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GREATER CAMBRIDGE
SHARED PLANNING

Secretary of State for Transport
c/o Transport Infrastructure Planning Unit
Department for Transport
Great Minister House
33 Horseferry Road
London , SW1P 4DR

By email only

Our ref. 21/02957/TWA

2 August 2021

Dear Secretary of State,

Network Rail (Cambridge South Infrastructure Enhancements) Order

Cambridge City Council (CCC) received formal notification on 18 June 2018 that Network Rail Infrastructure Limited (Network Rail) has applied under Section 6 of the Transport and Works Act 1992 for the abovementioned Order under Sections 1 and 5 of that Act. This letter provides the Council's formal response.

Proposed development

The main works are the construction of a new railway station located between the Cambridge Biomedical Campus and Hobson's Park and bordered to the north by the Cambridge Guided Busway. The proposed station works comprise of:

a. A two-storey station building with entrances on the east (Cambridge Biomedical Campus) and west (Hobson's Park) sides of the railway line, including a retail/catering unit;
b. Four platforms with step-free access via a footbridge and lifts; seating and platform canopies for waiting passengers;
c. An emergency evacuation footbridge and stairs a secondary covered footbridge at the platforms' southern end;
d. Cycle parking on both sides of the railway for a total of 1,000 cycles;
e. Pedestrian and cycle access paths on both sides of the railway;
f. A station forecourt on the eastern side containing five parking bays for Blue Badge Holders; two parking bays for station staff; two parking bays

for maintenance staff; three bays for drop-off/pick-up by private cars; and three bays for drop-off/pick-up by taxis; and

g. Introduction of 2 additional loop lines.

The scheme includes landscaping works within Hobson's Park to provide cycle and pedestrian connections across the park to the new station, as well as access for emergency and maintenance vehicles to the western station building from Addenbrooke's Road. Permanent land take of areas of public open space is required for the works and temporary land take is required for the construction period which includes the storage of excavated material.

Planning policy context

The adopted development plan is the Cambridge Local Plan 2018. Relevant supplementary planning documents (SPDs) are the Greater Cambridge Sustainable Design and Construction SPD (adopted 2018), the Cambridgeshire Flood and water SPD (adopted 2018) and the Public Art SPD (adopted in 2010). The National Planning Policy Framework (2021) (NPPF) and Planning Practice Guidance are material considerations.

Site constraints

The site includes land on the eastern side of the railway line within the site allocation for the Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change within the Local Plan. This is an allocation for health care and biomedical and biotechnology research and development uses.

The application site boundary includes land within the Cambridge Green Belt, including the railway line, Hobson's Park and Long Road Sixth Form College. Long Road Sixth Form College on the eastern side of the railway line is a protected open space (SPO 29) within the Local Plan. Hobson's Brook is a City Wildlife Site.

There is an area tree preservation orders (TPOs) covering trees to the south of the Long Road bridge and individual TPOs on the St Mary's Playing Field to on the western side of the railway line. Small parts of the railway line and larger areas within the open space to the west and within the Cambridge Biomedical Campus are within Flood Zones 2 and 3, and within areas at risk of surface water flooding up to a 1 in 200 year rainfall event.

The National Grid high pressure pipeline runs though the site, including running parallel to the railway line on the eastern side and within the Cambridge Biomedical Campus. The site is within the Cambridge Airport Safeguarding Zone consultation aera for any structure greater than 15m above ground level. The site is also within the Special Control of Advertisements Zone.

Summary response

Overall, the Council supports the principle of the new station and the associated works, which will facilitate connectivity and promote sustainable transport within the

area, to support growth. The scheme has the potential to create a high-quality development, however the success of the scheme in this sensitive location within the Green Belt and effecting public open space, depends on the mitigation through the station design and landscaping proposal. In particular, the impact of the construction compound on public open space and the impact on trees must be carefully considered and weighed in the planning balance.

In order to properly assess the application, there is essential information missing from the application which must be provided before the application is determined. I have detailed this in our comments below, but have summarised this as follows:

1. Evidence to support the case for a Green Belt location in order to meet the exception for inappropriate development in the NPPF paragraph 150;

2. Confirmation that no spoil will be permanently placed within areas of public open space, which must also be secured through a condition;

3. Controls on the temporary storage of spoil within areas of public open space, including the site compound area and duration which must be minimised, and details of the ground preparation works within the compound;

4. AIA and AMS to assess the impact on TPOs and other effected trees, hedgerows and existing planting;

5. Information on the deliverability of options to achieve the biodiversity net gain target on site, or as close to the site as possible;

6. Confirmation of proposals for biodiverse green roofs and amendments to notation on the drawings to remove reference to this as being ‘potential’;

7. BREEAM pre-assessment to demonstrate the scheme is on-target to achieve BREEAM ‘excellent’ rating;

8. Comments from Cambridgeshire County Council Highways Authority regarding the predicted trip generation, modal share and number of cycle parking spaces;

9. A commitment within the Design Principles to limit the number of car parking spaces to the specified maximum number for each user group in the locations identified; and

10. Details as requested by the Sustainable Drainage Engineer.

We request the opportunity to comment again on the proposals once the information above has been provided. We also request a further review of the draft planning conditions following review of these additional details and prior to determination. Where referenced in the report, we have made requests for replacement or additional conditions and we have provided recommended wording at the end of this letter.

Detailed comments

Our comments are provided on the following themes:

1. Principle of development
2. Response to context
3. Impact on public open space
4. Biodiversity
5. Impact on trees
6. Impact on residents and sensitive uses
7. Sustainable construction
8. Cycling infrastructure
9. Car parking
10. Drainage
11. Public art

Principle of development

The Council supports the aim of the Cambridge South Infrastructure Enhancements scheme to promote connectivity within Cambridgeshire to facilitate future growth in the area and promote sustainable development, which aligns with the Cambridgeshire and Peterborough Combined Authority Local Transport Plan (2020). This supports the vision and strategic objectives of the Cambridge Local Plan 2018 to promote sustainable economic growth, respond to climate change, and maximise sustainable transport modes, and in accordance with Local Plan policy 5 which supports implementation of the Local Transport Plan.

The site includes land on the eastern side of the railway line within the site allocation for the Cambridge Biomedical Campus (including Addenbrooke's Hospital) Area of Major Change within the Local Plan. This is an allocation for health care and biomedical and biotechnology research and development uses. The allocation supports associated support activities for the site as a whole, which meet the needs of employees and visitors and to add to the vibrancy of the area. The proposed station building on the eastern side and the ancillary uses would support the CBC for the reasons established in the Local Transport Plan, and would contribute to the vibrancy of the area. The proposal is acceptable in accordance with Local Plan policy 17.

The western side of the station building, forecourts, landscaping and access across Hobson's Park would be within the Cambridge Green Belt. The applicant has submitted a Consideration of Green Belt Issues report, which states that the proposal would be 'local transport infrastructure which can demonstrate a requirement for a Green Belt location', as listed within paragraph 150 of the NPPF as one of the exceptions to inappropriate development. The Council agrees that the proposal would be 'local transport infrastructure', however the need for a Green Belt location has not been evidenced within the submission. This is likely to be demonstrable based on the Strategic Outline Business Case and the options selection, however this is critical to the assessment of the appropriateness of development in the Green Belt, and the applicant should provide evidence of its assessment for completeness.

Provided this can be demonstrated, then in order to be not inappropriate development in the Green Belt, the scheme must also preserve the openness of the Green Belt and not conflict with the purposes of including land within in it (NPPF paragraph 150). The Council understands that the interpretation of this has been guided by case law, and that even if development falling within paragraph 150 would cause some degree of impact on openness it would not necessarily mean it was 'inappropriate'. In each case of the development listed in paragraph 150, it must be the case that some form of such development must be possible without having unacceptable effects on openness or the NPPF purposes of Green Belt. It must be a matter of planning judgement to determine the level of harm/tipping point.

The methodology within the applicant's Consideration of Green Belt Issues report used for assessing the effect on the purposes of Green Belt - as detailed in the NPPF and the specific Cambridge Green Belt purposes as set out in the supporting text to Local Plan policy 4 - conforms to the methodology used in the Cambridge Inner Green Belt Boundary Study, November 2015 and is supported. The reported impacts for each of the Green Belt sectors affected by the proposals are in the categories of 'none', 'negligible', 'minor' and in some instances 'beneficial'.

The findings and conclusions of the Green Belt assessment report are reliant on successful mitigation through the landscape proposals and the detailed design of the station. Due to the outline nature of the application, there is currently limited detail on these important matters, which means that the success of the mitigation must be secured through the conditions. While we are content that the drafted conditions would secure submission of the necessary details, the success of the mitigation will also depend on how well the mitigation is delivered onsite.

In summary, notwithstanding the lack of evidence to demonstrate the need for a Green Belt location within the submission, the Council's view is that the proposal is likely to be appropriate development within the Green Belt in accordance with the NPPF paragraph 150 and Local Plan policy 4, subject to conditions to secure necessary mitigation.

Response to context

Throughout pre-application discussions, the Council recommended that the applicant submits as much detail as possible on the design of the station building and the landscaping works, in order to minimise the substantial elements of the scheme that would be approved through conditions. However, we note that the scheme has been submitted similar to an 'outline' planning application, with the approval sought for a series of parameter plans, accompanied by an illustrative scheme, a Design and Access Statement and a set of Design Principles. The Council has given minimal consideration to the illustrative scheme, except that it demonstrates a high-quality operational station could come forward within the parameters and principles.

Overall, based on the level of information submitted with this application, the Council supports the approach to approve a set of Design Principles through the consent, and for the planning conditions to mandate that the detailed design of the station building and landscape works must come forward in compliance with those approved

Design Principles. This will be an essential tool for the discharge of conditions, to ensure the scheme achieves high-quality development appropriate to its context. The Design Principles as submitted are supported, however the scheme will require further detailed engagement with the Council and the Cambridgeshire Quality Panel prior to the submission of conditions to ensure that the quality aspirations are delivered.

Layout

The general location, position and layout of the station building on either side of the railway line is supported. The Design Principles acknowledges the need for the station building to respond to the different characters on either side, having two distinct sides which respond appropriately to the interface with the CBC set within new public realm, and integrate into the public open space and rural character of Hobson's Park. The indicative images show a building that creates a welcoming sense of arrival, whether from the east or the west. These are all qualities that will need to translate through to the detailed design and are captured in the Design Principles.

Movement and Access

The new station proposal has been organised to pick up on pedestrian and cycle movements from the east and west, and effectively ties into existing movement networks. The forecourt space on the east side of the proposals will form the main entry and exit to the station and accommodates passenger pick up and drop off facilities with a limited number of disabled parking bays. The station will integrate with the emerging Cambridge South East Transport (CSET) proposals on Francis Crick Avenue. The forecourt to the west is for pedestrian and cycle access only with a main pedestrian and cycle route linking across from Trumpington to the station across Hobson's Park. The proposed circulation responds to the likely key pedestrian and cycle movements and accommodates limited motor vehicle movements to the east side of the scheme.

In pre-application discussions, it was considered best to deliver a segregated pedestrian and cycle route in response to the likely pedestrian and cycles flows and to follow advice within LTN 1/20 Cycle Infrastructure Design. Notation on the Parameter Plan 1: Access and Movement refers to 'Proposed New Pedestrian and Cycling Access' but it is recommended this is amended to read 'Proposed segregated new pedestrian and cycle access'. Some local leisure routes will be adjusted to fit in with the circulation patterns within Hobson's Park.

Scale and massing

The scale and massing will be fixed by the proposed parameter plans, which set the maximum building envelope, while the Design Principles provide more detail on the overall design approach. The indicative cross sections and the illustrative scheme design show that a building can be delivered within the maximum envelope set out in the parameter plans. The station building will remain physically low in the landscape to reduce the impact on Hobson's Park, and yet have a presence against the

backdrop of the significant buildings of CBC. The scale and massing identified in the parameter plans and described within the Design Principles is acceptable.

Elevations, materials and details

The detailed design of elevations and materials will come forward through the discharge of conditions, so limited comments are provided at this stage. The Design and Access Statement provides clear illustrations for the intended architectural form of the building which demonstrate how it can respond to the prevailing context and deliver a building of high design quality. Whilst the design shown is 'indicative', it does demonstrate that a well-designed and distinctive building can be delivered within the proposed parameter plan envelope.

Landscape and visual impact

The Landscape and Visual Impact Assessment (LVIA) has been carried out in accordance with the relevant guidance set out in 'Guidelines for Landscape and Visual Impact Assessment, Third Edition' (GLVIA3) (Ref. 1) and it is proportionate and appropriate. The Council agrees to a large extent with the findings and conclusions of the assessment in relation to both the landscape character and visual impacts. However, as with the Green Belt mitigation, the findings and conclusions of the LVIA are partly reliant on the successful mitigation through the landscape proposals, which will be secured through conditions and rely on high quality implementation.

It is noted that the drawings show a 'potential green biodiverse roof', but in other documents there are statements that suggest a green roof is definite. The roof form and finish form a significant part of helping the building sit acceptably within Hobson's Park and wider landscape context and to delivering a distinctive high-quality design. This feature is also beneficial to drainage and biodiversity. We request confirmation that the green roof is definite. This will depend to some extent on the gradient of the roof, and information is requested to confirm a suitable gradient could be achieved within the parameters. We request the notation on the proposed Parameter Plan: Land Use and Landscape drawing has the word 'potential' removed in relation to the green roofs to provide certainty. The wording of draft condition 20 relating to the biodiverse green roof is not supported and should include further details necessary to ensure the roof is sustainable. This includes further specification for the substrate and mix of species, and a maintenance plan in perpetuity. Revised wording has been recommended.

In addition, we note the proposal for a biodiverse green wall. We would request details of this feature as soon as possible particularly as many types of green walls are not sustainable and are high maintenance.

Impact on public open space

Permanent works

The proposals require permanent use of two areas of public open space; one being part of Hobson's Park (TL1) and one being part of the western boundary of Long

Road Sixth Form college grounds (TL2). Local Plan policy 67 does not support proposals which would lead to the loss of, or harm the character of, protected open space of environmental and/or recreational importance unless the open space can be satisfactorily replaced in terms of the quality, quantity and access, and the re-provision is within 400m of the original site. The proposal includes re-provision within an area to the south of Addenbrooke's Road which is currently farmland and would be landscaped for recreational use and to provide biodiversity enhancement. While this area would be detached from the existing open space, it is considered to be the most appropriate location for exchange land, and the success of the area for mitigation will depend on the landscaping details secured through conditions.

We note the Public Open Space Assessment states that in relation to the impact during construction, the assessment recognises that 'Temporary significant adverse effects during construction are anticipated on both areas of public open space in relation to recreational and visual amenity. However, as these effects are temporary, it is not anticipated that there will be any long-term significant adverse effects as a result of the construction of the proposed Development,' (page 58). The impact of the physical presence of the main compound and haul road might be temporary, but the establishment of the landscape proposals and regaining of the biodiversity value will take years. This is particularly so for the loss of any mature trees which may have taken 30 to 50 years to mature to their current stature.

Site ref. TL1 (170,503m2) immediately to the west of the railway line is proposed to provide temporary access and use as a site compound. At this time, the land is not formally designated as protected open space within the Local Plan, although it lies within designated Green Belt. The permanent land take comprises a width of maintenance track immediately adjacent to the Network Rail boundary and a width of mounding, immature scrub and tree planting and semi-improved neutral grassland that was introduced at the time of constructing the park to soften the visual effects of the CBC for the residents of Great Kneighton. Although the loss of semi-improved neutral grassland, scrub and woodland will be mitigated through replacement planting, the biodiversity value will take some years to regain. Further details (including planting plans) must be included within the landscape design to be submitted pursuant to conditions.

Site ref. TL2 (2,761m2) is an area of Protected Open space as identified in the Local Plan and is proposed to provide temporary access and use for construction. It currently forms a wooded area along the western boundary of the school. The strip of land as identified on the Indicative Landscape Drawings shows mature boundary planting to be removed. This will open up views into the college grounds. Within the ES it states that the proposals 'will result in a temporary, adverse effect to Long Road Sixth Form College grounds that is significant at the local level in the short term (3-5 years) until replacement planting or natural regeneration becomes established'. After this point, no significant residual effects are predicted.' We estimate the age of the existing vegetation to be 30-50 years. The replacement planting will take far longer than 3-5 years to mature to the canopy cover and condition that it is currently at and therefore the residual effects will be more significant.

<u>Excavated spoil</u>

The ES states that a large quantity (approximately 9,600m3) of excess unbulked spoil will be generated from the excavation activities required to construct the platforms and widen the track on the west of the site. The Council raised strong concerns throughout pre-application discussions about the impact of initial proposals to place spoil within the public open space and biodiversity in Hobson's Park. Officers asked the applicant to assess the options to deal with the excavated material generated by the scheme. The ES states that 'options to retain this material onsite have been explored and exhausted', however we note that no information has been included within the submission.

The ES states that 'it is therefore necessary that excess spoil is transferred offsite'. While this statement is supported, there are some conflicting statements within the report which create uncertainty. The report states that the site levels and grading will be 'designed to enable flexibility in the landscaping, so that it can accommodate the changes in spoil volumes that may arise when site conditions differ from those assumed during the design'. It is uncertain whether this means that spoil could be retained onsite in the event that construction generates more spoil than anticipated. In order to protect the biodiversity, landscape and amenity value of the public open space, it is essential that a condition is used to prevent spoil placement in public open space. Wording for an appropriate condition has been provided.

The excavated materials will be stored and sorted within the construction compound before being reused elsewhere. The construction compound includes large areas of Hobson's Park which would have a considerable impact on the amenity and biodiversity value of the public open space. The construction compound area must be minimised as much as possible and more information must be provided before the application is determined. This must include how long the construction compound and storage area will be in place. It must also include detailed information on the stripping and storage of the existing low nutrient topsoil prior to temporary surfacing being laid and what that surfacing will be. Wording for an appropriate condition has been provided.

Biodiversity

The ES demonstrates that there would be an overall approximate 5% decrease in biodiversity value of all habitats on the site as a result of the proposal, primarily due to the loss of woodland habitats to the west of the railway south of Long Road to facilitate access and the loss of newly planted woods within Hobson's Park which would be reinstated following construction works but would have a long-term impact. To mitigate this, Network Rail has committed to achieve a 10% net gain in biodiversity. However, in light of the Council's declared biodiversity emergency, we encourage the applicant to aspire to a higher 20% net gain target for this significant project This higher target would also allow for the element of risk associated with proposed translocation and recreation of habitats.

The application provides limited information about how the biodiversity net gain target would be achieved. Some biodiversity enhancement would be provided on the proposed public open space exchange land to the south of Addenbrooke's Road. However, the applicant has also stated that the net gain targets would be achieved

through options to purchase additional land to build new habitats; to purchase biodiversity units from third party organisations; or working with third parties to achieve biodiversity units on their land. The priority must be for biodiversity net gain to be secured on site and the application must demonstrate that all options to achieve this within the application boundary have been exhausted before offsite mitigation could be considered. In addition, if offsite mitigation is appropriate, then this must be as closely related to the application site as possible.

The application proposes that the detail of how the biodiversity net gain is to be achieved would be secured through a condition for an Ecological Method Statement to be submitted to the Council. However, no information has been submitted at this stage to demonstrate that these options are feasible, would achieve the target and would provide appropriate mitigation. These options would be dependent to some extent on third parties and are somewhat outside of the applicant's control. As such, we question whether the claimed 'significant beneficial at the local level' effect is deliverable and whether the condition could be met. More information about the proposed biodiversity enhancement must be submitted before the application is determined.

The Council's ecology officer has questioned whether the assessment of the potential impact on the breeding population of Corn Bunting (10 breeding pairs – 20% of County Population) has been given sufficient weight. Many of these territories occur along the line of the rail track and construction route. Breeding pairs may well be displaced for one or more breeding seasons during construction. Whilst this species may nest within the arable crop, they ae reliant on song posts and arable weeds along field margins, which may not be available during construction. These birds are largely sedentary and therefore impacts may be permanent if breeding birds are displaced. Consideration of providing temporarily favourable weed rich habitats, nesting cover and song posts in the adjacent farmland might mitigate this construction impact.

We also have similar concerns for both Corn Bunting and Skylark nesting within Hobson's Park. The loss of a significant area for recreation, specifically dog walking, including the existing railway track, is likely to mean alternative desire routes will emerge. These have the potential to reduce existing areas of low disturbance for ground nesting birds. It might be that temporary designation, fencing and management of areas for ground nesting birds is required to mitigate during the construction phase. This needs to be given more weight in the assessment of the impact on existing biodiversity.

As such, the proposal has not currently demonstrated compliance with Cambridge Local Plan 2018 policies 69 and 70, and NPPF 2021 paragraph 174.

Impact on trees

The application provides insufficient information to make a proper assessment of the impact on canopy cover and amenity. It is nevertheless clear that significant tree loss is required to accommodate the station, but the full extent of that loss is not known. We require a detailed assessment in the form of an Arboricultural Implications Assessment (AIA) and Arboricultural Method Statement (AMS) of

vegetation to be removed on all sites temporary and permanent. The information must be shown on accurate scaled plans and include the temporary and permanent proposals overlaid onto accurate topographical survey information (including levels) of all areas of vegetation to be removed. All efforts must be made to retain the existing vegetation in an undamaged condition. The assessments must comply with BS 5837:2012 Trees in relation to design, demolition and construction.

The principle of accepting losses because replacement planting is proposed must be given careful consideration in the planning balance. It will take decades to replace the amenity associated with the Long Road Sixth Form College trees not the 3-5 years suggested in the ES. Furthermore there are no securities that the replacement trees will not be lost to future development. The ES describes the amenity value of the Long Road Sixth Form College trees as 'local', however the trees are clearly visible from Hobson's Park, Addenbrooke's Road, Nine Wells Bridge and the Cambridge Guided Busway and they contribute significantly to the character and appearance of the Green Belt. The lack of an AIA means that it is not possible to ascertain the extent of tree removal required to accommodate the development.

This woodland strip is, however, only about 20m wide and is dominated by trees of similar age that have established as a single canopy. The trees are co-dependent therefore and rely on their neighbours to withstand wind forces. If local topography allows for the widening of the track in this location with the retention of trees that form the eastern edge of the strip, the sudden change in wind loading is likely to result in significant additional losses, potentially resulting in harm and/or damage. The loss of the strip could materially alter the character of the Green Belt in this location with no mitigation proposed locally to safeguard long-term amenity.

In addition to the loss of the mature woodland strip in the college grounds, young trees planted to mitigate the impact of the CBC development north of the guided busway bridge are required to be removed. This requires mitigation.

In summary, at this stage, due to the lack of information, the proposal has not currently demonstrated compliance with Local Plan policy 71 for the protection of trees. Notwithstanding this, tree protection conditions will be required the minimise the damage to the tree population. The drafted conditions are not supported and requested replacement conditions are provided.

Impact on residents and sensitive uses

<u>Contamination</u>

The ES contains acceptable information required to provide a preliminary (desk-top) assessment. It is acknowledged that contaminated land is likely to be a low risk in the proposed station area. The phased approach to contaminated ground investigations within the draft conditions 6 – 9 is acceptable and will ensure that the site is suitable for its proposed end use, in accordance with Local Plan policy 33.

<u>Air quality - operational</u>

The ES states that the proposed development will 'result in a reduction in traffic on the local and strategic road network' (Section 17.1.6) with the development leading to a net reduction of 1,175 vehicle movements on the local road network due to the modal shift to rail (Section 17.5.20). Section 7.1.8 confirms that the proposed development will not lead to a change in the number of diesel locomotives using the route. The ES has scoped out the need for a quantitative assessment. Based on the information provided this is acceptable. Section 7.2.83 states that 'It is anticipated that the development will not lead to an increase in bus movements. The station will generate about 678 rail/bus interchange trips throughout the day which equates to about 2 extra passengers per bus'.

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 Council's Environmental Health team acknowledges that this is true across the wider road network and agrees with the methodology used, however officers are concerned that the assessment has overlooked negative impacts on local roads around the development site due to cars waiting / idling to pick up passengers. It does not appear that monitoring the impact on adjacent minor residential roads is a requirement of the Cambridgeshire County Council Transport Team. However, from an air quality perspective, we recommend that some form of monitoring once the development site is operational is conditioned.

Whilst we acknowledge that there is limited parking proposed, in line with evolving national policy and in accordance with the Sustainable Design and Construction SPD we require the provision of active slow electric vehicle charging points (EVCPs) in a minimum of 4 of the 9 car parking spaces with passive provision in the remaining 5. No EVCPs are required in the drop off/pick up bays. Further information on things to consider when designing and delivering EVCP's can be found in the EV Charge Points Infrastructure Advice Note (www.cambridge.gov.uk/air-quality-guidance-for-developers). A recommended condition is provided.

Air quality – construction

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.

A construction phase dust emissions assessment was undertaken and is presented in Appendix 7.3 of the ES. The assessment predicts that the maximum risk of unmitigated dust effects is high. A Dust Management Plan is included within the Code of Construction Practice Part A (CoCP) (Appendix 2.4). This provides detail on mitigation measures in accordance with best practice. This will be reviewed and refined prior to commencement for approval under CoCP Part B. This approach is acceptable.

In addition to the above we would expect details on mitigation measures to be implemented to minimise onsite emissions from Non-Road Mobile Machinery (NRMM) in the CoCP Part B as stated in Section 7.1.5.

Noise – operational

The Calculation of Rail Noise (CRN) method has been used to predict the change in rail airborne noise levels between the existing railway lines and the proposed new and altered tracks. The assessment has also utilised noise "correction" factors / penalties representing specific train "classes" with heavier weighted corrections for noisier diesel engines and corrections for "switch gear". The results indicate no significant adverse impacts as a result of the project when operational with the biggest change being at the Anne McLaren building on the biomedical campus (1-2dB rise defined as being "slight adverse). The methodology and results are acceptable. With regards to road traffic, the DMRB11 was used. As above, no significant adverse changes are forecast. We concur with these findings.

At this stage of the proposed development, it is acknowledged that the specific details of plant to be installed is likely to be unknown. We recommend a plant noise condition which will require full details of plant to be installed and any mitigation required to minimise noise impacts on neighbouring premises. Noise levels from plant and equipment associated with the application requires assessment to ensure local amenity is protected. It is required that the rating level (in accordance with BS4142:2014) from all plant, equipment and vents etc (collectively) associated with this application should be less than or equal to the existing background sound level (LA90) at the boundary of the premises subject to this application and having regard to noise sensitive premises.

The noise assessment anticipates that "normal design considerations with highly directional speakers typical of platform announcement system (PAVA) systems and signal levels adjusted against the prevailing background noise level that that noise levels incident on the nearest commercial and residential receptors will be significantly below the ambient noise level". It is also acknowledged that in the same way that plant type and design is not yet known, the details for the PAVA are also not yet known. Details of the PAVA can be required through an additional condition.

Noise - construction

The noise modelling exercise presented in Section 5.0 of the ES has identified construction noise levels at various locations as being potentially moderate to major in terms of magnitude by day and by night. These are largely restricted to the immediate vicinity of the proposed station area, the vicinity of the proposed works at Hills Road. It is acknowledged that due to health and safety reasons and access constraints, work will need to be carried out throughout the day and night depending on whether or not possession of rail tracks is required. Site specific mitigation and attenuation measures will need to be employed at locations where works will occur that have the potential to (or are predicted to) adversely impact residential premises i.e. residential properties in the Hills Road. We will expect these measures to be included in the CoCP.

Some of the work activities will require piling to be carried out. Section 5.2.45 of the ES states that “All piling works are assumed to be a lower noise method, i.e. Continuous Flight Auger (CFA)”. However, in Appendix 5.3 (Noise Calculations), the piling activities are detailed as “Leader rig with piling hammer”. Therefore, it is unclear as to what has been assessed in terms of piling activities and whether or not this has significant impacts on the noise output. If driven piling methodologies are to be used, we will require careful consideration of noise management, monitoring and community liaison to be detailed within Part B of the Code of Construction Practice document.

With regards to construction traffic noise, assessment has been made using a combination of BS5228 (ABC method) and LA111 with consideration of magnitude of impacts at high-very high sensitivity receptors. The results indicate that there will be minimal change in noise levels (<1dB) at the receptor locations and as such, impacts are not significant. We agree with the methodology used and results / conclusions.

In terms of cumulative impacts, the ES states that the Cambridge South East Transport (CSET) Phase 2 scheme will be developed alongside the proposed Development, with overlapping periods of construction. This approach is acceptable in terms of local transport project impacts.

Vibration – operational

The operational rail track related ground-borne vibration issues impacting on neighbouring commercial premises is unlikely to be considered a statutory noise nuisance (as defined in Section 78 of the Environmental Protection Act 1990). However, it is clear that further consideration will need to be given to this issue especially due to the high sensitivity nature of the adjoining premises on the CBC. The ES provides options for track vibration mitigation measures which will be finalised at the detailed design stage. Mitigation will be adopted into the scheme to avoid any significant impact on the Medical Research Council Laboratory of Molecular Biology (LMB) with the final details of the method to be employed to be agreed with LMB at the detailed design stage.

Mitigation for construction related vibration is to be incorporated into the CoCP. However, as stated above, details of operational vibration mitigation have not yet been finalised. Given this, a condition is recommended requiring full details of operational vibration mitigation prior to the commencement of development. However, we recognise that there may need to be formal legal-type agreements between the applicant and existing businesses in order to investigate further and to fully address and mitigate operational rail track related ground-borne vibration issues and potential adverse impacts.

Vibration – construction

In terms of the assessment of construction vibration, there are two specific considerations, as detailed in the ES, specifically construction works at the CBC site and at Shepreth Branch Junction. A construction vibration risk assessment has been provided based on the anticipated plant / equipment to be used for specific construction activities. The methodology used appears to be satisfactory and are

provided in terms of Peak Particle Velocity (PPV) and Vibration Dose Value (VDV). Moderate – major vibration impacts are identified in close proximity to the station area work. The applicant has subsequently committed to Best Practicable Means alongside continued liaison and communication with occupiers of the premises in close proximity to the station area. This will also mitigate the potential impact on mental health of residents. Full details of mitigation will be provided within the Code of Construction Practice.

Construction dust

A construction dust management plan will be provided within Part B of the CoCP detailing the measures to be implemented to control airborne dust arising from construction activities. Part A of the CoCP includes various commitments to dust management and monitoring (Sections 4.3-4.11) under the various activity specific headings. The details provided within these sections is acceptable.

Code of Construction Practice

Part A of the CoCP has been submitted with the application. It contains details of embedded noise and vibration mitigation measures (including Best Practicable Means (BPM)) that will be utilised generally to reduce noise from the construction activities. Part B will be provided prior to commencement (in accordance with the draft CoCP condition) and will provide additional mitigation measures to reduce noise and vibration at surrounding sensitive receptors. The embedded measures are included in Section 5.5 of the ES.

Of particular note and importance are the proposed working hours. These are provided in Section 3.12 of Part A of the CoCP and are as follows: Monday-Friday 07.00hrs – 18.00hrs and Saturdays 07.00hrs- 16.00hrs. This is outside our standard recommended construction hours which are Monday-Friday 08.00hrs-18.00hrs and Saturdays 08.00hrs-13.00hrs (with no work on Sundays / Bank Holidays). In addition, it is noted that "*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).*"

It is anticipated that such a comprehensive content will mitigate significant construction impacts arising from the development and will protect local and residential amenity. Additionally, any mitigation and management measures implemented on site, which have been presented within the ES, will need to follow appropriate and up-to-date guidance and Best Practicable Means (BPM) which must be demonstrated at all times.

Artificial lighting

With regards to artificial lighting, it is acknowledged that risk to people as a result of this project is likely to be low, although there may be some impact. Generally speaking, for human receptors, it is required that any artificial lighting installed (for construction or operational purposes) 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)' both on-site and off-site. Replacement wording for condition 24 is provided to secure compliance with this guidance and to cover construction and operational lighting, in accordance with Local Plan policy 34.

Sustainable construction

The Design Principles include a series of commitments related to smart architecture and sustainable design, which will be secured though the discharge of conditions for the detailed design of the station building and landscaping works. The Council welcomes these commitments, which include:

- Seeking potential for harvesting sustainable resources such as solar and grey water systems.
- Providing robust operational flexibility.
- Achievement of BREEAM 'excellent'.
- Encouraging energy efficiency in station design.
- Integrating climate resilience into station design.
- Roof geometry to consider creating volume where needed whilst providing an opportunity for water recycling;

The Design and Access Statement makes reference to a BREEAM assessment already having been undertaken. The Council would normally expect to see a pre-assessment submitted as part of the application process, in order to ensure that schemes are on target to achieving BREEAM excellent, in line with Local Plan policy 28. Given the nature of this application, which will see full details submitted through the discharge of conditions, the Council requests that an additional condition for the submission of the pre-assessment is added, alongside draft conditions 21 and 22. This will also help to provide further related information to be issued, such as the energy strategy for the station building, an area where the proposals currently lack detail. A draft condition is provided at the end of this letter.

With regards to wider climate change impacts of the proposals, the overall methodology within the ES is supported. It is noted that the CoCP Part A includes sections on mitigation measures to reduce impacts on climate change, and that further detail will be provided in the Part B. This will include a Carbon Efficiency Plan, and the we recommend that this considers further measures to reduce the construction phase emissions for the scheme, in line with the commitments made in Network Rail's Environmental Sustainability Strategy (2020-2050). We query the findings in relation to some of the potential climate resilience impacts of the scheme, for example the effect of rail buckling due to extreme temperatures is identified as 'not significant'. However, it is noted that Network Rail's Environmental Sustainability Strategy does include further work on enhancing the resilience of the rail network due to extreme weather events, which will include extreme heat.

Taking the above into account and subject to the recommended conditions, the proposal is supported in sustainable construction terms, in accordance with Local Plan policies 28, 29 and 31, and the Sustainable Design and Construction SPD.

Cycle infrastructure

The proposal includes 1,000 cycle parking spaces to serve the station. This has been calculated based on the predicted modal shared and assuming most passengers would make a return trip on the same day, and that there would be enforcement of non-rail passenger cycle parking. It concludes that there would be a surplus of 200 spaces. The predicted trip generation, modal share and number of cycle parking must be by the Cambridgeshire County Council Transport Assessment Team. The agreed minimum number of cycle parking spaces must be secured through a condition. We request sight of the Highways Authority's comments prior to determination. The cycle parking must be secure and a cycling management plan must be put in place to ensure the safety and security of the cycle parking facility. This is necessary in order to ensure high quality cycle parking to promote cycling among station users, and to avoid overspill cycle parking in the CBC. For these reasons, the drafted condition 19 is not supported and revised wording has been recommended.

The proposed temporary diversion of the NCN 11 route during the construction works should be of minimum duration and with suitable diversions in place, which should be consulted on with local cycling groups. The timing of the construction works affecting cycle routes should carefully consider the Greater Cambridge Partnership's proposed Sawston Greenways route on the existing Genome Path between the Cambridge Biomedical Campus and Great Shelford to minimise disruption to users.

Car parking

We support the scheme's intention to minimise car parking and only provide limited staff and maintenance parking and disabled spaces. These spaces are shown on the illustrative station layout drawings, however these will not be approved drawings. The application needs to include a mechanism to secure a limit to the number of car parking spaces. We recommend that this commitment is made within the Design Principles document, which should specify the maximum number of spaces for each user group to be allowed to serve the station in the locations stated.

Drainage

The Council's Sustainable Drainage Engineer has reviewed the proposals and provided the following detailed comments, and requests for further information before the application is determined:

> <u>River Modelling – Flood Risk</u>
>
> The 1D hydraulic river modelling indicated in section 5.5 of the Flood Risk Assessment (ES- Vol3- appendix 18.2) appears to simulate the current situation i.e. models the open north ditch section upstream and downstream the railway culverts. Results appear to show that no out-of-bank flooding for modelled events.
>
> Although a culvert 2m wide by 1.5m high has been proposed no proposed modelled scenario with the culvert has been indicated and therefore the impact of the proposed culvert on the water levels downstream is not known.

The proposed scenario including the proposed culvert should be modelled to fully understand the impact of the proposed culvert on the proposed development and on the watercourse.

Surface water drainage strategy

Catchments reference and impermeable areas indicated on table 7 of the Flood Risk Assessment (ES- Vol3- appendix 18.2) do not appear to be aligned with impermeable areas shown on appendix D of the FRA. For clarity, a drawing/table with catchment references, locations, areas, and attenuation volumes required should be included.

Appendix D of the Flood Risk Assessment (ES- Vol3- appendix 18.2) indicates an estimate of attenuation volumes using Quick Storage estimate. It is considered that quick storage calculations should be used as a starting point of the design, but it does not give a good level of confidence due to the significant of variables assumed. A more suitable method with a greater detail would be expected.

Drawing 158454-ARC-02-ZZ-DRG-ECV-140012 indicates two proposed outfalls discharging to south ditch and to the north ditch there is one proposed outfall to the east of the track and two to the west (AZ and attenuation tank). For clarity, individual discharges rates for each outfall and how these rates would be achieved (i.e type of flow controls) should be presented.

Current proposals appear to indicate a below ground storage as part of the drainage strategy comprised by a pre cast storm tank with a 100mm flow pipe discharging directly to the culverted north ditch. This solution does not appear to be included in the Simple Index Approach for water quality shown in Appendix E of Flood Risk Assessment (ES- Vol3- appendix 18.2). Clarification on how the water quality would be managed before discharging to the north ditch for this solution should be included.

As referenced in chapter 6.3 of the Flood Risk Assessment (ES- Vol3- appendix 18.2) and in the section 8.2.34 of the Environmental Statement – Volume 3 Appendix 18.5, the need of the middle attenuation basin is to be reviewed in the next design stages. Opportunities should be explored to replace the below ground storage and/or culverting and replace for open features/ditch solutions as recommended in the Cambridge local guidance.

At this stage, due to the information requirements above, the application has not demonstrated compliance with Local Plan policy 32.

Public art

Local Plan policy 56 requires the inclusion of public art embedded within the scheme. The application has provided no details of the public art proposals at this stage, however we support draft condition 17 to secure a public art delivery plan.

I trust that these comments will be taken into account and please do not hesitate to contact me if you require further clarification on any of these points. I look forward to hearing from you with regards the next stages of the application in due course.

Yours sincerely,

Stephen Kelly
Joint Director of Planning and Economic Development
On behalf of
Cambridge City Council

Requested replacement or additional conditions

1. Operational Vibration

No development shall commence until a rail track ground borne vibration mitigation measure scheme to protect neighbouring premises on the Cambridge Biomedical Campus from the operation of the completed development has been submitted to and approved in writing by the Local Planning Authority. The ground borne vibration mitigation measure scheme shall be implemented as approved and retained a such.

Reason: To protect the amenity of nearby properties (Cambridge Local Plan 2018 policy 35)

2. Plant/machinery/equipment (station building)

No operational plant, machinery or equipment both internal and external shall be installed until a noise assessment and any noise insulation / mitigation scheme as required to mitigate and reduce to a minimum potential adverse impacts has been submitted to and approved in writing by the local planning authority. The scheme shall be carried out as approved and retained a such.

Reason: To protect the amenity of nearby properties (Cambridge Local Plan 2018 policy 35)

3. Platform Announcement Sound System

No station and platform public address / announcement sound system shall be installed until a detailed design / setup of and a scheme for the mitigation of noise to reduce to a minimum any adverse noise impacts from the said systems has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include details regarding hours of operation, design to include number, location and sound power of loudspeakers and permissible noise levels with consideration of noise mitigation / limiting measures as appropriate and a programme of maintenance. Any public address / announcement or voice alarm sound system associated with the approved development / use shall only be used for operational, health and safety, security and emergency announcements. The scheme shall be carried out as approved and retained a such.

Reason: To protect the amenity of nearby properties (Cambridge Local Plan 2018 policy 35)

4. Artificial lighting

No artificial lighting for construction or operation shall be installed until a detailed artificial lighting scheme 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)'. Development shall be carried out only in accordance with the approved details.

Reason: To protect the amenity of nearby residential properties (Cambridge Local Plan 2018 policy 34).

5. Electric Vehicle Charge Points

No electrical services shall be installed until an electric vehicle charge point scheme has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include:

1. Four slow electric vehicle charge points with a minimum power rating output of 7kW
2. Additional passive electric vehicle charge provision of the necessary infrastructure including capacity in the connection to the local electricity distribution network and electricity distribution board, as well as the provision of cabling to parking spaces for five car parking spaces to facilitate and enable the future installation and activation of additional active electric vehicle charge points as required
3. The electric vehicle charge points shall be designed and 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 use of the station and maintained and retained thereafter.

Reason: In the interests of encouraging more sustainable modes and forms of transport and to reduce the impact of development on local air quality, in accordance with Policy 36 - Air Quality, Odour and Dust of the Cambridge Local Plan (2018) and with Cambridge City Council's adopted Air Quality Action Plan (2018).

6. Site compound and temporary storage

No development shall commence until full details of the site compounds and temporary storage facilities have been submitted to and approved in writing by the local planning authority. The information shall include plans and sections of the site compounds and haul routes together with detailed information on the stripping and storage of the existing low nutrient topsoil prior to the temporary surfacing being laid and the type surfacing. Information on how long each compound will be in place will be required as well as how the surfacing will be removed and how the ground beneath will be remediated and decompacted prior to topsoil respreading and other landscape works being carried out. Development shall be carried out only in accordance with the approved details.

Reason: In the interests of visual amenity and to ensure that suitable hard and soft landscape is provided as part of the development (Cambridge Local Plan 2018; Policies 55, 57 and 59).

7. Spoil placement

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 the approved details for temporary storage.

Reason: In the interests of amenity and biodiversity (Cambridge Local Plan 2018; Policies 55, 57, 59, 69 and 70).

8. AMS and TPP

No development shall commence until Prior to commencement and, a phased tree protection methodology in the form of an Arboricultural Method Statement (AMS) and Tree Protection Plan (TPP) and in accordance with BS5837 2012 has been submitted to and approved in writing by the local planning authority, before any tree works are carried and before equipment, machinery or materials are brought onto the site for the purpose of development (including demolition). In a logical sequence the AMS and TPP will consider all phases of construction in relation to the potential impact on trees and detail tree works, 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 activity related to the development, including supervision, access, storage of materials, ground works, installation of services and landscaping.

Reason: To satisfy the Local Planning Authority that trees to be retained will be protected from damage during any construction activity, including demolition, in order to preserve arboricultural amenity in accordance with section 197 of the Town and Country Planning Act 1990 and Cambridge Local Plan 2018 Policy 71: Trees.

9. Arboricultural pre-commencement site meeting

No site clearance shall commence until a pre-commencement site meeting has been held and attended by the site manager and retained arboricultural consultant to discuss details of the approved AMS.

Reason: To satisfy the Local Planning Authority that trees to be retained will not be damaged during any construction activity, including demolition, in order to preserve arboricultural amenity in accordance with section 197 of the Town and Country Planning Act 1990 and Cambridge Local Plan 2018 Policy 71: Trees.

10. Tree protection implementation

The approved tree protection methodology will be implemented throughout the development and the agreed means of protection shall be retained on site until all equipment, and surplus materials have been removed from the site. 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 without the prior written approval of the local planning authority. 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.

Reason: To satisfy the Local Planning Authority that trees to be retained will not be damaged during any construction activity, in order to preserve arboricultural amenity in accordance with section 197 of the Town and Country Planning Act 1990 and Cambridge Local Plan 2018 Policy 71: Trees

11. Replacement tree planting

If any tree shown to be retained on the approved tree protection methodology is removed, uprooted, destroyed or dies 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.

Reason: To satisfy the Local Planning Authority that remaining arboricultural amenity will be preserved in accordance with section 197 of the Town and Country Planning Act 1990 and Cambridge Local Plan 2018 Policy 71: Trees.

12. BREEAM Pre-Assessment: Station Building

No development relating to the station building shall commence until a BREEAM pre-assessment 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.

Reason: In the interests of reducing carbon dioxide emissions, ensuring efficient use of water and promoting principles of sustainable construction and efficient use of buildings (Cambridge Local Plan 2018 Policy 28 and the Greater Cambridge Sustainable Design and Construction SPD 2020).

19. Cycle Parking: Cambridge South Station

Cambridge South station shall not be occupied or the use commenced, until cycle parking for station users has been installed and made operational in accordance with details that have been submitted to and approved in writing by the local planning authority. The number of cycle parking shall be agreed by the local highways authority. The details shall include the type of stands, location and means of

enclosure, and shall include a cycle parking management plan. The cycle parking shall be provided and maintained in accordance with the approved details.

Reason: To ensure appropriate provision for the secure storage of bicycles (Cambridge Local Plan 2018 Policy 82).

20. Green Biodiverse Roof: Cambridge South Station

Prior to the commencement of development of the Cambridge South Station, details of the biodiverse (green) roof(s) as detailed on the Parameter Plan 158454-ARC-ZZ-ZZ[1]DRG-LEP-000101 shall be submitted to and approved in writing by the Local Planning Authority. Details must include means of access for maintenance, plans and sections showing the make-up of the sub-base to be used and the following:

i. Roofs can/will be biodiverse based with extensive substrate varying in depth from between 80-150mm,
ii. Planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (the seed mix shall be focused on wildflower planting indigenous to the local area and shall contain no more than a maximum of 25% sedum,
iii. The biodiverse (green) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency,
iv. The biodiverse roof(s) shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter,
v. Where solar panels are proposed, biosolar roofs should be incorporated under and in between the panels. An array layout will be required incorporating a minimum of 0.75m between rows of panels for access and to ensure establishment of vegetation,
vi. A management/maintenance plan.

Development shall be carried out and maintained in perpetuity in accordance with the approved details.

Reason: To ensure the development provides the maximum possible provision towards water management and the creation of habitats and valuable areas for biodiversity. (Cambridge Local Plan 2018; Policy 31).

INFORMATIVE: Any artificial lighting, contaminated land, noise / sound, air quality impact assessments and mitigation shall have regard to the scope, methodologies, submission requirements and local planning policies of relevant sections of the Greater Cambridge Sustainable Design and Construction SPD, (https://www.cambridge.gov.uk/greater-cambridge-sustainable-design-and-construction-spd) and in particular 'section 3.6 – Pollution' and the following associated appendices; 6: "Requirements for Specific Lighting Schemes", 7: The Development of Potentially Contaminated Sites in Cambridge and South Cambridgeshire: A Developers Guide" and 8: "Further technical guidance related to noise pollution". Due regard should also be given to relevant and up to date Government / national and industry British Standards, Code of Practice and best practice technical guidance.