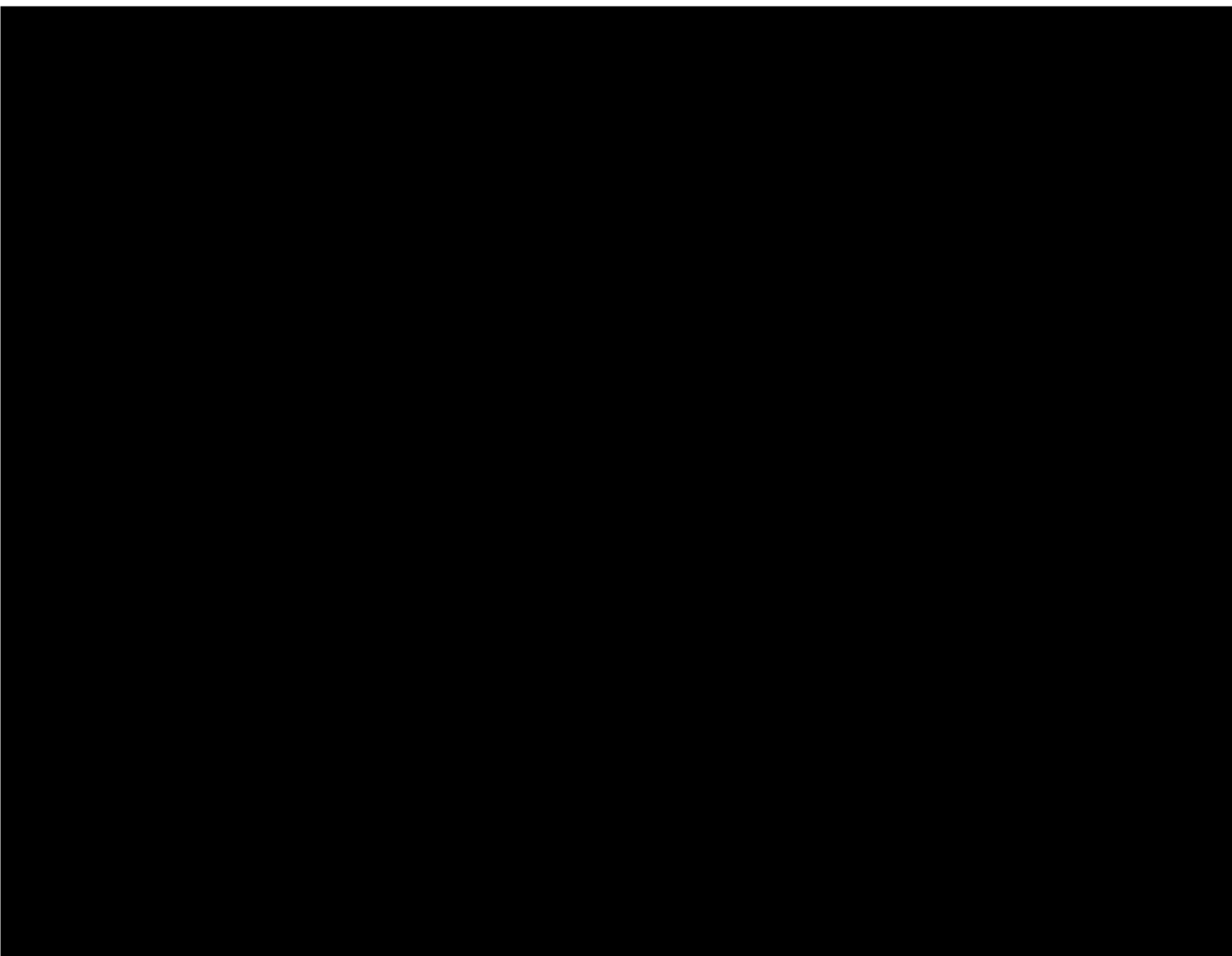


Clare Hall (OBJ213) Costs Application (Appendices)

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From: Peter Blake <Peter.Blake@cambridgeshire.gov.uk>

Date: Friday, 14 February 2025 at 14:24

To: Alan Short <cas64@cam.ac.uk>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>

Subject: Clare Hall - Cambourne to Cambridge scheme

Good afternoon, Professor Short,

I hope this finds you well.

I write further to Clare Hall's recent submission to the Department for Transport (DfT) regarding the Cambourne to Cambridge busway scheme (CtoC).

The Objection to the CtoC scheme submitted on your behalf by Dentons states that Clare Hall believes that, based on detailed flood modelling and mitigation reporting commissioned by the College, there is significant increased flood risk associated with the Scheme and that these risks have been inadequately assessed as part of the proposed route.

We would be pleased to ask our consultants to engage with your advisors to understand these concerns in more detail.

In order to try to address the matter could you please provide the flood modelling and mitigation report referred to and a contact point to take this forward.

Kindest regards

Peter

Peter Blake
(Interim) Director of the Greater Cambridge Partnership

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Horner, Thomas

From: Horner, Thomas
Sent: 17 February 2025 15:08
To: Peter.Blake@cambridgeshire.gov.uk
Cc: Vas, Michele; JoM.Baker@cambridgeshire.gov.uk; Alan Short
Subject: RE: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]
Attachments: HM_VL_P24-3220_05TN - C2C Busway FRA Review TN(1.0)(1020123526.1).pdf

Dear Peter,

I hope you're well.

By way of introduction, I am an Associate in the Planning team at Dentons. Michele Vas (copied) and I are instructed by Clare Hall in relation to its objection to the Cambourne to Cambridge TWAO application.

We write in response to your email to Alan Short below, in which you request copies of the flood mitigation and modelling reports that have been commissioned by the college.

We do not believe that it would be appropriate to share the documents at this time, further information is required (not readily identifiable from the TWAO supporting documents) in order for my client's consultant to finalise the model.

Accordingly, please find attached an itemised list of queries and questions posed by Clare Hall's flood consultants, Create – the answers to which will allow Clare Hall to formulate its Statement of Case in a meaningful way and allow us to properly assist the appointed inspector.

Please provide a response to all of the points raised in the document within 10 days.

Once we have been provided with the requested information, our client will be in a better position to engage proactively on the issues raised in its objection and welcome any information that can be provided by the Applicant.

Kind regards,

Tom

Thomas Horner

Associate

 +44 20 7246 7193 |  +44 7778 337378

London

From: Peter Blake <Peter.Blake@cambridgeshire.gov.uk>

Date: Friday, 14 February 2025 at 14:24

To: Alan Short <cas64@cam.ac.uk>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>

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Peter

Peter Blake
(Interim) Director of the Greater Cambridge Partnership

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The logo consists of a solid red square with the word "create" in white, lowercase, sans-serif font centered within it.

QUERIES OF THE APPLICANT

Date: 17/02/2025

File Ref: HM/VL/P24-3220/05TN

Subject: P24-3220 – Clare Hall – C2C Busway FRA Review

1.0 INTRODUCTION

- 1.1 Please see below the results of the review of the Busway Flood Risk Assessment. This is an itemised list of information requests regarding items that we would expect to see in an FRA, any irregularities that require explanation and any results or areas that we believe have not been adequately explained.
- 1.2 The document reviewed is the Greater Cambridge Partnership, Flood Risk Assessment by WSP. Appendix TR13.1. Published October 2024 [CToC-11-TR13-00].

2.0 ITEMISED RESPONSES – FLOOD RISK ASSESSMENT

- 2.1 Section 1.3.1 – The report states that consultation was undertaken via emails, this indicates that the EA were not fully engaged. On a typical project the EA will be directly engaged to discuss the proposals and air any potential stumbling blocks early. Can the full liaisons held with the EA be shared, alongside their formal review and model approval? This normally takes the form of a 'RAG' spreadsheet and we would expect to see this fully worked through.
- 2.2 Section 4.2.5 – Can the exact model used as a baseline be confirmed and named.
- 2.3 Section 5.2.4 – Can the plate TR13.1-5-1 be zoomed out to show further into the estate upstream to understand change of extent there.
- 2.4 Section 5.2.5 – The change in depth shown on the associated figure is showing impoundment

upstream of the embankment, indicating that impoundment is occurring. This warrants further, more detailed investigation. Can the same results at a 1mm scale be provided. Furthermore, can the impact on water levels within the channel through the site, downstream and upstream of the site be provided to show the extent of the impoundment. A long section would work well here to give an indication of how far the impoundment backs up and what impacts there are downstream.

- 2.5 Section 5.2.5 – The associated impact grid image only shows an impact above 10mm along a short reach of the model. This suggests some instability as the top end and lower end of the impacted areas are unnaturally straight lines. Can this be described or addressed further.
- 2.6 Section 5.6.1 – The associated image shows the 1000yrCC return period impact (plate T13.1-5-3). This impact shows an increased risk in Clare Hall above 10mm mark and also increases in extent upstream of the site. This indicates that the updated bridge opening and embankment are changing the flow regimes through Bin Brook at the crossing and further warrant a closer look at the 100yrCC events. Please provide relevant impact grids for this event, again with a 1mm tolerance.

3.0 ITEMISED RESPONSES – HYDRAULIC MODELLING REPORT

- 3.1 Section 2.2.6 Table 13.1.1.3 Roughness and downstream boundary sensitivity tests are referenced here – have blockage scenarios, in which the Bin Brook bridge is partially or wholly blocked, also been tested?
- 3.2 Section 2.3.1 states that the soffit of the bridge was set to such a point that the bridge would not need to be represented within the hydraulic model. Can an image or further description be provided to show exactly how the structure was then included in the hydraulic model to ensure that losses to the bridge abutments are correctly calculated? Were any additional cross sections added at the bridge structure to ensure that the shape of the bridge cross section was retained?
- 3.3 Section 2.3.3 Can a Flood Modeller¹ export be provided to discuss the key structures in and around the target site and how they change post development? It is unclear which structures are being referred to in the text.
- 3.4 Section 3.1.1 The plate TR13.1-1-2 shows gaps at key structures or breaks in the 1D domain at key structure locations. There are some structures in the current EA model that appear to not be included in this model, can this be confirmed? The two that are immediately identified is the footbridge within Clare Hall (immediately downstream of the proposed development) and the culverting of the Bin Brook upstream of the site in the housing estate.

¹ Flood Modeller Software (by Jacobs) used for building and running the 1D/2D linked Bin Brook model.

- 3.5 Plate TR13.1-2-2 – The change in extent image is showing increases in extent in both Clare Hall and in the small area of the upstream housing estate that can be seen, this would indicate increases in levels that are not discussed in detail.
- 3.6 Plate T13.1-1-3 – This image shows the change in depth as a result of the proposals. The change in depth image is symbolised to 10mm minimum change. Can a 1mm image be provided. Also, as referenced above, a discussion around a long section and detailed analysis of in channel 1D levels showing baseline vs proposed would provide a higher level of confidence in the results.
- 3.7 Section 3.2.2 This section discusses results. There is no discussion in the change in the flow profile through the bridge structure. Given the funnelling of flows from a wider flood plain flow into a singular in channel flow, it is anticipated that peak flow rates passing from the site into Clare Hall would increase. Can analysis of this impact be provided and discussion of how this may affect Clare Hall. Particularly considering the footbridge in Clare Hall immediately downstream of the site.
- 3.8 Section 3.3 This section discusses sensitivity tests. As mentioned above, given the nature of the intervention a detailed review of blockage scenarios would be expected to understand the impact blockages might have to offsite locations. In the baseline scenario the impacts of a blockage of the rifle range bridge could be alleviated by flow spilling over the structure or bypassing it in the floodplain. In the proposed scenario this is not possible. Therefore, a blockage of the bridge would result in direct impoundment which would further impact upstream offsite locations. Please therefore provide full results of a blockage assessment that has been agreed with the EA.

4.0 ITEMISED RESPONSES – HYDROLOGY REPORT

- 4.1 Section 6.5 Summarised the final flow rates used in the model. The final flow rates for the full catchment are between 15 and 20% lower than the current EA approved model can this reduction be discussed and justified?

return period	2	5	10	20	30	50	75	100	200	1000
EA Model	3.56	5.09	6.17	7.3	8.01	8.97	9.78	10.39	12.74	18.48
WSP	3.04	4.12	4.91	5.78	6.37	7.26	8.14	8.86	10.8	15.54
Reduction	14.61%	19.06%	20.42%	20.82%	20.47%	19.06%	16.77%	14.73%	15.23%	15.91%

- 4.2 Section 6.5 The model is based on an existing model, comparison against the previous model is expected in this scenario to understand how extents and flows have changed and justification for these changes. Can any commentary be provided as to the comparison between this model and the preceding model? In terms of both the hydrological estimates

and flood extents.

4.3 Section 6.6 Can the version of HiFlows data base be confirmed?

5.0 ITEMISED RESPONSES – DRAINAGE REPORT

- 5.1 The attenuation relating to the Bin Brook section of the C2C Busway has been designed based on a 'hand calc' so to speak and the networks have not been modelled, this method does not contain the level of detail a typical hydraulic model would generate and is not a very accurate way to design. Not only that, but it is also limited to the 600minute event only, therefore the critical event is unknown and could be significantly worse.
- 5.2 The treatment section is vague and does not show the treatment train for each outfall. Some runoff volumes may only pass through a dry basin which will offer little or no treatment.
- 5.3 Half drain down times are all most likely a fail. For example, Basin 08, volume = 9004m³, discharge rate = 5 l/s drain down time = 21 day half drain down needs to be 1 day, 2-3 days max, however in this case the half drain time would be circa 10-15 days which is outside the typical requirements.

Note By: Harry Mansfield, BSc (Hons) MSc MCIWEM

Approved By: Graham Sinclair, BSc (Hons), MSc, DIC, C.WEM, MCIWEM

Horner, Thomas

From: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>
Sent: 27 February 2025 12:52
To: Horner, Thomas
Cc: Vas, Michele; UK - Cambourne to Cambridge
Subject: RE: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]

[WARNING: EXTERNAL SENDER]

Yes it does

Best regards

Jo

Jo Baker
Project Manager | [Greater Cambridge Partnership](#)
jom.baker@cambridgeshire.gov.uk | [MS Teams](#) | 07788 563061



From: Horner, Thomas <Thomas.Horner@dentons.com>
Sent: 27 February 2025 12:37
To: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>
Cc: Vas, Michele <michele.vas@dentons.com>; UK - Cambourne to Cambridge <C2C@wsp.com>
Subject: RE: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]

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Dear Jo,

Many thanks for your email.

Can you please confirm that includes the requests for information regarding flooding (sent 17 February), as those weren't attached to your email.

Kind regards,

Tom

Thomas Horner

Associate

+44 20 7246 7193 | +44 7778 337378

London

From: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>
Sent: 27 February 2025 09:38
To: Horner, Thomas <Thomas.Horner@dentons.com>
Cc: Vas, Michele <michele.vas@dentons.com>; UK - Cambourne to Cambridge <C2C@wsp.com>
Subject: FW: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]

[WARNING: EXTERNAL SENDER]

Dear Thomas

Just to confirm that we have received your requests for information and that the technical team is preparing responses for you.

Best regards

Jo

Jo Baker
Project Manager | [Greater Cambridge Partnership](https://www.greatercambridgepartnership.org.uk)
jom.baker@cambridgeshire.gov.uk | [MS Teams](#) | 07788 563061



From: Peter Blake <Peter.Blake@cambridgeshire.gov.uk>
Sent: 21 February 2025 17:12
To: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>
Subject: Fw: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]

Sent from [Outlook for iOS](#)

From: Horner, Thomas <Thomas.Horner@dentons.com>
Sent: Friday, February 21, 2025 4:32:58 PM
To: Peter Blake <Peter.Blake@cambridgeshire.gov.uk>
Cc: Vas, Michele <michele.vas@dentons.com>; Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Alan Short <cas64@cam.ac.uk>
Subject: RE: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]

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Hi Peter,

Further to my email below, please find attached some additional questions for the applicant in respect of the scheme's route alignment/transport impacts, and effects on heritage.

Please provide a response to all of these additional points within 10 days.

Kind regards,

Tom

Thomas Horner

Associate

 +44 20 7246 7193 |  +44 7778 337378

London

From: Horner, Thomas

Sent: 17 February 2025 18:30

To: Peter.Blake@cambridgeshire.gov.uk

Cc: Vas, Michele <michele.vas@dentons.com>; JoM.Baker@cambridgeshire.gov.uk; Alan Short <cas64@cam.ac.uk>

Subject: RE: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]

Hi Peter,

Further to my email below, please do ensure that all correspondence on this matter is sent for Michele's and my attention going forwards, given we understand the TWAO application is now going to be considered at a public inquiry.

Many thanks,

Tom

Thomas Horner

Associate

 +44 20 7246 7193 |  +44 7778 337378

London

From: Horner, Thomas

Sent: 17 February 2025 15:08

To: Peter.Blake@cambridgeshire.gov.uk

Cc: Vas, Michele <michele.vas@dentons.com>; JoM.Baker@cambridgeshire.gov.uk; Alan Short <cas64@cam.ac.uk>

Subject: RE: Under legal privilege: Clare Hall - Cambourne to Cambridge scheme [DEN-UK_ACTIVE.FID10577279]

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Tom

Thomas Horner

Associate

 +44 20 7246 7193 |  +44 7778 337378

London

From: Peter Blake <Peter.Blake@cambridgeshire.gov.uk>

Date: Friday, 14 February 2025 at 14:24

To: Alan Short <cas64@cam.ac.uk>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>

Subject: Clare Hall - Cambourne to Cambridge scheme

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In order to try to address the matter could you please provide the flood modelling and mitigation report referred to and a contact point to take this forward.

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Peter

Peter Blake

(Interim) Director of the Greater Cambridge Partnership

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Horner, Thomas

From: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>
Sent: 18 March 2025 16:30
To: Vas, Michele; Horner, Thomas
Cc: Franklin, James @ London HH
Subject: Cambourne to Cambridge
Attachments: CHC-SK-0001_P01.pdf; CtoC Clare Hall Signed Letter 180325.pdf

Follow Up Flag: Follow up
Flag Status: Completed

[WARNING: EXTERNAL SENDER]

Dear Michele and Thomas

Apologies for the delay in the response as we needed input from a number of parties. I hope this addresses some of the issues raised – we will be happy to discuss further.

I believe James Franklin from CBRE is trying to contact you with regards to property matters.

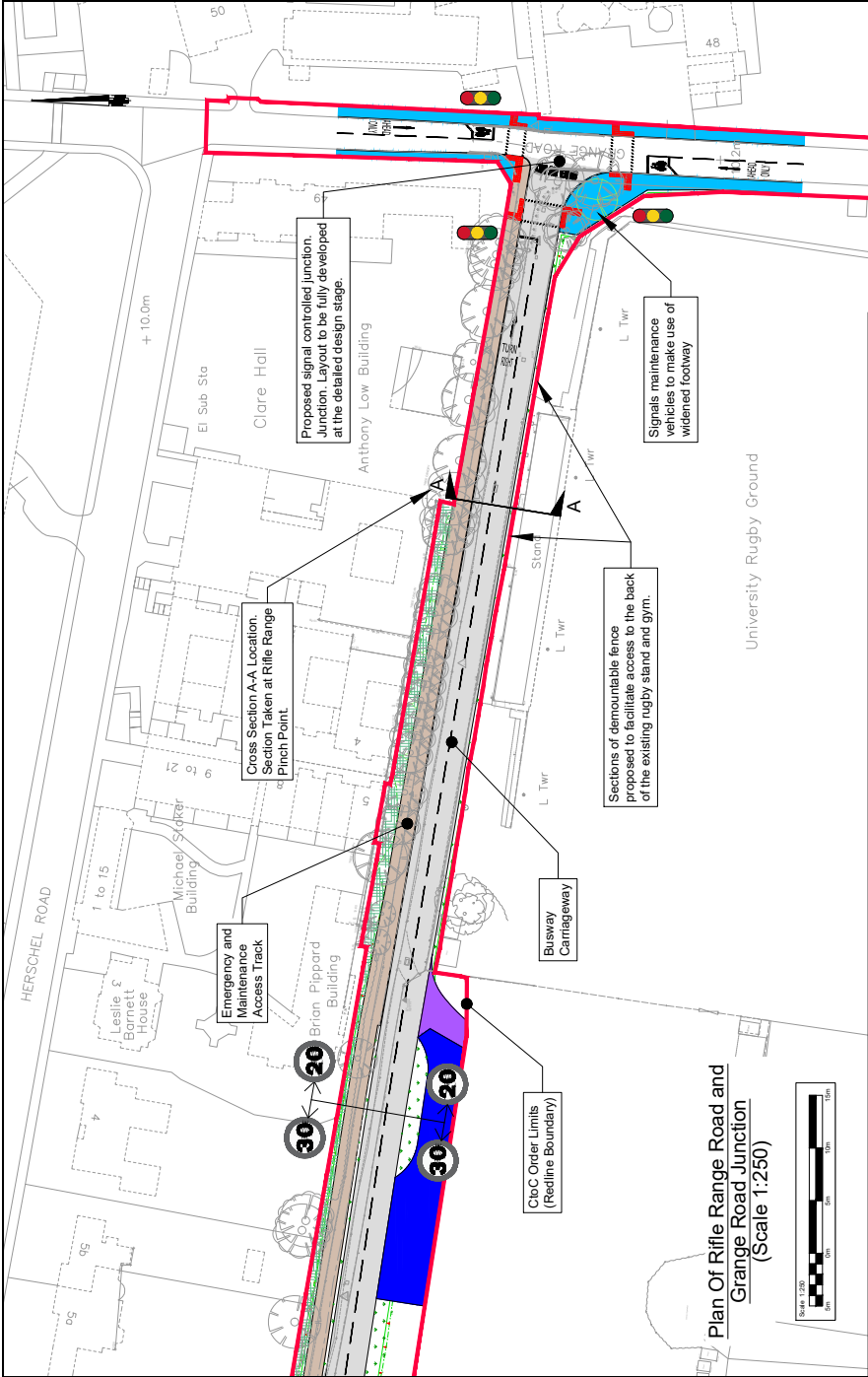
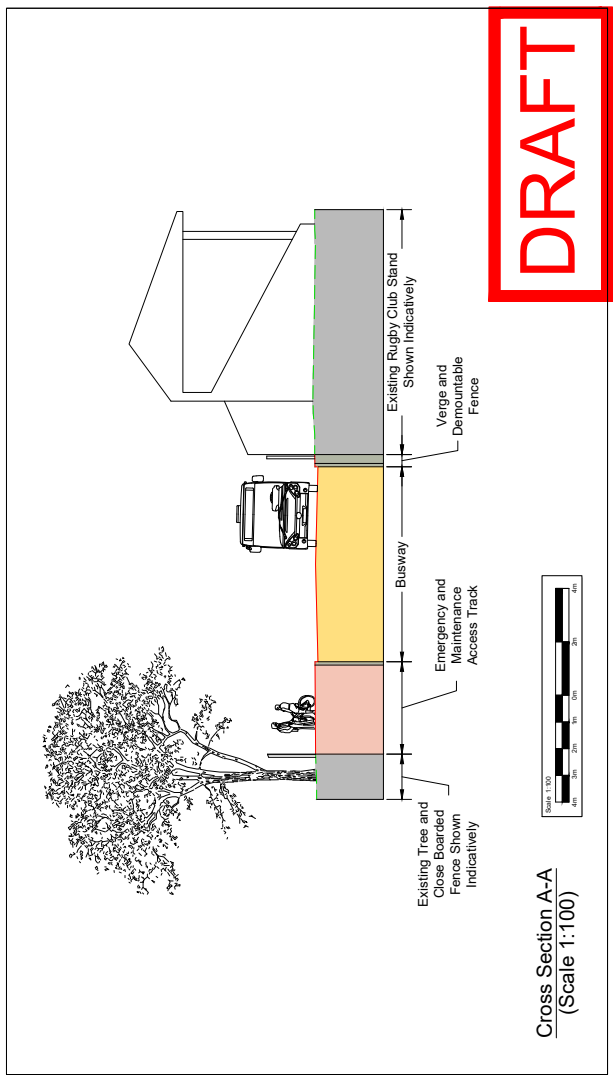
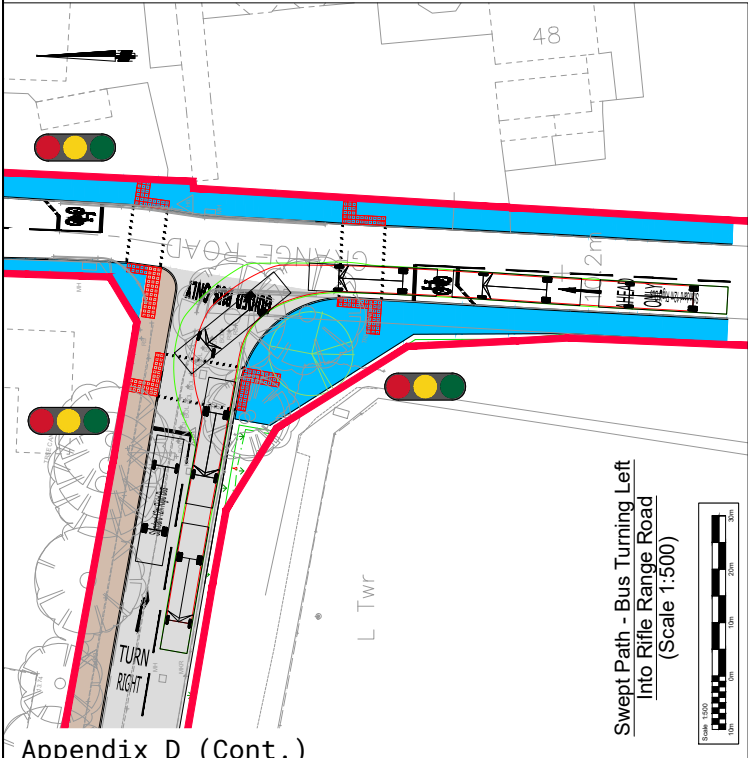
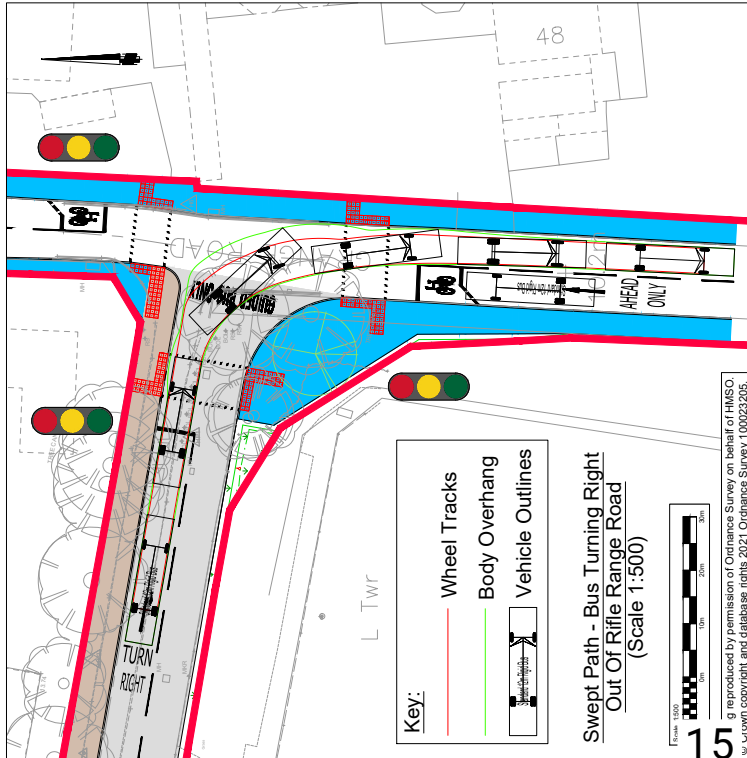
Best regards

Jo

Jo Baker
Project Manager | [Greater Cambridge Partnership](#)
jom.baker@cambridgeshire.gov.uk | [MS Teams](#) | 07788 563061



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DRAFT

Date: 18th March 2025
Contact: Jo M Baker
Email: gcp.admin@cambridgeshire.gov.uk

PO Box 1493
4 Regent Street
Cambridge
CB1 0YR

To Michele Vas
Dentons
By email

Dear Michele

Cambourne to Cambridge - Clare Hall Questions

Please find below responses to the questions raised by your colleague Thomas Horner on 21st and 27th February 2025.

17/2/25 Request - Flood Questions

Having considered the report commissioned from consultants, Create, who were tasked by Clare Hall with reviewing the CtoC Flood Risk Assessment (FRA), we note that they have made several requests for information, as well as certain queries requiring clarification.

The CtoC FRA and supporting flood risk modelling was developed and run having first agreed the scope with the Environment Agency. The Environment Agency were engaged via a pre-application agreement. They reviewed a baseline and the proposed modelling before providing feedback on required revisions. These points were actioned and the FRA updated to reflect the Environment Agency's comments on the modelling. As part of the draft TWAO application the updated modelling was supplied to the EA for re-review.

The Create report includes several requests to see existing information, as well as requests for information that necessitate the preparation of additional materials. We would be happy to provide the former and to discuss these with you and your consultants, while also seeking to address other queries contained in the Create report. The provision thereafter of any further information, especially where this necessitates additional work, can be agreed on a case-by-case basis.

The products received from the EA were:

- Product 5 – Gough Way Model Report, November 2017, CH2M
- Product 6 – Output data of Gough Way Model, November 2017, CH2M
- Product 7 – Calibrated and Verified Model Input data of Gough Way Model, November 2017, CH2M

We note your request to see changes in depth at 1mm increments. However, we do not consider this appropriate as water level or relative difference grids at this scale are well beyond the confidence limit of the hydraulic modelling software or flow estimation techniques. However, we would be happy to provide a long section of channel levels.

The review makes much of the risk of flooding from blockage of the new CtoC bridge over Bin Brook. However, as the proposed structure is a 10m clear span structure with abutments set back from the channel top of bank there is considered to be a low risk of blockage. In addition, as part of CtoC proposals involve removal of the existing much smaller opening bridge at this location, it is expected that the Scheme will

Appendix D (Cont. 2)

reduce the risk of blockage in this location.

The Create report refers to the change in extent image showing increases in extent in both Clare Hall and in the small area of the upstream housing estate. However, these small areas of increase are less than an 8mm change in depth and no properties or other assets are affected.

We note your request to compare current and earlier hydrological and flood models. While these could be provided, the benefits in comparing a current model with an out-of-date model are unclear.

21/2/25 Request - Transport Questions

Adams Road

1. Has there been any environmental impact assessment of the Adams Road busway route option?

Environmental issues were not assessed to EIA level but consideration was given to the Adams Road option in OAR1 and the potential impact on the ponds and woodland to the west of Sylvester Road was identified as a concern.

2. Has a Road Safety Audit or any safety assessment been undertaken of the Adams Road section of the Comberton Greenway proposals?

This is ongoing work related to another project.

3. Does the applicant have any recent traffic data (more recent than November 2019) for Adams Road and Grange Road?

Ongoing data monitoring can be found here.

[Cambridgeshire & Peterborough Insight – Roads, Transport and Active Travel – Traffic Flows – Cycle Flows Dashboard](#)

4. Is it possible for the applicant to provide the full ATC data for Adams Road that is summarised in the Mott McDonald 2020 Adams Road survey report?

Given the time lapsed since this data was collected it is suggested that the more recent data from the dashboard would be more useful. We are investigating what data is available.

Rifle Range GCP Proposals

5. What is the purpose of the emergency and maintenance access strip along the proposed busway on Rifle Range Road (RRR) and how wide would this be? Is the intention that this could also be utilised by pedestrians, cyclists and for equestrian purposes?

The maintenance strip would be 3 m wide. It would enable maintenance vehicles to service the route without disruption, provide a safe means of egress for passengers in emergency, carry any necessary ducting for services such as the Granta Backbone Network in a way in which they can be accessed without causing disruption. It will be capable of being utilised by pedestrians and cyclists throughout. Equestrian access will be provided in the rural section west of the West Cambridge campus but is not envisaged on the Rifle Range Road.

6. RRR is currently used by pedestrians for leisure purposes. Will this be retained? If so, where and how?

As above this will be provided via the emergency and maintenance access strip.

7. What is the proposed maximum frequency of buses along the RRR section of the busway?

Service frequency is estimated at around 10 buses each way hourly but no maximum has been specified.

8. Other than buses, what other access rights (and to whom) will be provided along RRR?

No access rights other than those existing (St Johns and Jesus College, Kings College School and the Rugby Club) are proposed. The only exception would be for the emergency services when operating under blue light and vehicles associated with the operation and maintenance of the scheme.

9. Can the applicant provide the swept path analysis for the proposed RRR/Grange Road signal junction?

The swept path analysis for the Rifle Range/Grange Road Junction is presented in Sketch Number CHC-SK-0001. The design prepared for the TWAO application is outline and may still be subject to change within the permitted limits of deviation.

10. What is the construction period for the busway to the south of Clare Hall?

GCP would propose to engage with Clare Hall to agree this but the intention would be to commence once the summer term is complete and ensure works are completed in advance of the Steele Bodgers match.

11. Immediately south of Clare, the proposed carriageway appears to skirt very close to the rugby club's land and spectator stand? Is there a cross section that shows the width of the verge between the carriageway and the rugby club's land? Will there be any utilities, lighting or signage located within this verge?

A cross section at the pinch point is presented in Sketch Number CHC-SK-0001. The design prepared for the TWAO application is outline and may still be subject to change within the permitted limits of deviation. Where the corridor along the Rifle Range is very constrained a 20mph speed restriction is proposed and consideration will be given to potentially reducing the width of the busway throughout this section during the subsequent design stages. The final cross section and location signage will not be confirmed until the detailed design stage has been completed. It is envisaged at this stage that any new or diverted utilities would be located within the emergency and maintenance track

12. Will there be lighting along the busway? If so, where will this be located and are there any design details that can be provided.

No. The scheme will be lit at junctions but not elsewhere.

13. Will there be any physical measures to stop vehicles (including cyclists) from accessing the busway from Grange Road?

The current intention is to use a combination of traffic signals which are called by buses and ANPR cameras to restrict access. Cyclists would be guided onto the operation and maintenance track. This will be kept under review and consideration might be given to gating should that be considered to be necessary.

Access for Clare Hall and other parties

14. Will Clare Hall continue to enjoy the same access rights along Rifle Range Road and how will direct access be provided from the southern edge of Clare Hall on to RRR?

Yes, properties with current access rights to the RRR will have similar access rights to the Operation and Maintenance track.

15. How will construction vehicles gain access to the southern areas of Clare Hall for future development?

As above, existing access rights would be maintained. Should future development be planned then access would need to be considered as a part of the planning process.

16. Other parties require access along RRR. How will this be managed?

GCP is engaging with other parties requiring access. As above existing rights will be maintained.

21st Feb 2025 - Heritage Questions

1 8.2.4 of the Technical Report confirm that the level of harm to above ground heritage assets are minor. Please provide justification for this assessment including details of the information used in the assessment of harm. We note that it is considered good practice to assess any change to the setting of a listed building against a statement of significance.

Justification for this conclusion is provided in the Heritage Statement (Appendix TR7.1) that accompanied the ES Technical Report 7: Heritage and Archaeology (including Historic Environment Desk Based Assessment). TR7.1 includes a statement of significance.

2 The existing trees along the grassed southern boundary are part of the original landscape scheme. These trees frame views out from the stepped accommodation rising-up from Rifle Range Road. How will these trees be retained and protected?

These trees will need to be removed. They are semi-mature trees alongside the southern curtilage. Given the 1969 build date of the listed building, we consider that it is highly unlikely that these trees will have formed part of its original landscape. The removal of these trees will not affect the stated conclusions of minor impact in the heritage statement and non-significant effect in ES.

3 The view of Clare Hall from the South is expansive, as the entire designed complex can be read and understood from many different vantage points. The different sections of the different buildings stepping down towards the south, form a fifth elevation and were carefully curated by Erskine to be viewed in this way. The stepped slopping section is also a very deliberate and important move by Erskine to provide views out and daylight into rooms, inner courtyards and the external spaces. The new busway will present a significant barrier to both views in and out and therefore have a significant impact on the listed asset. Please provide information that explains how the impact of the new busway has been assessed taking account of the above.

We do not agree with your statement that “The new busway will present a significant barrier to both views in and out and therefore have a significant impact on the listed asset”. The impact of the completed busway will comprise infrequent passing buses which will have no bearing on views out or daylight in. Moreover, the ‘expansive’ southward views referred do not appear to take account of the intervening rugby stand which runs along much of the southern aspect of the building.

Your sincerely



Jo Baker
Project Manager

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Our ref: TZZH/079640.00001

25 March 2025

Dear Jo

Cambourne to Cambridge - Clare Hall Questions

We write in respect of your letter dated 18th March 2025, responding to queries and requests for information raised by this firm, on behalf of the appointed consultants of Clare Hall, on 17th and 21st February 2025.

Whilst we appreciate that some responses have been provided, Clare Hall is not satisfied that all of the questions raised have been answered in sufficient detail or indeed, in some cases, at all.

We have set out below where information is lacking or provides no greater level of clarification than that which is already in the public domain.

Unless otherwise stated, we have used the same numbering system that was used in your letter and the respective requests for information.

17/2/25 Request – Flooding

This section of your letter fails to respond to various requests made by Create in respect of flood modelling information as set out below.

- 2.1 The letter fails to provide evidence of the EA's formal review and approval of the flood risk modelling as requested.
- 2.2 The exact model used as a baseline has not been confirmed and named.
- 2.3 A revised, zoomed out, version of plate TR13.1-5-1 has not been provided to show further into the estate upstream to understand the extent of changes in that area.
- 2.4 Your letter has claimed that showing changes in depth at 1mm increments is "well beyond the confidence limit of the hydraulic modelling software or flow estimation techniques". EA guidance

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directs that these tolerances in the software should not be accounted for when reviewing impacts so that trends of impact can properly be identified and mitigated.

2.5 As above.

2.6 As above.

3.2 An image or description has not been provided to show exactly how the bridge structure was included in the hydraulic model to ensure that losses to the bridge abutments are correctly calculated and that the river dimensions at the bridge are retained.

3.3 A Flood Modeller export has not been provided to identify key structures in and around the target site.

3.4 Gaps identified in plate TR13.1-1-2 have not been explained or otherwise confirmed.

3.5 Where there are increased levels identified in the change of extent imaging, these have not been discussed in detail as pointed out in the request for information.

3.6 As above at 2.4.

3.7 No analysis has been provided regarding how peak flow rates passing from the site into Clare Hall may be impacted as a result of the bridge structure.

3.8 Comment has been provided regarding the lower risk of blockage of the new structure as compared to the existing structure, however this does not negate the need for blockage to be considered in a design when introducing a new bridge structure into a river channel.

4.1 Justification has not been provided for why the final flow rates in the model are between 15 and 20% lower than the current EA approved model.

4.2 It has been acknowledged that current and earlier hydrological and flood models could be provided but these have not been shared.

4.3 The requested version of HiFlows data base has not been provided.

5.1 No comment has been made against Create's assertion that the method used for calculating the attenuation to the Bin Brook does not contain the level of detail a typical hydraulic model would generate and is not a very accurate way to design.

5.2 No comment has been made against Create's assertion that the treatment section is vague and does not show the treatment train for each outfall.

5.3 No comment has been made against Create's assertion that half drain down times are all most likely a fail.

21/2/25 Request - Transport / Route Alignment

This section of your letter fails to respond to various requests for information made by Pulsar in respect of transport and route alignment, as set out below.

1. Why was Adams Road not assessed to EIA level? What were the "potential impacts on the ponds and woodland to the west of Sylvester Road" and why were they deemed sufficiently serious to contribute to the discounting of this route option?
2. Can the Applicant provide a timescale for the safety assessments for the Adams Road section of the Comberton Greenway proposals?
3. The dashboard data provides data for the Cotton Path and start of Adams Road. Is there any data for Grange Road?
4. Pulsar has requested ATC data for Adams Road used by Mott MacDonald 2020 Adams Road survey report so that it can understand the decision-making process that led to the rejection of that potential route alignment. Presumably this data is available. More recent data would not be helpful as it would not help Pulsar to understand the position at the time that the route alignment decisions were made.
5. How will the arrangement between Grange Road and Rifle Range Road be designed to allow cyclists to enter or exit the maintenance strip? Is the intention for maintenance vehicles to traverse along this strip and/or park on it? If so, how is it going to be "capable of being utilised by pedestrians and cyclists throughout"?
9. Can the Applicant confirm that the existing mature tree at the south west corner of the junction will be removed?
11. The cross-section in CHC-SK-001 does not include any dimensions. Can the Applicant provide a version showing widths and/or can the Applicant confirm the proposed width of the carriageway and the verge (between the carriageway and demountable fence) in this location?
12. The junction at Grange Road will be adjacent to Clare Hall, please can you therefore provide design details of the lighting at this point of the busway.
14. It was requested that the Applicant confirm that Clare Hall will continue to enjoy the same access rights along Rifle Range Road and how direct access be provided from the southern edge of Clare Hall on to Rifle Range Road. We do not believe that this has been properly addressed. It is said that properties with current access rights to Rifle Range Road will have similar access rights. In what way will those rights be different?

21/2/25 Request – Heritage

1. We do not believe that the Heritage Statement (Appendix TR7.1) that accompanied the ES Technical Report 7: Heritage and Archaeology (including Historic Environment Desk Based Assessment) sufficiently justifies that the level of harm to above ground heritage assets are minor – this has not been explained in any greater detail.
3. We do not agree with the assertion that "the impact of the completed busway will comprise infrequent passing buses which will have no bearing on views out or daylight in." In your letter, you have confirmed that service frequency is estimated at around 10 buses each way hourly, but no maximum has been specified. This is a significant increase when compared to the very limited current use of Rifle Range Road for vehicle traffic and cannot be reasonably said to be "infrequent". We believe that this impact has not been assessed sufficiently.

As was explained in our email dated 17 February 2025, and subsequently, the questions and requests for information have been raised to allow Clare Hall to formulate its Statement of Case in a meaningful way and allow us to properly assist the appointed inspector.

We had expected responses to these queries by 27th February (Flooding) and 3rd March (Heritage and Transport) respectively (being 10 days from the corresponding requests). Unfortunately, we received the responses in your letter on 18th March and in any event, as highlight above, many of those responses are lacking detail or indeed no responses have been provided at all.

Lack of Engagement

This letter does not address the issues raised by this firm on behalf of Clare Hall regarding the lack of engagement with the college, which is being dealt with separately and directly with James Franklin of CBRE.

It is worth noting that James only contacted this firm on 19th March 2025 and in any event his email does not seem to address the point we are raising regarding a purported lack of engagement but instead describes how the land referencing process has taken place. Clare Hall's instructed CPO surveyor has suggested dates for a meeting with CBRE and is waiting on a response.

CBRE and the land referencers should have identified from a site visit that Clare Hall's properties have numerous pedestrian access points onto Rifle Range Road and as such, if there are no explicit rights in title, there are at the very least prescriptive rights over this land (plot 16-178). They would have also identified from a site visit that some of the drainage channels are positioned with Plot 16-178. This point will be explored further with James.

Generally speaking, the responses contained in your letter do not further assist Clare Hall in the preparation of its Statement of Case and, as a consequence, the Inspector's ability to understand the issues presented. We request that appropriate responses to the points raised above are provided no later than 10 days from the date of this letter.

We look forward to your response.

Yours sincerely



Thomas Horner
Associate
Dentons UK and Middle East LLP

Date: 8th April 2025
Contact: Thomas Horner
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Cambourne to Cambridge

Flooding

2.1 The letter fails to provide evidence of the EA's formal review and approval of the flood risk modelling as requested.

The Environment Agency undertook a review of the modelling during pre-application engagement and are currently re-reviewing the updated modelling. We anticipate releasing the model comments sheets along with the model once this has concluded.

2.2 The exact model used as a baseline has not been confirmed and named.

The model we used as the source of our initial model build was the 2017 Gough Way Model prepared by CH2M Hill (now part of Jacobs).

We made various adaptations to this model to make it suitable for scheme assessment and in response to comments from the Environment Agency to produce our baseline model (which represents present day topographic conditions in the catchment). We anticipate that we will release the name of our baseline model as well as the proposed scenario model once the EA review has concluded.

2.3 A revised, zoomed out, version of plate TR13.1-5-1 has not been provided to show further into the estate upstream to understand the extent of changes in that area.

Updated figures can be prepared following the Environment Agency's conclusion of their review.

2.4 Your letter has claimed that showing changes in depth at 1mm increments is "well beyond the confidence limit of the hydraulic modelling software or flow estimation techniques". EA guidance directs that these tolerances in the software should not be accounted for when reviewing impacts so that trends of impact can properly be identified and mitigated.

As previously offered a long section of channel level can be provided following the Environment Agency's conclusion of their review. We would maintain that hydraulic models and flow estimates of this nature should not be relied upon for millimetre accuracy.

2.5 As above.

2.6 As above.

3.2 An image or description has not been provided to show exactly how the bridge structure was included in the hydraulic model to ensure that losses to the bridge abutments are correctly calculated and that the river dimensions

at the bridge are retained.

The proposed bridge structure is clear span of the channel and therefore the impact of the bridge abutments are represented in the 2D element of the model. There is no change to the 1D element other than to remove the existing smaller bridge unit. The channel geometry / river dimensions at the bridge location remain unchanged.

3.3 A Flood Modeller export has not been provided to identify key structures in and around the target site.

As noted above we anticipate releasing the model once the Environment Agency's formal review and approval has concluded.

3.4 Gaps identified in plate TR13.1-1-2 have not been explained or otherwise confirmed.

We assume this is reference to Plate TR13.1-5-2. The representation of the existing structures is addressed in the Environment Agency model review which can be shared on completion and resolution of any associated queries. Some structures are represented fully in the 1D model and would therefore not be shown as 'gaps' or 'breaks' on figure TR13/1-5-2.

3.5 Where there are increased levels identified in the change of extent imaging, these have not been discussed in detail as pointed out in the request for information.

The impact of the proposed works is discussed in section 5.2 of the FRA.

3.6 As above at 2.4.

3.7 No analysis has been provided regarding how peak flow rates passing from the site into Clare Hall may be impacted as a result of the bridge structure.

This can be provided following the conclusion of the Environment Agency review of the model.

3.8 Comment has been provided regarding the lower risk of blockage of the new structure as compared to the existing structure, however this does not negate the need for blockage to be considered in a design when introducing a new bridge structure into a river channel.

The proposed structure is 10m clear span with abutments set back from the channel top of bank. There are other online structures with smaller openings nearby upstream of the proposed bridge structure with limited potential for additional trash or debris accumulation in the intervening area. The proposed bridge is considered to be a low risk of blockage.

4.1 Justification has not been provided for why the final flow rates in the model are between 15 and 20% lower than the current EA approved model.

As noted above we anticipate releasing the model once the EA's formal review and approval has concluded. This will include the flood hydrology estimation record.

4.2 It has been acknowledged that current and earlier hydrological and flood models could be provided but these have not been shared.

As noted above we anticipate releasing the model once the EA's formal review and approval has concluded.

4.3 The requested version of HiFlows data base has not been provided.

The hydrology study was undertaken in 2022 and made use of NRFA peak flow data set v10 which was the most recent version available at the time of the study. It should be noted that the hydrology study concludes by recommending the flow estimates from ReFH2 in preference to the Statistical method as the ReFH2 method peak flow estimates are higher in comparison to the peak flow estimates produced by the Statistical method. ReFH2 does not use the NRFA peak flow data set so even updating this to use NRFA peak flow data set v13 (which is the current

version as of the time of writing), would not impact on the flow estimates used in the model.

5.1 No comment has been made against Create's assertion that the method used for calculating the attenuation to the Bin Brook does not contain the level of detail a typical hydraulic model would generate and is not a very accurate way to design.

The detailed design for the Scheme has not commenced so the Applicant is unable to share detailed drainage design information at this stage. The Lead Local Flood Authority was consulted during the development of the Drainage Strategy for the Transport and Works Act Order Application. Drainage is a reserved matter in the draft conditions at Schedule 1 to the Request for Deemed Planning Permission. A Surface Water Drainage Scheme will be produced before the Scheme is constructed to ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the Scheme.

5.2 No comment has been made against Create's assertion that the treatment section is vague and does not show the treatment train for each outfall.

As above

5.3 No comment has been made against Create's assertion that half drain down times are all most likely a fail.

As above

Transport / Route Alignment

1. Why was Adams Road not assessed to EIA level? What were the "potential impacts on the ponds and woodland to the west of Sylvester Road" and why were they deemed sufficiently serious to contribute to the discounting of this route option?

The issue was fully addressed in OAR1 where the options were assessed in detail and Rifle Range selected as the best performing option. By the time OAR 3 was produced, the Adams Road option was considered to be slightly better performing but that was contingent on the assumption that it offered greater future proofing against delivery of the CAM proposals which have now been abandoned. Also whilst the issue was revisited as a result of local opposition to the use of the Rifle Range, once Adams Road was revisited it became clear that there was also local opposition to that, and so there was no benefit from a community perspective in either option. Therefore, as documented in the OBC addendum the preferred scheme has reverted to the original recommendations of OAR1.

As such there is no requirement to cover the assessment of Adams Road to full EIA level. It was considered as an option, as stated in para 4.6.9 of the ES Main Report, but as stated therein "Ultimately, the Rifle Range track was recommended as being better performing despite the operational challenges".

The ponds and woodlands to the west of Sylvester Road were reviewed to a level required for that stage of scheme development. OAR1 concluded that "there will be a loss of ponds that are potential habitats for Great Crested Newts (European protected species). If these ponds are proven to be GCN habitats then alternative habitat must be provided. There will also be loss of urban woodland. Assessed as medium decrease in biodiversity".

2. Can the Applicant provide a timescale for the safety assessments for the Adams Road section of the Comberton Greenway proposals?

As indicated previously this request has been passed to the relevant project manager and is not relevant to the CtoC public inquiry.

3. The dashboard data provides data for the Coton Path and start of Adams Road. Is there any data for Grange Road?

The dashboard provides details of available data

4. Pulsar has requested ATC data for Adams Road used by Mott McDonald 2020 Adams Road survey report so that it can understand the decision-making process that led to the rejection of that potential route alignment. Presumably this data is available. More recent data would not be helpful as it would not help Pulsar to understand the position at the time that the route alignment decisions were made.

A summary of the data which informed the decision making process is provided.

[C2C Adams Road traffic survey data](#)

The raw data is not readily available as it is superseded. It is unclear why more recent data is not pertinent.

5. How will the arrangement between Grange Road and Rifle Range Road be designed to allow cyclists to enter or exit the maintenance strip? Is the intention for maintenance vehicles to traverse along this strip and/or park on it? If so, how is it going to be "capable of being utilised by pedestrians and cyclists throughout"?

The Operation and Maintenance track will not be a thoroughfare in regular usage. As such whilst there is a risk that from time to time a vehicle will park on the track this will be similar to any such track across the city which on occasions will be blocked due to maintenance or utility access requirements.

9. Can the Applicant confirm that the existing mature tree at the south west corner of the junction will be removed?

Yes

11. The cross-section in CHC-SK-001 does not include any dimensions. Can the Applicant provide a version showing widths and/or can the Applicant confirm the proposed width of the carriageway and the verge (between the carriageway and demountable fence) in this location?

The main busway (carriageway) is 7.3m wide. However, this will be reviewed at the detailed design stage and may still be subject to change. The cross section presented in drawing CHC-SK-001 is taken at the pinch point along the Rifle Range at the back of the Rugby Club stand. A 20mph speed restriction is proposed in this area and given the spatial constraints a reduced carriageway width may be considered at the detailed design stage to provide an increased verge width between the carriageway and demountable fence which is set back by approximately 300mm at the pinch point in the current design. Considering the straight alignment in this location and given the proposed 20mph speed restriction, the final carriageway width is expected to be within the range of 6.1 and 7.3m which aligns with Cambridgeshire County Council's design criteria for distributor roads and bus routes.

12. The junction at Grange Road will be adjacent to Clare Hall, please can you therefore provide design details of the lighting at this point of the busway.

The detailed design for the Scheme has not commenced so we are unable to share detailed lighting design information at this stage. The lighting at the junction with Grange Road will be designed in accordance with the applicable British and European standards for the design of exterior lighting and will comply with the Cambridgeshire County Council's lighting specification where required and applicable. Operational lighting is a reserved matter in the draft conditions at Schedule 1 to the Request for Deemed Planning Permission. An artificial lighting impact assessment and mitigation scheme will be produced before the Scheme is constructed to ensure that the proposed lighting scheme complies with the relevant planning policies.

14. It was requested that the Applicant confirm that Clare Hall will continue to enjoy the same access rights along Rifle Range Road and how direct access be provided from the southern edge of Clare Hall on to Rifle Range Road. We do not believe that this has been properly addressed. It is said that properties with current access rights to Rifle Range Road will have similar access rights. In what way will those rights be different?

Access will be similar in that pedestrians and cyclists will make use of the operation and maintenance track. Notwithstanding point 5, this may, under normal circumstances reflect an improved level of access with a tarmac surface more readily used by disabled people. Overall we believe access will be similar.

Heritage

1. We do not believe that the Heritage Statement (Appendix TR7.1) that accompanied the ES Technical Report 7: Heritage and Archaeology (including Historic Environment Desk Based Assessment) sufficiently justifies that the level of harm to above ground heritage assets are minor – this has not been explained in any greater detail.

As noted in our previous response dated 18 March 2025, we believe that the justification for our conclusions is in the Heritage Statement and accompanying ES Technical Report 7, to the appropriate level of detail.

3. We do not agree with the assertion that "the impact of the completed busway will comprise infrequent passing buses which will have no bearing on views out or daylight in." In your letter, you have confirmed that service frequency is estimated at around 10 buses each way hourly, but no maximum has been specified. This is a significant increase when compared to the very limited current use of Rifle Range Road for vehicle traffic and cannot be reasonably said to be "infrequent". We believe that this impact has not been assessed sufficiently.

A frequency of around 20 vehicles per hour is a very low level of traffic. Whilst we cannot specify an absolute maximum number of vehicle movements, this number could double and still remain very low.

Yours sincerely

A handwritten signature in black ink, appearing to read 'JBaker'.

Jo Baker
Project Manager

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Our ref: TZZH/079640.00001

17 July 2025

Dear Womble Bond Dickinson

**Camborne to Cambridge TWA0 Application
Clare Hall, University of Cambridge (OBJ213)**

We write in response to matters raised at the Pre-Inquiry Meeting relating to the above application, held 24 June 2025, and subsequent matters.

Statement of Common Ground

We have confirmed that Clare Hall is willing to enter into a Statement of Common Ground with the Applicant, in an email dated 2 July 2025. Please can you provide a first draft of this document so that we can attempt to meet the Inspectors' proposed submission deadline of 29 July.

Ongoing Discussions

We understand that discussions are ongoing between various members of OBJ213's consultancy team (including Jody Blacklock (Acoustics), David Conboy (Compulsory Acquisition and Compensation) and, to a certain extent, Fiona Lamb (Heritage)), however, we would request that these discussions are extended more broadly to consider other specific matters, including flood risks raised by Clare Hall's consultants, so as to assist the Inspectors in producing a well-developed Statement of Common Ground.

We note that an initial site visit of Clare Hall was conducted on 10 June 2025, albeit mainly to discuss access rights. We note that it still remains unclear to OBJ213 how its existing access to Clare Hall will be maintained, or indeed how construction access for the college's future development proposals will be accommodated. Nevertheless, we would encourage further site visits are undertaken to better understand the points raised by OBJ213 and to encourage agreement to be made on specific matters where possible.

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Outstanding Queries / Points of Objection

As you are aware, on behalf of OBJ213, we have submitted an Objection Letter (dated 7 January 2025), further requests for information from the Applicant (dated 17 February, 21 February and 25 March 2025), and a Statement of Case (CD23-17) (dated 11 April 2025) since the application for the Camborne to Cambridge TWAO was made. In the aforementioned documents and correspondence, we have raised several queries and concerns (or indeed forwarded queries raised by OBJ213's consultants), in respect of the proposed application which have been requested in an attempt to better understand how the proposed scheme will impact OBJ213. We continue to believe that many of the queries and concerns have not been addressed satisfactorily or indeed at all.

The fact that the Applicant has not yet provided this information means that Clare Hall continues to instruct its consultants to undertake modelling and work on Proofs of Evidence, in order to address areas of concerns that have not yet been resolved by the provision of the requested information.

We have since written to the Inspectors, and you have received a copy of the same note, setting out what Clare Hall believes are shortcomings in the Applicant's Environmental Statement. In addition to this and in light of the fact that we are now looking to produce a Statement of Common Ground and that our client's witnesses are preparing Proofs of Evidence for participation at the public inquiry, we would like to ask, once again, for detailed responses to the queries set out as an annex to this letter (**Annex 1**). We believe that much of the information provided thus far (including in the Applicant's own Statement of Case (CD23-01)) is lacking in detail or provides no greater level of clarification than that which is already in the public domain.

In order to assist the Inspectors and indeed OBJ213 in preparing its witness evidence, we request that appropriate responses to the points raised in Annex 1 are provided no later than 10 days from the date of this letter. This is an appropriate timescale given the limited time that Clare Hall's witnesses will have to react to such information before the proofs of evidence become due, and as the information listed has been requested several times before and has still not been provided.

We look forward to hearing from you.

Yours faithfully

Dentons UK and Middle East LLP

Dentons UK and Middle East LLP

Annex 1

Flooding

	Query / Dentons Comments	Applicant Response / Dentons Comments
1.	<p>The exact hydraulic model used as a baseline has not been confirmed and named.</p> <p>This is a recurring theme throughout the queries raised of the Applicant on flooding and presents a barrier to OBJ213's consultants' ability to prepare their witness evidence.</p>	<p>The applicant confirmed that <i>"the model we used as the source of our initial model build was the 2017 Gough Way Model prepared by CH2M Hill (now part of Jacobs)."</i></p> <p><i>"We made various adaptations to this model to make it suitable for scheme assessment and in response to comments from the Environment Agency to produce our baseline model (which represents present day topographic conditions in the catchment). We anticipate that we will release the name of our baseline model as well as the proposed scenario model once the EA review has concluded."</i></p> <p>We do not believe this has addressed our query. The Applicant's SoC is largely repetitive of this point and states that <i>"The modelling and associated reporting were provided to the Environment Agency in February 2025 Confirmation from the Environment Agency that their concerns have been suitably addressed is awaited."</i> We have been requesting this information since submission of our Objection Letter.</p>
2.	<p>A revised, zoomed out, version of plate TR13.1-5-1 has not been provided to show further into the estate upstream to understand the extent of changes in that area.</p>	<p>Updated figures can be prepared following the Environment Agency's conclusion of their review.</p> <p>This has not yet been provided.</p>
3.	<p>Your letter has claimed that showing changes in depth at 1mm increments is "well beyond the confidence limit of the hydraulic modelling software or flow estimation techniques". EA guidance directs that these tolerances in the software should not be accounted for when reviewing impacts so that trends of</p>	<p>As previously offered a long section of channel level can be provided following the Environment Agency's conclusion of their review. We would maintain that hydraulic models and flow estimates of this nature should not be relied upon for millimetre accuracy.</p>

	impact can properly be identified and mitigated.	This has not yet been provided.
4.	A Flood Modeller export has not been provided to identify key structures in and around the target site.	As noted above we anticipate releasing the model once the Environment Agency's formal review and approval has concluded. This has not yet been provided.
5.	Gaps identified in plate TR13.1-1-2 have not been explained or otherwise confirmed.	We assume this is reference to Plate TR13.1-5-2. The representation of the existing structures is addressed in the Environment Agency model review which can be shared on completion and resolution of any associated queries. Some structures are represented fully in the 1D model and would therefore not be shown as 'gaps' or 'breaks' on figure TR13/1-5-2. This has not yet been provided.
6.	No analysis has been provided regarding how peak flow rates passing from the site into Clare Hall may be impacted as a result of the bridge structure.	This can be provided following the conclusion of the Environment Agency review of the model. This has not yet been provided.
7.	Justification has not been provided for why the final flow rates in the model are between 15 and 20% lower than the current EA approved model.	As noted above we anticipate releasing the model once the EA's formal review and approval has concluded. This will include the flood hydrology estimation record. This has not yet been provided.
8.	No comment has been made against Create's assertion that the method used for calculating the attenuation to the Bin Brook does not contain the level of detail a typical hydraulic model would generate and is not a very accurate way to design. No comment has been made against Create's assertion that the treatment section is vague and does not show the treatment train for each outfall. No comment has been made against Create's assertion that half drain down times are all most likely a fail.	The detailed design for the Scheme has not commenced so the Applicant is unable to share detailed drainage design information at this stage. The Lead Local Flood Authority was consulted during the development of the Drainage Strategy for the Transport and Works Act Order Application. Drainage is a reserved matter in the draft conditions at Schedule 1 to the Request for Deemed Planning Permission. A Surface Water Drainage Scheme will be produced before the Scheme is constructed to ensure that the proposed development can be adequately drained and to ensure that there is no increased flood risk on or off site resulting from the Scheme. We do not believe this has addressed our query.
9.	Sequential Test	The FRA does not adequately address the sequential test, summarising that " <i>based upon the requirements of the transport route to connect certain areas the scheme cannot completely avoid</i>

		<p><i>areas of potential flooding. As a result, the C2C Scheme is partly located within Flood Zone 3 and an Exception Test is required."</i></p> <p>In light of the acknowledgement by the Applicant that the preferred route and the Alternative Route options were judged to be 'finely balanced', and that a key differentiating factor is the location of Rifle Range Road in Flood Zones 2 and 3, further justification for the selection of the preferred route (and discounting the sequentially preferable Alternative Route) is needed in order to address the requirements of the sequential test.</p>
--	--	--

Transport / Route Alignment

1.	<p>Why was Adams Road not assessed to EIA level? What were the "potential impacts on the ponds and woodland to the west of Sylvester Road" and why were they deemed sufficiently serious to contribute to the discounting of this route option?</p>	<p>The issue was fully addressed in OAR1 where the options were assessed in detail and Rifle Range selected as the best performing option. By the time OAR 3 was produced, the Adams Road option was considered to be slightly better performing but that was contingent on the assumption that it offered greater future proofing against deliver of the CAM proposals which have now been abandoned. Also whilst the issue was revisited as a result of local opposition to the use of the Rifle Range, once Adams Road was revisited it became clear that there was also local opposition to that, and so there was no benefit from a community perspective in either option. Therefore, as documented in the OBC addendum the preferred scheme has reverted to the original recommendations of OAR1.</p> <p>As such there is no requirement to cover the assessment of Adams Road to full EIA level. It was considered as an option, as stated in para 4.6.9 of the ES Main Report, but as stated therein "Ultimately, the Rifle Range track was recommended as being better performing despite the operational challenges".</p> <p>The ponds and woodlands to the west of Sylvester Road were reviewed to a level required for that stage of scheme development. OAR1 concluded that "there will be a loss of ponds that are potential habitats for Great Crested Newts (European protected species). If these ponds are proven to be GCN habitats then alternative habitat must be provided. There will also be loss of urban woodland. Assessed as medium decrease in biodiversity".</p> <p>We do not believe that this is an appropriate response.</p>
----	---	--

2.	Benefits of the Alternative Route	<p>We have set out an alternative route suggestion in OBJ213's Statement of Case. No dialogue as such with the Applicant on this point.</p> <p>We contest that the Applicant's explanation at 7.3.54 – 7.3.61 is insufficient. 7.3.57 states "The results of the reassessment indicated that the Rifle Range track option is more costly and has a greater impact on the West Fields and Green Belt... the degree of segregation is partially undermined by the need to maintain various access rights along the Rifle Range track."</p>
----	-----------------------------------	--

Heritage

1.	We do not believe that the Heritage Statement (Appendix TR7.1) that accompanied the ES Technical Report 7: Heritage and Archaeology (including Historic Environment Desk Based Assessment) sufficiently justifies that the level of harm to above ground heritage assets are minor – this has not been explained in any greater detail.	<p>As noted in our previous response dated 18 March 2025, we believe that the justification for our conclusions is in the Heritage Statement and accompanying ES Technical Report 7, to the appropriate level of detail.</p> <p>We do not believe this is an adequate response.</p> <p>There is no justification for the Applicant's assessment that the level of harm to the above-ground heritage assets at Clare Hall will be minor. The Applicant has failed to undertake an adequate assessment of the significance of this Grade II* Listed Building to provide the essential starting point for an assessment of the potential impact.</p>
2.	We do not agree with the assertion that "the impact of the completed busway will comprise infrequent passing buses which will have no bearing on views out or daylight in." In your letter, you have confirmed that service frequency is estimated at around 10 buses each way hourly, but no maximum has been specified. This is a significant increase when compared to the very limited current use of Rifle Range Road for vehicle traffic and cannot be reasonably said to be "infrequent". We believe that this impact has not been assessed sufficiently.	<p>A frequency of around 20 vehicles per hour is a very low level of traffic. Whilst we cannot specify an absolute maximum number of vehicle movements, this number could double and still remain very low.</p> <p>We do not believe this is an adequate response. There will be a large, relative, increase to the traffic levels on Rifle Range Road next to Clare Hall which is a sensitive receptor.</p>
3.	Listed Building Consent	<p>No assessment appears to have been undertaken as to whether separate Listed Building Consent would be required for any of the works. The removal of paths (to access Clare Hall from the south) would be considered harmful due to the loss of original fabric and the fact that these paths connect with the southern end of the family and scholars' walks which are fundamental to the organisation of the campus plan.</p>

		The Applicant has not addressed this point.
4.	Privacy and Noise	<p>Rooms deliberately placed to the south of the college grounds by Erskine to exploit the quiet and tranquil outlook. These rooms will all therefore be adversely affected by the proposed Scheme - limiting their use due to reduced privacy and increased noise disturbance.</p> <p>The Applicant has not addressed this point.</p>
5.	Removal of Existing Trees	<p>The proposed removal of existing trees and lawn running along the southern boundary of Clare Hall will sacrifice the soft green edge of the college and the framing of views. The proposed Scheme envisages replacing these features with hedgerow which will block views out of the ground floor rooms and views back towards the college's south elevation.</p> <p>The Applicant has not addressed this point.</p>
6.	Significant Views	<p>The proposed Scheme will present an intermittent barrier to both views in and out of the college as the buses pass Clare Hall, resulting in a notional divide between the campus site and the landscape beyond, and therefore have a significant impact on the listed asset.</p> <p>The Applicant has not addressed this point.</p>

General

1.	Rights of Access	To date, whilst in principle the Applicant accepts that access rights must remain for pedestrians to access Clare Hall from Rifle Range Road and that construction vehicles may use the road (subject to necessary restrictions), there has been no explanation of how this will be accommodated (especially the latter).
----	------------------	---

Horner, Thomas

From: Southon, Jack <jack.southon@wsp.com>
Sent: 24 July 2025 17:02
To: Horner, Thomas; Vas, Michele
Cc: Jo M Baker; Higgins, Graham; Haberfield, Stephanie
Subject: C2C Clare Hall request for modelling files

Follow Up Flag: Follow up
Flag Status: Completed

[WARNING: EXTERNAL SENDER]

Thomas, Michele,
Jo has asked me to provide a copy of our model files to Clare Hall in response to their previous request. The link below has three folders in it.

- 01 - the model as provided to the Environment Agency in July 2023
- 02 - the updated model as provided to the Environment Agency in February 2025
- 03 - a copy of the model provided to the Environment Agency in May 2025 to provide sensitivity tests in response to review comments

Each folder contains the model files and associated reporting for that submission

https://wsponline-my.sharepoint.com/:f/g/personal/jack_southon_wsp_com/EiqBTv3HL_1Jk8rrYMmtdEYBPDy9kxeeVrDSFdmdAYw82Q?e=7pgicp

You should have view and download access to this folder and it can be shared with Clare Hall and their representatives.

I will need to add specific additional email addresses for further users who wish to access.

I am out of the office between Monday 28- Thursday 31st July but I have granted Stephanie full access and she should be able to do add other viewer uses.

Kind Regards,

Jack Southon

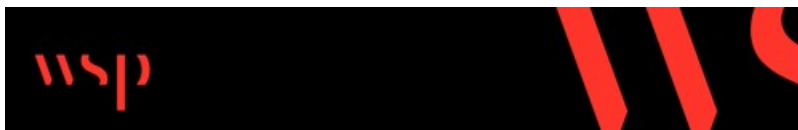
Technical Director
BSc MSc FRGS MCIWEM C.WEM CEnv CSci CGeog (GIS)
Pronouns (He / Him)

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-LAEmHhHzdJzBITWfa4Hgs7pbKI

Horner, Thomas

From: Harry Mansfield <harry.mansfield@createce.co.uk>
Sent: 25 July 2025 14:39
To: 'Southon, Jack'; Horner, Thomas; Vas, Michele
Cc: Jo M Baker; Higgins, Graham; Haberfield, Stephanie; Grace Beard; Graham Sinclair; Jessica Wilson
Subject: RE: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

[WARNING: EXTERNAL SENDER]

Hi Jack,

Thank you for the data transfer. We have successfully downloaded the data packages and have reviewed the files. I have provided some comments below.

The submittal contains the RAG spreadsheet with EA comments on the 2023 WSP submission and with WSP responses to those comments that were submitted back to the EA as part of the February 2025 submission. This information brings us up to February 2025 in the ongoing EA review process. However the data package is missing information on the ongoing dialogue that we assume is taking place between WSP and the EA since February 2025. Can any information be provided regarding this dialogue, such as further RAG responses, so that we can understand the current status of the model in the approval process? You have shared the results of sensitivity tests dated May 2025 which indicate that these discussions are ongoing and that there are some back and forth discussions, but there is no information in this package as to the EA comments or the EA overall position.

In respect to the queries outlined in previous letters dated 17th February and 25th March that we raised, I have set out below where information has been provided or is still lacking. The numbering structure imitates that of our latest letter:

- 2.1 The information has provided partial evidence of the EA's formal review and approval, however as discussed above the dialogue from the last 6 months is missing.
- 2.2 The exact model used as a starting point is now confirmed as the 2017 Gough Way Model.
- 2.3 A revised, zoomed out version of Plate TR13.1-5-1 has not been provided, however the provision of the model results has permitted independent analytics to be undertaken.
- 2.4 Documentation and addendums still assert that 1mm increments are outside the confidence limit of hydraulic modelling software, however EA guidance directs that these tolerances in the software should not be accounted for when reviewing impacts so that trends of impact can be properly identified and mitigated.
- 3.2 No further images or descriptions of the hydraulic model representation of the bridge structure is provided, however the models have been provided and therefore the representation can now be reviewed independently.
- 3.3 No flood modeller export has been provided, but the submitted models have been provided so structure review can now be independently verified.
- 3.4 Gaps identified in plate TR13.1-1-2 have not been explained or otherwise confirmed.
- 3.5 Where there are increased levels identified in the change of extent imaging these have not been discussed in detail.
- 3.7 No analysis has been provided regarding how peak flow rates passing from the site into Clare hall may be impacted as a result of the bridge structure.
- 3.8 there has been no further comment regarding the need for blockage to be considered in a design when introducing a new bridge structure into a river channel.
- 4.1 No further commentary or justification has been provided as to why final design storm flow rates are lower than the current EA approved model.
- 4.2 No comparison is made in the reporting as to the difference in the WSP model with the 2017 Gough way model upon which it is based.

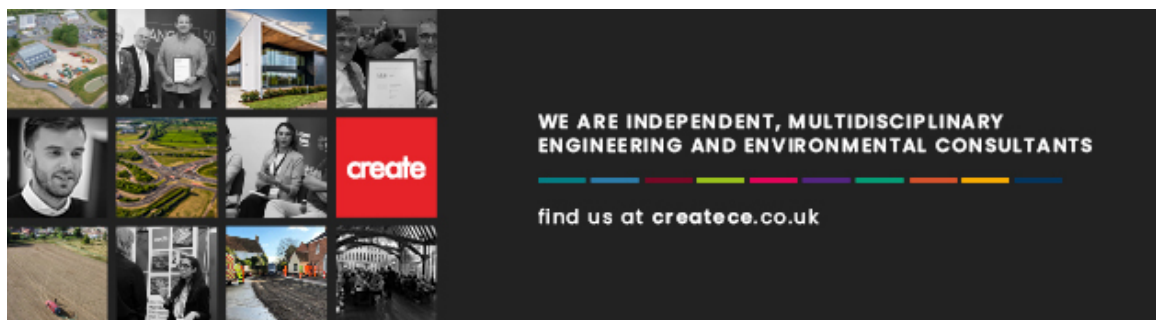
4.3 There is some commentary in the further sensitivity tests package dated May 2025 regarding changes to software and data set versions since the outset of the project, the note asserts that the NRFA dataset used (version 10) was the most up to date at the time of publication, however at the time of the DFT submission version 12.1 was available.

Further information as to the position of WSP on the remaining outstanding comments will allow Clare Hall to appropriately formulate our case in a meaningful way. Given the advanced stage of the inquiry in order to include any further information in the proofs we would require responses by 01/08/2025.

Many thanks,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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From: Southon, Jack <jack.southon@wsp.com>

Sent: 24 July 2025 21:57

To: Horner, Thomas <thomas.horner@dentons.com>; michele.vas <michele.vas@dentons.com>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Higgins, Graham <Graham.Higgins@wsp.com>;
Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; Grace Beard <Grace.Beard@createce.co.uk>;
Harry Mansfield <harry.mansfield@createce.co.uk>; Graham Sinclair <Graham.Sinclair@createce.co.uk>;
Jessica Wilson <jessica.wilson@newsteer.co.uk>

Subject: Re: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Hi Tom,

View and download access added as requested.

Graham, Harry and Grace should get a notification to confirm



graham.sinclair
EXTERNAL USER

👁 Can view



harry.mansfield
EXTERNAL USER

👁 Can view



grace.beard
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👁 Can view

Kind Regards,

Jack Southon

Technical Director
Pronouns (He / Him)

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From: Horner, Thomas <Thomas.Horner@dentons.com>

Sent: Thursday, July 24, 2025 17:28

To: Southon, Jack <jack.southon@wsp.com>; michele.vas <michele.vas@dentons.com>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Higgins, Graham <Graham.Higgins@wsp.com>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; Grace Beard <grace.beard@createce.co.uk>; Harry Mansfield <harry.mansfield@createce.co.uk>; Graham Sinclair <graham.sinclair@createce.co.uk>; Jessica Wilson <jessica.wilson@newsteer.co.uk>

Subject: RE: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Hi Jack,

Many thanks for your email.

Please can you provide access to:

Graham Sinclair - graham.sinclair@createce.co.uk

Harry Mansfield - harry.mansfield@createce.co.uk

Grace Beard - grace.beard@createce.co.uk

(all copied).

Kind regards,

Tom

Thomas Horner

Associate

+44 20 7246 7193 | +44 7778 337378

London

From: Southon, Jack <jack.southon@wsp.com>
Sent: 24 July 2025 17:02
To: Horner, Thomas <Thomas.Horner@dentons.com>; Vas, Michele <michele.vas@dentons.com>
Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Higgins, Graham <Graham.Higgins@wsp.com>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>
Subject: C2C Clare Hall request for modelling files

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Kind Regards,

Jack Southon

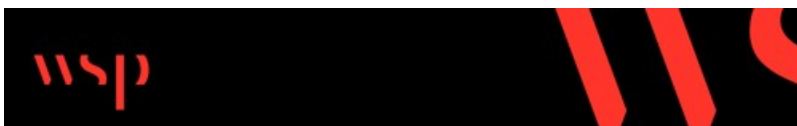
Technical Director
BSc MSc FRGS MCIWEM C.WEM CEnv CSci CGeog (GIS)
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-LAEmHhHzdJzBITWfa4Hgs7pbKI

Horner, Thomas

From: Southon, Jack <jack.southon@wsp.com>
Sent: 08 August 2025 12:51
To: graham.sinclair; Harry Mansfield; Higgins, Graham; Horner, Thomas; Vas, Michele
Cc: Jo M Baker; Haberfield, Stephanie; grace.beard; Jessica Wilson; UK - Cambourne to Cambridge
Subject: Re: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Follow Up Flag: Follow up
Flag Status: Completed

[WARNING: EXTERNAL SENDER]

Hi Graham,

Further to our discussion yesterday I have created a new sub-folder within the previous shared OneDrive link called '04 Sent 07-2025'. This contains the Environment Agency commissioned hydrology and hydraulics review by Arcadis (dated 23/07 and 24/07 respectively) and our response dated 29/07.

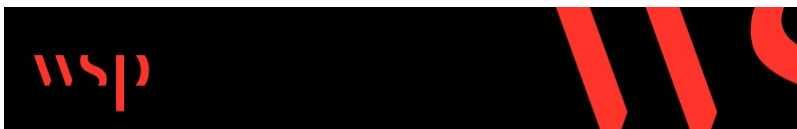
Following our call this morning with the Environment Agency they have indicated that, following review of our justification documentation, they are moving to accept our modelling for the purposes of this assessment and will be writing to the inspector before the proof of evidence deadline to remove their objection. We are yet to receive written confirmation of the Environment Agency's updated position so cannot confirm formally until then. Please keep an eye out on the independent inquiry website where this will be posted once available and we recommend you rely upon your own enquires of the Programme Officer (Joanna Vincent) for any formal updates from the Environment Agency.

The lead officer we have been corresponding with at the Environment Agency has been Alison Craggs (Sustainable Places Planning Advisor), her contact info can be found as the signatory of CD2-OBJ-301.

Kind Regards,

Jack Southon
Technical Director
Pronouns (He / Him)

M +44 077125-38324



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From: Graham Sinclair <Graham.Sinclair@createce.co.uk>
Sent: Thursday, August 7, 2025 12:25
To: Southon, Jack <jack.southon@wsp.com>; Harry Mansfield <harry.mansfield@createce.co.uk>; Higgins, Graham <Graham.Higgins@wsp.com>; Horner, Thomas <thomas.horner@dentons.com>; michele.vas

<michele.vas@dentons.com>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; grace.beard <grace.beard@createce.co.uk>; Jessica Wilson <jessica.wilson@newsteer.co.uk>; UK - Cambourne to Cambridge <C2C@wsp.com>

Subject: RE: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Hi Jack,

Thanks for your time earlier this morning, it was very helpful. Just to confirm you will be looking to upload the latest RAG review form the EA to the Sharepoint link, if this differs from that already provided. I note you will also be taking a further look the flow check point Harry flagged was comparable between the two models and what inferences this provides as to the suitability of the hydrology used.

Also, are you able to confirm the details of the lead officer you are now working with at the EA/will be meeting tomorrow?

Many thanks,

Graham.

Graham Sinclair
Technical Director
Water & Flood Risk
m. 07734 604 920 w. www.createce.co.uk



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From: Southon, Jack <jack.southon@wsp.com>

Sent: 05 August 2025 17:17

To: Harry Mansfield <harry.mansfield@createce.co.uk>; Higgins, Graham <Graham.Higgins@wsp.com>; Horner, Thomas <thomas.horner@dentons.com>; michele.vas <michele.vas@dentons.com>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; Grace Beard <Grace.Beard@createce.co.uk>; Graham Sinclair <Graham.Sinclair@createce.co.uk>; Jessica Wilson <jessica.wilson@newsteer.co.uk>; UK - Cambourne to Cambridge <C2C@wsp.com>

Subject: Re: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Hi Harry,

We have an update call with the EA on Wednesday afternoon, so Thursday 10am would be good as it can be informed by the latest update.

I will send you a meeting invite with Jo and Graham as optional for information.

Kind Regards,

Jack Southon
Technical Director
Pronouns (He / Him)

M +44 077125-38324



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From: Harry Mansfield <harry.mansfield@createce.co.uk>
Sent: Tuesday, August 5, 2025 15:18
To: Higgins, Graham <Graham.Higgins@wsp.com>; Southon, Jack <jack.southon@wsp.com>; Horner, Thomas <thomas.horner@dentons.com>; michele.vas <michele.vas@dentons.com>
Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; grace.beard <grace.beard@createce.co.uk>; graham.sinclair <graham.sinclair@createce.co.uk>; Jessica Wilson <jessica.wilson@newsteer.co.uk>; UK - Cambourne to Cambridge <C2C@wsp.com>
Subject: RE: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

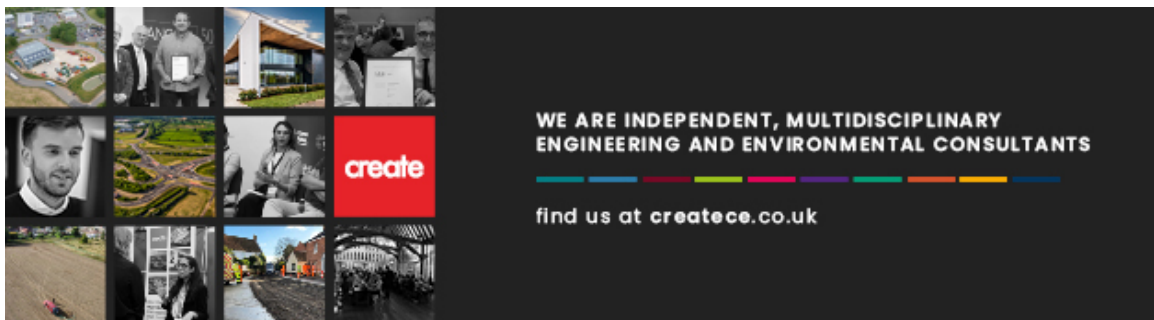
Hi Graham and Jack,

A meeting would be useful, we have availability tomorrow (9am – 1pm, 3pm onwards) and Thursday (10 am onwards).

Many thanks,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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From: Higgins, Graham <Graham.Higgins@wsp.com>
Sent: 30 July 2025 07:57
To: Harry Mansfield <harry.mansfield@createce.co.uk>; Southon, Jack <jack.southon@wsp.com>; Horner, Thomas <thomas.horner@dentons.com>; michele.vas <michele.vas@dentons.com>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; Grace Beard <Grace.Beard@createce.co.uk>; Graham Sinclair <Graham.Sinclair@createce.co.uk>; Jessica Wilson <jessica.wilson@newsteer.co.uk>; UK - Cambourne to Cambridge <C2C@wsp.com>
Subject: RE: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Harry

Thanks for your email.

Jack is on leave this week until Friday and didn't have a chance to respond to your email before he left.

The latest position regarding liaison with the EA is that discussions are ongoing, with the next meeting scheduled for 1 August.

We suggest that Jack meets with you when he is back from leave to discuss your various points below, to ensure that we understand exactly what information you need, noting that some of the items below are statements rather than questions. That meeting could also be used to inform negotiations of the Statement of Common Ground.

If you can let me know your availability for next week, I'll check with Jack and we can get a meeting scheduled.

Regards

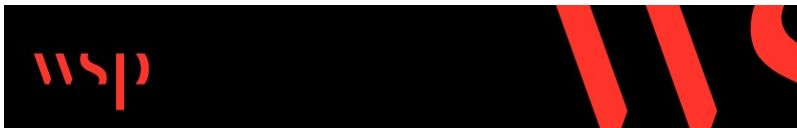
Graham

Graham Higgins

Technical Director
BEng, CEng, FICE

T +44 (0) 7817 547 372

Advance notice of leave 1 to 5 September inclusive



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Registered office: WSP House, 70 Chancery Lane, London, WC2A 1AF.

From: Harry Mansfield <harry.mansfield@createce.co.uk>
Sent: 25 July 2025 14:39
To: Southon, Jack <jack.southon@wsp.com>; Horner, Thomas <thomas.horner@dentons.com>; michele.vas <michele.vas@dentons.com>
Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Higgins, Graham <Graham.Higgins@wsp.com>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; grace.beard <grace.beard@createce.co.uk>; graham.sinclair <graham.sinclair@createce.co.uk>; Jessica Wilson <jessica.wilson@newsteer.co.uk>
Subject: RE: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Hi Jack,

Thank you for the data transfer. We have successfully downloaded the data packages and have reviewed the files. I have provided some comments below.

The submittal contains the RAG spreadsheet with EA comments on the 2023 WSP submission and with WSP responses to those comments that were submitted back to the EA as part of the February 2025 submission. This information brings us up to February 2025 in the ongoing EA review process. However the data package is missing information on the ongoing dialogue that we assume is taking place between WSP and the EA since February 2025. Can any information be provided regarding this dialogue, such as further RAG responses, so that we can understand the current status of the model in the approval process? You have shared the results of sensitivity tests dated May 2025 which indicate that these discussions are ongoing and that there are some back and forth discussions, but there is no information in this package as to the EA comments or the EA overall position.

In respect to the queries outlined in previous letters dated 17th February and 25th March that we raised, I have set out below where information has been provided or is still lacking. The numbering structure imitates that of our latest letter:

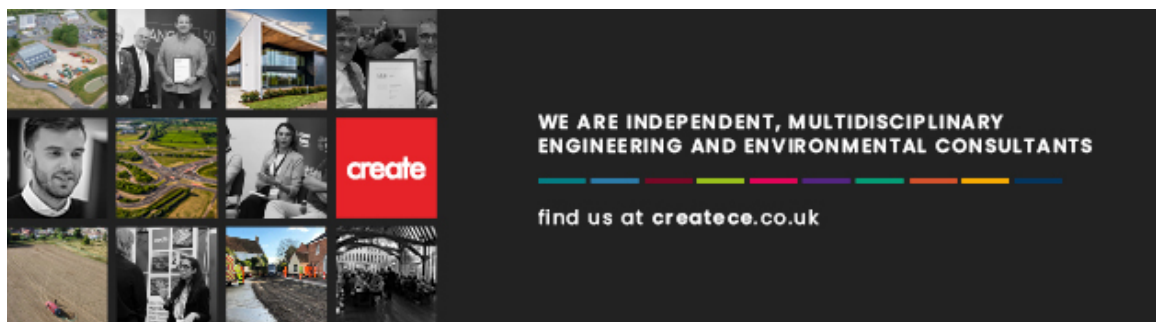
- 2.1 The information has provided partial evidence of the EA's formal review and approval, however as discussed above the dialogue from the last 6 months is missing.
- 2.2 The exact model used as a starting point is now confirmed as the 2017 Gough Way Model.
- 2.3 A revised, zoomed out version of Plate TR13.1-5-1 has not been provided, however the provision of the model results has permitted independent analytics to be undertaken.
- 2.4 Documentation and addendums still assert that 1mm increments are outside the confidence limit of hydraulic modelling software, however EA guidance directs that these tolerances in the software should not be accounted for when reviewing impacts so that trends of impact can be properly identified and mitigated.
- 3.2 No further images or descriptions of the hydraulic model representation of the bridge structure is provided, however the models have been provided and therefore the representation can now be reviewed independently.
- 3.3 No flood modeller export has been provided, but the submitted models have been provided so structure review can now be independently verified.
- 3.4 Gaps identified in plate TR13.1-1-2 have not been explained or otherwise confirmed.
- 3.5 Where there are increased levels identified in the change of extent imaging these have not been discussed in detail.
- 3.7 No analysis has been provided regarding how peak flow rates passing from the site into Clare hall may be impacted as a result of the bridge structure.
- 3.8 there has been no further comment regarding the need for blockage to be considered in a design when introducing a new bridge structure into a river channel.
- 4.1 No further commentary or justification has been provided as to why final design storm flow rates are lower than the current EA approved model.
- 4.2 No comparison is made in the reporting as to the difference in the WSP model with the 2017 Gough way model upon which it is based.
- 4.3 There is some commentary in the further sensitivity tests package dated May 2025 regarding changes to software and data set versions since the outset of the project, the note asserts that the NRFA dataset used (version 10) was the most up to date at the time of publication, however at the time of the DFT submission version 12.1 was available.

Further information as to the position of WSP on the remaining outstanding comments will allow Clare Hall to appropriately formulate our case in a meaningful way. Given the advanced stage of the inquiry in order to include any further information in the proofs we would require responses by 01/08/2025.

Many thanks,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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From: Southon, Jack <jack.southon@wsp.com>

Sent: 24 July 2025 21:57

To: Horner, Thomas <thomas.horner@dentons.com>; michele.vas <michele.vas@dentons.com>

Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Higgins, Graham <Graham.Higgins@wsp.com>;
Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; Grace Beard <Grace.Beard@createce.co.uk>;
Harry Mansfield <harry.mansfield@createce.co.uk>; Graham Sinclair <Graham.Sinclair@createce.co.uk>;
Jessica Wilson <jessica.wilson@newsteer.co.uk>

Subject: Re: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Hi Tom,

View and download access added as requested.

Graham, Harry and Grace should get a notification to confirm



graham.sinclair
EXTERNAL USER

Can view



harry.mansfield
EXTERNAL USER

Can view



grace.beard
EXTERNAL USER

Can view

Kind Regards,

Jack Southon
Technical Director
Pronouns (He / Him)

M +44 077125-38324



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From: Horner, Thomas <Thomas.Horner@dentons.com>
Sent: Thursday, July 24, 2025 17:28
To: Southon, Jack <jack.southon@wsp.com>; michele.vas <michele.vas@dentons.com>
Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Higgins, Graham <Graham.Higgins@wsp.com>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>; Grace Beard <grace.beard@createce.co.uk>; Harry Mansfield <harry.mansfield@createce.co.uk>; Graham Sinclair <graham.sinclair@createce.co.uk>; Jessica Wilson <jessica.wilson@newsteer.co.uk>
Subject: RE: C2C Clare Hall request for modelling files [DEN-UK_ACTIVE.FID10577279]

Hi Jack,

Many thanks for your email.

Please can you provide access to:

Graham Sinclair - graham.sinclair@createce.co.uk
Harry Mansfield - harry.mansfield@createce.co.uk
Grace Beard - grace.beard@createce.co.uk

(all copied).

Kind regards,

Tom

Thomas Horner

Associate

+44 20 7246 7193 | +44 7778 337378

London

From: Southon, Jack <jack.southon@wsp.com>
Sent: 24 July 2025 17:02
To: Horner, Thomas <Thomas.Horner@dentons.com>; Vas, Michele <michele.vas@dentons.com>
Cc: Jo M Baker <JoM.Baker@cambridgeshire.gov.uk>; Higgins, Graham <Graham.Higgins@wsp.com>; Haberfield, Stephanie <Stephanie.Haberfield@wsp.com>
Subject: C2C Clare Hall request for modelling files

[WARNING: EXTERNAL SENDER]

Thomas, Michele,
Jo has asked me to provide a copy of our model files to Clare Hall in response to their previous request.

The link below has three folders in it.

01 - the model as provided to the Environment Agency in July 2023

02 - the updated model as provided to the Environment Agency in February 2025

03 - a copy of the model provided to the Environment Agency in May 2025 to provide sensitivity tests in response to review comments

Each folder contains the model files and associated reporting for that submission

https://wsponline-my.sharepoint.com/:f:/g/personal/jack_southon_wsp_com/EiqBTv3HL_1Jk8rrYMmtdEYBPDy9kxeeVrDSFdmdAYw82Q?e=7pgicp

You should have view and download access to this folder and it can be shared with Clare Hall and their representatives.

I will need to add specific additional email addresses for further users who wish to access.

I am out of the office between Monday 28- Thursday 31st July but I have granted Stephanie full access and she should be able to do add other viewer uses.

Kind Regards,

Jack Southon

Technical Director

BSc MSc FRGS MCIWEM C.WEM CEnv CSci CGeog (GIS)

Pronouns (He / Him)

M +44 077125-38324

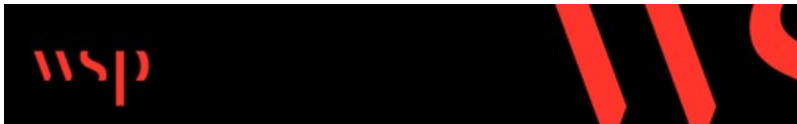
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-LAE mHhHzdJzBITWfa4Hgs7pbKI

Horner, Thomas

From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Sent: 21 August 2025 13:26
To: Graham Sinclair
Cc: Harry Mansfield; Horner, Thomas; Grace Beard; Enquiries_EastAnglia; 'Alan Short'
Subject: RE: P24-3220 - Clare Hall, Cambridge
Attachments: EA response.pdf

[WARNING: EXTERNAL SENDER]

Dear Graham,

Thank you for your email.

Please see attached our letter sent to the Inspector on Tuesday which sets out our updated position. I expect the inquiry website hasn't been updated yet.

I will get back to you about the meeting as soon as I can.

Kind regards,

Alison Craggs

Sustainable Places Planning Specialist

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**

Direct dial: **02077140285**



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From: Graham Sinclair <Graham.Sinclair@createce.co.uk>
Sent: 21 August 2025 11:31
To: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Cc: Harry Mansfield <harry.mansfield@createce.co.uk>; Horner, Thomas <thomas.horner@dentons.com>; Grace Beard <Grace.Beard@createce.co.uk>; Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>; 'Alan Short' <cas64@cam.ac.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Morning Alison,

Further to our below correspondence I am seeking confirmation of the EA's current position. I note our client, Alan Short, President of Clare Hall, wrote to you earlier this week, sharing the findings of our own modelling along with my Proof of Evidence. I do hope you have had time to review these.

As you will be aware Proofs of Evidence were exchanged on Wednesday and we note in the flood risk Proof of Evidence that the appendices include the following email from yourselves, dated 8th August 2025:

Hi Jack,

Following recent discussions, we can confirm that the Environment Agency considers the model used for the Cambourne to Cambridge busway acceptable for assessing flood risk in the area of interest. While there are some technical issues identified, including minor increases in flood depths in already inundated open fields, these do not appear to materially affect the flood risk evaluation. There are also modest reductions in flood depths in built-up areas downstream of the bridge. Post-development modelling will need to demonstrate that any increase in flood risk remains within the red line boundary of the application and, where possible, that the structure delivers an overall improvement in flood risk. It is important to note that although the model is suitable for supporting the TWA Order and Flood Risk Assessment, it would not meet internal Environment Agency standards for updating the flood map without addressing the issues highlighted in the review. However, for planning purposes it is acceptable and therefore we intend to withdraw our objection on flood risk grounds. We will write to the Inspector by 19th August with a detailed position.

Kind regards,

Alison Craggs
Sustainable Places Planning Specialist

This email notes you will be writing to the inspectorate by 19th August to potentially withdraw the EA's objection. We understand this has not yet occurred and can only assume that the EA's objection to the proposal remains? I would be grateful if you could confirm this point.

You will also note the deadline for rebuttal Proofs of Evidence is 9th September and any rebuttals Clare Hall wish to make are likely to be resultant of the EA's position. Therefore I must stress the importance in knowing the EA's position as soon as possible such that we have suitable time to prepare any rebuttals.

As per Alan Short's correspondence a meeting to discuss the above would be extremely helpful so do let us know your availability for this.

I look forward to hearing from you.

Many thanks,

Graham.

Graham Sinclair
Technical Director
Water & Flood Risk
m. 07734 604 920 w. www.createce.co.uk



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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Sent: 11 August 2025 10:02

To: Graham Sinclair <Graham.Sinclair@createce.co.uk>

Cc: Harry Mansfield <harry.mansfield@createce.co.uk>; Horner, Thomas <thomas.horner@dentons.com>; Grace Beard <Grace.Beard@createce.co.uk>; Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>

Subject: RE: P24-3220 - Clare Hall, Cambridge

Dear Graham,

Thank you for your email. I can confirm receipt.

Kind regards,

Alison Craggs

Sustainable Places Planning Specialist

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**



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From: Graham Sinclair <Graham.Sinclair@createce.co.uk>

Sent: 07 August 2025 17:01

To: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>; Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>

Cc: Harry Mansfield <harry.mansfield@createce.co.uk>; Horner, Thomas <thomas.horner@dentons.com>; Grace Beard <Grace.Beard@createce.co.uk>

Subject: RE: P24-3220 - Clare Hall, Cambridge

FAO Alison Craggs & Teresa Chapman

Dear Alison & Teresa

Further to our below correspondence, your correspondence with Alan Short of Clare Hall, Cambridge and the attached EA objection letter (with respect to the Cambourne to Cambridge Transport and Works Order) I write to further outline Clare Hall's position with regards the proposed crossing of Bin Brook.

As you will be aware Create Consulting has been instructed by Clare Hall to provide evidence at the upcoming Inquiry in regard to flood risk and the impact the proposed Bin Brook crossing will have on surrounding land.

We note the applicant's consultant, WSP, has been in contact with yourselves (albeit we are unsure exactly which officer) and are told that conversations are at an advanced stage with regards agreement of their hydraulic modelling.

We held a meeting with WSP and the applicant this morning in relation to setting out common ground. WSP were clear that they intended to not undertake the updates to the model requested by the EA in their most recent RAG review, but more to endeavour to defend the position as to the modelling being sufficient through the provision of additional sensitivity tests. We note this contravenes the requests of the EA's third-party reviewer, Arcadis.

As you will no doubt be aware the WSP model has a number of fundamental issues which in our view, and as expressed in your attached objection, make it unfit for purpose and thus not suitable for assessing the proposed development against. This primarily relates to the lack of detail provided to you by WSP, in particular in relation to inadequate assessments of channel structures close to the busway crossing as well as using an out of date hydrological assessment, which underestimates flows. We therefore believe these fundamental issues pose a significant risk to WSP's ability to assess flood risk impact to surrounding land and property (particularly Clare Hall and the upstream Gough Way estate). WSP have confirmed there are impacts beyond the application boundary and the above model flaws could further exacerbate these impacts when correctly modelled.

Create's own modelling, using the more up to date 2023 JBA Bin Brook model, shows impacts of the proposed busway, both in flood level and velocity (which increases by up to 100% immediately downstream), beyond the application boundary. We therefore must emphasise the clear contravention of national policy this poses and would like to again highlight this issue to the EA to ensure this is fully taken on board in your assessment. We currently take the view that the EA cannot draw sufficient conclusions based on the WSP modelling as it stands and significant updates are required.

We believe it would be a derogation of duty by the EA to approve the WSP model when (a) it does not properly determine that additional flood risk won't be created elsewhere and (b) it hasn't proposed what mitigation measures are available to remedy that.

I trust you will take the above into account when liaising with the applicant over the coming days and should these matters not be resolved we assume you will also be presenting evidence at the Inquiry. I would be grateful if you could confirm on this point.

If you could confirm receipt of this email and that it has been forwarded on to the relevant parties as required (if you are not directly dealing with the case), it would be much appreciated.

Many thanks,

Graham Sinclair
Technical Director
Water & Flood Risk
m. 07734 604 920 w. www.createce.co.uk



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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Sent: 28 August 2024 14:14
To: Harry Mansfield <harry.mansfield@createce.co.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Harry,

Thanks for your email. It's my understanding that this is our national approach.

Kind regards,

Alison Craggs

Sustainable Places Advisor

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**

Mob: **07467335963**

Direct dial: **02077140285**



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From: Harry Mansfield

Sent: Wednesday, August 28, 2024 10:11 AM

To: EastAnglia, Planning

Subject: RE: P24-3220 - Clare Hall, Cambridge

Good Morning Alison,

Thank you for your response.

That is unfortunate, though understandable. Just so I can inform my client and further my own understanding, is this a standard national rule the EA is following? Or is it a result of excessive workloads at the moment?

i.e. if we receive similar such third party consultancies in the future can we expect the same response?

Kind regards,

Harry Mansfield

Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Sent: Tuesday, August 27, 2024 3:51 PM
To: Harry Mansfield <harry.mansfield@createce.co.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Harry,

Thanks for your email.

If your client is a third party to the development you describe, rather than the developer/landowner, then we won't be able to take this forward unfortunately. We can only provide pre-application planning advice to developers or consultants to help shape individual planning proposals.

Please let me know if I've misunderstood.

Kind regards,

Alison Craggs

Sustainable Places Advisor

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brompton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**

Mob: **07467335963**

Direct dial: **02077140285**



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From: Harry Mansfield <harry.mansfield@createce.co.uk>
Sent: Tuesday, August 27, 2024 9:14 AM
To: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Allison,

Apologies I have been on leave for a few weeks.

Im picking this up now. Essentially our project is assessing the impact of a development works in south western Cambridge. The client has engaged with us to test and determine the likely impact of the development on their property. The development is across the bin brook just upstream of Clare hall college.

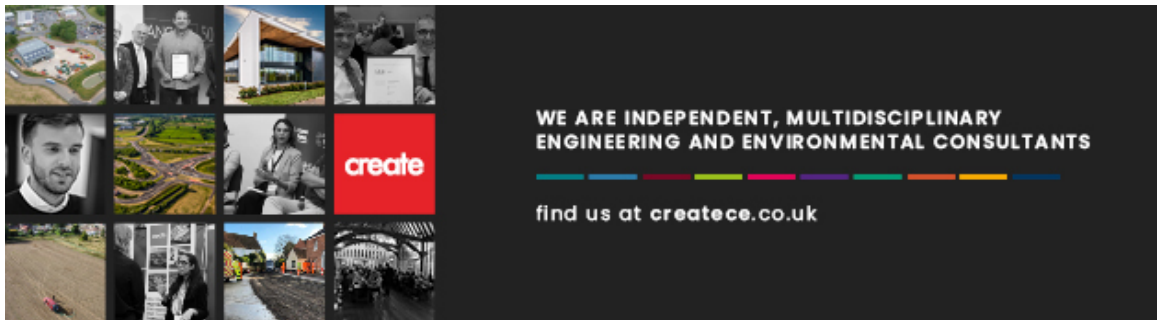
We would like a meeting with the EA to validate the work that we have undertaken. What we would like first of all is a meeting with yourselves so that we can discuss the model that we have used, the methodology we have followed and other details of the project so that we can flag anything the EA might object to.

Is it possible to arrange for a meeting?

Many thanks,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>

Sent: Wednesday, August 7, 2024 11:12 AM

To: Harry Mansfield <harry.mansfield@createce.co.uk>

Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Harry,

Thanks for your email. I apologise for the delay to our response.

Our flood risk team have limited capacity for model reviews currently and therefore we are having to limit our attendance to meetings to large scale/strategic sites at the moment.

Could you please provide more detail of the proposed development related to this request and the issues you would like to discuss? If there is any planning history this would be useful to know.

Kind regards,

Alison Craggs

Sustainable Places Advisor

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**

Mob: **07467335963**

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From: Harry Mansfield <harry.mansfield@createce.co.uk>
Sent: Thursday, July 4, 2024 11:28 AM
To: Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>
Subject: P24-3220 - Clare Hall, Cambridge

Hi,

We are currently reviewing the impact of the proposed development in Cambridge. The location is Herschel Rd, Cambridge CB3 9AL, the model is the bin brook 2023 model.

We have been provided with the model and have completed a review and pulled together our intended scope of works.

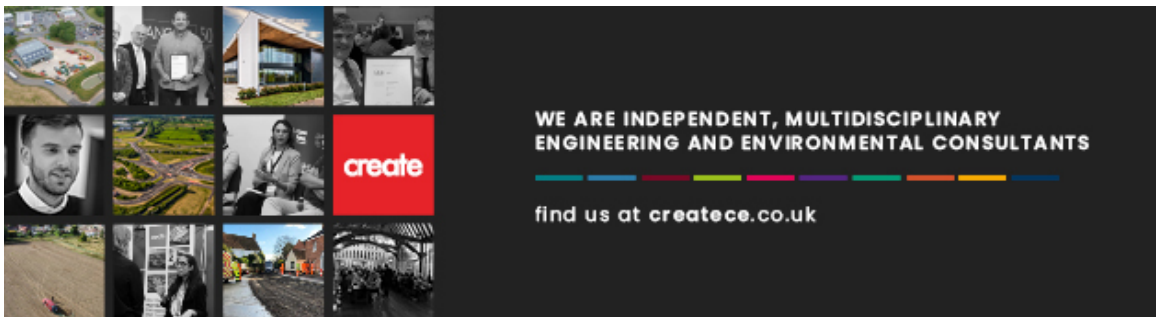
Id like to be put in touch with an EA advisor who can support us with this work. We to establish a purchase order so that we can have the EA input on the following:

1. Review/approval of our scope proposals
2. Meeting to discuss the details of the methodology

Many thanks,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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Ms Shenaz Choudhary - Planning
Casework Officer
Department for Transport
Transport Infrastructure Planning Unit
Great Minster House 33 Horseferry Road
LONDON
SW1P 4DR

Our ref: AC/2024/132485/02-L01

Your ref:

Date: 19 August 2025

Dear Ms Choudhary

**TRANSPORT AND WORKS ACT 1992
TRANSPORT AND WORKS (APPLICATIONS AND OBJECTIONS
PROCEDURE) (ENGLAND AND WALES) RULES 2006
THE CAMBOURNE TO CAMBRIDGE ORDER**

Further to our previous representation we are able to remove our objection on flood risk grounds and wish to make the following comments.

We first reviewed the applicant's Bin Brook model at the pre-application stage and provided a response to the applicant on 15th November 2023, stating that the model was unsuitable for its intended use. At the statutory consultation the model was not submitted therefore we were unable to determine whether our concerns had been resolved and objected in our letter dated 8th January 2025. Subsequently, the applicant approached us directly to review the model. We carried out two model reviews and provided feedback to the applicant in March 2025 and July 2025. At the most recent review there were still technical issues to address. The applicant submitted justification against these points.

Having reviewed the applicant's response we consider that the model is acceptable for assessing flood risk in the area of interest. While there are some technical issues identified (discussed below), the modelling is considered to be acceptable for the scale and nature of the proposed development. Therefore we are removing our objection.

Flood Modelling

The main issue raised at review was the age of the hydrology. Environment Agency guidance standards consider a 6 month timeframe is reasonable for transitioning to using new methods and data. The rainfall data set used in the model's hydrology is approximately 3 years old. The applicant has carried out sensitivity testing to demonstrate that the difference between the 2013 and 2022 data sets (FEH13 and FEH22) is approximately 3%. They have also demonstrated that the FEH22 values for the 1% Annual Exceedance Probability (AEP) for this site fall into the 68%/95% confidence intervals for the FEH 13 values that were used. This shows that they are within likely acceptable error margins for those values. Therefore, we consider that an update to the current version of the hydrology data sets would not materially change the outcome of the modelling, and this issue is resolved.

Environment Agency
Bromholme Lane, Bampton, Huntingdon, PE28 4NE.
Customer services line: 08708 506 506
Email: enquiries@environment-agency.gov.uk
www.environment-agency.gov.uk

Cont/d

The review also noted the presence of glass walling at the downstream end of the model. Glass walling is a modelling technique where the boundary is treated as a reflective barrier, preventing flow from passing through. This can create artificially higher water levels in the model that do not reflect reality. However, this feature is located far enough downstream and is separated from the site by other structures such as weirs, culverts, and bridges that prevent any backflow effects impacting the site. Therefore we consider that the glass walling does not affect the consideration of flood risk from the scheme.

The model shows minor increases in flood depths in some already inundated areas. These increases are maximum 8mm increase on depths of approximately 900mm in open fields. There are decreases of similar magnitude in the built up area immediately downstream of the bridge in the proposed design. The Design Manual for Roads and Bridges ([Standards For Highways](#)) states a less than or equal to 10mm increase in water levels, as demonstrated in modelling, is an acceptable detriment in road and bridge schemes.

There is a minor increase in the flooded extent. A small number of extra grid cells in the model domain, upstream of the bridge in the open fields, are indicated as wet in the after vs the baseline case. This occurs in the open fields area within the redline boundary. As this is within the redline boundary, we consider this acceptable.

On this basis we consider that the model can be used to make decisions with regards to flood risk in the area of interest. It is important to note that although the model is suitable for supporting the TWA Order and Flood Risk Assessment, it would not meet internal Environment Agency standards for updating the flood map without addressing the issues highlighted in the review.

Flood Risk Assessment

Our original objection was based on the pre-application model we reviewed not being suitable for assessing flood risk. Following the applicant's revisions and justifications, as outlined above, we are now satisfied that the model is appropriate for use in assessing flood risk for the application and are therefore able to comment further on the flood risk implications of the scheme. The Flood Risk Assessment (FRA) must meet the requirements of the Exception Test as set out in Paragraph 168 of the National Planning Policy Framework (NPPF). In accordance with the NPPF, the FRA should demonstrate that the proposed development will provide wider sustainability benefits to the community that outweigh the flood risk, and that it will be safe for its lifetime without increasing flood risk elsewhere. Specifically, it must demonstrate that there will be no increase in flood risk outside of the red line boundary and, where possible, deliver a net reduction in overall flood risk.

Based on our review of the Bin Brook Model Report (v1.4) and the FRA (Appendix TR13.1), we consider that the modelling work is sufficiently robust to support the FRA in meeting the NPPF requirements on flood risk. The model outputs show negligible reductions in flood depth outside the red line boundary, limited to small reductions in some locations, with all increases contained within the site. As stated in the FRA (Section 5.2.7): "As these changes are within the redline boundary there are no impacts of increased flood risk to third parties." These changes are within acceptable tolerances, do not materially increase flood risk to third parties, and demonstrate that the proposed development can be made safe for its lifetime. On this basis, the FRA satisfies the second limb of the Exception Test by evidencing that the scheme will not increase flood risk elsewhere. The wider sustainability benefits of the scheme are set out elsewhere in

the planning application; however, the FRA should continue to seek opportunities for net reductions in overall flood risk wherever practicable, in line with the NPPF.

We hope this information is of assistance. If you have any queries, please do not hesitate to contact us.

Yours sincerely

Ms Alison Craggs
Sustainable Places Planning Specialist

Direct dial 020 847 45242

Direct e-mail planning.EastAnglia@environment-agency.gov.uk

Horner, Thomas

From: Graham Sinclair <Graham.Sinclair@createce.co.uk>
Sent: 21 August 2025 17:27
To: 'EastAnglia, Planning'
Cc: Harry Mansfield; Horner, Thomas; Grace Beard; Enquiries_EastAnglia; 'Alan Short'
Subject: RE: P24-3220 - Clare Hall, Cambridge
Attachments: EA response.pdf; Figure 6.2 WSP Impact Grid 10m bridge at 1mm tolerance.jpg

[WARNING: EXTERNAL SENDER]

Hi Alison,

Thank you for sending this over so swiftly, that's very helpful. I have reviewed this afternoon and would like to raise some queries on your letter, just to fully confirm the EA's position with regards the application and to ensure the inspectorate is informed correctly. As per my email this morning this is very important in terms of the rebuttal timeframe and thus we would be grateful of your earliest response. A meeting to discuss would be very much appreciated so please do let us know available dates/times.

I include below sections from your letter in italics and my commentary and requested clarifications in red text.

The model shows minor increases in flood depths in some already inundated areas. These increases are maximum 8mm increase on depths of approximately 900mm in open fields.

This statement is factually incorrect and misleads the Inspectorate. The noted 8mm increases are not within open fields only but within the Bin Brook channel plus Gough Way flood diversion channel (which was specifically constructed to reduce flood risk on Gough Way) as well as within private gardens on the eastern side of Gough Way. I attach here a figure which is also included within my proof of evidence that clearly depicts these increases and that they are not solely limited to open fields. On the basis of this assessment I trust you will further clarify the position here with the Inspectorate so they are appropriately informed as to the impacts of the proposed busway?

The Design Manual for Roads and Bridges (Standards For Highways) states a less than or equal to 10mm increase in water levels, as demonstrated in modelling, is an acceptable detriment in road and bridge schemes.

Please can you confirm what weight the EA give to The Design Manual for Roads and Bridges compared to the NPPF, which is descript in its requirements for flood risk to not be increased elsewhere. I also refer to the EA's own guidance, here: <https://www.gov.uk/guidance/using-modelling-for-flood-risk-assessments>. This is very clear in its requirements and makes no reference to the Design Manual for Roads and Bridges but instead notes that flood risk must not be increased elsewhere. Therefore I am keen to understand how you view these various policy/guidance documents and what takes precedence.

The model outputs show negligible reductions in flood depth outside the red line boundary, limited to small reductions in some locations, with all increases contained within the site. As stated in the FRA (Section 5.2.7): "As these changes are within the redline boundary there are no impacts of increased flood risk to third parties." These changes are within acceptable tolerances, do not materially increase flood risk to third parties, and demonstrate that the proposed development can be made safe for its lifetime. On this basis, the FRA satisfies the second limb of the Exception Test by evidencing that the scheme will not increase flood risk elsewhere.

Again this statement is factually incorrect. You note increases are contained within the site when they clearly are not as per my commentary above. You then refer to a section of the submitted Flood Risk Assessment which is also incorrect given the noted increases upstream of the red line boundary. WSP's addendum FRA

goes on to confirm there is indeed an 8mm increase in flood level beyond the red line boundary of the site, confirming their own FRA to be incorrect. Again, I trust you will further clarify the position here with the Inspectorate so they are appropriately informed as to the impacts of the proposed busway given that in its current form your letter is misleading them?

Further to the above I would be grateful if you could re-confirm your position as to the second part of the Exception Test as it appears that the information on which your conclusions are based is incorrect.

Moving on, I would like to draw the EA's attention to Paragraph 049 and Table 2 of the PPG. The PPG paragraph 049 requires that where flood storage from any source is to be lost as a result of development, on site level for level compensatory storage, accounting for the predicted impacts of climate change over the lifetime of the development, should be provided. The Applicant has not done this, demonstrating a clear contravention of this requirement. The EA also fail to make reference to this in their response. Please can you clarify the EA's position here and how you consider Paragraph 049 to be passed?

Building on this, the requirements for Essential Infrastructure in the functional floodplain (Flood Zone 3b), as outlined in the notes to Table 2 of the PPG¹ state that there is a requirement for no net loss of flood storage, no impeding of flows and no increase in flood risk elsewhere. The proposals in their current form, fail to adhere to any of these requirements. Similarly, please can you confirm how the EA consider these fundamental policy requirements to be satisfied?

I look forward to hearing from you and as above we would be grateful for a meeting to be convened so we can discuss in full.

Many thanks,

Graham.

Graham Sinclair
Technical Director
Water & Flood Risk
m. 07734 604 920 w. www.createce.co.uk

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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Sent: 21 August 2025 13:26
To: Graham Sinclair <Graham.Sinclair@createce.co.uk>
Cc: Harry Mansfield <harry.mansfield@createce.co.uk>; Horner, Thomas <thomas.horner@dentons.com>; Grace Beard <Grace.Beard@createce.co.uk>; Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>; 'Alan Short' <cas64@cam.ac.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Dear Graham,

Thank you for your email.

Please see attached our letter sent to the Inspector on Tuesday which sets out our updated position. I expect the inquiry website hasn't been updated yet.

I will get back to you about the meeting as soon as I can.

Kind regards,

Alison Craggs

Sustainable Places Planning Specialist

East Anglia Area (West)

Environment Agency, Bromholme Lane, Bampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**

Direct dial: **02077140285**



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From: Graham Sinclair <Graham.Sinclair@createce.co.uk>

Sent: 21 August 2025 11:31

To: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>

Cc: Harry Mansfield <harry.mansfield@createce.co.uk>; Horner, Thomas <thomas.horner@dentons.com>; Grace Beard <Grace.Beard@createce.co.uk>; Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>; 'Alan Short' <cas64@cam.ac.uk>

Subject: RE: P24-3220 - Clare Hall, Cambridge

Morning Alison,

Further to our below correspondence I am seeking confirmation of the EA's current position. I note our client, Alan Short, President of Clare Hall, wrote to you earlier this week, sharing the findings of our own modelling along with my Proof of Evidence. I do hope you have had time to review these.

As you will be aware Proofs of Evidence were exchanged on Wednesday and we note in the flood risk Proof of Evidence that the appendices include the following email from yourselves, dated 8th August 2025:

Hi Jack,

Following recent discussions, we can confirm that the Environment Agency considers the model used for the Cambourne to Cambridge busway acceptable for assessing flood risk in the area of interest. While there are some technical issues identified, including minor increases in flood depths in already inundated open fields, these do not appear to materially affect the flood risk evaluation. There are also modest reductions in flood depths in built-up areas downstream of the bridge. Post-development modelling will need to demonstrate that any increase in flood risk remains within the red line boundary of the application and, where possible, that the structure delivers an overall improvement in flood risk. It is important to note that although the model is suitable for supporting the TWA Order and Flood Risk Assessment, it would not meet internal Environment Agency standards for updating the flood map without addressing the issues highlighted in the review. However, for planning purposes it is acceptable and therefore we intend to withdraw our objection on flood risk grounds. We will write to the Inspector by 19th August with a detailed position.

Kind regards,

Alison Craggs
Sustainable Places Planning Specialist

This email notes you will be writing to the inspectorate by 19th August to potentially withdraw the EA's objection. We understand this has not yet occurred and can only assume that the EA's objection to the proposal remains? I would be grateful if you could confirm this point.

You will also note the deadline for rebuttal Proofs of Evidence is 9th September and any rebuttals Clare Hall wish to make are likely to be resultant of the EA's position. Therefore I must stress the importance in knowing the EA's position as soon as possible such that we have suitable time to prepare any rebuttals.

As per Alan Short's correspondence a meeting to discuss the above would be extremely helpful so do let us know your availability for this.

I look forward to hearing from you.

Many thanks,

Graham.

Graham Sinclair
Technical Director
Water & Flood Risk
m. 07734 604 920 w. www.createce.co.uk

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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Sent: 11 August 2025 10:02
To: Graham Sinclair <Graham.Sinclair@createce.co.uk>
Cc: Harry Mansfield <harry.mansfield@createce.co.uk>; Horner, Thomas <thomas.horner@dentons.com>; Grace Beard <Grace.Beard@createce.co.uk>; Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Dear Graham,

Thank you for your email. I can confirm receipt.

Kind regards,

Alison Craggs

Sustainable Places Planning Specialist

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**



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From: Graham Sinclair <Graham.Sinclair@createce.co.uk>

Sent: 07 August 2025 17:01

To: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>; Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>

Cc: Harry Mansfield <harry.mansfield@createce.co.uk>; Horner, Thomas <thomas.horner@dentons.com>; Grace Beard <Grace.Beard@createce.co.uk>

Subject: RE: P24-3220 - Clare Hall, Cambridge

FAO Alison Craggs & Teresa Chapman

Dear Alison & Teresa

Further to our below correspondence, your correspondence with Alan Short of Clare Hall, Cambridge and the attached EA objection letter (with respect to the Cambourne to Cambridge Transport and Works Order) I write to further outline Clare Hall's position with regards the proposed crossing of Bin Brook.

As you will be aware Create Consulting has been instructed by Clare Hall to provide evidence at the upcoming Inquiry in regard to flood risk and the impact the proposed Bin Brook crossing will have on surrounding land.

We note the applicant's consultant, WSP, has been in contact with yourselves (albeit we are unsure exactly which officer) and are told that conversations are at an advanced stage with regards agreement of their hydraulic modelling.

We held a meeting with WSP and the applicant this morning in relation to setting out common ground. WSP were clear that they intended to not undertake the updates to the model requested by the EA in their most recent RAG review, but more to endeavour to defend the position as to the modelling being sufficient through the provision of additional sensitivity tests. We note this contravenes the requests of the EA's third-party reviewer, Arcadis.

As you will no doubt be aware the WSP model has a number of fundamental issues which in our view, and as expressed in your attached objection, make it unfit for purpose and thus not suitable for assessing the proposed development against. This primarily relates to the lack of detail provided to you by WSP, in particular

in relation to inadequate assessments of channel structures close to the busway crossing as well as using an out of date hydrological assessment, which underestimates flows. We therefore believe these fundamental issues pose a significant risk to WSPs ability to assess flood risk impact to surrounding land and property (particularly Clare Hall and the upstream Gough Way estate). WSP have confirmed there are impacts beyond the application boundary and the above model flaws could further exacerbate these impacts when correctly modelled.

Create's own modelling, using the more up to date 2023 JBA Bin Brook model, shows impacts of the proposed busway, both in flood level and velocity (which increases by up to 100% immediately downstream), beyond the application boundary. We therefore must emphasise the clear contravention of national policy this poses and would like to again highlight this issue to the EA to ensure this is fully taken on board in your assessment. We currently take the view that the EA cannot draw sufficient conclusions based on the WSP modelling as it stands and significant updates are required.

We believe it would be a derogation of duty by the EA to approve the WSP model when (a) it does not properly determine that additional flood risk won't be created elsewhere and (b) it hasn't proposed what mitigation measures are available to remedy that.

I trust you will take the above into account when liaising with the applicant over the coming days and should these matters not be resolved we assume you will also be presenting evidence at the Inquiry. I would be grateful if you could confirm on this point.

If you could confirm receipt of this email and that it has been forwarded on to the relevant parties as required (if you are not directly dealing with the case), it would be much appreciated.

Many thanks,

Graham Sinclair
Technical Director
Water & Flood Risk
m. 07734 604 920 w. www.createce.co.uk



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Sent: 28 August 2024 14:14
To: Harry Mansfield <harry.mansfield@createce.co.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Harry,

Thanks for your email. It's my understanding that this is our national approach.

Kind regards,

Alison Craggs
Sustainable Places Advisor
East Anglia Area (West)
Environment Agency, Bromholme Lane, Brompton, Huntingdon, Cambs. PE28 4NE
Tel: **02084745242**

Mob: **07467335963**
Direct dial: **02077140285**



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From: Harry Mansfield
Sent: Wednesday, August 28, 2024 10:11 AM
To: EastAnglia, Planning
Subject: RE: P24-3220 - Clare Hall, Cambridge

Good Morning Alison,

Thank you for your response.

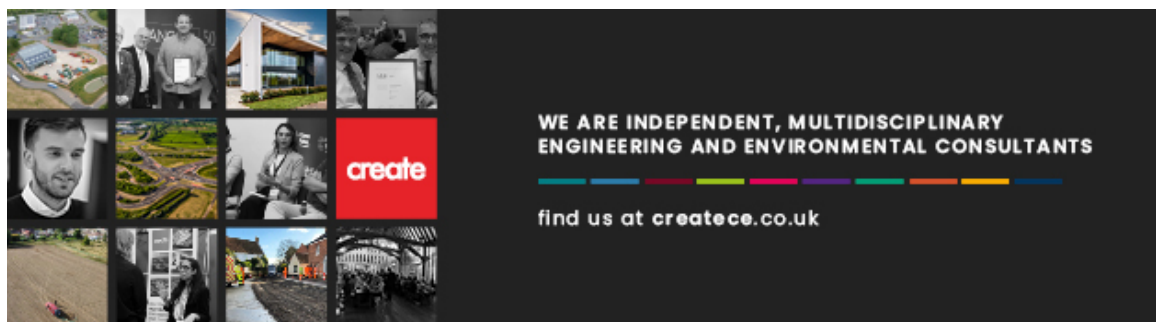
That is unfortunate, though understandable. Just so I can inform my client and further my own understanding, is this a standard national rule the EA is following? Or is it a result of excessive workloads at the moment?

i.e. if we receive similar such third party consultancies in the future can we expect the same response?

Kind regards,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Sent: Tuesday, August 27, 2024 3:51 PM
To: Harry Mansfield <harry.mansfield@createce.co.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Harry,

Thanks for your email.

If your client is a third party to the development you describe, rather than the developer/landowner, then we won't be able to take this forward unfortunately. We can only provide pre-application planning advice to developers or consultants to help shape individual planning proposals.

Please let me know if I've misunderstood.

Kind regards,

Alison Craggs

Sustainable Places Advisor

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**

Mob: **07467335963**

Direct dial: **02077140285**



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From: Harry Mansfield <harry.mansfield@createce.co.uk>
Sent: Tuesday, August 27, 2024 9:14 AM
To: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>
Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Allison,

Apologies I have been on leave for a few weeks.

Im picking this up now. Essentially our project is assessing the impact of a development works in south western Cambridge. The client has engaged with us to test and determine the likely impact of the development on their property. The development is across the bin brook just upstream of Clare hall college.

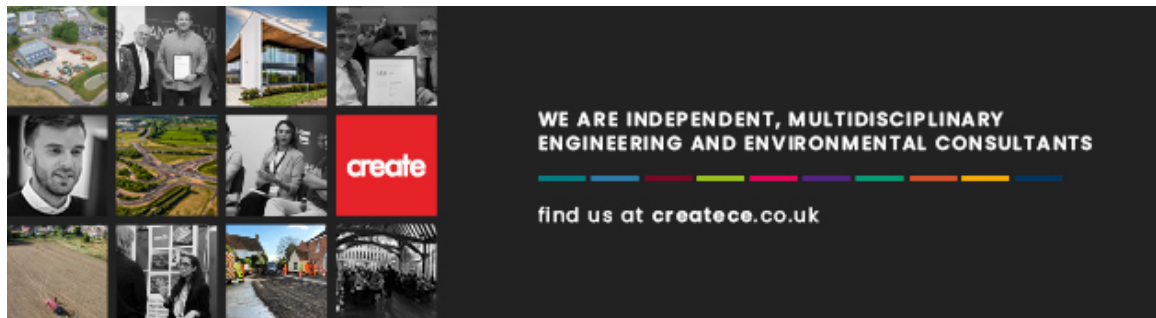
We would like a meeting with the EA to validate the work that we have undertaken. What we would like first of all is a meeting with yourselves so that we can discuss the model that we have used, the methodology we have followed and other details of the project so that we can flag anything the EA might object to.

Is it possible to arrange for a meeting?

Many thanks,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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From: EastAnglia, Planning <Planning.EastAnglia@environment-agency.gov.uk>

Sent: Wednesday, August 7, 2024 11:12 AM

To: Harry Mansfield <harry.mansfield@createce.co.uk>

Subject: RE: P24-3220 - Clare Hall, Cambridge

Hi Harry,

Thanks for your email. I apologise for the delay to our response.

Our flood risk team have limited capacity for model reviews currently and therefore we are having to limit our attendance to meetings to large scale/strategic sites at the moment.

Could you please provide more detail of the proposed development related to this request and the issues you would like to discuss? If there is any planning history this would be useful to know.

Kind regards,

Alison Craggs

Sustainable Places Advisor

East Anglia Area (West)

Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Tel: **02084745242**

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From: Harry Mansfield <harry.mansfield@createce.co.uk>
Sent: Thursday, July 4, 2024 11:28 AM
To: Enquiries_EastAnglia <Enquiries_EastAnglia@environment-agency.gov.uk>
Subject: P24-3220 - Clare Hall, Cambridge

Hi,

We are currently reviewing the impact of the proposed development in Cambridge. The location is Herschel Rd, Cambridge CB3 9AL, the model is the bin brook 2023 model.

We have been provided with the model and have completed a review and pulled together our intended scope of works.

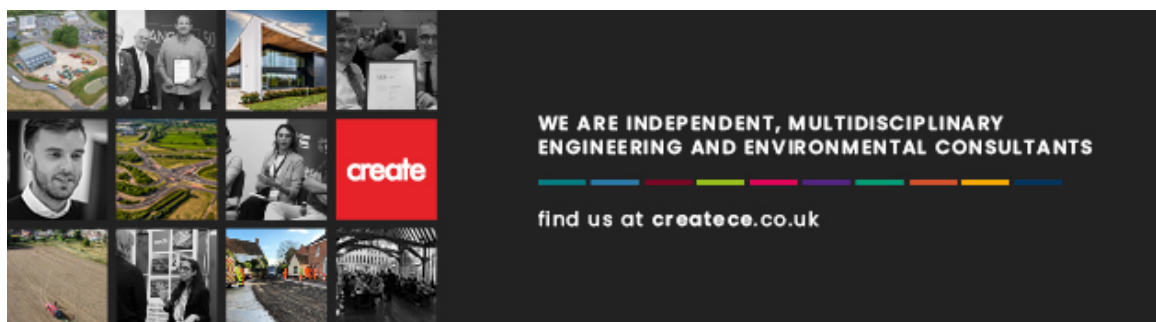
Id like to be put in touch with an EA advisor who can support us with this work. We to establish a purchase order so that we can have the EA input on the following:

1. Review/approval of our scope proposals
2. Meeting to discuss the details of the methodology

Many thanks,

Harry Mansfield
Senior Flood Risk Consultant

t. 01603 877 010 w. www.createce.co.uk



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