



**Proof of Evidence relating to the Statement of
Matters (211027) item 4; impact on Hobson's Park
and Nine Wells Local Nature Reserve.**

**IN RESPECT OF THE TRANSPORT AND WORKS ACT 1992: APPLICATION FOR
THE PROPOSED NETWORK RAIL (CAMBRIDGE SOUTH INFRASTRUCTURE
ENHANCEMENT) ORDER**

Planning Ref: 20/05054/CTY,
21/02957/TWA

Produced by

Alistair Wilson (Streets and Open Space – Development Manager)

on behalf of Cambridge City Council

Issued: 21st December 2021

CONTENTS

1. Introduction	3
•Qualifications and Experience	
•Statement of Truth	
2. Scope of Evidence	3
3. Site and Immediate Context	5
4. Objections	6
5. Reasons for Objections	7
6. Summary and Conclusions	14
7. Appendices	15

i.Network Rail Public Open Space Assessment: June 2021

ii.NR09: Deposited Plans and Sections, Rights of way plans and section Nov 2021

iii.Revised site compound drawing circulated by Paul Humphrey (26th Nov 2021)

iv.S106 for Clay Farm (August 2010)

v.Cambridge Local Plan 2018

vi.Cambridge City Council, Open Space and Recreation Strategy 2011

1.INTRODUCTION

- 1.1 My name is Alistair Wilson.
- 1.2 I am employed by Cambridge City Council as the Streets and Open Space, Development Manager.
- 1.3 I have been asked to prepare this proof of evidence by my employer, Cambridge City Council in respect of matters relating to the impact of the proposed Cambridge South Station in relation to Hobson's Park.
- 1.4 I confirm and declare that to my knowledge and belief all matters contained in this document are an accurate and true record of all matters put forward. My proof contains facts which I consider as being relevant to the professional opinions I have stated together with all matters which support and affect the validity of those opinions. I believe that the facts I have stated in this proof are true and that the opinions I have expressed are correct.
- 1.5 In preparing my proof of evidence I have consulted Sarah Tovell (Major Projects and Performance Manager) who has been the lead Officer for the design, build and transfer of Hobson's Park to the City Council on a leasehold arrangement. I have also consulted Joanna Davies (Arboricultural Officer) in respect of seeking advice on arboricultural matters.

2. SCOPE OF EVIDENCE

- 2.1 This evidence, which should be read alongside that of Charlotte Burton (Shared Planning Service) and Guy Belcher (Biodiversity Officer, Cambridge City Council), and is set out as follows.
- a) After the examination of documentation submitted as part of Network Rail's submission to the local planning authority (21/02957/TWA), further documentation supplied by Network Rail as referenced in the appendices, and other relevant documentation such as the approved Cambridge Local Plan 2018 and Open Space and Recreation Strategy 2011.
 - b) That the City Council has an obligation relating to the management and maintenance of Hobson's Park relating to a Section 106 (The Town and Country Planning Act 1990) dated 6th August 2010. The evidence considers the City Council's position in respect as a lease hold tenant of the land.
 - c) That the City Council was involved in the design and planning of Hobson's Park that establish design principles and these are set out

in planning documents to support the planning application 11/0319/REM which was approved.

- d) That the Council has a duty to ensure, adequate provision is made for the preservation or planting of trees.

3 SITE AND IMMEDIATE CONTEXT

- 3.1 Hobson's Park is situated in the south of Cambridge. It provides part of mitigation area from the development know as Clay Farm, a development of 2,300 homes to the west of the park
- 3.2 Hobson's Park was developed alongside two other 'linked' green spaces. (i) The active recreation area (sited to the north of Hobson's Park, the two sites are dissected by the guided bus way), and (ii) the SLEAP which is the primary play space, skateboard facility for the whole development, which sited to the north west of Hobson's park, also split by the Guided bus way. (insert plan?)
- 3.3 The design principles for the three sites mentioned above concluded that although the three sites where geographically separated by the guided bus routes, they should be considered as a whole in terms of design and functions. Access and links to the sites needed to work together, both in terms of use and management.
- 3.4 Hobson's Park provides SUD in the form of three ponds (managed by Anglian Water).
- 3.5 Hobson's Park provides location for Clay Farm Allotments (100+ plots).



4 SUMMARY OF OBJECTIONS

4.1 My objections to the application fall in the following categories and are summarised below, and detailed in section 5.

4.1.1 The impact of the proposals on Hobson's Park including;

a) the permanent loss of open space.

b) the extent and duration of the temporary loss of open space during the construction period.

c) The placement of soil (both permanent and temporary) and the impact on open space

d) The need for tree planting within the Park to provide replacement mitigation for structural planting to be lost on the Astra Zeneca site to mitigate the Cambridge Biomedical Campus

e) The proposed routes through the Park

f) The loss of the access adjacent the railway between areas of open space beneath the Cambridge Guided Busway.

g) The pedestrian link between areas of open space across the Cambridge Guided Busway and

h) Increased maintenance costs for the Park.

4.1.2 I also object to the adequacy of the exchange land as public open space including in relation to.

i) Its layout/ design

j) Accessibility.

k) and timing of its delivery

4.1.3 I also object to the loss of trees without mitigation.

(i) Loss of trees without mitigation.

5. REASONS FOR OBJECTIONS

5.1 (a) The permanent loss of open space and impact of the Station (not resolved)

- i. The exchange land may be capable of providing adequate mitigation, but not enough detail has been presented or any proposals for how the exchange land is to be laid out, used and for what purpose.
- ii. The proposed exchange land although compensatory in respect of size, does not address the impact of land left over after development due to the introduction of the Station, its forecourt and access paths. For example, the smaller parcels of land south of the Cambridge Guide Busway and between the new footpath networks, the areas of land around the Station, and the reconfiguration of the land south of Addenbrookes Access Road.
- iii. The proposed exchange land is south of Addenbrooke's Access Road (AAA) and therefore visually a separate or segregate space. Not enough detail has been presented or any proposals for how the exchange land is to be laid out, used and for what purpose.
- iv. The proposed exchange land is not easily accessible across a busy road, nor does it form a connection with the existing Park.
- v. The exchange land is not explained in the TWA application in respect of its intended purposes, for example is the exchange land also used as part of the Biodiversity Net Gain calculations, and therefore not suitable as exchange land for the purposes of mitigating the impact on recreation and access to open space.
- vi. The exchange land therefore could be sufficient in terms of quantities but limited in the range of qualities for recreation due to the biodiversity needs from the exchange land.
- vii. Increased footfall to the park and its surround, increased dwell times, and higher profile will create a new and increased audience for Hobson's Park which was not envisaged during the initial scope, design and planning for Clay Farm. There is a need to revert to the initial design principles for this site and adjacent green spaces (e.g active recreation area and Super Local Equipped Area for Play) and

ensure that the exchange mitigation land is adequate and suitable to ensure that Hobsons Park remains fit for its intended purpose, following the introduction of a new station.

5.2 **(b) The extent and duration of temporary compound (not resolved)**

- i. The temporary use of Hobson's Park has not been detailed or justified both in terms of the area of land and the duration for which the land is required. The justifications must be known, understood and agreed in order to minimise the temporary loss of public open space in accordance with Local Plan 2018 policy 67. This temporary use, scale and purpose must be secured through a condition to safeguard the land from unnecessary loss and damage
- ii. The latest compound layout submission (Nov 2021) still does not qualify or justify the extent of the requirement to use the Hobson's Park as a build out compound for Cambridge South Station. Therefore, Cambridge City Council as leaseholders reject this application on the grounds of the impact of the function and use of the recreation space and the impact it will have on established habitats and species on Hobson's Park.
- iii. The compound is imposing. It restricts and reduces access to a primary open space within the Clay Farm development. The site has been available for public use for the last 36 months and has established use. Residents around the park (and wider Cambridge Southern Fringe) have had to manage and accept the building out of Clay Farm development but have recently been able to appreciate the full benefits and vision for these green spaces, only for this to be removed by an unqualified requirement to use the land as an overly large compound area. The nearest broadly comparable green space, being Trumpington Country Park, which is 25-minute walk.
- iv. The Hobson's Park eastern boundary planting will be included within the compound boundary and therefore not publicly available for the duration of the build, therefore further reducing the space within Hobson's Park available for recreation.

5.3 **(c) The placement of spoil; (not resolved)**

- i. 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.

- ii. The Council has proposed a condition 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)*
- iii. Subject to the imposition of this condition (which has not been agreed by the Applicant) the Council's objection would be addressed.

5.4 **(d) Replacement planting to mitigate loss from AstraZeneca (AZ) and Cambridge Biomedical Campus. (CBC) (Partially resolved)**

- i. During discussions with NR and following correspondence with representatives for AZ, the Council has been made aware that the boundary of the permanent and temporary land acquisition includes land within the AZ site, specifically land within the site boundary of the reserved matters consent for the AZ South Plot development, which has come forward under the outline consent for the CBC.
- ii. 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.
- iii. 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 campus's outline consent if the station works go ahead.
- iv. 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 semi-mature tree specimens and with ground and soil preparation to promote successful establishment of trees.

5.5 **(e) The proposed routes through the Park (not resolved)**

- i. The layout of new future routes across the public open space should consider the impact on the remaining green spaces function and use for recreation. This is most important between the routes south of the guide bus route and the land separated / isolated by any new cycle and walking routes to the station. These new routes will result in changes to the lay out and form and will reduce the available spaces for recreation. Consideration needs to be given to future connectivity, in terms of location of the areas proposed as mitigation land.
- ii. The TWA has not set out how the compound will be accessed by vehicles during the build stage. There is also no detail in respect of long-term access need with regards to the maintenance of station and its infrastructure. Both of these access arrangements may reduce the function and use of Hobson's Park for recreation and have negative impact on biodiversity on site.

5.6 **(f) The loss of access underneath guided busway (not resolved)**

- i. The proposed Station location removes a maintenance access route which was secured during the design and build of Hobsons Park. This agreed access route avoids machinery having to cross the Cambridge Guide Bus Route. It is the only access route agreed from Addenbrookes Access Road.
- ii. The removal of the current maintenance, cycle and pedestrian access under the guided busway bridge to enable access to the Active Recreation Area, will impact on the path network which has already been installed in this location. The bridges installed as part of this scheme will require review in terms of connectivity and weight restrictions. Maintenance vehicles will be required to access the ARA via Long Road (not secured), which will incur increased drivetimes through south part of Cambridge, as this area can't be easily accessed due to highway control of a bus gate on Lime Tree Avenue.

- iii. The Council has not been proved with any detail regarding a new access route being proposed from Long Road. Long term and permanent access must be provided to ensure the Council can maintain and manage the Active Recreation Area.

5.7 (g) Pedestrian links between green spaces across guided bus way (partially resolved)

- i. 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. Discussion with Pemberton Estates (Freehold owner) Countryside Properties PLC (current occupier of the land) and the City Council (future lease holder of the land (S106 Agreement)) will need to be undertaken to determine timing for this area being completed and made accessible to general public.

5.8 (h) Increased maintenance costs for the park (not resolved)

- i. Cambridge City Council have pre-determined and pre-approved rates in relation to our obligations in respect of existing S106 agreement for Clay Farm (appendices iv) These can be applied for new or modified landscaping features should they be offered for adoption by Cambridge City Council. The City Council can also make design, specification, maintenance cost and adoption for new features introduced to Hobson's Park that are more sympathetic to the Park setting that those currently proposed to meet a standard of build that will be adopted by Cambridgeshire County Council. The current TWA is indicating a 7.5m wide cycle and walking network built to a highway's specification through the park, south of the Cambridge Guided Busway rather than alongside the existing Busway maintenance track.
- ii. At this point no plans have been approved in respect of footpath alignment and surfacing, lighting, street furniture, orientation / wayfinding, tree planting and associated soft landscaping e.g shrub / buffer planting and grassland management. We are therefore unable to give clear guidance as to increased costs of maintenance or indeed which statutory body will be requested to adopted features.

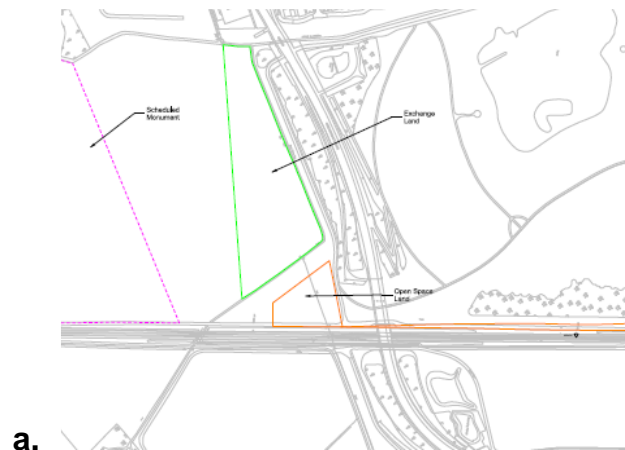
5.9 Adequacy of exchange land in terms of

(i) Its layout / design (not resolved)

- i. 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

(j) Accessibility (not resolved)

- i. The exchange land is bordered by Addenbrookes Access Road (AAA) to which the Clay Farm is predominately built to the North. The AAA is a very busy road and there are currently no controlled crossing points to allow access to the exchange land.
- ii. The exchange land is only accessible (without crossing AAA) from the Hobson's Park by access under the Addenbrookes Road bridge. This land also includes railway infrastructure in proximity. See the plan extract below.



- iii. At this point no plans have been approved in respect of the layout and purpose of the exchange land. The exchange land has limitations in respect of access due to a watercourse to two sides of its boundary.

(k) Timing for delivery (not resolved)

- i. If Hobson's Park must be used for the purposes of a storage and build site compound either as proposed or as a reduced footprint, the use cannot be sanctioned unless the Active Recreation Area (ARA) is complete and available to the public (managed by Countryside Developments Ltd) and the mitigation area is approved and available for use by the public. Access to both of those sites for residents needs to be carefully considered, using the design principles as set out in the Clay Farm development.
- ii. 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, to provide satisfactory replacement in accordance with Local Plan 2018 policy 67.

5.12

(I) The loss of the trees and mitigation (not resolved)

- i. The principle of accepting an unknown impact on the city's trees is insupportable. So too is the principle of accepting losses because replacement planting is proposed. It will take decades to replace the amenity and biodiversity associated with the Long Road Sixth Form College trees not the 3-5 years suggested in Chapter 8 of the ES.
- ii. Furthermore, there are no securities that the replacement trees will not be lost to future development. In addition to the loss of the mature woodland strip in the college grounds, trees planted to help offset the detrimental impact of development on Francis Crick Avenue are required to be removed.
- iii. Chapter 8 of the ES also describes the amenity value of the college trees as local. 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.
- iv. The lack of an arboricultural impact assessment means that it is not possible to ascertain the extent of tree removal required to the south of Long Road to accommodate the development. The woodland strip in the 6th form college is, only about 20+m wide and is dominated by trees of similar age that have established as a single canopy. The trees in the 20+m wide strip are co-

dependent therefore and rely on their neighbours to withstand wind forces.

- v. 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 will materially alter the character of the green belt in this location. Furthermore no mitigation is proposed locally to safeguard long-term amenity.

6 SUMMARY AND CONCLUSION

- 6.1 Cambridge City Council support in principle the vision and rationale for a new Cambridge South Station. However, the outline proposals for the new station building and the proposed mitigation measures proposed to date lack sufficient detail and do not fully address the impact of the station on the trees, landscape and the recreational and biodiversity qualities of the existing area.

End of document.