



Transport Infrastructure Planning Unit,
Department for Transport,
Great Minster House,
33 Horseferry Road,
London, SW1P 4DR

By email to: transportinfrastructure@dft.gov.uk

Cambridge Past, Present & Future
Wandlebury Country Park
Cambridge CB22 3AE

Phone 01223 - 243830

www.cambridgeppf.org

30/07/2021

Dear Transport Infrastructure Planning Unit

Ref: Cambridge South Station – Application by Network Rail for The Network Rail (Cambridge South Infrastructure Enhancements) Order

Cambridge Past, Present & Future is Cambridge’s largest civic society. We are a charity run by local people who are passionate about where they live. We operate in the greater Cambridge area and working with our members, supporters and volunteers we:

- Are dedicated to protecting and enhancing the green setting of Cambridge for people and nature.
- Care about Cambridge and are an independent voice for quality of life in the strategic planning of Greater Cambridge.
- Are working to protect, celebrate and improve the important built heritage of the Cambridge area.
- Own and care for green spaces and historic buildings in and around the city for people and nature, including Wandlebury Country Park, Coton Countryside Reserve, Cambridge Leper Chapel, Bourn Windmill and Hinnton Watermill.

Cambridge Past, Present & Future wishes to raise a number of **objections** to aspects of the application:

- Due to the temporary adverse effects on Hobson’s Park.
- Due to the permanent adverse effects on Hobson’s Park.

1. Introduction

In principle, CambridgePPF supports the new station as a means of reducing car journeys to the Biomedical Campus and our main concerns are to ensure that the new station does not negatively impact the park, its wildlife and users and that any impacts on Nine Wells Nature Reserve, Hobson’s Brook and the Schedule Ancient Monument are avoided or adequately mitigated.

Our secondary concern is that the new station should essentially be “car free” and does not become a magnet for London commuters’ cars. Therefore it must be supported by excellent walking, cycling and public transport links. Whilst this is not the direct remit of Network Rail it is essential in considering the design and functioning of the new station.

The Country Park (Hobson’s Park) was provided in mitigation for the substantial areas taken out of the Cambridge Green Belt in the 2006 Local Plan, development of which is nearing completion. In addition to its considerable amenity for local residents, this green corridor is one of four such corridors in and through the landscape of Cambridge, and serves a city wide not just a local purpose. Work has been done to enhance biodiversity right up to the railway line in some places. It includes the successfully established wildlife reserve on the protected lake within the Park and the park now has a flourishing botanical and invertebrate communities

which in turn are supporting good populations of birds, including those of conservation concern such as Kestrel and Skylark. This would be threatened by the proposed access road and temporary construction site.

We welcome the efforts that Network Rail have made through the optioneering process to try and select options and produce designs that have least impact on the park. However there are still some aspects of the scheme where temporary and permanent impacts could be avoided or more adequately mitigated and it is these that we object to and which we wish to see revised through the TWAO application process.

2. Temporary Adverse Effects on Hobson's Park

It is unreasonable that Network Rail's application, if granted, would remove from public use for upwards of two years 35 per cent of Hobson's Park for construction purposes. [Public Open Space Assessment, paragraph 5.1.3, Figure 2, & paragraph 5.1.6]

CambridgePPF has previously stated to Network Rail that the proposed western station building construction compound is excessive and should be reduced significantly, as should the extent of the proposed temporary construction area, the vast majority of which is inappropriately proposed on the western side of the railway in Hobson's Park. But to no avail to date as the "Station Compound CC3" proposed on the western side of the railway remains unchanged and much larger than the "Temporary Site Compound for Station Work, CC6" proposed on the eastern side where the main station building is to be located. Similarly, no reduction has been made in the excessive temporary construction area proposed on the western side of the railway in Hobson's Park. We object to this.

In response to representations, Network Rail says there is not sufficient land on the eastern side of the railway to increase the size of the eastern building construction compound and provide for the temporary storage of excavated material. It says –

"Land parcels on the Campus on either side of Francis Crick Avenue have been explored for temporary use, but it has not been possible to secure the use of these as temporary construction compounds."

[Network Rail letter 11 January 2021, sixth page]

In other words, there is sufficient land on the eastern side but not the will on Network Rail's part to insist by means of compulsory purchase or otherwise that it should be provided in support of the station's construction by the organizations on the Biomedical Campus. While Network Rail is willing to compulsorily appropriate land from Hobson's Park, which is adversely affected by the proposed station, it is not willing to compulsorily acquire land from organizations on the Campus for whose benefit the station is to be built. We **object** to this and to the de facto statement by Network Rail that Hobson's Park land is of lesser value than land in the Biomedical Campus – and that because it is public open space it is freer for construction use than Campus land notwithstanding the large disbenefit to the public it would entail for a significant period of time. The Park's status in the Local Plan and its value to the local community, should give it much greater protection than Network Rail proposes.

We ask that the temporary land acquisition proposed in Hobson's Park is significantly reduced through a large reduction in the size of the western station building construction compound and in the temporary construction area. This would be consistent with the spirit of the Environmental Statement, reduce the need for the extensive "Area-specific mitigation" envisaged by Network Rail and reduce the extent of trees and shrubs having to be removed, including trees planted by pupils of Fawcett School nine years ago. [Environmental Statement, Landscape & Visual, 13.4 Design & mitigation, pages 13-42 & 13-43]

3. Light pollution and permanent impact on Hobson's Park

The western station building includes a large area of glass frontage which faces out to Hobson's Park, which the Design & Access Statement states is to allow light into the station building. This is true, but the Design & Access Statement fails to point out that at night, when the inside of the station is illuminated the converse will be true – resulting in light pollution and making the upper storeys of the station very visible. The use of glass frontage is therefore at odds with the lighting strategy and the design strategy, which aim to reduce light pollution and integrate the building into the park landscape. Although the landscaping strategy includes some tree planting to

screen the station, this is not provided in front of the station where the light pollution would occur. **We request that a condition is included which requires the design of the glass frontage and the landscaping in front of the station to be revised to better mitigate the permanent negative impact of light pollution and better integrate the station into park when viewed from the park.** Alternatively the area of exchange land should be increased to compensate for the negative impacts.

4. Permanent impact on Hobson's Park and failure to integrate with Hobson's Park

The Design & Access Statement makes numerous claims that the design of the western station will integrate with Hobson's Park. We support the green roofs and the use of natural materials (although in practice it is non-natural materials that dominate, such as the large area of glass) but there are aspects of this scheme that turn its back on the park and are reflective of Network Rail's single focus on providing a station. During the consultation process we highlighted to Network Rail that the western station entrance should be designed to be as much a park building as it is a rail building but this has fallen on deaf ears. Parks around the UK benefit from well designed park buildings that provide facilities for park users, such as toilets, café's, seating, shelter and activity spaces. The station will have a permanent negative impact on Hobson's Park and this harm to the local community should be offset by providing facilities for park users. As an example the seating proposed outside the station is designed to face towards the station rather than towards the park (why would people wish to look at a station rather than a park? How does that benefit park users?). Will the toilet facilities in the station be available for park users? (answer = No). **We request that a condition is included which requires the western station entrance to be redesigned to better serve the needs of park users in order to compensate for the permanent negative impact, and as a minimum this should include visitor access to toilets.**

5. Electricity sub-station and rail systems enclosure

CambridgePPF **objects** to the proposed location of an electricity sub-station and rail systems enclosure/compound in the southern part of Hobson's Park south of Nine Wells Bridge in an unduly visible position when viable alternatives exist. [Design & Access Statement, paragraph 5.1.3 & Figure 5-1, page 31; and Drawing 158454-ARC-00-ZZ-DRG-EEN-000076]

We ask that a condition be included which requires an alternative location for the electricity sub-station and railway systems enclosure. We appreciate the effort Network Rail has made to screen the two rail facilities with landscaping - but this is a strategically important view from Trumpington towards White Hill which forms the first part of the Gog Magog Hills stretching away from Cambridge city edge towards Magog Down, Wandlebury and beyond. A less obtrusive location should be identified to leave this view undisturbed.

6. Maintenance track within the western boundary of Hobson's Park

Network Rail's application claims that there are:

"... dedicated maintenance/emergency vehicle tracks... along the eastern *and western* edges of the (Hobson's) Park. Both tracks are accessed off the public highway from Addenbrooke's Road...The *western maintenance path* heads northwards along Hobson's Brook before turning east and parallel with the Cambridge Guided Busway spur into the Cambridge Biomedical Campus until it reaches the site of the proposed station." (Our emphasis) [Design & Access Statement, pages 9-10, Figures 2-7 & 4-2 on pages 10&25; and Drawing 158454-ARC-ZZ-ZZ-DRG-LEP-000041]

There is not an existing western maintenance/emergency vehicle track within Hobsons Park, nor was one included in any of Network Rail's public consultations. CambridgePPF **objects** to the creation of a western maintenance/emergency vehicle track as an unwarranted intrusion into and loss of Park land. There used to be a temporary construction haul road in this location on the eastern side of Hobson's Brook from Addenbrooke's Road to the old haul / farm bridge across the Brook opposite Pinnington Close and the new Clay Farm Community Garden. But this was removed by Countryside Properties when its construction purpose was complete. It is now awaiting full restoration as Hobson's Park land, and is not available for the purpose Network Rail has in mind. There is also an informal pedestrian path of cut grass from the old haul bridge to the Guided Busway, which is also on the eastern side of Hobson's Brook; and another informal cut grass path from the

Busway entrance to the Park to North Ditch, but these are not maintenance tracks nor should they be. Network Rail has not explained why a western track is thought necessary. **In the first instance we ask for an explanation as to why this is necessary and that other alternatives have been considered. If it is concluded that it is necessary and no other alternatives are possible then we ask that further compensation be made by increasing the size of the “exchange land” and also that a condition is imposed on the specification for the maintenance track, such that it is an unsurfaced track seeded with grass (for example the use of grasscrete or similar).**

7. Compensation for loss of Hobson’s Park land – “Exchange land”

Whilst we have no objection to this proposal, the provision of new parkland next to a road embankment, railway line and electricity sub-station can hardly be described as creating an attractive community asset. Neither is it of a generous size, given the cumulative impacts of the station on the park, including light pollution, noise pollution and loss of amenity.

There are other development schemes proposed for this area, including for a new busway and East-West Rail, all of which will be required to create new areas of habitat and greenspace. These schemes will have a cumulative negative impact but there is an opportunity for them to work together to create a cumulative beneficial impact by combining habitat mitigation schemes to create a new large area of habitat for public benefit - instead of several small ones with little public or ecological benefit, such as the one proposed for this application. This is a missed opportunity and **we would welcome any planning measures that can encourage and enable a collective approach to mitigating harm.**

I trust that you will take our comments into consideration when determining this application and we would welcome the opportunity to engage in a public inquiry.

Yours faithfully



James Littlewood
Chief Executive