

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](mailto:charlotte.burton@greatercambridgeplanning.org)  
w: [www.greatercambridgeplanning.org](http://www.greatercambridgeplanning.org)



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

By email only: [sara.peters@networkrail.co.uk](mailto:sara.peters@networkrail.co.uk)

07 December 2021

Dear Ms Peters,

**Network Rail (Cambridge South Infrastructure Enhancements) Order  
OBJ24 South Cambridgeshire District Council**

Thank you for your letter dated 18 November providing an update on Network Rail's (NR) response to the objections raised by South Cambridgeshire District Council. Your correspondence follows on from meetings between the officers for the Council 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 6 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.

As discussions on the draft planning conditions are still in progress, this letter does not confirm the Council's 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 on 22 November.

### **Impact on trees**

#### **1. Loss of trees**

**The loss of trees along the railway line and across the scheme must be minimised, and a condition for tree protection measures must be imposed, in accordance with Local Plan 2018 policies HQ/1, NH/2, and NH/4.**

This matter was raised in our Statement of Case and has not been addressed in your letter. The Council maintains its objection on this ground.

### **Biodiversity net gain**

#### **2. Deliverability of biodiversity net gain**

**The application has not provided sufficient information to demonstrate the 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 policy NH/4, 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.

## **Planning**

### **3. LVIA mitigation**

**The application does not provide sufficient detail about the landscape proposals to provide unreserved assurance of the success of the LVIA mitigation, as required by Local Plan 2018 policies HQ/1, NH/2 and NH/8.**

Your letter refers to the TWAO application as comparable to an outline planning permission which requires suitable planning conditions requiring the local planning authority to agree the detail of the landscaping proposals. Officers advise that the Council accepts that the detail will come forward through the discharge of conditions for the detailed station design and landscape proposals, and that this matter cannot be resolved at this stage.

### **4. Deemed planning consent drawings**

**The deemed planning consent drawings must provide more information to control the scale and height of the substation and railway systems compound to the south of Addenbrooke's Road, in order that the buildings integrate into the rural location, in accordance with Local Plan 2018 policies HQ/1, NH/2 and NH/8.**

Your letter refers to Deemed Planning Drawing – Parameter Plan 'heights' (158454-ARC-ZZ-ZZ-DRG-LEP- 000102 P01) and highlights that this limits the maximum height of structures to 18m above ordnance datum (AOD). You explain that based on the existing AOD, the maximum height of structures would be 4m. The detail of the structures and the landscaping would be come forward through the discharge of conditions. Officers advise that the Council accepts this matter has been resolved.

Notwithstanding this, it is recommended for the avoidance of doubt that this drawing is updated to refer to maximum building heights in the annotations or drawing title.

### **5. Noise mitigation and attenuation at Great Shelford**

**Site-specific noise mitigation and attenuation measures must be included in the Code of Construction Practice for locations where works will occur that have the potential to adversely impact residential areas of Great Shelford, in accordance with Local Plan 2018 policies HQ/1 and SC/10.**

This matter was raised in our Statement of Case and has not been addressed in your letter. The Council maintains its objection on this ground.

### **6. Vibration impacts at Shrepreth Branch Junction**

**Good and early engagement with the Council and residents on both the mitigation measures and the consultation strategy to minimise the disruption from major construction ground-borne vibration impacts at Shepreth Branch Junction to local residents and impact on mental health, in accordance with Local Plan 2018 policies HQ/1 and SC/10.**

This matter was raised in our Statement of Case and has not been addressed in your letter. The Council maintains its objection on this ground.

## **7. Air quality monitoring on the adjacent minor residential roads**

**Further discussions to secure a programme to monitor the impact on air quality on the adjacent minor residential roads around the development, in accordance with Local Plan 2018 policies HQ/1 and SC/12.**

Your letter provides a detailed response which in summary advises that it is considered likely that any changes in emissions from idling vehicles would be offset by the reduction in vehicle movements to the Cambridge Biomedical Campus. The Council's Environmental Health team has reviewed this and provided comments as follows.

Whilst the station is designed to discourage the use of cars with no drop off/pick up or waiting area, the reality is that for some customers this station will prove to be more convenient than either the north or central station, and a percentage of customers will be driven to the station; it is not realistic to assume that all customers will walk, cycle or use public transport to the station. This could impact on the local roads around the station due to people waiting/idling in cars to drop off or pick up.

However the Environmental Health team agrees with NR that this is obviously extremely difficult to quantify and air quality monitoring is unlikely to be an effective way to monitor this issue. Whilst this will impact on air quality around local roads this will be more effectively managed as part of a wider traffic management programme around the station which is a matter for the Highways Authority.

Therefore, officers advise that no further information is required on this matter.

## **8. Artificial lighting condition**

**Replacement wording for the artificial lighting condition is required to secure compliance with the relevant guidance relating to construction and operational lighting, in accordance with local Plan 2018 policies HQ/1 and SC/9.**

Your letter does not provide a response on this, however officers have discussed the wording of the draft condition for lighting details with the NR Planning Manager on 18 November. It was agreed that construction lighting would be covered in the Code of Construction Practice and that operational lighting would be controlled through a separate condition requiring submission of a detailed operational lighting scheme.

The wording of these conditions should require compliance with 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)', as detailed in our comments. Officers advise that the Council requires agreed wording for a condition to be included in the Statement of Common Ground before the Council considers this matter to be resolved.

## **9. Engagement in wider Addenbrooke's Hospital campus masterplanning**

**Network Rail must commit to engage in the review of the wider masterplan for the Addenbrooke's Hospital campus currently being undertaken by the Cambridge University Hospitals NHS Foundation Trust to address connectivity issues, in accordance with Local Plan 2018 policies HQ/1 and TI/2.**

Your letter advises that NR are engaging with the relevant stakeholders. Officers advise that no further information is required on this matter at this stage.

## **10. Impact on cycle route NCN 11 at Shepreth Branch Junction**

**The works to the railway line at Shepreth Branch Junction must minimise the impact on the NCN 11 route and be considered carefully alongside the timing of works to other routes within the area to minimise disruption to users. Network Rail must consult with the Council, local cycling groups, Great Shelford Parish Council and other user groups.**

Your letter refers to discussions with the Council. Officers discussed this matter with NR Consents Manager and NR Planning Manager on 5 October. NR explained that a short stretch of the NCN 11 route near Webster's Level Crossing would be closed to allow for the construction compound. NR explained that this would be overnight closure only. NR has considered options to divert the route, however an alternative arrangement to marshal cyclists and pedestrians through the compound during the night closures is the preferred option.

While the detailed arrangements would be included in the Code of Construction Practice Part B to be secured through condition, officers requested that NR provide a commitment to minimise closures and to provide marshalled access, or a diversion, with specific reference to this area within the Code of Construction Practice Part A submitted with the TWAO application. Officers advise that the Council requires an updated Code of Construction Practice Part A to review before this matter can be resolved.

## **11. Works affecting the Scheduled Ancient Monument**

**The works affecting the Scheduled Monument must be minimal and must have the support of Historic England and Cambridgeshire County Council Archaeology Team, and mitigation must be secured through conditions, in accordance with Local Plan 2018 policies HQ/1 and NH/14.**

Your letter advises that NR are engaging with Historic England in respect of the Scheduled Ancient Monument, and that associated Scheduled Monument Consent will be applied for. Officers have also discussed the wording of a condition to secure a programme of archaeological investigation works, and are currently awaiting feedback from the Cambridgeshire County Council Archaeology Team with respect to the trigger for this condition in relation to other site investigation and enabling works. Feedback will be provided separately to the NR Planning Manager. Officers

advise that the wording of an agreed condition must be included in the Statement of Common Ground before the Council considers this matter to be resolved.

## **12. Awarded Watercourse informative**

**An informative should be applied to advise the applicant of the requirement to obtain land drainage bye law approval by the Council for works affecting the awarded watercourse.**

The Council has provided a copy of the Bye Law to the NR Consents Manager. Your letter advises that NR will continue to discuss this matter with the Council. This matter will be dealt with the land drainage bye law approval which will come forward at a later date, and therefore officers advise that the Council considers this matter to be closed for the purposes of the TWAO application.

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**