Registered Charity Number 204644

Hobson's Conduit Trust

The Guildhall

Cambridge

Please reply to

26, Highfield Avenue

CB4 2AL

7th March 2025

Secretary of State for Transport

Department for Transport

Great Minster House

33 Horseferry Road

London

SW1P 4DR

Attn: Transport Infrastructure Planning Unit

BY EMAIL ONLY: transportinfrastructure@dft.gov.uk

Dear Secretary of State,

Re CAMBRIDGE SOUTH EAST TRANSPORT ORDER

HOBSON'S CONDUIT TRUST OBJECTIONS

I, John Arthur Latham, of 26, Highfield Avenue Cambridge CB4 2AL, am writing as Chairman of Hobson's Conduit Trust to state the Trust's formal objections to the

application for a Transport and Works Act Order to the Department for Transport (DfT) for a new busway to the southeast of Cambridge, as submitted by Cambridgeshire County Council with the Greater Cambridge Partnership on 9th January 2025, the 'Cambridge South East Transport Order', covering a scheme also referred to below as CSET2.

2. The Trustees' Objections are set out in detail below.

3. Instead of the proposed CSET2 scheme the Trustees much prefer the alternative, mainly on-road route proposed by Better Ways for Busways, all of whose objections we support. This alternative route would cause no damage whatsoever to Hobson's Brook or to the character of the highly sensitive area of and around Nine Wells, the principal source of Hobson's Brook. By using the existing A1307 route, building sections of bus lane adjacent to the A1307 and 1 mile of new road (busway) and repurposing existing road lanes, this much cheaper alternative would avoid the unnecessary taking of green belt land in such a vital, sensitive and crucial landscape close the edge of Cambridge. The alternative would involve much less heavy engineering, with much lower embedded carbon. It would be much quicker to build and implement, obviating the need for the Order being sought for CSET2, provides analogous advantages, and would thus offer much faster relief for inbound movement into the Addenbrooke's and Biomedical Campus sites from the south eastern axis.

4. The Trustees therefore contend that the proposed construction of 5 miles of new bus road through open countryside and Cambridge's green belt is unnecessary in order to deliver needed improvements in transport. We contend that similar transport and economic benefits can be achieved by building a version of the much lower cost on-road scheme proposed by the applicant (Greater Cambridge Partnership) in 2018, but since discarded by the applicant in favour of the CSET2

scheme set out in the draft TWAO and related documents. We do not believe that the applicants have demonstrated clearly or convincingly in their application the reasons why they have not pursued the lower cost alternative which was also favoured by respondents to earlier consultations. Nor have they taken into account significant relevant changes including for example the post-pandemic changes in working and traffic patterns, or the forthcoming opening of Cambridge South Station. We note too the anticipated further housing developments on County Council land close to Babraham Road and planned developments associated with Phases 3 and 4 of the Biomedical campus, including the access road.

5. If the alternative scheme were to be pursued instead of the scheme set out in the draft CAMBRIDGE SOUTH EAST TRANSPORT ORDER (CSET2), the damaging impact of CSET2 on Nine Wells and Hobson's Brook would not take place because the alternative route completely avoids Nine Wells and Hobson's Brook. For the Trustees this fact is compelling, and would not give rise to the range of objections from the Trustees that are set out below.

6. The Trustees consider that the proposed construction method for CSET2 places an unexplained and unjustified emphasis on the use of concrete and cement bound aggregate in construction of the busway. As well as adding still further to the high embedded carbon of the CSET2 scheme, the use of such extravagant volumes of concrete and cement bound aggregate in the build-up of the road, as well as concrete for bridge structures, creates serious risk to the riverine and wider environment and has a high toll in embedded carbon. This high carbon toll would take years to mitigate through lower car emissions from any modal shift away from car use that may be generated by CSET2. Such vehicle emissions would in any case be expected to be falling in that period through well understood general measures that are current UK Government policy, and consequent trends in car propulsion systems.

7. Hobson's Brook and Conduit form a unique Chalk Stream and ancient man-made watercourse that rises at Nine Wells, and continues to the River Cam via Vicar's Brook, and then brings water to the centre of Cambridge via Hobson's Conduit.

8. Hobson's Conduit Trust and its predecessors have for nearly four centuries been responsible for the care, maintenance and enhancement of Hobson's Brook and Conduit and the associated historic structures. The Trust is a registered Charity Number 204644.

9**. The CAMBRIDGE SOUTH EAST TRANSPORT ORDER (CSET2) proposals would directly impact Hobson's Brook and Conduit as well as Nine Wells. Our own objections relate specifically to impacts at and around Nine Wells, including the proposed CSET2 bridge over the Brook and the anticipated impacts on hydrogeology of the proposed Bridge and Ecology Pond 3 and Attenuation Pond 1, the proposed Construction Compound 7, the scale and extent of the related proposed Compulsory Purchase and the proposed Protective Provisions for Hobson's Conduit Trust.**

10. **The Trustees do not believe that these and related impacts of the proposed CSET2 scheme can be fully mitigated so as to offer adequate and comprehensive protection for Hobson's Brook and Nine Wells.**

11. However, in our Letter of Objection set out below, where appropriate, we specify mitigations against many of the specific impacts and issues arising to which we object. We wish to clarify at the outset that these mitigations would apply in circumstances where the Secretary of State is minded to grant the CEST2 TWAO. If this were to transpire, then these are the mitigations that we would be seeking during (1) the construction phase and (2) during the operative phase. The proposed mitigations do not detract from the strength of the related Objections made by the Trust.

12. We have provided the applicants with the Tripartite Indenture of 1610 which establishes our 1,000 year tenure of the watercourse and rights over land six feet either side of it, and sets out the related maintenance obligations carried out by Trust with specialised assistance. We are the only local entity with such wide and continuing responsibilities, and we are one of three prominent local charities that are specifically interested in conservation and protection of the landscape to the south of Cambridge.

13. We are solely responsible for ensuring the continuous supply of high quality clean water to the lake in the registered Cambridge University Botanic Garden and the water features in the registered gardens of Emmanuel and Christ's Colleges via Hobson's Conduit.

14. The Brook and Conduit are important habitat for fish, birds, animals, notably Water Voles, and invertebrates along the whole watercourse from Nine Wells to the City Centre. The watercourse is a prized and unique chalk stream environment and is the vital core of a green corridor that is continuous up to Lensfield Road.

15. It is therefore of the highest importance to the Trustees that every possible care is taken to maintain the highest possible quality of water entering the Brook at all times, and to ensure that new developments that contribute surface water and ground water flows to the Brook and its tributaries, notably the North and South Ditches from the Addenbrooke's site and the Cambridge Biomedical Campus, are so arranged that risk of pollution is minimised, and flow rates are kept within the site-wide maxima. These considerations are set out in the enduring legal agreements (Deeds) between the Trust and other parties covering the whole site including surface water drainage from Francis Crick Avenue and all of Phase 2 of the Cambridge Biomedical Campus, both highly relevant for CSET2, as well as covering the whole Clay Farm residential development.

16. In order to protect the springs that feed the watercourse, Nine Wells was purchased jointly by the University and the Borough of Cambridge in 1835 under the Great Shelford Enclosure Act. This shared endeavour at Nine Wells mirrors the original joint venture between the University and the Town that underlay the creation of Hobson's Conduit. The Local Nature Reserve is managed by Cambridge City Council, but as set out above it is clearly axiomatic that the Trust is very specifically and outstandingly concerned with the protection of Nine Wells and its environs.

17. In order to protect the flows to Hobson's Brook from the springheads at Nine Wells, a long-sought augmentation scheme was commissioned by Cambridge Water Company under the auspices of the Environment Agency in 2020. This augmentation scheme involves a pipeline from Cambridge Water's PWS borehole in Babraham, and recognises the fragility of the aquifer and flows of spring water at Nine Wells. The existence of this major environmental protection scheme adds to the importance of avoiding actions in the vicinity of Nine Wells that could damage the hydrogeology around the springs and the Brook. The CSET2 scheme creates various new intrinsic risks to the springs and flow in the Brook which must be avoided, and any related potential risk to continuity of augmentation flow must be avoided.

18. The Trustees are therefore dismayed that the draft Order documents place insufficient weight and emphasis on the protection of Hobson's Brook and Nine Wells and their surrounds, indeed, repeatedly and notably throughout the Environmental Statements the applicants seek to dismiss or downplay these matters and the range of treats to them from the CSET2 scheme. We require that suitable additional analysis and protection work be performed and exhibited by the applicants and additional safeguards are inserted before the TWAO is given any approval.

19. The Trustees work with the Environment Agency among others to protect the Brook and Conduit, but we simply do not accept the various contentions that are made by the

applicants that the Environment Agency will be in a position to provide day-to-day oversight during construction. The Trustees have the required knowledge, experience, focus and the latest technology for real-time and regular monitoring of flow and water quality at key locations at Nine Wells and in Hobson's Brook and its tributaries.

20. We are also highly experienced in reviewing and authorising by way of Deeds of Grant and Licences, construction activities all over the Cambridge Biomedical Campus and Addenbrooke's sites where surface water drainage to the Brook or dewatering features. In essence that involves us in frequent discussions with the developers and managers of every new building and piece of construction on these sites, and with their advisors.

21. The Trustees contend that whilst the Environment Agency's role is widely understood, it does not extend to the type of in-advance or contemporaneous comprehensive critiquing and policing role that the applicants seek to portray in the draft Order's supporting documents, notably the Environmental Statement. This demonstrates either ignorance on the part of the applicants, or a wilful attempt to avoid ongoing scrutiny by seeking to place reliance on an entity that is neither staffed nor resourced to offer such ongoing oversight and acceptance services.

22. No doubt the Environment Agency will need to be asked to consider and in due course to give its permission for the bridge piling and dewatering elements of the proposals. Typically, the Trustees would base our own permissions and licence on any such licence given by the Environment Agency.

23. We consider that the Water Resources Act 1991, Section 24 and the Water Abstraction and Impounding (Exemptions) Regulations 2017, especially Regulation 5 (2), will be relevant in relation to the proposed piling of the proposed bridge over Hobson's Brook, and an Environment Agency licence will be required.

24. We also note that the Environment Agency will be particularly concerned if, as we do, they anticipate, among other things:-

- discharge of silty water containing fine or coarse suspended solids into surface water
- discharge of site drainage from surface areas such as haul roads, storage or working areas
- pollution of surface water
- discharge of water containing any chemical dosing agents, flocculants or coagulants
- discharge from a site which is contaminated by oil, metals, hydrocarbons, solvents or pesticides or other polluting substances
- any flooding from surface water
- erosion of the banks or bed of Hobson's Brook as receiving watercourse
- any discharge of concrete wash water even if it has been treated
- any discharge from a site with naturally elevated concentrations of substances which exceed environmental quality standards

We note, in these regards, inter alia, page 161 of the Environmental Statement.

25. These concerns relate particularly to construction of the proposed bridge over Hobson's Brook, and activities at the proposed nearby Construction Compound 7 and along haul and access roads draining into Hobson's Brook, and are matters that we will be raising with the Environment Agency.

26. As well as being a Local Nature Reserve, and the source of the spring water from the chalk that forms the base flow of the Brook, Nine Wells is a prized and much-loved community asset and haven of tranquillity, not only for residents, but importantly for those who work at Addenbrooke's and on the Biomedical Campus. The presence of

CSET2 with its wholly inadequate mitigation measures will debase the great value and growing importance of Nine Wells to the local community.

27. Hobson's Conduit Trust (HCT) has multiple objections to the CSET2 scheme, as currently set out in the draft Cambridge South East Transport Order and associated documents. As outlined above, these apply to the overall scheme and also specifically to the section from Francis Crick Avenue at the north end to the south end of the triangular field west of Nine Wells Local Nature Reserve (LNR) and Local Geology Site (LGS) and to the proposed busway drainage arrangements south of there, to the south towards Granham's Road with significant drainage flow towards Hobson's Brook.

28. Our Objections are set out below but in summary are:

A. General Objections

1. General objection to the route
2. HCT's Legal Rights regarding drainage are ignored
3. The TWAO and its associated documents seek to extinguish or over-ride the Trust's rights

B. Specific Objections

4. Insufficient weight is given to the historic and ecological importance of the Brook and Nine Wells
5. The proposed Compulsory Purchase land take area outlined in the submitted plans includes Hobson's Brook from Nine Wells to the eastern edge of the railway. This is excessive and is completely unacceptable to HCT.

6. Some aspects of the design of the busway and its immediate surroundings in the specified area would cause significant harm to Nine Wells, the Brook and their immediate surroundings.
7. The TWAO in its present wording, with associated plans and diagrams, fails to acknowledge and provide mitigation measures for the probable significant harm caused to Nine Wells, the Brook and their immediate surroundings in the specified area during both the construction phase and the operational phase.
8. The proposed Protective Provisions provide an inadequate scale of protection for the Brook.

A. GENERAL OBJECTIONS

OBJECTION 1

29. **Hobson's Conduit Trust (HCT) has a general objection to the route of the CSET2 busway where the busway passes close to Nine Wells and over Hobson's Brook, and to related features such as the proposed bridge over the Brook, the embankment, and Construction Compound 7, and the ancillary features related to them.**

30. HCT's objection stems from the proposed route of the busway where it passes close to Nine Wells and Hobson's Conduit, hereafter referred to in that vicinity as Hobson's Brook. This proximity would be seriously damaging to both, and their setting, in many ways (see further Objections). In overall terms it would have a massive adverse impact on the general character of the landscape surrounding Nine Wells and Hobson's Brook, which is currently rural, quiet, open and attractive, with the Biomedical Campus in the distant background to the north and the railway line, with trains passing by, to the west. This last has been a feature of the area for nearly two centuries.

31. To the east of Nine Wells the ground rises in a prominent and important feature, White Hill, which is in agricultural use. This has been found, through aerial photography and field survey, to be the site of a significant prehistoric site and is therefore archaeologically sensitive (Boreham, Boreham and Billington 2018; Boreham, Boreham and Billington 2021).

32. The intrusion into this peaceful, largely rural area of a huge, manmade, industrial structure, much of it raised above ground level (2.4 m height of the underside of the bridge deck above the Brook, plus a similar combined height of the bridge structures above that) with the busway running along a massive new embankment either side topped by crash barriers, involving extensive use of concrete, to take the busway past Nine Wells and over Hobson's Brook. This massive intrusion would completely alter the character of the area.

33. Nine Wells, a Local Nature Reserve and Local Geological Site, would be hemmed in. Hobson's Brook would have to pass under a 14.5 m wide, 15 m long concrete bridge deck which will create a dark, sterile cavern with little sunlight penetrating for most of the day. This will be unattractive to fish and will deter other wildlife movement.

34. The busway would visually and physically dominate this relatively small, at present rural, area. The landscape setting of Nine Wells and Hobson's Brook would undergo immense long-term, irreparable harm. The change in character would lessen the historical and ecological values of Nine Wells and Hobson's Brook as well as diminish their amenity value.

35. At present the surroundings of Hobson's Brook and Nine Wells, and Nine Wells LNR itself, are a much used, much loved peaceful refuge and recreational area for the many

people living locally and employed on the Addenbrooke's and Biomedical Campus sites. The amenity value of the area is high at present. The intrusion of the busway, on its massive embankment, and passing buses, would seriously reduce the area's value and tranquil attractiveness in this respect.

36. We do not accept or agree that the proposed route is the correct response to the ever-increasing needs for access and transport to Addenbrooke's and the Biomedical Campus.

37. We are fully aware of the urgent and growing need for improved and expanded sustainable transport provision, and the Trustees do support more appropriate schemes. Our full support for Cambridge South Station and related infrastructure is a matter of record.

38. As we have stated above, previously and over an extended period, the Trustees would much prefer a route for improved bus services that completely avoids Nine Wells, and the A1307 on-road alternative offers precisely that (Strategies 2 and 3 in Section 4 of the Environmental Statement).

39. It is not evident to us that this much lower cost alternative, both in monetary and environmental terms, requiring far less intrusive heavy engineering and embedded greenhouse gasses, has been properly assessed and weighed against the CSET2 scheme.

40. As the body responsible for an important local watercourse we are naturally also concerned about the River Granta and we deplore the impact that the proposed scheme will have on the Granta valley. This too would be avoided by the lower cost A1307 alternative. We are also acutely aware of the importance and fragility of the

landscape around the Gog Magogs, not only as the catchment for flows at Nine Wells. This would be widely and negatively impacted by the CSET2 scheme.

41. We reiterate the Trustees' concern that the proposed CSET2 scheme will have a permanent irreparable deleterious impact on the setting of the Brook to the east of the railway, and on Nine Wells Local Nature Reserve and Local Geological Site, and on its amenity value and to the Grade II listed monument.

OBJECTION 2

HCT's established legal rights regarding drainage are ignored

42. HCT has an over-arching set of powers covering the whole Addenbrooke's, Cambridge Biomedical Campus (and Clay Farm) sites in relation to surface water drainage, which includes both Francis Crick Avenue and Dame Mary Archer Way, as well as Discovery Drive, and all buildings constructed and to be constructed in the area delineated in the initial such Deeds.

43. All entities seeking new construction in the area covered by the Deeds are required to agree the details of surface water drainage arrangements with HCT and to keep to the limitations set by the over-arching Deeds. Once the Trust is satisfied with such details we may agree a Deed of Grant for an individual construction project. For de-watering during construction we may agree to offer a licence.

44. These legal arrangements include land comprising part of Phase 2 of Cambridge Biomedical Campus near to the Addenbrooke's Road Roundabout through which the

proposed busway passes. Therefore, we require that Cambridgeshire County Council or other Undertaker in due course shall enter into specific drainage arrangements that will also be legally binding on any contractors. Such arrangements will need to be sufficiently robust that they will satisfy the Trustees.

45. The Trustees are perturbed that no mention is made in the TWAO and related documents of such well-understood legal arrangements that are on the Public Register and are consistently and carefully complied with by every developer operating on the sites covered by the Deeds. These are fully understood as is the need for them, and the underlying concepts and restrictions are all fully accepted by all of them and their respective legal advisors.

46. These legal arrangements cannot be unknown to the advisors, solicitors and agents involved in the preparation of the draft TWAO and we see their omission as, at best, a serious oversight.

OBJECTION 3

The TWAO and related documents seek to extinguish or over-ride the Trust's rights

47. Examples are Articles 18, 33, 34 and 35 (2) of the Draft Order and the diagrams showing the Construction Compound 7 adjacent to Nine Wells, but there are many other detailed examples. All and any such concepts are oppressive, inappropriate, unnecessary and completely unacceptable to the Trust.

B. SPECIFIC OBJECTIONS

OBJECTION 4

The TWAO and associated submissions do not give sufficient weight to the historic and ecological importance of Hobson's Brook and Nine Wells

48. The TWAO seriously underplays the importance of Hobson's Brook and Nine Wells in terms of their historic, ecological, hydrological, geological and visual value. These values are high and have been well set out in various documents (Bushell 1938, Whittle 2017) and in Tony Eva's film '*Pure, Clean Water'*, 2023. The serious detrimental effects of the CSET2 scheme on the Brook and Nine Wells are consistently downplayed to levels such as 'negligible' in tables in the Environmental Statement describing the impacts of the CSET2 scheme.

49. We object to such dismissive terminology as 'Negligible' and 'Neutral / Slight adverse Not significant' being used repeatedly in Section 8.5, Impact Assessment, of the Environmental Statement Volume 2 to describe the significance of potential impacts. The 'Residual effects' column sets out in detail a range of deleterious effects, any of which could have major and enduring impacts downstream including on the considerable fish populations, which we can confirm, extend up to Nine Wells through the Brook section impacted by CSET2. Impacts of pollution of the Brook could easily extend to the River Cam via Vicar's Brook which is fed by Hobson's Brook, as well as the lakes and water features in the Cambridge University Botanic Garden, and Emmanuel and Christ's Colleges.

50. At this juncture we would expect to see a less dismissive, and much more meticulous assessment and recognition of detailed identified environmental risks to the

Brook and Nine Wells, and the potential for damage, and site and risk specific, rather than generalised and generic avoidance and mitigation measures, with what amounts to little more than wishful thinking about the effectiveness of proposed precautions and mitigations if the Secretary of State were minded to grant the CSET2 TWAO measures.

51. In the Environmental Statement Volume 2 at page 39 Figure 3.21 the only offered photograph of Nine Wells appears. This appears to the Trustees to have been purposefully and carefully selected for inclusion so that the normally limpid quality of the water issuing from the spring heads is not captured. On the contrary.

52. Since 2017, interrupted by the pandemic, the Trust has undertaken annual Bioblitz (effectively a series of 24 hour location specific) surveys, and other surveys including by use of eDNA. The Bioblitz events involve species experts investigating specific areas along the green corridor centred on the Brook and Conduit from Nine Wells, and taken together these various surveys now cover all but one part of the whole length. Species identified in each Bioblitz have averaged over 200, but in each study location a different mix has emerged. There are therefore species found to be present at Nine Wells, and along the Brook to the east of the railway that have not been identified elsewhere along the Brook. This underlines the quality and diversity of the ecology to be found along the whole length of the Brook, but highlights the unique habitat at and close to Nine Wells. We also commission regular professional Water Vole and other ecological surveys before undertaking maintenance work.

53. The Trustees are also actively involved with A-Level studies at the Cambridge Academy of Science and Technology, with students' field study work focused on the Brook. The Trust is also looking forward to soon commencing sponsorship of a postgraduate student at Anglia Ruskin University whose PhD will focus on managing the Brook for optimised ecological value. It will therefore be obvious that the Brook has recognised value as an educational resource, and for citizen science.

4 (i) Hobson's Brook

54. Throughout the draft TWAO and related documents the great historic importance of Hobson's Brook is underplayed, if not forgotten. It is not referred to as an historic watercourse at any point but is called a ditch or culvert. For instance, in Figure 10 (p.13) Hobson's Brook is referred to as a culvert and ditch. In the Environmental Statement Volume 2 page 154 it is stated that the watercourse [Hobson's Brook] 'is most adequately described as a ditch'. This is gratuitous, inappropriate, and at best misleading.

55. Hobson's Brook, constructed for the most part as an artificial waterway 4.6 km long in the first decade of the 17th century, over 400 years ago, is of immense local, regional and national historical importance. It is a rare and very early example of an artificial watercourse, constructed to bring fresh, clean water into an urban area for public use. In the early 17th century Cambridge was a town of very poor public health, mainly owing to the lack of clean drinking water. The Brook is a very carefully and cleverly engineered construction, with a very small fall of only 2.36 m. in level from its source, Nine Wells, to its overground termination, Hobson's Conduit Head. On the way it supplies water to the lake in the Cambridge University Botanic Garden. From the Conduit Head water from the Brook feeds the two runnels in Trumpington Street (Listed Buildings, Grade II) and flows in underground channels and pipes to several destinations, principally the lakes and water features in the Registered historic gardens of Emmanuel and Christ's Colleges.

56. Hobson's Brook is a chalk stream. Chalk streams are rare and often endangered. There are estimated to be only 200 - 280 in the world, of which 85% are in the UK. Their water is exceptionally pure and they are home to a rich and varied wildlife

57. The TWAO also gives insufficient weight to the high ecological value of Hobson's Brook.

58. There is no acknowledgement of Hobson's Brook as being of high ecological value. The TWAO documents state that the only water courses (within the TWAO corridor) seem to be 'rivers, ditches'. The Brook is not designated in the TWAO and the related documents as a *protected ecological site*. It is the view of HCT that there is sufficient evidence to show that it should be given this high level of protection.

59. The entire length of Hobson's Brook has been found, through various ecological surveys, to be of high ecological value (Boreham 1990, Hobson's Bioblitz at Nine Wells 2017, MKA Ecology water vole surveys for Hobson's Conduit Trust). Water quality and eDNA surveys have shown that the Brook is very biodiverse and therefore of great ecological and biodiversity value. This high value applies to the section of Brook between Nine Wells and the railway line to the west. It is particularly vulnerable to damage through pollution and disturbance.

60. The Trustees are therefore greatly concerned that insufficient care and seriousness of intent has been shown by the applicants in the taking, and ensuring implementation by contractors, of specific and careful measures to safeguard Hobson's Brook. In that regard too, the Protective Provisions are inadequate, and the proposed reliance on the Environment Agency to provide ongoing monitoring of construction methods and activity is wholly inappropriate and glib.

4 (ii) Nine Wells

61. The TWAO also gives insufficient weight to the importance and sensitivity of Nine Wells and downplays the serious detrimental effects that the CSET2 scheme would

have on it. This is evident in the analyses of these effects in the Environmental Statement. Nine Wells is a small area of mixed woodland in which several chalk springs arise. The water from the springs converges at the south end of the area and flows northwards in Hobson's Brook.

62. Nine Wells is designated as a Local Nature Reserve (LNR) for its rich and varied aquatic, terrestrial and avian wildlife. It is also designated as a Local Geological Site (LGS) 'for its unique blend of geology, geomorphology, hydrology, ecology, history and education value' (https://www.cambsgeology.org/local-sites/ninewells). HCT notes that the TWAO mentions the fact that Nine Wells is a LNR several times but only fleetingly mentions its designation as an LGS. This is a serious omission and indicates that insufficient weight is given to these values of Nine Wells.

63. Nine Wells is also of great historical importance in two ways: first, water from its chalk springs is the main source of water for the historic watercourse of Hobson's Brook. Secondly it contains an important monument, in the form of a stone obelisk on a plinth, to the benefactors who gave money for the construction of Hobson's Conduit. This obelisk was erected in 1861, by public subscription, and is protected as a Listed Building, Grade II. It was sited so as to be seen from trains on the adjacent railway.

64. Although the TWAO documents mention the Listed monument, no reference is made to the fact that the Nine Wells springs supply the water to the historic Hobson's Conduit, and the fact that the two are inextricably linked.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

65. The TWAO and its associated documents must recognise the high historical and ecological importance of Hobson's Brook and the ecological, geological and historical value of Nine Wells. These aspects of Nine Wells and Hobson's Brook should be given far more weight in the Environmental Statement and elsewhere.

66. Nine Wells, Hobson's Brook and their immediate surroundings should be removed from the Granta Valley LCA and be given a separate LCA, with a 'high sensitivity' value. See paragraph 109 below.

67. Stronger measures should be included to protect the area from harm during both the construction phase and the operational phase, including by widening and strengthening the Protective Provisions.

68. Terminology throughout the TWAO should be changed to recognise the Brook's significance. 'Ditch' and 'Culvert' should be changed to 'Brook', 'historic watercourse' and so on.

69. At no point in the TWAO is the South Ditch, an important feeder ditch which drains water from the Biomedical Campus into Hobson's Brook, named or given proper consideration. In the Environmental Statement, p. 39, Section 3.1.9 states that the Site crosses a Drainage Ditch. This is the South Ditch and should be referred to throughout as such.

70. Hobson's Brook, Nine Wells and their immediate surroundings should be designated as a *protected ecological site*, or sites, in the TWAO and related documents.

71. The surroundings should include the field to the north of both, to be used as a temporary construction site compound, Construction Compound 7, which has been shown through survey work (Meed 2022) to be rich in wildlife, particularly bird life. They should also include the triangular field to the west, south of the compound, where two ponds are proposed (Ecology Pond 3 and Attenuation Pond 1). They should also include the small area at the north end of the compound where two ponds (Ecology Ponds 1 and 2) are proposed. They should also include the South Ditch, an important feeder to Hobson's Brook, which runs south-westwards and then south from the Biomedical Campus to join Hobson's Brook just east of the railway.

OBJECTION 5

As delineated on Sheet 2 of the Works and Land Plan and elsewhere, the proposed land take area outlined in the plans includes Hobson's Brook from Nine Wells to the eastern edge of the railway. This is completely unacceptable to HCT.

72. HCT is the owner and custodian of the whole of Hobson's Brook, with rights and obligations attaching to six feet on either side of the Brook, from its source at Nine Wells to its overland termination at Hobson's Conduit Head, in the centre of Cambridge, a distance of about 4.6 km, and from there the listed Runnels and the underground pipes and culverts. The Trust must keep the Brook and its banks (6 ft on either side) in good condition and provide a constant supply of clean, fresh water to various users in Cambridge. The principal relevant ownership rights, and the related obligations, relied upon and discharged by the Trust, are set out in a Tripartite Indenture of 1610. The Trust has existed since 1868, the trustees previously being known as the Feoffees.

73. In order for HCT to fulfil its obligations in respect of the Brook it needs to have control over and access to the Brook and Conduit's whole length. The Trust's primary obligation is to maintain a continuous supply of clean water along the Brook. This requires regular maintenance in the form of desilting, vegetation clearance and repair of leaks and other defects where necessary. Were a section of the Brook to be taken out of HCT's ownership we would no longer be able to fulfil these obligations. Maintenance of this section of the Brook and its flanking banks would become impossible. It is therefore totally unacceptable for ownership of the section of the Brook adjacent to the proposed busway to be taken out of our hands. HCT sees no reason why Cambridgeshire County Council or other undertaker would want to own this stretch of Brook and we object in the strongest terms to this.

74. Equally, the Greater Cambridge Partnership has never shown us any justification for seeking ownership of this section of Hobson's Brook.

75. HCT therefore demands that the temporary Land Take boundary be moved north westwards away from the Brook, and that the permanent Land Take boundary on the south western bank of the Brook as shown in the TWAO draft documents be pushed back south-westwards from Hobson's Brook by at least 5m. This would ensure the continuity of HCT ownership and access the need for which is set out in paragraph 73 and would give HCT room for necessary maintenance, water monitoring and the maintenance of a wildlife corridor in and beside the Brook. This is especially important in view of the proposed enclosure of the triangular field with new fencing to which we also object (see paragraph 76).

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

76. Both the temporary and permanent land take boundaries must be moved away from the Brook to preserve the Trustees' access rights under the 1610 Tripartrite Indenture. The fencing proposed around the triangular field should be moved closer to the foot of the proposed embankment, aligned instead with the busway, with a gate access from the track from Granham's Road for pond maintenance during the operational phase. This would be consistent with the Trustees' long-held vision for expanding Nine Wells, and would benefit public access to the additional triangular open area currently shown to include Ecology Pond 3 and Attenuation Pond 1, which would otherwise be denied by the proposed fence.

OBJECTION 6

Various aspects of the design of the busway and its immediate surroundings in the specified area would cause significant harm to Nine Wells, the Brook and their immediate surroundings.

77. It is the view of HCT that various aspects of the design of the busway and its ancillary features should be altered in order to reduce harmful impacts on Nine Wells, the Brook and their immediate surroundings. These harmful effects would be on drainage, ecology and landscape.

6 (i) Drainage and pollution

78. It is acknowledged in the documents, e.g. at 10.1.1 p140 of the Environmental Statement, that once the busway is operational there would be increased surface water runoff which could include pollutants from buses. This is of serious concern to HCT. Polluted runoff from the busway surface not captured by built-in drains, traps and other pollution control measures, or via any infiltration from swales, would be included in flows that would then pass into attenuation ponds, and would then drain into Hobson's Brook, the South Ditch and the feeder ditch along the west side of Francis Crick Avenue. This polluted runoff would have serious adverse consequences for the ecological health of the Brook and ditches, and potentially also for the important downstream water features (e.g.in the Cambridge University Botanic Garden and Emmanuel College) that are reliant on the Brook's high quality water.

79. It is the view of HCT that drainage design in the vicinity of Hobson's Brook and the tributary ditches as presently shown in the draft TWAO documents is inadequate to capture and polish all potential surface water run-off . Pollution of Hobson's Brook and its banks from salt that is currently expected to be used in de-icing of the busway track is also of concern. Use of salt for de-icing would harm the biological environment of the Brook and its banks.

80. The swale along the west side of Francis Crick Avenue, which runs into the attenuation pond at its south end, drains surface and ground water from adjacent areas and buildings eventually, after passing through the attenuation ponds, into Hobson's Brook. On p. 21 of the TWAO Planning Statement, section 3.16, it is stated that the existing drainage features (i.e. the infiltrating swales) along Francis Crick Avenue will need to be locally altered due to changes to the busway layout although existing swales will be retained. There are no details in the TWAO as to how these carefully designed and structured drainage arrangements will be altered, either in route or form.

81. As stated above, we have established legal rights in this regard and we expect these to be respected.

82. The construction of the busway bridge over Hobson's Brook has the potential to cause serious harm to the purity of water in the Brook. Construction works would include large amounts of concrete and significant piling close to the Brook and could damage flow. Spill of concrete into the Brook would cause serious harm to its wildlife and purity. Piling has the potential to disrupt flow, and to damage and pollute the aquifer. By disturbing the watercourse and underlying and adjacent areas piling activity could drain down the Brook and Conduit, with disastrous consequences. See also paragraph 102 below.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

83. In order to prevent pollution of Nine Wells and the Brook, the capacity and detailed arrangements for drainage infrastructure built into the busway in the vicinity of Nine Wells and Hobson's Brook should be increased and modified to a sufficient level to be able to cope with predicted flows during maximum periods of run-off, keeping these within the agreed site-wide maximum of 2 litres/sec/ha, and to ensure that to the best extent achievable pollutants in run-off are trapped before they can enter the watercourse

84. Salt should not be used in de-icing the busway and the Multi User Path and we object to this. There are alternatives which are much less harmful to the environment.

85. We require to see only de-icing compounds with less noxious effects on fish than rock salt, white salt and brine employed along at least the relevant parts of the Busway, and we look for specific undertakings in this regard. For example Sodium or Potassium Formate-based proprietary de-icing compounds would be acceptable to the Trustees.

86. Construction of the bridge should require specific working methods that will remove the possibility of contamination of the Brook by concrete spillage and of the aquifer by piling, and appropriate method statements shall be agreed with the Trustees and our advisors.

87. The adoption of a smaller, lighter more elegant bridge structure design using materials other than concrete, and splitting the multi-user path bridge from the busway bridge, for which we have been asking consistently, would facilitate much less intrusive foundation work close to the Brook and Nine Wells.

88. The drainage ditch along the west side of Francis Crick Avenue should not be obstructed in any way and HCT wish to be advised in advance of any proposed altered course and any changes to infiltration arrangements, details not at present shown in the TWAO documents. The Trustees and our advisors will wish to have prior knowledge and oversight of the detailed proposals for any modifications before they are implemented, which we gather may be in advance of and any Public Inquiry or the TWAO taking effect.

6 (ii) Ecology Pond 3, Attenuation Pond 1 and Ecology Ponds 1 and 2

89. The excavations of Ecology Pond 3 and Attenuation Pond 1 in their present locations as shown in the TWAO could have a serious adverse impact on flow from Nine Wells springs into Hobson's Brook. It is known that some of the present flow also issues through the southern bank of Hobson's Brook via the field in which these two proposed ponds are located. Any excavation close to either Nine Wells enclosure or Hobson's Brook could disrupt the flow of spring water into the Brook.

90. It is abundantly clear to the Trustees that insufficient research has taken place, both in relation to proposed piling for the bridge structure, and in relation to Ecology Pond 3 and Attenuation Pond 1. It is not adequate or acceptable for the applicants to offer a generalised cross section 'sketch' which purports to show that the hydrology of the spring heads will not be impacted.

91. We have compelling evidence that spring water is prone to flow through fissures out of the southern bank of the Brook near the exit channel from Nine Wells, bypassing the springheads and emerging through the south bank of the Brook very close to the proposed location for Ecology Pond 3.

92. We have also previously pointed out specifically that when a CSET2 test excavation trench was dug earlier at the site of Ecology Pond 3, it filled up rapidly with water, and this was clearly not rainwater. We therefore require that Ecology Pond 3 be moved away from Nine Wells and the Brook, and that Attenuation Pond 1 be moved and so designed and arranged that excavation for its creation is minimised.

93. Ecology Ponds 1 and 2, as shown in the TWAO, are in the wrong location and are too small to be helpful. They would not intercept urban runoff from the Biomedical Campus or the South Drain and do not have the scale or capacity to attract an optimally wide range of wildlife.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

94. Ecology Pond 3 should be moved further away from Hobson's Brook, possibly out of the field in which it is currently proposed.

95 . Attenuation Pond 1 should also be moved away from the south-west corner of the Nine Wells enclosure, possibly further south.

96. Ecology Ponds 1 and 2 should be much larger attenuation ponds, located so as to intercept urban run-off from the Biomedical Campus South Drain and other inputs including busway drainage. Sufficient space exists for this to the west of the busway and east of the railway, to the south of Addenbrooke's Road where the current triangular Network Rail/J Murphy & Sons Ltd CSIE compound is situated.

Summary

97. HCT does not accept that the pollution control and mitigation measures proposed for the construction phase or the operational phase are sufficient or rigorous enough. The Trust rejects the proposals and indications in the documents, notably the Environmental Statement, that the Environment Agency will be able to act in an ongoing, real-time policing role in these regards.

98. We acknowledge that any significant pollution incident could be reported by us or Cambridge City Council to the Environment Agency, but this would inevitably be retrospective. By the time action were to be taken damage to the precious ecology of the Brook, including precious and highly publicly visible water features downstream, would be significantly and potentially irreparably harmed.

99. The Trust is therefore unwilling to accept the attempts at offering such assurances as are set out in the TWAO and associated documents. Mitigation and avoidance measures set out in this letter should be put in place to prevent unacceptable damage.

6 (iii) Harm to Ecology

100. While the TWAO has included a number of measures that are aimed at safeguarding and enhancing the high ecological value of Nine Wells, and Hobson's Brook and their immediate surroundings, HCT is of the opinion that some aspects of the design of the busway and its ancillary features would cause serious ecological harm.

101. The main source of potential ecological harm, pollution, has been dealt with in Section 6 (i) of this Objection (Drainage and pollution) above, from paragraph 78.

102. A second source would be potential physical damage to the channel of Hobson's Brook and the impacts on flow and water quality, if, for example, the piling of the bridge were to impact flows from the springs or in the Brook, or still worse, drain down the Brook. Severe ecological damage would occur downstream along the whole length of the Brook and Conduit and the recipient water bodies. Any pollution incident, including spills of concrete, cement or chemicals, and/or turbidity would have dire and highly publicly visible ecological effects, these could include impacts on the River Cam as it flows through Central Cambridge.

103. As shown in Figure 10, p.13 of the Design and Access Statement,[and at] a number ancillary features of the busway would be close enough to cause this harm.

104. The close proximity of Ecology Pond 3 to Nine Wells and the Brook, as shown on Figure 10, as stated above has the potential to abstract and divert flow from the springheads at Nine Wells, and to cause physical harm to the Brook's channel and its south-west margin. See paragraph 89.

105. The extreme width (14.5m) and length (15 m) of the proposed bridge deck over Hobson's Brook is of concern in relation to the ecology of the Brook underneath the

bridge. This will create a dark, tunnel-like environment in which the wildlife of the Brook and its banks would be unlikely to thrive.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

106. HCT requires that careful and thorough research be undertaken to ascertain the effects of the proposed bridge on the ecology of Hobson's Brook, its margins and the airspace above it. Were the results to show that the effect would be harmful, HCT would wish to see a redesign of the bridge, ideally splitting it into two bridges each of smaller width (for the busway and the multi-user path separately), to reduce or eliminate the harm.

107. The extensive scale of the concrete deck of the current bridge design creates an industrial structure out of scale and out of keeping with the surrounding environment. We have stated repeatedly that we would much prefer to see a more elegant bridge structure, ideally with two smaller bridges, with a gap between them, and the multi user path on a much smaller separate structure. The scale of the deck is made even wider by the inclusion of both the multi-user path and the two metre concrete 'safety verge' plus steel safety barrier along the 'verge'. This addition is an example of over-engineering and is wholly unnecessary across the bridge, making the already colossal bridge deck even more so. Part of the 5 metre bearing maintenance access space that is understood to be required between two bridges instead of one would be provided by the eliminated 2 metre verge.

108. With East West Rail now having chosen to place its proposed additional two tracks to the west of the West Anglia Main Line, we believe that there is sufficient space to the east of the railway for the multi-user path to cross the Brook on a smaller separate bridge structure from the Busway, ideally one that is more elegant and similar to the existing wooden DNA path bridge over the Brook. We can see no good reason why the

multi-user path needs to be incorporated in the Busway Bridge over Hobson's Brook. If this separation were implemented the width of the concrete bridge deck would be reduced by at least 5 metres which would benefit ecology as well as landscape, as would the clear gap between the two bridges, bringing in light and air to the Brook. These measures could we believe be implemented well within the proposed line of deviation.

6 (iv) Landscape

109. The overall harm to the landscape surrounding Nine Wells and Hobson's Brook has been set out above. However, there are two further specific objections that HCT wishes to make:

(a) The LVIA (Landscape and Visual Impact Assessment) makes sweeping generalisations about the character of the landscape through which the busway would run.

The Landscape Character Area (LCA) within which Nine Wells and Hobson's Brook and their setting have been placed in the TWAO documents is 'Granta Valley' in the LVIA. This is a very disparate area of low-lying ground, not all of which is in the Granta Valley. The Granta Valley LCA is given a value of 'medium sensitivity'. First, Nine Wells and Hobson's Brook are not in the Granta Valley. Secondly, on all counts, including landscape value, we contend that they should be classed in the 'high sensitivity' category. The LCA value given to them is therefore not accurate and downgrades their evident sensitivity.

(b) The elevated embankment on which the busway will run for most of the stretch adjacent to Nine Wells and Hobson's Brook is visually alien to the whole Nine Wells and Hobson's Brook area, which is flat. The embankment would be topped

with galvanised steel crash barriers both sides of the busway, and a steel fencing safety barrier along the concrete 2 metre safety verge across the bridge deck. Mitigation planting of screening trees on and around the busway's embankments has been proposed, together with a new hedgerow to be planted along the top of the embankments on the eastern side, visible from Nine Wells (VP 6). However, on at 11.8.3 (p 228) of the Environmental Statement the applicants seek to convey that the landscape impact at Nine Wells will no longer be moderate adverse and significant. We object to this assessment and its implications.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

110. We reiterate that we believe that the visually intrusive crash barriers on the eastern side of the embankment closest to and most visible from Nine Wells should be of a more sympathetic, natural-looking material than standard Armco, ideally wood-clad barriers of appropriate strength, as used in other sensitive locations in the UK and Europe. On the western side of the embankment, notwithstanding our concerns about excessive use of concrete in construction, we would prefer a concrete crash barrier to be used rather than galvanised steel for the taller west side crash barrier required to protect the railway as we judge that this would have a lesser visual impact from Nine Wells, and would look similar to the parapets of the Addenbrooke's Road bridge over the railway, the related receptor being VP 6

OBJECTION 7

The TWAO and related documents and diagrams, fail to acknowledge and provide mitigation measures for the probable significant harm caused to Nine Wells, the Brook and their immediate surroundings in the specified area during the construction phase.

Note

111. **Since publication of the draft Order and related documents, there has been a suggestion, made by GCP, that Works Compound 7, in the field to the north of Nine Wells, might be moved to a smaller area in the same field, away from Nine Wells and Hobson's Brook.** This would make use of and cover the present Cambridge South (Network Rail/CSIE/J Murphy & Sons Ltd) triangular works compound and possibly a small part of the field to its south-east.

112. Were this possible move to take place, with the size of the Compound significantly reduced and moved away from Nine Wells and the Brook, that part of our objections to the proposed Construction Compound 7, set out below, specifically related to its excessive size and proximity to Nine Wells and Hobson's Brook of Construction Compound 7 would be removed, but only in these regards.

113. Until we have greater certainty about this possible reshaping of Construction Compound 7, and the concomitant shrinkage of the perimeter proposed for the related Compulsory Purchase, the Trustees maintain the following Objection to the scale and range of possible uses of Construction Compound 7.

114. The construction phase of the development has the potential to cause serious harm to the ecological health of both Nine Wells and Hobson's Brook. HCT wishes to see more in-depth analysis of these risks and stronger mitigation measures to counter them, including expansion of the 'regulated zone' under the Protective Provisions (see Objection 8 below)

7 (i) Construction Compound 7 is too large and too close to Nine Wells and Hobson's Brook, with the potential to cause major environmental damage

115. In the Environmental Statement Volume 1 p. 18, Section 4, 'Significant environmental effects during operational phase', and at equally relevant points elsewhere in the Environmental Statement Volume 2, there is no mention of Nine Wells or Hobson's Brook. This is a serious omission that downplays their importance. This should be rectified.

(a) The proposed Construction site Compound 7 comes damagingly close to Nine Wells and Hobson's Brook.

(b) The Compound is drawn in Figure 10, p.13 of the Design and Access Statement and on other plans such as the Proposed Site Plans, to include the Brook and both its banks on its south-west boundary. This is unacceptable to the Trustees, and could lead to serious harm both to the Brook's structure and to its ecology, through pollution from operations, vehicles operating within the compound and along the haul roads, and run-off into the Brook causing destruction of wildlife habitat. Although the compound would be temporary the damage thus caused is likely to be more long-lasting, possibly permanent.

(c) Compound 7 is also delineated as running right up to the boundary of Nine Wells. A ditch runs along this boundary, with water from it feeding into Hobson's Brook. Run-off from the Compound could enter this ditch and therefore Hobson's Brook. If this contains contaminants the result would be serious harm to the purity and wildlife of the Brook. This too is unacceptable to the Trustees.

116. We have found no explanation of, description of or rationale behind a 'temporary structure' over the south end of Hobson's Brook marked on the plans where the spring

water emerges from Nine Wells. This would have the potential to cause structural harm to the Brook. Pollution of the spring water in the Brook would occur should the 'structure' be used for vehicular access.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

117. The boundary of Construction Compound 7 should be moved well away from the Brook and Nine Wells, leaving room for a wildlife corridor and access to Nine Wells, as well as the Trustees' required maintenance access. Continuous bunds should be constructed along the perimeter of the compound to prevent runoff from the compound and haul roads reaching the Brook and Nine Wells.

118. The applicants must explain the need, nature and use of the 'temporary structure' crossing the Brook. These are at present lacking.

7 (ii) Construction Compound 7 threatens the ditch along the north west side of Nine Wells which then joins Hobson's Brook at the outflow channel from Nine Wells

119. The proposed compound boundary on the south-east side runs alongside the ditch along the north-west side of the Nine Wells LNR and LGS. When it is present water from this ditch runs into Hobson's Brook at its south end. The same objections concerning the potential for damage to the structure of the ditch, pollution and destruction of wildlife habitat apply here. In addition, the boundary of the compound appears to include the north-west edge of the LNR and LGS. The probability of damage to a protected wildlife site (LNR) and geological site (LGS) therefore arises.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

120. The boundary of the compound should be moved away from this ditch, in the same way and for the same reasons as (1) and (2) above. A continuous protective bund should be constructed all the way along both banks of the Brook and along the ditch on the north western edge of Nine Wells to prevent polluted run-off into the ditch.

7 (iii) Surface water run-off from the Compound threatens the Brook, including via the South Ditch. The South Ditch is an increasingly important tributary of Hobson's Brook, and is also threatened by run-off from Construction Compound 7 and vehicle movements along the proposed haul/access road from Addenbrooke's Road roundabout. Too little detail is offered about culverting and the treatment of the relevant section of the South Ditch

121. More clarity is needed over the drainage of the area on the north side of the compound and how its creation and use will affect this drainage. We anticipate that without appropriate measures this will be to the detriment of water quality in the South Ditch and consequently in Hobson's Brook.

122. Most importantly it is not clear how the South Ditch will be treated and safeguarded during construction. This is a drainage ditch that feeds water from the Biomedical Campus to the north of the Compound into Hobson's Brook. Running north-east to south-west and then north to south, it meets the Brook just east of the railway line. This is an increasingly important feeder of surface water into the Brook in this area, including from new buildings constructed on Phase 2 of the Biomedical Campus.

123. We note that it is proposed to culvert the South Ditch where the Busway would pass over it. We require a much clearer understanding of what these arrangements are, and how they will relate to other drainage flows in this vicinity, and the proposed working method for construction of the culvert for the South Ditch.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

124. The South Ditch carries important surface water flows from new construction, e.g. new buildings under construction and planned along Discovery Drive (CBC Phase 2). We require to understand what measures will be taken to ensure that flows along the South Ditch will be safeguarded.

125. Measures should be included in the TWAO to protect the South Ditch and the quality of the water running in it from harm due to the proximity of the works compound. This harm could be in terms of pollution, structural damage to the ditch and loss of wildlife habitat. We will wish to be satisfied with pollution control measures for any run-off into the South Ditch during both the construction and operational phases.

126. We expect to see the boundaries of the haul/access roads and the northern side of Construction Compound 7 fully bunded. We require to know that the South Ditch will be fully protected from run-off and that inappropriate activities will not be allowed to take place in proximity to the South Ditch during the construction phase.

7 (iv) No refuelling of vehicles will be acceptable

127. The Trustees object strenuously to any refuelling of construction vehicles taking place either in the Construction Compound 7 area as set out in the TWAO documents, or on the haul or access roads, or indeed in the possible smaller Construction Compound to be taken over from Network Rail and J Murphy & Sons Ltd, if this transpires.

128. We also note that this smaller compound has hitherto only been used for storage of dry materials for the Cambridge South Station project. The Trustees wish to ensure that only dry materials will be stored and handled at this site under the CSET2 project.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

129. A ban on any operations within the compound that could threaten to pollute the Brook and its feeder ditches.

130. Those possible activities included in the TWAO's related documents such as the Environmental Statement include concrete handling, storage of chemicals and fuels and washing of vehicle wheels. Run-off from operations such as these would have a detrimental effect on water quality and wildlife in the Brook and its feeder ditches, and should be prohibited.

131. Operating procedures to be agreed with contractors must ban refuelling of vehicles at the Construction Compound. Measures to be included in the TWAO to reduce or eliminate these harmful effects should restrict storage exclusively to dry materials; the banning of wheel washing and its removal to alternative construction

compounds or locations away from Hobson's Brook. No vehicle refuelling to be permitted.

7 (v) Use of artificial lighting must be minimised, and location and design of lighting agreed with the Trustees

132. Artificial lighting within the compound would have a harmful effect on wildlife, particularly that of birds. The applicants have indicated that some construction activity would be intended to take place after sunset.

Proposed mitigation if Secretary of State were to grant the CSET2 TWAO

133. Use of artificial lighting must be minimised, and the lighting arrangements so designed that leakage of artificial light towards Nine Wells is avoided. Artificial lighting close to Nine Wells LNR is unacceptable. Artificial lighting must be switched off when the construction compound is not in use.

7 (vi) Proposed use of Bailey Bridges requires limitation. Full bridge decks are required.

134. Proposed haul roads and bailey bridges in the vicinity of Hobson's Brook and Nine Wells have the potential to cause polluting run-off from them into the Brook and its feeder ditches. The Trustees are concerned that excessive use will be made of the haul road route to and from the major Granham's Road compound to the compound

adjacent to Nine Wells, with excessive crossing of the Brook by construction vehicles, each vehicle crossing bringing a risk of run-off, debris and pollution.

Proposed mitigation if the Secretary of State were to grant the CSET2 TWAO

135. Haul roads should be kept as far as possible away from Hobson's Brook and its feeder ditches and be fully bunded on both sides. Bailey Bridges over the Brook will only be acceptable if constructed with sealed full decks and no gaps. This measure is intended to minimize run-off and pollution of the Brook, and as much as possible to avoid mud and other debris falling into the Brook from vehicles passing over the temporary bridges. Construction traffic patterns and flows should be set up to minimise the need for vehicles to cross the Brook

OBJECTION 8.

The proposed Protective Provisions provide an inadequate scale of protection for the Brook.

136. The Trustees welcome and are grateful for the inclusion of Protective Provisions for the Trust in the draft TWAO.

137. However, as we have stated repeatedly, we do not accept that a 'regulated zone' extending 5 metres either side of the Brook is adequate.

138. We note that Network Rail willingly offered the Trust 16 metres either side in the Cambridge South Infrastructure Enhancements (CSIE) TWAO Protective Provisions, and

we are not aware of any impediment, delay or hindrance that this has caused to the good progress of that project. We have continued a consistently productive dialogue with both Network Rail and their main Contractor J Murphy& Sons Ltd, and agreement has quickly been reached on all matters.

139. As outlined above, the Trustees are alarmed by the likely impacts of piling for and construction of the bridge over the Brook, and it is obvious that restricting the regulated zone to 5 metres either side is simply a ploy by the applicants to avoid the Trust being in a position reasonably to intervene in the process of bridge construction, including in relation to piling.

140. This restriction in the Protective Provisions to 5 metres around Hobson's Brook is therefore unacceptable to the Trust. We object to it, and we require 16 metres, consistent with the high standard of protection set by Network Rail and the Secretary of State in the CSIE TWAO.

Yours sincerely

J. A. Latham.

John A Latham

Chairman

Hobson's Conduit Trust

References

Publications:

Boreham, S., 1990. ‘Hobson’s Bioblitz at Ninewells 2017’.

Boreham, S., 2022. ‘Hobson’s Brook: a Cambridge Chalk Stream’, in Hill, M., *ed., The Nature of Cambridge* (Pisces Publications).

Boreham, S., Boreham, J., and Billington, L., 2018. ‘A flint scatter at Nine Wells, Great Shelford’. *Proceedings of the Cambridge Antiquarian Society.*

Boreham, S., Boreham, J., and Billington, L., 2021. ‘The Nine Wells ring-ditch, Great Shelford, Cambridgeshire’, *Proceedings of the Cambridge Antiquarian Society.*

Bushell, W.D., 1938. *Hobson’s Conduit*, Cambridge University Press

Meed, J., 2022, *A Haven for farmland birds* (Independent Publishing Network).

Whittle, E.H., 2017. ‘Ornamental and utilitarian water features and their water supply in Cambridge at the beginning of the seventeenth century’, in *Garden History* 45.1, pp. 21-44.

Film:

Eva A. ‘Pure Clean Water’, 2023