regard to all relevant material considerations and the development plan as a whole, I find that deemed planning permission should be granted subject to the recommended conditions.

14 OBJECTIONS TO THE TWAO

14.1 The case for those who objected to the TWAO and those who commented on it, together with NR’s response is set out at Sections 10, 11 and 12 of this Report.

14.2 St John’s College Cambridge (OBJ 01)

14.2.1 St John’s College objects to the manner in which the various options in relation to the Exchange Land has been scored. It suggests that the scoring matrix should be reviewed by an independent consultant in the interests of fairness. [11.2.1,11.2.2]

14.2.2 St John’s College raises concerns in relation to the closure of the two level crossings, including the nature of the rights impacted and the design of the accommodation bridge. It also questions the need for the RSC and how it will interact with the Sustrans cycleway, and NR’s approach to costs [11.2.4-11.2.6,11.2.7,11.2.8]

14.2.3 Matters in relation to the Exchange Land are addressed at SoM 12. Matters in relation to the rights impacted by the closure of the level crossings and the design of the accommodation bridge are addressed at SoM 3(a) [13.13.9,13.13.12,13.4.8, 13.4.11,13.4.12–13.4.19]

14.2.4 The RSC is addressed under SoM 4. NR explain that the interface between the RSC and NCN11 would be a combination of “line of sight” by cyclists and pedestrians and some form of site traffic marshalling to be developed by the Maintenance Organisation during the limited periods of operation of the

compound. [13.13.9 – 13.13.12, 11.2.14]

14.2.5 NR state that it has provided undertakings for reasonable and proper surveyor and legal fees up to an initial capped amount, with the ability to quantify and approve further sums beyond that point. [11.2.5]

14.3 Chris Pointon (OBJ 02)

14.3.1 Mr Pointon questions the modelling used by NR. This matter is discussed in the context of SCT's Objection below.[11.3.1-11.3.3]

14.4 TRA (OBJ 07)

14.4.1 The objections relate to:

- The temporary adverse effect on Hobson's Park; [10.2.12]
- The shared use of the footpath across Hobson's Park ;[10.2.13 – 10.2.15]
- The cycle parking at the western station building; [10.2.16,10.2.17]
- The RSC; [10.2.18,10.2.19] and
 - Bus interchange facilities.[10.2.20-22]

14.4.2 These matters are addressed at SoM 4 and SoM 5. [13.5.17-13.5.31, 13.5.38,13.5.34,13.5.35, 13.6.9-13.6.12, 11.10.54]

14.5 CBCManCo (OBJ10 and CML (OBJ 11)

14.5.1 Objections are made in relation to:

- Interference with land and rights in land;[11.10.5]
- Failure to acquire land by agreement; [11.10.6]
- The impact on drainage systems;[11.10.7 -11.10.11]
- Impact on roads, pedestrians and cyclists within the CBC;[11.10.12 – 11.10.19]
- Impact on the ability to bring forward the remainder of Phase 2 of the CBC; [11.10.20,11.10.21]
- the cumulative impact of the CSIE project with CSET; [11.10.22] and
- Additional infrastructure maintenance costs.[11.10.23 11.10.25]

14.5.2 At the Inquiry NR advised that it was negotiating agreements with CBCManCo and CML and had agreed HoTs.

14.5.3 The impact on drainage systems, including the concerns raised by CBCManCo and CML are addressed at SoM 3(g). [11.10.32, 13.4.122- 13.4.132]

14.5.4 The impacts on roads, pedestrians and cyclists are addressed at SoM 3(b),3(c), and 3(d). The ability to bring forward the remainder of CBC Phase 2, including the MSC is addressed at SoM 5, The cumulative effect with the CSET Project is addressed at SoM 5.[13.4.20 – 13.4.13.6.15,13,6,17,13.6.4 – 13.6.13].

14.5.5 NR agrees in principle with the requirement for a maintenance contribution and has been engaging constructively to come to an agreement on the value of this. This commitment will be included in the agreements being drafted between the two parties

14.6 CPPF (OBJ 14)

14.6.1 CPPF raised concerns in relation to the temporary adverse effects on Hobson's Park; the permanent adverse effects on Hobson's Park ; and the location of the RSC. [10.3.7-10.3.9,10.3.4-10.3.6, 10.3.10- 10.3.11].

14.6.2 These matters are addressed at SoM 4 [13.5.17-13.5.31, 13.5.38,13.5.34,13.5.35]

14.6.3 CPPF raised a further concern regarding the piecemeal approach to compensatory land for the CSIE Project and other schemes such as the EWR and CSET schemes. CPPF suggested that there would be a beneficial impact for habitats and the public if the mitigation schemes for these projects were combined to create one larger area instead of several small ones. [10.3.13]

14.6.4 Whilst the benefits of such an approach is appreciated, the CSET scheme and the EWR are at a much less advanced stage than the CSIE Project, and there is no certainty if, or when, they will come forward, or the extent and nature of any mitigation required. Should these other projects come forward, it may be that mitigation could be designed to integrate with, or complement that provided by the CSIE Project, but at the present time CPPF's suggestion cannot be progressed. Notwithstanding this, the proposed Exchange Land adjoins Hobson's Park and would be landscaped in a manner to integrate with it. As such it would be part of a much larger space, providing the habitat and other benefits sought by CPPF.

14.7 Pemberton Trustees (OBJ 15)

14.7.1 Pemberton Trustees objected on the basis of:

- The extent of land and rights taken;[11.13.2,11.133]
- The impact on infrastructure, in particular the access to the station; [11.13.4,11.13.5]
- Impact on drainage;[11.13.6]
- Impact on Hobson's Park; [11.13.7]
- Farm Access; [11.13.8] and
- Impact on CGB.[11.13.9]

14.7.2 Drainage is addressed at SoM 3(g). The impact on Hobson's Park is addressed at SoM 4. The farm access is addressed at SoM 3(a). [13.4.109-13.4.132, Section 13.5,13.4.11,13.4.12-13.4.19]

14.7.3 The impact on the CGB and the access arrangements for the station is considered at SoM 3(b) and 3(d). [13.4.32-13.4.40, 13.4.44 - 13.4.50, 13.4.68 - 13.4.73]

14.8 CoC1 and CoC 2 (OBJ 17)

14.8.4 CoC1 and CoC2's concerns relate to:

- The extent of land acquisition; [11.15.2, 11.15.3]
- The need for a safe alternative access across the CGB to the northern part of Hobson's Park; [11.15.5, 11.15.6]
- The impact on drainage; [11.15.7, 11.15.8]
- Integration with CSET. [11.15.9, 11.15.10]

14.8.5 Access across the CGB is addressed at SoM 3(b). The impact on drainage, including the contractual arrangements with HCT is addressed at SoM 3(g). Integration with CSET is addressed at SoM 5 [13.4.53-13.4.55, 13.4.109-13.4.132, 13.6.4 - 13.6.1]

14.9 St Mary's School (OBJ 19)

14.9.1 St Mary's School's concerns relate to insufficient information in relation to Plot 001, which is due to be stopped up temporarily. This access is utilised as athletics facilities for track and field, AstroTurf pitches for hockey, rugby and football, cricket nets, netball and tennis courts. It is seeking further information in relation to the quantum and nature of the traffic that will be using this road both during and post the construction phase. It is also concerned that the NR's machinery and vehicles could cause damage to this road that has recently been upgraded by the School. [11.7.1, 11.7.2]

14.9.2 In relation to Plot 002 St Mary's School seek to clarify the rights NR are seeking over the land. [11.7.3]

14.9.3 NR is not seeking to acquire any permanent or temporary land from St. Mary's School. NR will temporarily be using the shared access road (AR3) off Long Road to access the existing railway compound and to access the proposed construction haul road (HR4). The access will only be stopped up on a temporary basis for short periods during construction, such as overnight periods. [11.7.6, 11.7.7]

14.9.4 NR seeking to agree the most convenient times to limit the impact of these temporary closures with St Mary's School. There is potential for conflicting vehicle movements along AR3 whilst the school playing fields are in use. NR is in consultation with St. Mary's School over the timings when the playing fields are in use by St. Mary's School and Homerton College, to minimise or avoid impacts on the day-to-day use of the playing fields. Arrangements for avoiding conflicts and managing construction traffic movements will be detailed in the Construction Traffic Management Plan (CTMP) and Construction Logistics Plan (CLP). [11.7.6]

14.9.5 Should there be any damage to the access road, NR will make good such damage. [11.7.5]

14.10 Dave Jackson (OBJ 20)

14.10.1 Mr Jackson supports the position of TRA. He is particularly concerned about

the impacts on Hobson's Park. [11.18.1,11.18.2]

14.10.2 Mr Jackson is also concerned that the station should not be used to reduce reliance on Cambridge Station in the city centre. Increased use of the Park and Ride would bring a significant increase in motorised traffic to an area where there is already too much. [11.18.3]

14.10.3 The issues in relation to Hobson's Park are discussed under SoM 4. [13.5.9 - 13.5.52]

14.10.4 There is no evidence that the proposed station would encourage greater use of the Park and Ride sites. These sites are served by bus services to the city centre and also to the CBC. The provision of the station would be likely to reduce any trips from the Park and Ride to the CBC, and there is no evidence to suggest that there would be an increase in car journeys by those wishing to access the city centre.

14.11 Richard and Vanessa Price (OBJ 21)

14.11.1 Mr and Mrs Price's concerns relate to Hobson's Park. They raise concerns in relation to the extensive cycle parking on the west side of the station; the shared access to the western station building, including its impact on the trees; the RSC and the size of the construction compounds. [11.9.3]

14.11.2 All of these matters have been addressed at SoM 4. [13.5.9-13.5.52]

14.12 SCT (OBJ 22)

14.12.1 SCT has concerns about the suitability and/or appropriateness of the modelling used by NR. It considers that standard modelling techniques are not appropriate for Cambridge South Station because of the high concentration of employment and regional hospitals at the CBC. SCT submits that the modelling severely underestimates the likely rate of growth beyond 2031 – from 27,000 jobs in 2031 to potentially 40,000 in 2041. The OBC takes no account of the modal shift required to achieve local and national targets for transport decarbonisation or public health (notably, air quality and physical activity).[10.4.3,10.4.4,10.4.5, 10.4.12]

14.12.2 SCT considers that there would be little scope to extend the station in the future should the demand exceed the capacity of the station to operate safely and efficiently. It also seeks tighter integration between rail and bus services. [10.4.14,10.4.13,10.4.17,10.4.18]

14.12.3 SCT proposes an alternative scheme that it considers would resolve these issues. The alternative scheme relies on the demolition and rebuilding of the CGB bridge with the main station entrance located on the replacement bridge together with a bus station. It submits that this would require a reduced land take and minimal land take from Hobson's Park. [10.4.19, 10.4.21]

14.12.4 The SCT proposal would involve the demolition and rebuilding of the CGB bridge which would give rise to disruption during construction, and would prevent bus services using the CGB route that links the city centre and the CBC. SCT suggests that this could be mitigated by way of a temporary bus and cycle diversion which would not be overly burdensome for a few weeks.

SCT considers that the complexity of maintenance and safety issues could be overcome with an appropriate design and budget, whilst any concerns about the visual impact may be addressed through the use of sympathetic architecture and landscaping. [10.4.20]

- 14.12.5 SCT considers that this alternative scheme would have a number of advantages in terms of station capacity, integration with bus services and facilities for pedestrians and cyclists. [10.4.22]
- 14.12.6 SCT's modelling would give rise to a demand of about 9 mppa, compared to the 2mppa calculated by the DfT's approved methodology. The DfT modelling accords with the requirements of the Government guidance, TAG UNIT M4, Forecasting and Uncertainty (TAG4), adherence to which is explicitly required for all projects intended to be funded and approved by the DfT. That modelling has subsequently been reviewed by the DfT's Centres for Excellence; the DfT has accepted it at SOBC and OBC stage. The model used has been subject to sensitivity tests, for a demand of 6mppa. [10.4.28,10.4.29]
- 14.12.7 I acknowledge the unusual nature of the proposed Cambridge South Station, in that it is intended as a destination station, primarily serving the CBC. However, there is no substantive evidence to indicate that the DfT modelling is flawed, and SCT agree that the forecast rail demand has been correctly calculated on the basis of that model. In addition, the capacity of the station has been sensitivity tested for 6 mppa. [7.66, 7.69, 10.4.23,10.4.29,13.4.45]
- 14.12.8 When the 9 mppa modelled by SCT is compared to passenger numbers at other stations, I find it to be implausible. It would be busier than Oxford Station which has 8.3 mppa pre-pandemic. I therefore consider the DfT modelling to be robust. Nonetheless, should passenger numbers exceed the 2.3 mppa, the evidence is that there would be sufficient capacity in terms of the Station and the associated infrastructure.[10.4.23]
- 14.12.9 Integration with bus services and other means of sustainable transport is considered at SoM 3(d).
- 14.12.10 The alternative scheme proposes a station, built on a podium above the railway, with bus stops directly outside it. Cycle parking would be on a deck above the station. Construction would involve the demolition and rebuilding of the Guided Busway Bridge. NR suggest that the rebuilding of CGB bridge would cost about £30 million. SCT did not dispute this figure. Mr Barnes, on behalf of NR, explained that there would also be a potential need to demolish further bridges, signalling challenges due to the proximity of Long Road Bridge, and a need to address potential concerns about fire safety. The extent to which these measures would exceed those required by the CSIE project is unclear. [10.4.39]
- 14.12.11 The SCT scheme would involve the diversion of the CGB and a significant extension of the travel time for cyclists and pedestrians during the construction period. The suggestion that traffic using the CGB would only need to be diverted for about 6 weeks is unsupported by evidence. NR suggest that 6 to 9 months would be a more realistic figure for the partial

demolition and reconstruction of the CGB bridge. I share this view. Moreover, CCoC, who own the CGB, have already made clear that they do not support the alternative. [10.2.40]

14.12.12 SCT's alternative scheme would make no provision for drop off/pick up facilities, including for taxis. SCT suggest that passengers needing taxis could travel to Cambridge Station and then take a taxi to CBC. This would mean that any disabled passengers or patients visiting the hospitals and in need of transport from the station would not be able to use the the proposed station. Whilst the pick-up/drop-off facilities proposed for the CSIE project are limited, the submitted evidence suggests that they would be sufficient to meet the likely demand.

14.13 Mark Chaplin (OBJ 25)

14.13.1 Mr Chaplin considers that the proposed Exchange Land would not provide suitable mitigation for the impact of the proposed development on users of Hobson's Park from the east of the railway line. He suggests that EL2 would provide a more suitable option.[11.20.2,11.20.3]

14.13.2 This matter is addressed at SoM 12.[13.13.8-13.13.11]

14.14 Other Representations

14.14.1 Representations from HE (REP 07) and HCT are addressed under SoM 8 and SoM 3(g)respectively.

14.14.2 A number of other representations were also received. These include the impact on Hobson's Park, integration with CSET and EWR and impacts on biodiversity. These matters are all considered in the context of the relevant SoM.

14.15 SoM 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 Rules" 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.

14.15.1 The Government's Guidance on confirming CPOs ('the Guidance') states that Acquiring Authorities should use compulsory purchase powers where it is expedient to do so, and an Order should be made only where there is a compelling case in the public interest. The AA should demonstrate that they have taken all reasonable steps to acquire land and rights included in the Order by agreement. Compulsory purchase should only be a last resort to secure the assembly of land.

14.15.2 Cambridge South Station has been identified as a necessary piece of infrastructure to support the on-going development of the CBC. There is a clear evidence base pointing to its necessity. The Acquiring Authority (NR) have a clear idea of how it intends to use the land which it is proposing to acquire. The proposal is generally consistent with national and local

planning policies. Looked at in the round it would fit with the Planning framework for the area.

14.15.3 Environmentally the Project would facilitate sustainable travel to the CBC, for the benefit of employees, patients and other visitors. In doing so it would assist with alleviating congestion on the local road network and within the city centre. The improved connectivity would support the further growth of the CBC and provide access to the employment opportunities at the CBC for a wider sector of the population. Whilst there would be some harm to environmental objectives, this harm would be mitigated and offset to some extent by measures set out in the ES and other measures discussed during the Inquiry and secured by the suggested planning conditions.

14.15.4 Overall, the CSIE Project would make a significant contribution to the economic, social and environmental wellbeing of the area. I therefore conclude that there is a compelling case in the public interest.

14.15.5 Socially there would be benefits in terms of improving the accessibility to several hospitals for staff and patients, as well as to research facilities within the CBC. Together these contribute to the status of the CBC as a world class centre and the improvements to the transport network that would flow from the project would enable the CBC to continue to flourish thereby adding to scientific research and understanding.

14.15.6 Environmentally the project would reduce traffic congestion and encourage active travel, thereby contributing towards improvements in air quality. It would also help to maintain the high-quality environment on the CBC.

(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);

14.15.7 The acquisition of the land represents an interference with the human rights of those affected but must be balanced against the need for the land to facilitate the overall benefits of the Scheme. Article 1 of the First Protocol to the European Convention on Human Rights and the Human Rights Act 1998 provides that for the peaceful enjoyment of a person's possessions.

14.15.8 Several parties would be deprived of their interests within the Order Land. Any interference must be balanced against the public interest. The CSIE Project is unusual in that no residential properties will be acquired, and no businesses need to be relocated. The concerns raised by the UoC, MRC and others have been addressed by way of the additional assessments and agreements and/HoTs agreed with these parties. The public interest would be served by the access to sustainable transport provided by the Project; the improved transport infrastructure serving patients and staff at the hospitals; and the benefits in terms of the future growth of the CBC. In these circumstances, having regard to the very considerable public benefits of the proposal, I conclude that any interference with rights under Article 1

of the First Protocol is proportionate.

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

- 14.15.9 I am unaware of any impediments to the delivery of the CSIE Project pursuant to the powers that would be conferred by the Order. I have found the deemed planning application to be acceptable and the suggested conditions are considered to be reasonable and capable of being discharged.
- 14.15.10 NR has, throughout the design of the Project, been supported by the DfT. The Government in its March 2020 Budget confirmed that it would, subject to planning, “*build a new rail station at Cambridge South, improving connectivity to the world-leading research facilities of the Cambridge Biomedical Campus – the largest cluster of medical and life sciences research in Europe*”.³⁸⁶ The SoST approved the OBC for the project in April 2021 and has further confirmed in writing that funding will be met from the Department’s Rail Enhancements Budget subject to a value for money analysis.³⁸⁷
- 14.15.11 I therefore conclude that there are no known legal financial or other impediments that would prevent NR from exercising the powers in the Order.

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

- 14.15.12 NR seeks to modify the CPO through the deletion of Plots 92 and 100, and an amendment to Plot 96 to clarify that it is seeking a right of access over the land.
- 14.15.13 A number of parties have made representations indicating that NR has failed to justify that all of the land it is seeking to acquire is necessary. Several objections relate to the extent of the permanent and temporary land take within Hobson’s Park, including the land required for the RSC. [10.2.12,10.2.18, 10.3.8,10.3.9, 11.10.4, 11.10.5,11.13.2,11.13.3, 11.19.2, 11.20.2]
- 14.15.14 The permanent land take in this area is required in order to deliver the necessary infrastructure. As described above, aside from the area for the Station and the RSC, the permanent land take is largely confined to a narrow strip adjacent to the railway. This land is necessary to construct and maintain the CSIE Project. NR have committed to reducing the extent of the RSC in the event that signalling improvements mean that any of the land it is currently seeking to acquire is not needed. [10.2.31]
- 14.15.15 NR has reduced the extent of the temporary land take within the park. I have found above that the land it now seeks to acquire is necessary for the construction of the CSIE Project.[13.5.23]
- 14.15.16 St John’s College (OBJ 01), CML (OBJ 10), CBCManCo (OBJ 11),

³⁸⁶ NR11.2 paragraph 8.2.4

³⁸⁷ NR05

Pemberton Trust (OBJ 15) and CoC1 and CoC2 (OBJ16), make generalised comments regarding the extent of land to be acquired. In the absence of any more precise information, having regard to the evidence submitted to the Inquiry, I am satisfied that the land NR seek to acquire is necessary for the delivery of the CSIE Project.

- 14.15.17 The test to be applied in considering whether to confirm a CPO is whether there is a compelling case in the public interest for it to be made. This test satisfies the balancing act required when considering whether interference with Article 8 and/or Article 1 of the First Protocol constitutes a breach of the European Convention on Human Rights (ECHR) and is thus lawful and justified.
- 14.15.18 The Guidance advises that compulsory purchase is intended as a last resort to secure the assembly of all the land needed for the implementation of projects. It also advises that compulsory purchase powers are an important tool to use as a means of assembling the land needed to help deliver social, environmental and economic change.
- 14.15.19 There are a number of interests in the land, and it would be unrealistic to expect NR to acquire all of those interests by private treaty within a reasonable timescale. It is evident that compulsory purchase is required to allow assembly within a timely fashion.
- 14.15.20 I conclude that the CSIE project would make significant contributions to the economic and environmental well-being of the area. The Scheme is supported by development plan policies and national planning and policies.
- 14.15.21 Having regard to all of the above I am firmly of the view that interference with the private rights of the affected individuals is more than justified by the identified public benefits. Those individuals would of course be entitled to compensation for the loss of their land. In light of the significant public benefit that would flow from the provision of the CSIE Project it is my view that the Orders would not constitute an unlawful interference with individual property rights. I conclude that any residual interference with human rights would be necessary in order to achieve the Scheme.

15 RECOMMENDATIONS

- 15.1 Subject to a suitable Land and Works Agreement between the parties, the CSIE Project should not hinder the delivery of the MSCP or the delivery of Phase 2 of the CBC. The SoS may wish to ensure that the necessary agreement is in place prior to approving the Order.

Network Rail (Cambridge South Infrastructure Enhancements) Order 202[]

- 15.2 I recommend that the Network Rail (Cambridge South Infrastructure Enhancements) Order 202[] should be approved subject to modifications.
- 15.3 The recommended modifications include:
- The Deposited Plans and the BoR should be updated to reflect the most recent version of the Order (INQ 80).[3.13]

- Modifications to the Deposited Plans in respect of the proposed temporary land take at Plot 87. [13.13.36]
- The modifications to the Order as set out at INQ 52-2, together with the modifications to schedules 3, 4, 8 and 12 should be accepted. [4.2,4,5,4.],
- For the reasons given at paragraphs 4.8-4.17 that the modifications to Articles 11,35, and 36 of the Order are accepted.

Deemed Planning Permission

15.4 I recommend that the application for deemed planning permission should be granted subject to the suggested conditions and the recommended modifications.

15.5 The modifications include:

- Amendments to ensure consistency between plans as set out at paragraph 4.20, and the schedule of plans updated accordingly.
- The wording of clause (g) and clause (h) of the interpretation of the suggested conditions be amended to read:

(g) "the planning drawings" means the drawings listed in Part 1 of Schedule 2 to these conditions.

(h) "parameter plans" means the parameter plans listed in Part 2 of Schedule 2 to these conditions.

- The wording of Condition 2 be amended to refer to the drawing lists at Schedule 2, Part 1 of the recommended

Certificate in Relation to Acquisition of Open Space

15.6 It is recommended to SoS for the Department of Levelling Up Housing and Communities that the application for a Certificate under Sections 19 and 28 of the Acquisition of Land Act 1981 be granted.

Lesley Coffey

PLANNING INSPECTOR

APPENDIX A

APPEARANCES

FOR NETWORK RAIL:

Rebecca Clutten of Counsel

Michael Rhimes of Counsel

They Called:

Andy Barnes BEng, CEng, MICE	Engineering Director within One Team Wessex and Contractor's Engineering Manager for the CSIE Project
Lewis Wingfield BA, MA	Network Rail Sponsor
Geoff Hilling BSc, FCILT, MIHT	Senior Technical Director, Arcadis
Lynden Spencer-Allen MA MEng CEng MICE	Director, Ramboll UK Limited
Simon Taylor BSc (Hons) MIOA	Director of Acoustics, Ramboll UK Limited
Jenny Wylie BA, MA, CIfA	Associate Technical Director – Cultural Heritage, Arcadis,
Sue Brocken BEng CEng MICE	Principal Engineer within Arcadis Consulting (UK) Limited
Guy Stone BSc (Hons), MSc, CEnv, MCIEEM	Associate Technical Director, Arcadis Consulting (UK) Limited
David Jones BA (Hons), PG Dip, MRTPI	Technical Director, Arcadis
John Prest	Route Level Crossing Manager (West Anglia), Network Rail
Rasheed Hameed BSc, MSc, C.Eng MIET	Technical Director, Rail System Director and Head of Electrical and Plant, Arcadis Consulting (UK) Limited
William Simms BA (Hons) MRICS	Equity Partner, Bruton Knowles
John Pearson Bsc Hons – PG Dip, MRTPI	Director of Environment Services, Schofield Lothian Limited

Objectors who Appeared at the Inquiry

For Cambridge City Council & Cambridge South Council

Jack Parker of Counsel

He Called:

Charlotte Burton BA (Hons),MA (Cantab),MSc(Spatial Planning) MRTPI	Principal Planning Officer, Greater Cambridgeshire Shared Planning
Alistair Wilson	Streets and Open Space Development Manager, Cambridge City Council
Ms Davies	Arboricultural Officer

Other Parties

David Plank	Trumpington Residents Association
James Littlewood	Cambridge Past Present and Future
Edward Leigh	Smarter Cambridge Transport

APPENDIX B

DOCUMENTS SUBMITTED DURING THE INQUIRY

- INQ-01 Affidavit from Network Rail (NR) confirming procedural compliance
- INQ-02 Letter to Department of Levelling Up Housing & Communities dated 25 Jan 2022
- INQ-03 NR witness details
- INQ-04 NR Opening Statement
- INQ-05 OBJ/23 & OBJ/24 Cambridge City Council (CCiC) and South Cambridgeshire District Council (SCDC) Opening Statement
- INQ-06 OBJ/08 University of Cambridge (UoC) Opening Statement
- INQ-07 Bus Back Better Strategy - chapter 2
- INQ-08 Segregated Cycle & Footpath Alternative Option Drawing
- INQ-09 Note 1 - Consultation on Code of Construction Practice Part B
- INQ-10 Statement of Common Ground (SOCG) between NR and Trumpington Residents Association (TRA)
- INQ-11 Proposed Station Drainage Plan - General Arrangement
- INQ-12 Letter of response from Levelling Up department (INQ-02)
- INQ-13-1 Arboricultural Impact Assessment Report
- INQ-13-2 Tree Constraints Plans
- INQ-13-3 Tree Impact and Protection Plans
- INQ-14 East West Rail Consultation Document
- INQ-15 Tag 4 Forecasting and Uncertainty - Chapter 8 Modelling a Scenario
- INQ-16 Correspondence between Smarter Cambridge Transport (SCT) and Cambridgeshire County Council December 2021
- INQ-17 Note 2 Week Two Updates
- INQ-18 Email Exchange referred to in TRA Evidence
- INQ-19 Hobson's Park Working Area Compound Drawing
- INQ-20 Note 3 - References for questions put to John Pearson
- INQ-21-0 CSIE Design Principles Feb 2022
- INQ-21-1 Final Design Principles - March 2022 (NR-15-1)
- INQ-22 Inclusion of Structural Vegetation within the LVIA

INQ-23-1 OBJ-22 SCT Presentation to Inquiry
INQ-23-2 Updated Supplement Evidence - excel
INQ-24 OBJ-23 CCiC position statement issued 10.02.2022
INQ-25 OBJ-24 SCDC position statement issued 10.02.2022
INQ-26 Accompanied Site Visit - Proposed walking route and points of interest
INQ-27 Note from the Inspector 15.02.2022
INQ-28 Biodiversity Net Gain Offset Site
INQ-29-1 Long Road Tree Preservation Order (TPO) cover email
INQ-29-2 TPO 1978
INQ-29-3 TPO 2002
INQ-30-1 Hobson's Park Strategic Cycle Way Application
INQ-30-2 Application Form
INQ-30-3 Cycleway Connection Location Plan
INQ-30-4 Cycleway Connection Drawing
INQ-30-5 Cycleway Link Bridge
INQ-31-1 Clay Farm S106 - extent of secured open spaces signed plan
INQ-31-2 Green Corridor Landscape Strategy
INQ-32 SCT Evidence as Presented
INQ-33 SOCG between Network Rail and UoC
INQ-34 Corn Bunting Territory Note
INQ-35 NR Response to questions from SCT - resilience of track option
INQ-36 Southern Fringe Housing Figures
INQ-37 Site visits in connection with AIA Tree Group 151 (see INQ-13)
INQ-38 Approval Notice regarding land at Addenbrookes Campus
INQ-39-1 Greater Cambridge Shared Planning (GCSP) Note regarding Landscape Officer Comments
INQ-39-2 Landscape Consultation Response
INQ-40 Note 4 - regarding closure of Webster's and Duke's No. 2 Level Crossings and provision of an Accommodation Bridge
INQ-41 Correspondence between NR and REP-01 R Wakeford
INQ-42 Correspondence between NR and REP-02 J Saunders

INQ-43 Correspondence between NR and REP-03 S Patel
INQ-44 Correspondence between NR and REP-04 Great Shelford Parish Council
INQ-45 Correspondence between NR and REP-06 National Grid
INQ-46 Correspondence between NR and REP-07 Historic England
INQ-47 Correspondence between NR and REP-11 J Meed
INQ-48 Correspondence between NR and SUP-06 J Swadling
INQ-49 NR Note 5 Responses to Representations
INQ-50-1 Updated Draft Planning Conditions Feb 2022 (see NR-12-01) - Clean
INQ-50-1 Updated Draft Planning Conditions Feb 2022 (see NR-12-01) - Tracked
INQ-51 Sensitivity Testing of Impacts associated with up to 6m Passenger Trips
INQ-52-1 Amended Draft Order 21.02.22
INQ-52-2 Schedule of Changes to Draft Order
INQ-52-3 Explanatory Memorandum
INQ-53 Guide to the Assessment of Compounds within the ES
INQ-54-1 NR Note 6 - Article 35 Drafting
INQ-54-2 Astra Zeneca Permissions
INQ-54-3 University of Cambridge Permission
INQ-55 NR response to Landscape Officer note from GCSP - INQ-39
INQ-56-1 Letter to Inspector from Hobson's Conduit Trust regarding Protective Provisions
INQ-56-2 Further update from Hobson's Conduit Trust
INQ-56-3 Final update from Hobson's Conduit Trust
INQ-57 Update Position of Cambridge Past Present and Future at end of Inquiry
INQ-58 SCT Closing Statement
INQ-59 Permanent and Temporary Land Acquisition Plan for Hobson's Park
INQ-60 Arboricultural Impact Assessment dated 18.02.22
INQ-61 NR Closing Statement
INQ-62 CCoC letter regarding Biodiversity Net Gain
INQ-63 Inspector Adjournment Note 1
INQ-64 Inspector Adjournment Note 2
INQ-65 Draft S106 Agreement between NR and CCiC (NR-25)

- INQ-66 Note re S106 Clay Farm and Hobsons Park
- INQ-67 Schedule of alterations to Planning Direction Drawings (NR13 to NR13.1)
- INQ-68 Final Draft Order (tracked changes) - March 2022 (NR-02-2)
- INQ-69 Final Submitted Planning Conditions. March 2022 (NR-12-1)
- INQ-70-0 GCSP response to the inquiry CB issued 18.03.2022
- INQ-70-1 Appendix A – Amendments to draft S106 Agreement - Draft CC 106 Agreement
- INQ-71 Final amended Draft Order (Amendment to Article 11)
- INQ-72 Final Explanatory Memorandum to the Order
- INQ-73 Agreed draft for S106 Agreement with Cambridge City Council
- INQ-74 Final Submitted Planning Conditions March 2022
- INQ-75 NR response to Inspector request for clarification relating to the impact of the proposals on St Mary's School
- INQ-76 Inspector Adjournment Note 3
- INQ-77 Inspector Adjournment Note 4
- INQ-78 Cambridge City Council Permissions
- INQ-79-0 NR Response to Adjournment Note 4
- INQ-79-1 NR Revised Response to Adjournment Note 4 (submitted 31.05.22)
- INQ-80 Final draft TWAO (amendment to Article 35) (submitted 31.05.22)
- INQ-81 Response from Greater Cambridge Shared Planning dated 10th June 2022

APPENDIX C

CORE DOCUMENTS

A: APPLICATION DOCUMENTS

NR-01 Transport and Works Act Order Application Letter

NR-02-0 Draft of the proposed Order

NR-02-1 Updated Draft Order (tracked changes) - January 2022

NR-02-2 Final Draft Order (tracked changes) - March 2022

NR-03 Explanatory Memorandum

NR-04 Statement of Aims

NR-05 Funding Statement

NR-06 Estimate of Costs

NR-07 Consultation Report

NR-08-0 Book of Reference

NR-08-1 Updated Book of Reference - Updated January 2022

NR-08-2 Updated Book of Reference - Updated January 2022 (tracked)

NR-09-0 Deposited Plans and Section and Open Space Plans

NR-09-1 Updated Deposited Plans and Sections Rights of Way Plans and Open Space Plan - January 2022

NR-10 List of consents, permissions or licences under other enactments

NR-11 Waiver directions given under Rule 18

NR-12-0 Request for Deemed Planning Permission and statement of proposed conditions

NR-12-1 Final Submitted Planning Conditions - March 2022

NR-13-0 Planning Direction Drawings

NR-13-1 Planning Direction Drawings in support of the request for a planning direction

NR-14 Planning Statement

NR-15 Design and Access Statement

NR-16 Volume 1 Environment Statement Non-Technical Summary

NR-16 Volume 2 - Main Environment Statement

NR-16 Volume 3 - part 1 Environment Statement Appendices

- NR-16 Volume 3 - part 2 Environment Statement Appendices
- NR-17 Rule 14(4A) Notice
- NR-18 Consideration of Green Belt Issue
- NR-19 Public Open Space Assessment
- NR-20 Outline Business Case - Cambridge South Rail Station (February 2021)
- NR-21 Application for certificate under section 19 and section 18 and Schedule 3 of the Acquisition of Land Act 1991
- NR-22 Revised Deposited Plans and Sections Rights of Way Plans and Open Space Plan - November 2021
- NR-23 Schedule of Alterations to the Deposited Plans reflected in the Revised Deposited Plans
- NR-24 References for NR Evidence
- NR-25 Draft S106 Agreement between NR and Cambridge City Council

B: LEGISLATION

- B-01 Transport and Works Act 1992
- B-02 Part 3 and Part 8, Planning and Compulsory Purchase Act 2004
- B-03 Transport and Works (Applications and Objections Procedure) (England and Wales) Rules 2006
- B-04 Transport and Works (Inquiries Procedure) Rules 2004
- B-05 Transport and Works (Model Clauses for Railways and Tramways) Order 2006
- B-06 Planning and Compulsory Purchase Act 2004
- B-07 Town and Country Planning Act 1990
- B-08 Compulsory Purchase Act 1965
- B-09 Railways Act 1993
- B-10 The Railways and Other Guided Transport Systems (Safety) Regulations 2006
- B-11 European Union (Withdrawal) Act 2018
- B-12 Acquisition of Land Act 1991
- B-13 Town and Country Planning (General Permitted Development) Order 2015
- B-14 Human Rights Act 1998
- B-15 Equality Act 2010
- B-16 Land Compensation Act 1961

- B-17 Land Compensation Act 1973
- B-18 Neighbourhood Planning Act 2017
- B-19 Horn v Sunderland Corporation [1941] 2 K.B. 26
- B-20 Director of Building and Lands v Shun Fung Ironworks [1995] 2 A.C. 111
- B-21 Lyndon Print Ltd v West Midlands CC [1987] 1 W.L.R. 354
- B-22 London County Council v Tobin [1959] 1 W.L.R. 354
- B-23 Lee v Minister of Transport [1965] [1966] 3 W.L.R. 553
- B-24 First Protocol of the European Convention on Human Rights
- B-25 Convention for the Protection of Human Rights and Fundamental Freedoms
- B-26 Control of Pollution Act 1974
- B-27 Environmental Protection Act 1990
- B-28 Noise Insulation Regulations 1975
- B-29 Noise Insulation (Railways and Other Guided Transport Systems) Regulations 1996
- B-30 Annex IV and Annex II of The Habitats Directive
- B-31 Annex I of the Birds Directive
- B-32 Section 1, Section 9, Schedule 1, Schedule 5, Schedule 9 and Section 14 of the Wildlife and Countryside Act 1981
- B-33 The Habitats Regulations 2017 (as amended by EU exit regulations 2019)
- B-34 Section 40 and 41 of The Natural Environment and Rural Communities Act 2006
- B-35 Environment Protection Act 1990
- B-36 The Waste (Circular Economy) (Amendment) Regulations
- B-37 The Hedgerows Regulations 1997
- B-38 The Protection of Badgers Act 1992
- B-39 Section 6 and Schedule 14 The Environment Act 2021
- B-40 The Waste (Circular Economy) (Amendment) Regulations 2020
- B-41 R(oao Brommell) v Reading BC [2018] EWHC 3529 (Admin)
- B-42 Railways Act 2005 High Level Output Specification (HLOS) (2017)
- B-43 Rail network enhancements pipeline (2019)
- B-44 Planning (Listed Buildings and Conservation Areas) Act 1990
- B-45 Ancient Monuments and Archaeological Areas Act 1979

B-46 Electromagnetic Compatibility Regulations 2016

B-47 Directive 2014/30/EU

C: SCHEME DEVELOPMENT DOCUMENTS

C-01 Diversity Impact Assessment (including appendix)

C-02 Budget 2020

C-03 Strategic Outline Business Case (2017)

D: NATIONAL AND LOCAL POLICY AND GUIDANCE DOCUMENTS

D-01 National Planning Policy Framework (July 2021)

D-02 Guidance on Compulsory purchase process and the Crichel Down Rules (July 2019)

D-03 A Guide to TWA Procedures

D-04 National Planning Practice Guidance (relevant extracts)

D-05 National Policy Statement for National Networks

D-06 Cambridge City Council Cambridge Local Plan (October 2018)

D-07 Cambridge Policies Map 2018

D-08 South Cambridgeshire Local Development Plan (2018) (including errata relating to Chapter 3: Strategic Sites)

D-09 Cambridgeshire and Peterborough Local Transport Plan (2020)

D-10 Transport Strategy for Cambridge and South Cambridgeshire (2014)

D-11 Cambridge Southern Fringe Area Action Plan (2008)

D-12 Sustainable Design and Construction SPD (2020)

D-13 Cambridgeshire Flood and Water SPD

D-14 Public Art SPD (2010)

D-15 Cambridge Inner Green Belt Boundary Study (November 2015)

D-16 Cambridgeshire and Peterborough Combined Authority: Business Plan (2019-2020)

D-17 Cambridgeshire and Peterborough Combined Authority: Business Plan (2020-2021)

D-18 Cambridgeshire Local Transport Plan 2011 – 2031: Long Term Transport Strategy (July 2015)

- D-19 Life Sciences Industrial Strategy
- D-20 Transport Investment Strategy – Moving Britain Ahead (July 2017)
- D-21 National Planning Policy Framework (February 2019)
- D-22 Green Book Review 2020: Findings and response
- D-23 Decarbonising Transport – Setting the Challenge (2020)
- D-24 Greater Cambridge Greater Peterborough Enterprise Partnership Strategic Economic Plan
- D-25 Greater Cambridge City Deal
- D-26 Government White Paper (Creating growth, cutting carbon: Making Sustainable Transport happen) (2011)
- D-27 Decarbonising Transport, A Better, Greener Britain
- D-28 Cambridgeshire and Peterborough Combined Authority: Business Plan (2021-2022)
- D-29 CBC Transport Strategy and 5-year Implementation Plan (CBCTS)
- D-30 CBC Transport Needs Review Part 1 Report
- D-31 CBC Transport Needs Review Part 2 Report
- D-32 CBC Transport Needs Review Part 3 Report
- D-33 The Design Manual for Roads and Bridges (DMRB) LA 104 Environmental Assessment and Monitoring (2020)
- D-34 Guidelines for the Environmental Assessment of Road Traffic 1993
- D-35 Department of Environment, Food and Rural Affairs, 2010. Noise Policy Statement for England.
- D-36 South Cambridgeshire District Council, 2010. District Design Guide Supplementary Design Guide
- D-37 British Standards Institution, 2014. British Standard 4142:2014+ A1 2019 Method for Rating and Assessing Industrial and Commercial Sound. BSI.
- D-38 British Standards Institution, 2014. British Standard 5228: 2009+A1:2014 Code of Practice for Noise and Vibration Control on Construction and Open Sites, BSI.
- D-39 British Standards Institution, 2003&1991. British Standard 7445-1&-2 Description and Measurement of Environmental Noise, BSI.
- D-40 British Standards Institution, 2014. British Standard 8233 = Guidance on sound insulation and noise reduction for buildings, BSI.
- D-41 Department of Transport, 1995. Calculation of Railway Noise, DoT

- D-42 Department of Transport and the Welsh Office, 1988. Calculation of Road Traffic Noise, DoT & Welsh Office
- D-43 Highways England Sustainability & Environment Appraisal, 2020 Design Manual for Roads and Bridges LA 111 Noise and Vibration, Highway England Sustainability & Environmental Appraisal
- D-44 Network Rail, 2009. NR-L2-TEL-30134-PAVA Design and Installation Requirements for Public Announcement, Voice Alarm and Long Line Public Announcement Systems, NR
- D-45 Network Rail, 2019. NR/L2/ENV/121 ISSUE 1 Managing Environmental and Social Impact of Noise and Vibration, NR.
- D-46 World Health Organisation. 1999. Guidelines for Community Noise. Geneva. WHO
- D-47 World Health Organisation. 2009. Night Noise Guidelines for Europe. Geneva. WHO
- D-48 World Health Organisation. 2018. Environmental Noise Guidelines for the European Region. Geneva. WHO.
- D-49 Home Office. Code of Practice for the Housing and Care of Animals Bred, Supplied or Used for Scientific Purposes (December 2014)
- D-50 Cambridgeshire and Peterborough Biodiversity Group Lists of Priority Species
- D-51 The Chartered Institute of Ecology and Environmental Management Guidelines for ecological impact assessment in the UK and Ireland: terrestrial, freshwater, coastal and marine, 2018
- D-52 Biodiversity Metric 2.0 (JP029)
- D-53 Biodiversity Net Gain – Principles and Guidance for UK Construction and Developments 2016
- D-54 Biodiversity Net Gain – Principles and Guidance for UK Construction and Developments 2019
- D-55 Network Rail’s Environmental Sustainability Strategy
- D-56 Handbook for Phase 1 habitat survey
- D-57 Common Bird Census Instructions. British Trust for Ornithology
- D-58 Cambridgeshire Bird Report 2017
- D-59 Cambridgeshire Bird Report 2018
- D-60 SuDS Manual (CIRIA C753)
- D-61 City of Cambridge SuDS Design and Adoption Guide
- D-62 ‘Design Manual for Roads and Bridges’ (DMRB) LA 112 for community land and assets, (Highways England et al, 2019)

- D-63 Connecting people: a strategic vision for rail (DfT 2017)
- D-64 Trees and Development Sites SPD (2009)
- D-65 Open Space in New Developments SPD
- D-66 International Council on Monuments and Sites (ICOMOS) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011)
- D-67 Chartered Institute for Archaeologists (CIfA) 'Code of conduct' (2019)
- D-68 Chartered Institute for Archaeologists (CIfA) 'Standard and guidance for commissioning work or providing consultancy advice on archaeology and the historic environment' (2014)
- D-69 Chartered Institute for Archaeologists (CIfA) 'Standard and guidance for historic environment desk-based assessment' (2017)
- D-70 Historic England's 'Managing Significance in Decision-Taking in the Historic Environment, Historic Environment Good Practice Advice in Planning Note 2'
- D-71 Historic England's 'The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3' (2017)
- D-72 Historic England's 'Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment' (2008)
- D-73 Network Rail's standard on Heritage Care and Development
- D-74 Network Rail's Biodiversity Action Plan
- D-75 SCDC's Adopted Policies Map (2018)
- D-76 Bird Monitoring Methods: A Manual of Techniques for UK Key Species
- D-77 Cambridgeshire Bird Report 2019
- D-78 University of Cambridge Transport Policy
- D-79 Defra/Natural England (2014).UK Government Guidance Local nature reserves: setting up and management
- D-80 Bird Survey & Assessment Steering Group. (2021). Bird Survey Guidelines for assessing ecological impacts, v.0.1.0.
- D-81 Waterman E, Tulp I, Reijnen R, Krijgsveld K, Braak C (2002) Disturbance of meadow birds by railway noise in The Netherlands. Geluid 1:2-3
- D-82 Scuseme Recommends (2019) Dog walks in Cambridge - 15 of the best
- D-83 National Vegetation Classification: Users' handbook
- D-84 Great Crested Newt Conservation Handbook
- D-85 Great Crested Newt Mitigation Guidelines
- D-86 Competencies for Species Survey: Great Crested Newt

D-87 Herpetofauna workers' manual

D-88 Froglife Advice Sheet 10

D-89 Barn Owl Tyto alba Survey Methodology and Techniques for use in Ecological Assessment

D-90 Bat surveys for professional ecologists: Good practice guidelines

D-91 Core Sustenance Zones: Determining zone size

D-92 Water Vole Conservation Handbook

D-93 The Water Vole Mitigation Handbook

D-94 CIEEM Competencies for Species Survey: Water Vole

D-95 CIEEM competencies for Species: Eurasian Otter

D-96 Landscape in New Development SPD 2010

D-97 Biodiversity SPD 2009

D-98 Emerging Greater Cambridge Local Plan

MISCELLANEOUS

M-1 Open Space and Recreation Strategy, Cambridge City Council October 2011
(OBJ/23 & 24)

OBJECTIONS

OBJ 01 - Objection by St John's College Cambridge - 20 July 2021

OBJ 02 - Objection of Chris Pointon - 27 July 2021

OBJ 03 - Objection of AstraZeneca - 28 July 2021

OBJ 03-W Objection of AstraZeneca

OBJ 04 - Objection of Saba Infra Cambridgeshire Ltd – 28 July 2021

OBJ 04-W Withdrawal of Objection of Saba Infra Cambridgeshire Ltd

OBJ 05 - Objection of Environment Agency – 30 July 2021

OBJ 05-W Withdrawal of Objection - Environment Agency 20 September 2021

OBJ 06 - Objection of Cambridge University Hospitals NHS Foundation Trust - 30 July 2021

OBJ 06-W Withdrawal of Objection of Cambridge University Hospitals NHS Foundation Trust

OBJ 07 - Objection of Trumpington Residents Association – 30 July 2021

- OBJ 08 - Objection of University of Cambridge – 30 July 2021
- OBJ 09 - Objection of Medical Research Council – 30 July 2021
- OBJ 10 - Objection of CBC Estate Management Company Limited – 30 July 2021
- OBJ 11 - Objection of Cambridge Medipark Limited – 30 July 2021
- OBJ 12 - Objection of Cadent Gas Limited – 30 July 2021
- OBJ 12-W Withdrawal of Objection of Cadent Gas Limited
- OBJ 13 - Objection of Cambridge Group, Ramblers – 30 July 2021
- OBJ 13-W Withdrawal of Objection - Cambridge Ramblers 16 December 2021
- OBJ 14 - Objection of Cambridge Past, Present and Future – 30 July 2021
- OBJ 15 - Objection of The Pemberton Trustees – 30 July 2021
- OBJ 16 - Objection of South Staffordshire Water PLC – 2 August 2021
- OBJ 16-W Withdrawal of Objection of South Staffordshire Water PLC
- OBJ 16-W withdrawal of South Staffordshire Water PLC
- OBJ 17 - Objection of Countryside Cambridge One Limited and Countryside Cambridge Two Limited – 2 August 2021
- OBJ 18 - Objection of Cambridgeshire County Council and Greater Cambridgeshire Partnership – 2 August 2021
- OBJ 18-W Withdrawal of Objection of Cambridgeshire County Council and Greater Cambridgeshire Partnership
- OBJ 19 - Objection of St Mary’s School, Cambridge – 2 August 2021
- OBJ 20 - Objection of Dave Jackson – 2 August 2021
- OBJ 21 - Objection of Richard and Vanessa Price – 2 August 2021
- OBJ 22 - Objection of Smarter Cambridge Transport – 3 August 2021
- OBJ 23 - Representation of Cambridge City Council – 2 August 2021
- OBJ 24 - Representation of South Cambridgeshire District Council – 2 August 2021
- OBJ-25 - Objection by Mark Chaplin - July 2021

REPRESENTATIONS

- REP 01 R Wakeford
- REP 02 J Saunders
- REP 03 S Patel
- REP 04 Great Shelford Parish Council

REP 06 National Grid

REP 07 Historic England

REP 10 J Swadling

REP 11 J Meed

E: PRE-INQUIRY DOCUMENTS - PART 2

E-01 - Statement of Case (SoC) Network Rail CSIE

E-02 - OBJ/03 AstraZeneca and Medimmune Limited SoC

E-03 - OBJ/08 University of Cambridge SoC

E-04 - OBJ/09 Medical Research Council SoC

E-05 - OBJ/11 Cambridge Medipark Ltd and OBJ/10 CBC Estate Management Co Ltd
SoC

E-06 - OBJ/13 Ramblers, Cambridge Group SoC

E-07 - OBJ/14 Cambridge Past, Present and Future SoC

E-08 - OBJ/15 Pemberton Trustees SoC

E-09 - OBJ/17 Countryside Cambridge One Limited and Countryside Cambridge Two
Limited SoC

E-10 - OBJ/24 South Cambridgeshire District Council - SoC

E-11 - OBJ/23 Cambridge City Council SoC

E12 - OBJ/18 Correspondence of 15.09.2021 on behalf of Cambridgeshire County
Council and Greater Cambridgeshire Partnership requesting their letter of
Objection be treated as Statement of Case

E13 - OBJ/16 Correspondence of 15.09.21 from South Staffordshire Water PLC
requesting their letter of Objection be treated as their Statement of Case

E14 - OBJ/07 Trumpington Residents Association SoC

E15 - OBJ/04 Saba Infra Cambridgeshire Ltd SoC

NETWORK RAIL - PROOFS OF EVIDENCE

W1 - ANDY BARNES - SCHEME / CONSTRUCTION

NRE 1.1 - Summary - Andy Barnes - Scheme

NRE 1.2 Proof - Andrew Barnes - Scheme

NRE1.3 - NR Appendices to Proof of Evidence - Scheme

W2 - GEOFF HILLING - TRANSPORT

NRE2.1 CSIE Summary Proof of Evidence - Transport

NRE2.2 CSIE Proof of Evidence - Transport

NRE2.3 Appendices - Transport - Geoff Hilling

W3 - LYNDEN SPENCER-ALLEN - VIBRATION

NRE3.1 Vibration Proof Summary Lynden Spencer-Allen

NRE3.2 Vibration Proof Lynden Spencer-Allen

NRE3.3 Vibration Proof Appendices Lynden Spencer-Allen

W4 - SIMON TAYLOR – NOISE

NRE4.1- CSIE - NR Summary Proof of Evidence - Noise

NRE4.2 - CSIE - NR Proof of Evidence - Noise

NRE4.3 - CSIE - Appendices - NR Proof of Evidence - Noise

W5 - SUE BROCKEN - DRAINAGE

NRE 5.2 - Proof of Evidence - Drainage

W6 - JOHN PREST - LEVEL CROSSINGS

NRE 6.1 Summary John Prest - Level Crossings

NRE6.2 CSIE - NR Proof of Evidence - Level Crossings

NRE6.3 Appendices to Proof of Evidence - Level Crossing

W7 - JENNY WYLIE - HERITAGE

NRE7.1 - NR Proof of Evidence - Heritage

NRE7.2 - NR Proof of Evidence - Heritage

W8 - DAVID JONES – OPEN SPACE

NRE8.1 Summary - Open Space - David Jones

NRE8.2 CSIE - NR Proof of Evidence - Open Space (David Jones)

W9 - JOHN PEARSON - PLANNING

NRE9.1 - CSIE - NR PoE - Planning Summary (John Pearson)

NRE9.2 - CSIE - NR Proof of Evidence - Planning (John Pearson)

NRE9.3 - CSIE - NR PoE - Planning Appendices (John Pearson)

W10 - BILL SIMMS - PROPERTY

NRE 10.1 Summary Proof - Bill Simms

NRE 10.2 Proof - Bill Simms

NRE 10.3 Appendices - Bill Simms

W11 - LEWIS WINGFIELD - STRATEGIC CASE FOR THE PROJECT

NRE 11.1 CSIE Strategic Case for Project Proof Summary

NRE 11.2 CSIE - NR Proof of Evidence - Strategic Case

NRE 11.3 CSIE - Appendices to Proof of Evidence - Strategic Case

W12 - GUY STONE - BIODIVERSITY

NRE12.1 - Summary Proof - Guy Stone

NRE12.2 - Proof - Guy Stone

NRE12.3 - Appendices - Guy Stone

W13 - RASHEED HAMEED - EMI

NRE 13.1 Rasheed Hameed - Summary

NRE13.2 - Rasheed Hameed - Proof

NRE13.3 - Appendices - Rasheed Hameed

NETWORK RAIL REBUTTALS

NRE-REB-01 Rebuttal Evidence to OBJ-06 (Cambridge University Hospitals NHS Foundation Trust)

NRE-REB-02-0 Rebuttal Evidence to OBJ-08 (University of Cambridge)

NRE-REB-02-1 Appendices to Rebuttal Evidence to OBJ-08 (University of Cambridge)

NRE-REB-03 Rebuttal Evidence to OBJ-09 (Medical Research Council)

NRE-REB-04-0 Rebuttal Evidence to OBJ-14 (Cambridge Past Present and Future)

NRE-REB-04-1 Addendum to Rebuttal Evidence to OBJ-14 (Cambridge Past Present and Future)

NRE-REB-05 Rebuttal Evidence to OBJ-22 (Cambridge Smarter Transport)

NRE-REB-06-0 Rebuttal Evidence to OBJ-23 (Cambridge City Council)

NRE-REB-06-1 Appendices to Rebuttal Evidence to OBJ-23 (Cambridge City Council)

NRE-REB-07 Rebuttal Evidence to OBJ-24 (South Cambridgeshire District Council)

OTHER PARTIES - PROOFS OF EVIDENCE

OBJ-03 AstraZeneca UK Ltd and Medimmune Limited

OBJ-3-1 Update Letter 05.01.22

OBJ-06 Cambridge University Hospitals NHS Foundation Trust (CUH)

W1 - CARIN CHARLTON, DIRECTOR OF CAPITAL, ESTATES & FACILITIES
MANAGEMENT, CUH

OBJ-6-W1/1 - Summary Proof of Evidence

OBJ-6-W1/2 - Main Proof of Evidence

OBJ-6-W1/3 - Appendices to Main Proof of Evidence

W2 - IAN JACKSON, DEPUTY DIRECTOR OF ESTATES & FACILITIES -
ENGINEERING, CUH

OBJ-6-W2/1 - Main Proof of Evidence

OBJ-6-W2/2 - Appendices to Main Proof of Evidence

W3 - ELLIOT PAGE, DIRECTOR OF TRANSPORT, STANTEC UK LIMITED

OBJ-6-W3/1 - Summary Proof of Evidence

OBJ-6-W3/2 - Main Proof of Evidence

OBJ-6-W3/3 - Appendices to Main Proof of Evidence

OBJ-6-W3/4 - Rebuttal Proof of Evidence

OBJ-07 Trumpington Residents Association

OBJ-07-W1 Proof of Evidence

OBJ-08 University of Cambridge

W1 - COLIN SMITH - STRATEGIC ADVISER, CBRE

OBJ-08-W1-1 Proof of Evidence of Colin Smith - Compensation

OBJ-08-W1-2 Summary Proof of Evidence of Colin Smith - Compensation

OBJ-08-W1-3 Rebuttal Proof of Evidence of Colin Smith

W2 - GRAHAM HUGHES - STRATEGIC ADVISER, STANTEC

OBJ-08-W2-1 Proof of Evidence of Graham Hughes - Transport

OBJ-08-W2-2 Summary Proof of Evidence of Graham Hughes - Transport

W3 - JOHN MCAULEY - MANAGING DIRECTOR, COMPLIANCE ENGINEERING
IRELAND LTD

OBJ-08-W3-1 Proof of Evidence of John McAuley

OBJ-08-W3-2 Summary Proof of Evidence of John McAuley

OBJ-08-W3-3 Rebuttal Proof of Evidence of John McAuley

W4 - KARL WILSON - OPERATIONS DIRECTOR, UNIVERSITY OF CAMBRIDGE

OBJ-08-W4-1 Proof of Evidence of Karl Wilson - Research and the University

OBJ-08-W4-2 Summary Proof of Evidence of Karl Wilson- Research and the University

OBJ-08-W4-3 Rebuttal Proof of Evidence of Karl Wilson- Research

W5 - PAUL JENKIN, STANTEC

OBJ-08-W5-1 Proof of Evidence of Paul Jenkin- Drainage

OBJ-08-W5-2 Summary Proof of Evidence of Paul Jenkin - Drainage

OBJ-08-W5-3 Supplementary Proof of Evidence of Paul Jenkin- Drainage

W6 - PAUL MILLINER, HEAD OF ESTATE PLANNING, UNIVERSITY OF CAMBRIDGE

OBJ-08-W6-1 Proof of Evidence of Paul Milliner - Planning

OBJ-08-W6-2 Summary Proof of Evidence of Paul Milliner- Planning

OBJ-08-W6-3 Rebuttal Proof of Evidence of Paul Milliner- Planning

W7 - RUPERT THORNELY-TAYLOR - RUPERT TAYLOR LTD

OBJ-08-W7-1 Proof of Evidence of Rupert Thornely-Taylor - Noise & Vibration

OBJ-08-W7-2 Summary Proof of Evidence of Rupert Thornely-Taylor - Noise & Vibration

OBJ-08-W7-3 Rebuttal Proof of Evidence of Rupert Thornely-Taylor - Noise and Vibration

OBJ-09 Medical Research Council

W1 - RICHARD MUIR - DIRECTOR, SANDY BROWN

OBJ-09-W1-1 Richard Muir Proof of Evidence

OBJ-09-W1-1 Richard Muir Summary Statement

W2 - DAVID PURCELL, TECHNICAL DIRECTOR, AKTII

OBJ-09-W2-1 David Purcell Proof of Evidence

OBJ-09-W2-2 David Purcell Summary Statement

W3 - DIRECTOR OF MEDICAL RESEARCH COUNCIL LABORATORY OF MOLECULAR BIOLOGY

OBJ-09-W3-1 Dr Jan Lowe Proof of Evidence

OBJ-09-W3-2 Dr Jan Lowe Summary Proof of Evidence

OBJ-10 CBC Estate Management Company Ltd & OBJ-11 Cambridge Medipark Ltd

OBJ-10 & OBJ-11 Written Submission

OBJ-14 Cambridge Past Present and Future

OBJ-14-1 James Littlewood, Chief Executive - Proof of Evidence

OBJ-17 Countryside Cambridge One Limited and Countryside Cambridge Two Limited

OBJ-17-W/1/1 Written Submission

OBJ-22 Cambridge Smarter Transport

OBJ-22-W1/1 Proof of Evidence submitted by Edward Leigh

OBJ-22-W1/2 Edward Leigh - Supporting Data to Proof of Evidence

OBJ-23 Cambridge City Council

CHARLOTTE BURTON, PRINCIPAL PLANNING OFFICER, GREATER CAMBRIDGE SHARED PLANNING

OBJ-23-W1/1 – Proof of Evidence

OBJ-23-W1/2 – Appendices to Proof of Evidence

OBJ-23-W1/3 – Summary Proof of Evidence

ALISTAIR WILSON, STREETS & OPEN SPACE, DEVELOPMENT MANAGER, CAMBRIDGE CITY COUNCIL

OBJ-23-W2/1 – Proof of Evidence

OBJ-23-W2/2 – Appendices to Proof of Evidence

OBJ-23-W2/3 – Summary Proof of Evidence

GUY BELCHER, BIODIVERSITY OFFICER, CAMBRIDGE CITY COUNCIL

OBJ-23-W3/1 – Proof of Evidence

OBJ-23-W3/2 – Appendices to Proof of Evidence

OBJ-23-W3/3 – Summary Proof of Evidence

OBJ-24 South Cambridgeshire District Council

CHARLOTTE BURTON, PRINCIPAL PLANNING OFFICER, GREATER CAMBRIDGE SHARED PLANNING

OBJ-24-W1-1 - Proof of Evidence

OBJ-24-W1-2 - Appendices to Proof of Evidence

OBJ-24-W1-3 - Summary Proof of Evidence

APPENDIX D

RECOMMENDED CONDITIONS TO BE ATTACHED TO DEEMED

PLANNING PERMISSION

Schedule 1

Interpretation

In the following conditions—

a) "the Order" means The Network Rail (Cambridge South Infrastructure Enhancements) Order 2021;

b) "the development" means the development authorised by the Order and this Direction under deemed

planning permission.

c) "the Code of Construction Practice (Part B)" means the code of construction practice to be submitted

to and approved by the local planning authority under condition 10(b) (Code of Construction Practice);

d) "the Environmental Statement" means the Environmental Statement that accompanied the application

for the Order;

e) "the Flood Risk Assessment" means the flood risk assessment prepared by Arcadis dated May 2021,

as submitted in the Environmental Statement;

f) "the local planning authority" means Cambridge City Council or South Cambridgeshire District Council,

as the context requires;

g) "the planning drawings" means the drawings listed at Schedule 2 of these conditions.

h) "parameter plans" means the parameter plans listed at Schedule 2 of these conditions.

i) "Specified Phase" as defined under condition 5 means any phase of the development for which the approved Phasing Plan specifies that the relevant condition will not apply

j) "Competent person" has the same meaning as defined in the Guidance 'Land affected by contamination' ref. Paragraph: 006 Reference ID: 33-006-20190722 and NPPF Annex 2 (Glossary), 'A person with a recognised relevant qualification, sufficient experience in dealing with the type of pollution or land instability and membership of a relevant organisation'.

k) "the Cambridge South station building" means the station buildings, platforms and canopies, and ancillary structures, as shown on the Proposed Site Plan (drawing reference 158454-ARC-ZZ-ZZ-DRGLEP- 000041 P02) listed in Part 1 of Schedule 2 to the request for deemed planning permission.

l) "the Exchange Land" means the land to the south of Addenbrooke's Road provided as replacement open space annotated as such on the Indicative Landscape Plan (drawing reference 158454-ARC-00-ZZ-DRG-EEN-000076 P03) or such alternative area of Exchange Land as shall be agreed by the local planning authority as being of equivalent size and suitability for the purpose of the intended use of the Exchange Land.

1. Time for commencement

The development hereby permitted must commence before the expiration of 5 years from the date on which the Order comes into force.

2. Accordance with Drawings

The development hereby approved must be carried out in accordance with the approved planning drawings listed at Schedule 2 Part 1 of these Conditions.

3. Accordance with Design Principles

The development hereby approved must be carried out in accordance with the Cambridge South Design Principles (NR-15-1 dated March 2022).

4. S106 Agreement

No development to construct the Cambridge South station building above the ground floor slab level shall commence until Network Rail enters into the Cambridge South Infrastructure Enhancements Section 106 Agreement that is in substantially the same form as Document NR-25.

5. Phasing Plan

No development shall commence (including demolition and enabling works) until a Phasing Plan for the development hereby permitted has been submitted to and approved in writing by the local planning authority. The Phasing Plan must include (but not limited to) the following elements:

- (i) Enabling works e.g. haul roads, site compounds, archaeology and site investigations including the provision of appropriate of all site compounds;
- (ii) Cambridge South station building;
- (iii) Alterations to Webster's Footbridge;
- (iv) Accommodation bridge over Hobson's Brook;
- (v) Railway Systems Compound;
- (vi) Landscaping; and
- (vii) Any other building/structure or alteration to an existing building/structure for which details of scale and external appearance were not provided as part of the request for the planning direction.

The Phasing Plan shall identify:

- a) each phase of development and any such Specified Phase of development to which planning conditions 6, 7, 8, 10, 11, 12, 14, 15, 16, 26, 28, 29, 34 and 35 will not apply.
- b) the location of site compounds including indicative duration of works for each area including where and when areas of public open space are proposed to be used temporarily for construction works and for other associated purpose for the delivery of the development will be closed to and unavailable public use.
- c) A construction programme providing the sequence and timing of the proposed development.

The development shall only be carried out in accordance with the approved Phasing Plan, unless otherwise agreed in writing by the local planning authority.

6. Submission of preliminary contamination assessment

Prior to the commencement of development (other than a Specified Phase) a site wide investigation strategy setting out the location and details of the site investigations to be carried out to effectively determine the nature and extent of any contamination, including soil, gas and/or water to inform the remediation strategy shall be submitted to and approved in writing by the local planning authority.

The site wide investigation strategy will be prepared by a Competent Person based on the information identified in the desk study undertaken to support Chapter 12 of the Environmental Statement (doc NR16).

The site investigations shall only be undertaken in accordance with the site investigation strategy approved in writing by the local planning authority.

7. Submission of site investigation report and remediation strategy

Prior to undertaking any excavations with the exception of works agreed under conditions 6 (site investigations) and 11 (Archaeology) or a Specified Phase the following shall be prepared by a Competent Person and submitted to and approved in writing by the local planning authority:

- (a) A site investigation report detailing the findings of the site investigations carried out under condition 6 to determine the nature and extent of any contamination, including the results of the soil, gas and/or water analysis and subsequent risk assessment to any receptors.
- (b) A proposed remediation strategy detailing the works required to address unacceptable risks from the identified contamination given the proposed end use of the site and surrounding environment including any controlled waters.

The strategy shall include a schedule of the proposed remedial works setting out a timetable for all remedial measures that will be implemented.

The works shall only be undertaken in accordance with the remediation strategy approved in writing by the relevant local planning authority.

8. Implementation and completion of remediation strategy works

Prior to the first operational or public use of the land under any phase of the

development (other than a Specified Phase) the following shall be prepared by a Competent Person and submitted to and approved in writing by the local planning authority:

- (a) a completion report demonstrating that the approved remediation scheme as required by condition 7 has been undertaken and that the land has been remediated to a standard appropriate for the end use of the development; and
- (b) details of any post-remedial sampling and analysis (as defined in the approved Material Management Plan submitted under the Code of Construction Practice Part B) shall be included in the completion report along with all information concerning materials brought onto, used in and removed from the development.

The information provided must demonstrate that the site has met the required clean-up criteria set out in the approved remediation strategy.

9. Unexpected contamination

If unexpected contamination is encountered whilst undertaking any part of the development which has not previously been identified, works shall immediately cease in the contaminated area until the local planning authority has been notified in writing and a dedicated remediation strategy for that area including details of any further site investigations required to address unexpected contamination the has been approved in writing by the local planning authority following steps (a) and (b) of condition 7 above.

The approved dedicated remediation strategy shall then be fully implemented under condition 7 and prior to any further development of the area concerned.

10. Code of Construction Practice

(a) The development must be carried out in accordance with the provisions of the Code of Construction Practice (Part A) contained in the Environmental Statement (Volume 3: Appendix 2.4) unless amended through the CoCP Part B.

(b) Other than in relation to a Specified Phase no development shall commence until a Code of Construction Practice (Part B) has been submitted to and approved in writing by the local planning authority for that phase of work.

The Code of Construction Practice (Part B) will include the following documents other than in relation to a Specified Phase:

- 1) Flood Emergency Response Plan
- 2) Emergency and Incident Response Plan
- 3) Dust management Plan
- 4) Construction Logistics Plan
- 5) Construction Travel Plan
- 6) Construction Traffic Management Plan
- 7) Site Waste Management Plan
- 8) Materials Management Plan (Includes storage of excavated material)
- 9) Lighting Management Plan
- 10) Pollution Control Plan
- 11) Carbon Efficiency Plan
- 12) Noise and Vibration Management Plan

- 13) Details of any temporary structure, plant or machinery greater than 15 metres in height above existing ground level.

The development shall only be carried out in accordance with the details approved in writing by the local planning authority.

11. Archaeological mitigation, investigation and evaluation

No development other than a Specified Phase shall commence until the implementation of a programme of archaeological investigations has been undertaken on the relevant site in accordance with a site wide written scheme of investigation which has been submitted to and approved in writing by the local planning authority. The approved scheme shall be implemented in full including any post development requirements, e.g. archiving and submission of final reports.

12. Construction Ecological Method Statement (EMS)

No development other than a Specified Phase shall commence until an Ecological Method Statement (EMS) for that phase addressing protection, enhancement, mitigation and compensation during construction has been submitted and approved in writing by the local planning authority. The EMS shall include but not limited to the following:

- (a) Review of site potential and constraints, based on species surveys and operational limitations of the site.
- (b) Detailed design(s) and/or working method(s) to achieve stated objectives, including:
 - i. Risk assessment of potentially damaging construction activities.
 - ii. Identification of "biodiversity protection zones".
 - iii. Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
 - iv. The location and timings of sensitive works to avoid harm to biodiversity.
 - v. The times during construction when specialist ecologists need to be present on site to oversee works.
 - vi. Responsible persons and lines of communication.
 - vii. The role and responsibilities on site of an ecological clerk of works (ECoW) or a similarly competent person.
 - viii. Use of protective fences, exclusion barriers and warning signs if applicable.
- (c) Extent and location/area of proposed works on appropriate scale maps and plans.
- (d) Details of monitoring and remedial measures, including timetable for submission to local planning authority.
- (e) Details of the mitigation for breeding birds, including within the Exchange Land, which must be made available in a condition suitable for breeding birds before the commencement of any breeding season in which there will be disturbance of existing habitats.

The strategy shall also set out (where the results from monitoring show that conservation aims and objectives of the EMS are not being met) contingencies and/or that remedial action will be identified, agreed and implemented so that the development continues to protect, enhance, mitigate and compensate for the construction works as originally approved. The development shall only be carried out in accordance with the EMS approved in writing by the local planning authority.

13. Biodiversity Net Gain

Network Rail shall achieve a no less than 10% Biodiversity Net Gain (BNG) based on the DEFRA metric V2 calculations demonstrated through document NRE-REB-06-01 containing Biodiversity Metric 2.0 calculations based on drawing Retained Enhanced and Created Habitat within Site Boundary dated January 2022.

Updated Biodiversity Net Gain calculations based on the DEFRA metric V3 calculations will be submitted in accordance with Condition 29 to demonstrate the permitted development will achieve 10% Biodiversity Net Gain and confirm the units for different habitat types onsite and offsite.

Prior to, or concurrently with, the last submission of details as required by condition 29, an Offsite Biodiversity Scheme to meet any onsite shortfall shall be submitted to and approved in writing by the local planning authority. The scheme shall include:

- (i) details of the location site;
- (ii) Biodiversity Net Gain units;
- (iii) details of the contract to secure its delivery, monitoring and reporting to the local planning authority for a minimum 30 year period which will evidence the scheme's implementation and that its objectives are being met together with provisions to review, amend and implement any proposals to change the scheme.

The development shall be carried out in accordance with the approved details.

14. Construction Surface water drainage Strategy

No development shall commence (except for approved site investigations, works to trees, demolition or works under any Specified Phase) until details of measures to manage additional surface water run-off from the site during the construction works (or any phase(s) thereof) have been submitted to and approved in writing by the local planning authority.

The approved measures shall be brought into operation before any works (or phase(s) thereof) commence and shall thereafter be maintained in accordance with the details approved in writing by the local planning authority.

15. Operational Surface Water Drainage Strategy

No development shall commence except for approved site investigations, works to trees, demolition or works under any Specified Phase until a site wide Surface Water Drainage Strategy (SWDS), based on sustainable drainage principles and principles within section 6 of the Flood Risk Assessment, has been submitted to and approved in writing by the local planning authority. The SWDS shall include where appropriate:

- (a) Full calculations detailing the existing surface water runoff rates for the QBAR, 3.3% Annual Exceedance Probability (AEP) (1 in 30) and 1% AEP (1 in 100) storm events.
- (b) Full results of the proposed drainage system modelling in the above-referenced storm events (as well as 1% AEP plus climate change), inclusive of all collection, conveyance, storage, flow control and disposal elements and including an allowance for urban creep, together with an assessment of system performance.
- (c) Site Investigation and test results to confirm infiltration rates.
- (d) Details of overland flood flow routes in the event of system exceedance, with demonstration that such flows can be appropriately managed on site without increasing flood risk to occupants.
- (e) Details of the maintenance/adoption of the surface water drainage system.
- (f) Measures taken to prevent pollution of the receiving groundwater and/or surface water.
- (g) Implementation programme.

The SWDS shall be implemented in accordance with the details approved in writing by the local planning authority and shall be completed and operational prior to the use of the respective phase of the development or in accordance with the implementation programme agreed in writing with the local planning authority.

16. Operational Surface Water Drainage Scheme

No development (or phase thereof) except for written approved site investigations, works to trees, demolition or works under any Specified Phase shall commence until a Surface Water Drainage Scheme (SWDSc)(for that phase), based on the approved operational Surface Water Drainage Strategy, has been submitted to and approved in writing by the local planning authority. The SWDSc shall include where appropriate:

- (a) Detailed drawings of the entire proposed surface water drainage system, including levels, gradients, dimensions and pipe reference numbers.
- (b) Details of the proposed attenuation and flow control measures.
- (c) Details of the measures taken to prevent pollution of the receiving groundwater and/or surface water.
- (d) Full details of culvert extension appropriately sized to convey the existing channel modelled flow.
- (e) Full details for the long term maintenance/adoption of the surface water drainage system. The submitted details should identify runoff sub-catchments, SuDS components, control structures, flow routes and outfalls. In addition, the plan must clarify the access that is required to each surface water management component for maintenance purposes. The maintenance plan shall be carried out in full thereafter.

The SWDSc shall be implemented in accordance with the details approved in writing by the local planning authority and shall be completed and operational prior to the use of the development (or respective phase thereof) or in accordance with the implementation programme approved in writing with the local planning authority.

17. Detailed design approval: Cambridge South Station

No development relating to the construction of Cambridge South Station building shall commence until full details of the scale, massing and external appearance, including details of floor and roof plans, elevations, and long sections of the development have been submitted to and approved in writing by the local planning authority.

Details submitted must be in accordance with the approved parameter plans and shall be submitted with a Design Compliance Statement demonstrating compliance with the relevant approved Cambridge South Design Principles (NR-15-1 dated March 2022). The submitted scale details must include plans at a minimum scale of 1:250, and elevations at a minimum scale of 1:100.

The development shall only be carried out in accordance with the approved details.

18. External Materials

Prior to commencement of construction of all external surfaces approved under conditions 17, 22 and 26 the following shall be submitted to and approved in writing by the local planning authority:

- a) details of all the materials for the external surfaces of buildings to be used in the construction of the development
- b) a sample panel for relevant materials (including external brickwork) to include details of fixings, finishes and junctions between materials shall be submitted to and approved in writing by the local planning authority. The approved sample panel is to be retained on site for the duration of the works for comparative purposes.

Development shall only be carried out in accordance with the approved details.

19. Roof Top Plant: Cambridge South Station

No roof mounted plant/equipment shall be installed until details of the plant/equipment have been submitted to and approved in writing by the local planning authority. The details shall include the type, dimensions, materials, location, and means of fixing. The development shall only be carried out and maintained thereafter in accordance with the approved details.

20. Public Art: Cambridge South Station

Concurrently with the first submission of details of the Cambridge South station building (pursuant to condition 17 or 18) or the hard and soft landscaping scheme (pursuant to condition 29) (whichever is first to come forward) a Public Art Delivery Plan (PADP) shall be submitted to and approved in writing by the local planning authority. The PADP must include the following:

- (a) Details of the public art and artist commission;
- (b) Details of how the public art will be delivered, including a timetable for delivery;
- (c) Details of the location of the proposed public art on the application site;
- (d) The proposed consultation to be undertaken;
- (e) Details of how the public art will be maintained;

- (f) How the public art would be decommissioned if not permanent;
- (h) How the public art would be replaced in the event that it is destroyed.
- (i) Details of the proposed budget; and
- (j) Address ownership proposals post delivery

The public art shall be fully implemented and maintained in accordance with the approved PADP.

21. Waste: Cambridge South Station

Concurrently with the submission of details in compliance with condition 17, a scheme for the on-site storage facilities for commercial waste, including waste for recycling shall be submitted to and approved in writing by the local planning authority. The approved scheme shall be carried out before the use of the station is commenced and shall be retained thereafter.

22. Cycle Parking: Cambridge South Station

Concurrently with the submission of details in compliance with condition 17, details of the cycle parking for station staff and public use and ongoing management and maintenance shall be submitted to and approved in writing by the local planning authority in consultation with the highway authority. The details shall include:

- i) the number of cycle parking spaces and where relevant the details of phased installation;
- ii) the location;
- iii) the type of stands;
- iv) the means of enclosure; and
- v) a Cycle Parking Management Plan.

The Cambridge South station building shall not be brought into operational use until the cycle parking has been installed in accordance with the approved details, and shall thereafter be maintained in accordance with the approved Cycle Parking Management Plan.

23. BREEAM Pre-Assessment: Station Building

No development relating to the Cambridge South station building shall commence until a BREEAM preassessment prepared by an accredited BREEAM Assessor has been submitted to and approved by the local planning authority indicating that the building is capable of achieving the applicable 'excellent' rating as a minimum with maximum credits achieved for Wat 01.

24. BREEAM Design Stage Certification

Within six months of the commencement of construction above the ground floor slab level of Cambridge South station building, a BRE issued Design Stage Certificate shall be submitted to and approved in writing by the local planning authority demonstrating that BREEAM 'excellent' as a minimum will be met, with maximum credits for Wat 01 (water consumption). Where the Design Stage certificate shows a shortfall in credits for BREEAM 'excellent', a statement shall also be submitted identifying how the shortfall will be addressed. If such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the development.

25. BREEAM Post Construction Certification

Within six months of Cambridge South station building being brought into operational use, a BRE issued post Construction Certificate shall be submitted to and approved in writing by the local planning authority indicating that the approved BREEAM rating has been met. If such a rating is replaced by a comparable national measure of sustainability for building design, the equivalent level of measure shall be applicable to the proposed development.

26. Detailed design approval: Other elements of the proposed development

No development relating to the following elements shall commence until full details of the scale and external appearance of the development concerned has been submitted to and approved in writing by the local planning authority:

- (a) Alterations to Webster's Footbridge.
- (b) the Accommodation bridge over Hobson's Brook.
- (c) Railway Systems Compound Buildings and Structures.
- (d) Exchange Land footbridge over Hobson's Brook
- (e) Any other building/structure or alteration to an existing building/structure for which details of scale and external appearance were not provided.

Design details must be in accordance with the approved parameter plans. The submitted scale details must include plans at a minimum scale of 1:250, and elevations at a minimum scale of 1:100 and details of external appearance shall include samples of materials to be used externally.

27. Lighting Scheme

No permanent artificial lighting shall be installed until a detailed artificial lighting scheme including a plan showing lux levels has been submitted to and approved in writing by the local planning authority. The lighting scheme shall meet the Obtrusive Light Limitations for Exterior Lighting Installations contained within the Institute of Lighting Professionals (ILP) 'Guidance Notes for the Reduction of Obtrusive Light - GN01/20 (2020) or as superseded'.

The development shall be carried out and thereafter maintained in accordance with the approved details.

28. Soil Management Plan

No development except for approved works to trees or any Specified Phase shall commence until a Soils Management Plan has been submitted to and approved in writing by the local planning authority detailing protection of ground to be reinstated to open space, sustainable drainage or general landscape, methodology of soil stripping, storage, handling, haul routes, formation level decompaction measures, soil re-spreading and decompaction as well as soil/spoil disposal (if necessary).

Development must be carried out in accordance with the approved details and in accordance with the recognised 'Construction Code of Practice for the Sustainable Use of Soils on Construction Sites' produced by DEFRA and Protecting and Enhancing Soils Policy Position Statement produced by Chartered Institute of Water and Environmental Management (CIWEM).

29. Hard and Soft Landscape

No development other than a Specified Phase shall commence until details of a hard and soft landscape scheme have been submitted to and approved in writing by the local planning authority. This scheme must be in accordance with the approved Parameter Plans and shall be submitted with a Design Compliance Statement demonstrating compliance with the relevant Cambridge South Design Principles (NR-15-1 dated March 2022). Details of the scheme must include:

- (a) proposed finished levels or contours including proposed grading and mounding of land areas including sections through the areas to show the proposed make-up of the mounding, the levels and contours to be formed and showing the relationship of proposed mounding to existing vegetation and surrounding landform
- (b) details of post formation soil decompaction.
- (c) car parking layouts, other vehicle and pedestrian access and circulation areas; hard surfacing materials; tree pits, including those in planters, wayfinding structures, hard paving and soft landscaped areas, minor artefacts and structures (e.g. Street furniture, location of artwork, refuse or other storage units, signs, lighting, CCTV installations and water features); proposed (underground elements need to be coordinated with the landscape plans prior to being installed) and existing functional services above and below ground (e.g. drainage, power, communications cables, pipelines indicating lines, manholes, supports);
- (d) planting plans with written specifications (including cultivation and other operations associated with plant and grass establishment); schedules of plants, noting species, plant sizes and proposed numbers/densities where appropriate;
- (e) boundary treatments indicating the type, positions, design, and materials of boundary treatments to be erected;
- (f) a landscape and ecology management plan for proposed landscaped areas and green biodiverse roof, including long term design objectives, management responsibilities and maintenance schedules/programme for all landscape areas;
- (g) a Biodiversity Net Gain (BNG) report (including DEFRA metric V2 calculations) demonstrating BNG best practice and how the scheme contributes to the minimum 10% BNG for the development as a whole,
- (h) a wayfinding strategy; and
- (i) an implementation programme

The development shall only be carried out and maintained in accordance with the approved details.

If within a period of five years from the date of the planting, or replacement planting, any tree or plant (except through an Act of God or vandalism) is removed, uprooted or destroyed or dies, another tree or plant of the same species and size as that originally planted shall be planted at the same place as soon as is reasonably practicable, unless the local planning authority gives its written consent to any variation.

30. Plant/machinery/ equipment (station building)

No operational plant, machinery or equipment both internal and external shall be installed on the site until a noise assessment demonstrating that the collective rating level (in accordance with BS4142:2014+A1:2019 – “Methods for rating and assessing industrial and commercial sound” or as superseded) from all plant, equipment and vents etc associated with the development (or phase thereof) is less than or equal to the existing background sound level at the receptors reported in Chapter 5 of the Environmental Statement.

Development shall be carried out and maintained only in accordance with the approved details.

31. Platform Announcement Sound System

No station and platform Public Address/Voice Alarm (PAVA) system shall be installed until a detailed design in accordance with BS 5839-8:2013 - Code of practice for the design, installation, commissioning and maintenance of voice alarm systems or as superseded has been submitted to and approved in writing by the local planning authority.

The scheme shall include details regarding hours of operation, number and location of loudspeakers, proposed mitigation, sound power of loudspeakers and permissible noise levels with consideration of its use e.g. announcement or alarm, noise mitigation / limiting measures as appropriate, noise levels assessed against the existing background sound level at the receptors reported in Chapter 5 of the Environmental Statement and a programme of maintenance.

Any public address/voice alarm sound system installed on the site associated with the approved use of the development shall only be used for operational, health and safety, security and emergency announcements.

The scheme shall be carried out as approved and retained as such.

32. Electric Vehicle Charge Points

No electrical services shall be installed within Cambridge South station building until an electric vehicle charge point scheme has been submitted to and approved in writing by the local planning authority. The scheme shall include as a minimum:

- (a) Four electric vehicle charge points with a minimum power rating output of 7kW
- (b) Passive provision comprising the necessary infrastructure including ducting and capacity in the station network and ability to connect to the local electricity distribution network to facilitate and enable the future installation and activation of additional active electric vehicle charge points as required.
- (c) The electric vehicle infrastructure shall be designed to allow for future installed in accordance with BS EN 61851 or as superseded. The electric vehicle charge point scheme as approved shall be fully installed prior to the first operational use of the station and maintained and retained thereafter.

33. Excavated Material

No excavated material or other material shall be placed within public open space, including Hobson's Park other than in accordance with the approved landscaping details or any approved details for temporary storage contained within the approved Soil Management Plan.

34. Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP)

No development other than a Specified Phase shall commence until a phased tree protection methodology in the form of an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) in accordance with BS5837 2012 has been submitted to and approved in writing by the local planning authority.

The AMS and TPP will consider all relevant phases of construction in relation to the potential impact on trees including the following:

- (i) required tree works including a tree removal and retention plan
- (ii) the specification and position of protection barriers and ground protection and all measures to be taken for the protection of any trees from damage during the course of any relevant activity related to the development,
- (iii) ground works including the installation of services and SUDS
- (iv) management including supervision, access, site briefings attended by the site manager and retained arboricultural consultant and storage of materials;
- (v) landscaping;
- (vi) detailed tree survey; and
- (vii) Phasing plan for the removal of tree protection measures.

35. Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) implementation

The approved tree protection methodology in the AMS and TPP will be implemented throughout the development and the agreed means of protection shall be retained on site until all relevant equipment, and surplus materials have been removed from the site as set out in the phasing plan for the removal of tree protection measures. Nothing shall be stored or placed in any area protected in accordance with approved tree protection plans and the ground levels within those areas shall not be altered, nor shall any excavation be made. If any tree shown to be retained is damaged, remedial works as may be specified in writing by the local planning authority will be carried out.

36. Construction Replacement tree planting

If any tree shown to be retained on the tree removal and retention plan within the approved AMS and TPP is removed, uprooted, destroyed or dies as a result of the development hereby permitted within five years of project completion, another tree shall be planted at the same place and that tree shall be of such size and species, and shall be planted at such time, as may be approved in writing by the local planning authority. Any replacement tree that is lost within five years shall likewise be replaced.

37. Pedestrian link across the Cambridge Guided Busway

The new pedestrian crossing over the Cambridge Guided Busway between Hobson's Park and the Active Recreation Area shall be completed and available for public use before and for the duration of public use of the Active Recreation Area, unless the existing connection beneath the Cambridge Guided Busway is available for public use.

38. Footpaths & Cycleways

1. The development shall not prevent access to Hobson's Park (save for the approved site compounds) at any time from Addenbrooke's Road and the Trumpington residential area.
2. National Cycle Network Route 11 in the vicinity of Shepreth Branch Junction shall not be closed to use until details of the proposed closure, including times of the closure and management of pedestrians and cyclists to facilitate an alternative means of access during the any proposed closure have been submitted to and approved in writing by the local planning authority. The closure shall be managed in accordance with the approved details.

39. Footbridge across Hobson's Brook to the proposed Exchange Land

The 'potential future footbridge' shown on drawing ref. 158454-ARC-ZZ-ZZ-DRGLEP-000054/P02 across Hobson's Brook shall be provided and shall be completed prior to when the Exchange Land is available for public recreational use. The footbridge shall be made available and maintained for public use whilst the Exchange Land remains public open space except for periods of maintenance to the footbridge.

Schedule 2. List of Deemed Planning Drawings

THESE DRAWING NUMBERS WILL NEED TO BE UPDATED TO REFLECT ANY CHANGES ARISING FROM THE NEED TO ENSURE CONSISTENCY BETWEEN THE ORDER DOCUMENTS

Part 1: Drawings for Approval

Title / Location	Drawing Description	Drawing Number	Revision
Cambridge South Station area	Deemed Planning Drawings – Proposed Plan – Sheet 1 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000051	P02
	Deemed Planning Drawings – Proposed Plan – Sheet 2 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000052	P02
	Deemed Planning Drawings – Proposed Plan – Sheet 3 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000053	P02
	Deemed Planning Drawings – Proposed Plan – Sheet 4 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000054	P02
Shepreth Branch Junction	Deemed Planning Drawings – Proposed Plan – Sheet 5 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000055	P02
Cambridge South Station	Deemed Planning Drawings – Proposed Site Sections – Sheet 1 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000061	P01
	Deemed Planning Drawings – Proposed Site Sections – Sheet 2 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000062	P01
	Deemed Planning Drawings – Proposed Site Sections – Sheet 3 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000063	P01
	Deemed Planning Drawings – Proposed Site Sections – Sheet 4 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000064	P02
	Deemed Planning Drawings – Proposed Elevations	158454-ARC-ZZ-ZZ-DRG-LEP-000071	P02
Cambridge South Station Parameter Plans	Deemed Planning Drawings – Parameter Plans – Access and Movement	158454-ARC-ZZ-ZZ-DRG-LEP-000100	P02
	Deemed Planning Drawings – Parameter Plans – Land Use and Landscape	158454-ARC-ZZ-ZZ-DRG-LEP-000101	P02
	Deemed Planning Drawings – Parameter Plans – Heights	158454-ARC-ZZ-ZZ-DRG-LEP-000102	P02

Part 2: Drawings issued for information only

Title / Location	Drawing Description	Drawing Number	Revision
Location Plan	Deemed Planning Drawings - Location Plan	158454-ARC-ZZ-ZZ-DRG-LEP-000001	P01
Route Drawing Sheet 1: Cambridge South Station area	Deemed Planning Drawings - Existing Site Plan -Sheet 1 of 2	158454-ARC-ZZ-ZZ-DRG-LEP-000002	P02
Route Drawing Sheet 2: Shepreth Junction	Deemed Planning Drawings - Existing Site Plan -Sheet 2 of 2	158454-ARC-ZZ-ZZ-DRG-LEP-000003	P02
Route Drawing Sheet 1: Cambridge South Station area	Deemed Planning Drawings - Proposed Site Plan -Sheet 1 of 2	158454-ARC-ZZ-ZZ-DRG-LEP-000041	P02
Route Drawing Sheet 2: Shepreth Junction	Deemed Planning Drawings - Proposed Site Plan -Sheet 2 of 2	158454-ARC-ZZ-ZZ-DRG-LEP-000042	P02
Cambridge South Station area	Deemed Planning Drawings - Existing Plan - Sheet 1 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000011	P01

Title / Location	Drawing Description	Drawing Number	Revision
	Deemed Planning Drawings - Existing Plan - Sheet 2 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000012	P01
	Deemed Planning Drawings - Existing Plan - Sheet 3 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000013	P01
	Deemed Planning Drawings - Existing Plan - Sheet 4 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000014	P01
Shepreth Branch Junction	Deemed Planning Drawings - Existing Plan - Sheet 5 of 5	158454-ARC-ZZ-ZZ-DRG-LEP-000015	P01
Cambridge South Station area	Deemed Planning Drawings - Existing Site Sections - Sheet 1 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000021	P01
	Deemed Planning Drawings - Existing Site Sections - Sheet 2 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000022	P01
	Deemed Planning Drawings - Existing Site Sections - Sheet 3 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000023	P01
	Deemed Planning Drawings - Existing Site Sections - Sheet 4 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000024	P01
	Deemed Planning Drawings - Existing Site Elevations	158454-ARC-ZZ-ZZ-DRG-LEP-000031	P01
Cambridge South Station area	Deemed Planning Drawings - Illustrative Station Layout Plan - Platform Level	158454-ARC-ZZ-ZZ-DRG-LEP-000081	P02
	Deemed Planning Drawings - Illustrative Station Layout Plan -Bridge Level	158454-ARC-ZZ-ZZ-DRG-LEP-000082	P02
	Deemed Planning Drawings - Illustrative Station Layout Plan -Roof Level	158454-ARC-ZZ-ZZ-DRG-LEP-000083	P02
	Deemed Planning Drawings - Illustrative Station Elevations - Sheet 1 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000084	P01
	Deemed Planning Drawings - Illustrative Station Elevations - Sheet 2 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000085	P01
	Deemed Planning Drawings - Illustrative Station Elevations - Sheet 3 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000086	P02
	Deemed Planning Drawings - Illustrative Station Elevations - Sheet 4 of 4	158454-ARC-ZZ-ZZ-DRG-LEP-000087	P02
	Deemed Planning Drawings - Illustrative Station Sections - Sheet 1 of 2	158454-ARC-ZZ-ZZ-DRG-LEP-000088	P01
	Deemed Planning Drawings - Illustrative Station Sections - Sheet 2 of 2	158454-ARC-ZZ-ZZ-DRG-LEP-000089	P01
Cambridge South Station – North of Addenbrookes Bridge	Indicative Landscape Plan -Sheet 1 of 4	158454-ARC-00-ZZ-DRG-EEN-000074	P03
Cambridge South Station	Indicative Landscape Plan -Sheet 2 of 4	158454-ARC-00-ZZ-DRG-EEN-000075	P03
Cambridge South Station – South of Nine Wells Bridge	Indicative Landscape Plan -Sheet 3 of 4	158454-ARC-00-ZZ-DRG-EEN-000076	P03
Shepreth Junction	Indicative Landscape Plan -Sheet 4 of 4	158454-ARC-00-ZZ-DRG-EEN-000077	P03