

Charlotte Burton
Principal Planner (Strategic Sites)
Greater Cambridge Shared Planning
South Cambridgeshire Hall
Cambourne Business Park
Cambourne, Cambridge, CB23 6EA

t: 01223 457147 m: 07704 018482
e: charlotte.burton@greatercambridgeplanning.org
w: www.greatercambridgeplanning.org



Sara Peters
Network Rail
Capital Delivery
SN1 Building
Station Road
Swindon, SN1 1DG

By email only: sara.peters@networkrail.co.uk

07 December 2021

Dear Ms Peters,

**Network Rail (Cambridge South Infrastructure Enhancements) Order
OBJ23 Cambridge City Council**

Thank you for your letter dated 18 November providing an update on Network Rail's (NR) response to the objections raised by Cambridge City Council. Your correspondence supplements NR's earlier letters dated 1 October and follows on from meetings between the Council's officers and NR Consents Manager and NR Planning Manager in recent weeks.

This letter provides advice from officers on the status of the Council's objections. The purpose of the letter is to aid ongoing discussions with NR at officer level. To be clear, the advice within this letter is given at officer level and does not constitute the formal position of the Council, which will be provided in the Council's Proof of Evidence and our Statement of Common Ground for the Public Inquiry.

I have addressed each of the objections raised in the Council's Statement of Case as summarised in Section 7 of our statement. I have reordered these by grouping them under three key headings, which broadly form the topics on which the Council intends to provide evidence at the Public Inquiry. These combine the Council's objections as local planning authority and landowner with a tenant interest in Hobson's Park.

This letter also puts in writing two matters which have arisen through discussions with NR since the submission of the Council's Statement of Case. These are the

need for additional tree planting in Hobson's Park to mitigate for the loss of structural planting within the AstraZeneca site boundary, and the need for commuted sums towards increased maintenance costs for Hobson's Park (see items 6 & 11).

As discussions on the draft planning conditions are still in progress, this letter does not confirm the position on the proposed draft condition wording, other than where specifically referred to. For the avoidance of doubt, the omission of comments on any draft conditions does not imply agreement to them. Further correspondence will be provided in response to the updated draft conditions sent by NR Planning Manager.

Impact on Hobson's Park and trees

Planning objections

1. Exchange land – adequate mitigation

Further information on the landscaping and biodiversity features, and the accessibility and safety of crossing Addenbrooke's Road is required in order to assess whether the proposed exchange land is appropriate replacement for the loss of existing public open space, in accordance with Local Plan 2018 policy 67.

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. Officers require further information to demonstrate that the landscape and biodiversity, and amenity value of the proposed land will provide adequate compensation for the area of Hobson's Park to be lost. This also includes demonstrating that the proposed exchange land is accessible safely given its location physically separate from the rest of Hobson's Park and requiring users to cross Addenbrooke's Road to move between the park and the proposed land. As no further information has been provided, the Council maintains its objection on this ground.

2. Exchange land – timing

The exchange land to compensate for the permanent loss of public open space and the new access routes outside of the site compound must be laid out and available for use before the use of areas of existing public open space for the development commences, in order to provide satisfactory replacement in accordance with Local Plan 2018 policy 67.

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

3. Use of Hobson's Park

The temporary use of Hobson's Park must be justified both in terms of the area of land and the duration for which the land is required, and this must be

secured through a condition in order to minimise the temporary loss of public open space in accordance with Local Plan 2018 policy 67.

Your letter refers to a soil management plan. While a soil management plan is required in respect of the temporary use of Hobson's Park this does not provide a response to the Council's objection above because it does not justify the use of Hobson's Park or demonstrate that the area and duration of use is the minimum required.

Updated deposited plans were issued by NR Consents Manager on 26 November which showed a reduced area of temporary land acquisition on Hobson's Park for the site compound. Officers are currently reviewing this and will provide comments in due course.

Notwithstanding this, the Council also requires a response from NR to justify the area of land required and the duration for which that land is required. This additional information will be reviewed by officers alongside the amended deposited plans before the Council can consider whether this matter has been resolved.

Insofar as the soil management plan is concerned, the Council will give consideration to the plan once it has been received but until the Council has had an opportunity to review the plan, officers advise that the Council's objection has not been resolved.

4. Permanent spoil placement

There must be no spoil permanently placed within areas of public open space and this must be secured through a condition in order to ensure that spoil placement does not lead to the permanent loss of public open space or harm to the character of the public open space in accordance with Local Plan 2018 policy 67.

Your letter commits to a condition to provide a soil management plan. While a soil management plan is required in order to agree where soil will be placed, the Council also requires a compliance condition to control where soil will NOT be placed. This is in the form of a compliance condition to prevent excavated material being placed within the public open space unless agreed through the soil management plan or landscaping works.

Officers discussed wording of a suitable condition at the meeting with the NR Planning Manager on 18 November which was subsequently drafted and proposed by the NR Planning Manager (sent on 22 November) as follows:

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 contained within the approved soil management plan.

Officers advise that the Council requires this condition to be agreed in the Statement of Common Ground before this matter can be resolved.

5. Trees

The application has not demonstrated compliance with Local Plan policy 71 for the preservation and protection of trees and hedges. An Arboricultural Implications Assessment (AIA) and Arboricultural Method Statement (AMS) must be submitted prior to determination, and the impact on Tree Preservation Orders (TPOs) and other trees and hedges must be minimised and mitigated through protection measures and replacement planting secured through conditions.

Your letter refers to conditions to secure the implementation of tree protection measures. While such conditions are necessary, this is not sufficient to resolve the Council's objection. As matters currently stand, the Council is not satisfied that the potential impact on trees and hedges can be satisfactorily addressed through conditions because no information has been provided about the extent of tree and hedge loss and the options for mitigation.

Therefore, while officers are happy to engage with NR in respect of the wording of any possible conditions to secure the implementation of tree protection measures, the Council requires submission of further evidence in respect of the extent of tree and hedge loss and the potential mitigation for that loss BEFORE the Council is in a position to agree that this issue can be satisfactorily addressed by way of conditions.

At our meeting with NR Consents Manager on 5 October, officers were advised that the AIA and AMS would come much later on in the process, but that further information may be provided. The Council requires information about the loss of trees and options for appropriate replacement planting to mitigate any impact before the Council can consider whether this issue can be satisfactorily resolved by way of condition.

Any additional information provided will be reviewed by the Council before it can consider whether this matter has been resolved.

6. Structural planting in Hobson's Park

During discussions with NR and following correspondence with representatives for AstraZeneca, officers have been made aware that the boundary of the permanent and temporary land acquisition includes land within the AstraZeneca site, specifically land within the site boundary of the reserved matters consent for the AstraZeneca South Plot development, which has come forward under the outline consent for the Cambridge Biomedical Campus (CBC).

As NR are aware, the outline consent for the CBC secured structure planting along the western boundary of the CBC along the railway line, and secured strategic gaps connecting the green open space within the retained Green Belt with open spaces within the CBC, including one gap which aligns with the station proposals. These elements of structural planting are important components of the mitigation for the CBC.

The Council has been informed that the areas of permanent and temporary mitigation mean that the structural planting along the railway line must be removed and cannot be replaced, and that the station platform including the walkover will align with the strategic gap. As a result, the CBC mitigation cannot be achieved in accordance with the outline consent if the station works go ahead.

It is critical that the proposal includes appropriate mitigation for the loss of structural planting within the CBC. The Council's landscape officer has met with NR Landscape Consultant to discuss options for replacement planting on the eastern side of Hobson's Park. This would require planting mature large specimens and with ground and soil preparation which promotes the fast establishment of trees.

The Council's landscape officer has advised that a suitable planting scheme could be implemented to mitigate this impact, however these details must be secured through inclusion in the Design Principles document. Officers advise that the Council requires submission of an updated Design Principles document to review before this matter can be resolved.

The cost of maintaining these trees is covered in item 11 below.

Landowner objections

7. Hobson's Park – temporary and permanent work

The use of existing public open space for the creation of new access routes and temporary work required for the construction must be the minimum requirement and must be justified.

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. Please provide a formal response.

Your letter refers to our comments on the notation of the pedestrian and cycling route on Parameter Plan 1: Access and Movement requesting this is amended to read 'Proposed segregated new pedestrian and cycle access'. You have responded to explain that the detail of the route will come forward through the discharge of conditions which will allow further discussion with stakeholders. Officers advise that the Council accepts this.

8. Hobson's Park – landscaping of routes

The layout of new routes across the public open space should consider the impact on the remaining green spaces between the routes, and any resulting changes to the management regime required or to the use of these spaces for recreation.

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

9. Timing of exchange land and new access routes

The exchange land and the new access routes outside of the site compound must be laid out and available for use prior to commencement of the use of the existing open space for the works, which must be secured through an amendment to paragraph 36 of Part 4 of the draft Order. Confirmation that the exchange land will be secured for public open use in perpetuity through the draft Order must be provided.

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

10. Pedestrian link beneath Cambridge Guided Busway

The pedestrian link across the Cambridge Guided Busway between Hobson's Park and the Active Recreation Area must be complete before the existing connection beneath the Cambridge Guided Busway is lost. This must be secured through the Order.

This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council maintains its objection on this ground.

11. Commuted sums towards increased maintenance costs

The Council is reviewing the implications of the proposed works on the maintenance costs for Hobson's Park. This includes additional costs of maintaining any paths, hard surfacing and structures that fall within the Council's maintained areas, and the additional cost of maintaining tree planting on the western side of the railway line as replacement planting for the trees to be lost on the CBC. Officers will discuss this further with NR and provide an estimate of any additional costs for which contributions will be need to be agreed.

Impact on biodiversity and biodiversity net gain

12. Biodiversity Net Gain (BNG)

The application has not provided sufficient Information to demonstrate the minimum 10% biodiversity net gain target is achievable and can provide appropriate mitigation on or near to the site, and as a result has not demonstrated compliance with Local Plan 2018 policies 69 and 70, and NPPF 2021 paragraph 174.

Your letter refers to conditions to secure the delivery of the 10% BNG target. While this condition is necessary to approve the detail of the ecological mitigation, this is not a sufficient response to the matter above as it does not demonstrate that this target is achievable and can provide appropriate mitigation. This is because there is no further information about the deliverability of biodiversity enhancements.

Your earlier letter dated 1 October and meetings with the NR Consents Manager have confirmed that NR has entered into discussions with Cambridgeshire County Council with a view to securing an Options Agreement for the provision of all the BNG units required to meet the 10% target at Lower Valley Farm in Fulbourn.

The letter advised that once discussion have progressed further with the County Council, NR will be able to provide confirmation that it has secured the mechanism for delivering the required 10% BNG. Officers have been advised that NR are aiming to secure the Option Agreement with the County Council ahead of the public inquiry.

In addition to this, officers understand that the BNG calculations submitted with the TWAO application for the 'worst case scenario' are being updated to reflect the changes to the site compound area and to landscaping and that the calculations will be reissued to the Council, however officers have not had sight of this.

The Council currently maintains its objection on these grounds which have not been addressed. Officers look forward to receiving the updated BNG calculations and further information on the proposed mitigation to review before the public inquiry. This additional information will be reviewed by the Council before it can consider whether this matter has been resolved.

13. Birds

The potential impact on the breeding population of Corn Bunting along the line of the rail track and construction route, and on Corn Bunting and Skylark nesting within Hobson's Park needs to be given more weight in the assessment of the impact on existing biodiversity, in accordance with Local Plan 2018 policies 69 and 70.

Your letter advises that NR are looking into whether additional mitigation is necessary to reduce the potential impact on the breeding population of Corn Bunting and nesting of sky larks within Hobson's Park. This matter was raised in our Statement of Case and has not been addressed in your letters dated 1 October or 18 November. The Council does not agree that this issue has been resolved and requires further information on the availability of options for mitigation to review before it can consider whether this matter has been resolved.

Planning objections

14. Green Belt

The application has not made a full and clear case to demonstrate the proposal would not be inappropriate development within the Green Belt in accordance with the NPPF paragraph 150 and Local Plan policy 4, or that very special circumstances exist, in accordance with NPPF paragraph 148.

You have referenced the Department of Transport Strategic Outline Business Case for Cambridge South Station which sets out the requirement for the station and how the proposed location was identified, and the Planning Statement which explains how this meets Green Belt policy in accordance with the NPPF 2021. The Council

acknowledges that NR has put forward a case for the proposal being not inappropriate development in the Green Belt. Officers do not make a judgement as to whether the proposal complies with the NPPF in this regard but are now satisfied that the Inspector has satisfactory information to consider the matter.

15. Drainage

Details as requested by the Sustainable Drainage Engineer must be submitted prior to determination in order to demonstrate the proposals comply with Local Plan policy 32 relating to flood risk.

Your previous letter dated 1 October provided a detailed response to the issues raised by the Council's sustainable drainage engineer. Officers have reviewed this and confirmed this was acceptable in an email to NR Consents Manager dated 5 October. Officers advise that the Council's objection has been resolved.

16. Green roofs

The proposals for biodiverse green roofs must be confirmed as to whether or not they are required as part of the LVIA and Green Belt mitigation.

Your letter states that given the current stage of design, NR cannot confirm the exact location and amount of green biodiverse roof as part of the proposed development. As a result, no amendments will be made to remove the word 'potential' from the Parameter Plan: Land Use and Landscape drawing.

While the Council acknowledges that there is not yet a detailed design for the station, officers have requested in the comment above clarification from NR about whether a biodiverse green roof is required as part of the LVIA and Green Belt mitigation. The Council requires confirmation on this with reference to the submitted documents for the Council to review before this matter can be resolved.

Regarding the wording of the draft condition to secure details of biodiverse green roofs, officers have discussed this at meetings with NR Planning Manager. The Council accepts that the detail of the roof could come forward under the condition requiring the detailed design of the station building and landscaping details, so that a separate condition is not required.

Notwithstanding this, the Council requires that the specification for the substrate and mix of species and a maintenance plan for the biodiverse green roof – as detailed in the draft condition wording requested by the Council – must be included in the Design Principles document and must be complied with unless there are planning or biodiversity reasons which make this not possible. The Council requires submission of an updated Design Principles document to review before this matter can be resolved.

Your letter also responds to our comments on biodiverse green walls requesting details of this feature as many types are not sustainable and are high maintenance. You have responded to explain that this detail would come forward through the conditions. Officers advise that the Council accepts this.

17. BREEAM

A condition for submission of a BREEAM pre-assessment demonstrating the scheme is on-target to achieve BREEAM 'excellent' rating is required in accordance with Local Plan policies 28, 29 and 31, and the Sustainable Design and Construction SPD.

Your response proposes an additional condition to secure submission of a BREEAM pre-assessment. The Council's sustainability consultant supports the wording of the proposed draft conditions 20, 21 and 22 sent by NR Planning Manager on 22 November. The Council requires this condition to be agreed in the Statement of Common Ground before this matter can be resolved.

18. Trip generation and cycle parking

Cambridgeshire County Council Highways Authority must support the predicted trip generation, modal share and number of cycle parking spaces in accordance with Local Plan policies 81 and 82.

Your letter dated 1 October provided a more detailed response with reference to the Transport Assessment. Officers advise that the Council has made its position clear and has nothing further to add. Officers will review the draft condition 19 to secure details of cycle parking as sent by NR Planning Manager on 22 November.

19. Car parking

The maximum number of car parking spaces for each user group must be specified in the Design Principles and details of cycle parking facilities must be secured through the recommended revised wording, in accordance with Local Plan policy 82.

Your letter confirms that NR will amend the Design Principles to specify that no more than 9 vehicle parking spaces will be provided within the station forecourt (5 spaces for blue badge holders and 4 spaces for station staff and maintenance staff) and space for no more than 6 passenger and taxi drop-off/pick-up will be provided within the station forecourt. Officers advise that the Council requires submission of an updated Design Principles document to review before this matter can be resolved.

20. Environmental Health conditions

Conditions relating to noise and vibration, lighting and electric vehicle charging points must be secured in order to mitigate the impact on residential amenity and sensitive receptors, in accordance with Local Plan 2018 policies 34, 35, and 36.

Your letter confirms that NR does not have an objection in principle to the proposed conditions on noise and vibration, and lighting. The wording of those conditions was discussed between the Council's environmental health officers and NR Planning Manager at the meeting on 18 November. The re-drafted conditions issued by NR

Planning Manager on 22 November will be reviewed by officers before the Council can confirm whether this matter has been resolved.

Your letter provides no further information in response to the Council's requirement for electric vehicle charging points. This was also discussed between environmental health officers and NR Planning Manager. Officers set out the case for providing electric vehicle charging for Blue Badge Holders at the station. NR Planning Manager explained that this issue has been escalated within NR. Officers advise that the Council requires confirmation that the provision will be made and agreement to a condition to secure this within the Statement of Common Ground before this matter can be resolved.

I trust the contents of this letter are clear, however if you have any queries then please do not hesitate to contact me.

Yours sincerely,

Charlotte Burton MRTPI
Principal Planning Officer (Strategic Sites)
Greater Cambridge Shared Planning