



Registered Charity Number 204644

Hobson's Conduit Trust

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Planning Policy

Cambridge City Council

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Dear Sir or Madam,

Consultation on Draft Cambridge Biomedical Campus Supplementary Planning Document

I am the Chairman of Hobson's Conduit Trust.

My purpose in writing is to draw your attention to various elements of the draft Supplementary Planning Document where the Trustees would wish to see greater reference made to Nine Wells and its surrounds, and to Hobson's Brook.

For four centuries the Trust and its precursors (known as the Feoffees) have been responsible for the protection and maintenance of Hobson's Brook and Conduit, with rights and obligations deriving initially from the 1610 Tripartite Indenture. Whilst Nine Wells Local Nature Reserve is owned jointly by the City and the University, and is managed by the City Council, it remains the principal source of spring water feeding into our chalk stream system, and so it is axiomatic that the Trust is directly concerned with the health of the springs and the curation of Nine Wells LNR, where there is a Listed nineteenth century monument commemorating the Conduit and its benefactors. Hobson's Conduit was then Cambridge's principal potable water supply.

More recently, we have entered into a range of legal agreements (Deeds) with both the developers of Clay Farm, and Cambridge University Hospitals and the Cambridge Biomedical Campus which are binding also upon all developers of new buildings on the hospital and CBC sites. These Deeds of Grant of easements covering surface water arriving into the Brook from nearly the entire area delineated as M15 on page 15 of the draft SPD (but not yet Phase 3), are very well understood and observed and are on the public register, so it would appear to us that it is necessary to make reference to these well understood agreements within the Supplementary Planning Document. Indeed, we recently entered into a further such Deed related to groundwater management with AstraZeneca, and we regularly grant licences covering dewatering for piling of new buildings.

It will therefore be obvious to you why the Trustees are alarmed by the paucity of references in the SPD to the Trust, to Nine Wells, and to the Brook, and to the legal structure surrounding surface water in and around the Biomedical Campus.

We believe that this SPD needs to state and to underpin the extreme importance that the Trust places on the maintenance of water quality and the natural environment and habitats along the green corridor from Nine Wells to the City centre formed around Hobson's Brook and Conduit.

Our concerns about these aspects are manifest when, with the City's sustainable drainage engineers and our advisors Stantec, we scrutinise and discuss the surface water handling arrangements for all new developments on the CBS, including those for Cambridge South station, and other transport infrastructure.

The Trust carries out regular monitoring of flows and water quality, with the assistance of professional consultants, and using the latest technology. We therefore have a strong view that it is only through the Trust's early involvement in the planning process for new developments and constant vigilance that we can discharge our responsibilities.

The effects of any pollution of the watercourse or deterioration in water quality in the Brook and Conduit would be widely seen and felt, including in the River Cam through the City, and at the Cambridge University Botanic Garden and Emmanuel and Christ's Colleges, the lakes and water features in whose Listed gardens are fed by the Conduit, and where there are significant habitat concerns.

For example, we are presently discussing the replacement of salt for de-icing roads and pavements on the hospital and CBC sites with less noxious proprietary Sodium or Potassium Formate de-icing compounds that we know will be used at Cambridge South station. This requirement could usefully be included in the SPD.

We expect soon to discuss surface water drainage strategy and attenuation in relation to area E/2 on page 16 with the interested parties to bring Phase 3 into line with Phase 2, as we anticipate that surface water drainage from E/2 will also come to Hobson's Brook via the South Ditch. We expect legal documents similar to those covering Phase 2 to be agreed.

These are our further comments on the draft SPD:

1. P17 3.14

We note the wording:

'The SPD ensures that new development reduces its environmental impact by minimising carbon emissions, flood risk, pollution and pressure on resources such as water, as well as helping to protect and enhance biodiversity.

2. p23 3.24

We are surprised and disappointed, indeed, astonished, to find no reference to Nine Wells, and to White Hill and the Gog Magogs. The relationship of the built environment of Addenbrooke's and the CBC with all of these surrounding landscape features to the south is highly relevant, and as anyone looking north towards Cambridge from Magog Down will know, the scale and impact of the whole of the mass of hospital and CBC buildings and their height and increasingly dense and industrial texture is very significant and of high sensitivity, and needs to be given appropriate weighting in the SPD which is currently completely missing.

3. P24 3.26

This states: '3.26 Most users of the Campus do not have direct access to high quality public realm or green open space for play, recuperation, sports or any other outdoor activities to support health and wellbeing. Green infrastructure is also unevenly distributed across the Campus and so there are large areas with no green infrastructure, links to natural habitats to support biodiversity or improve the Campus environment.'

We feel that this highlights the importance of ensuring that Nine Wells is properly and comprehensively safeguarded, and remains readily accessible and its footprint is expanded sufficiently to absorb greater numbers of people working at the CBC. It also emphasises the important role that Hobson's Park can play, and the potential value of walking routes in the Park including beside Hobson's Brook. The Trustees are currently aiming to complete a continuous walking route from the City Centre to Nine Wells, part of which would provide an excellent and attractive circular walking route from CBC.

4. p28 3.28

The incinerator chimney's height has made it a recognised landmark for 60 years, but this should not be used as an excuse for a generalised uplift in building height beyond that of the main hospital building. We therefore believe that the SPD should be much more explicit about limitations on maximum building heights, and much more specifically than what is set out in Policy 60 quoted on page 52. This is particularly important in relation to our point 2 above, especially in relation to views from Magog Down over the CBC and Addenbrook's site towards the city, and to the northern skyline as seen from Nine Wells. This is also relevant to Clay Farm and other Trumpington and Shelford residents, and visitors to Hobson's Park.

Chapter 4 - Development principles

5. p30 4.10

We do not consider the following wording to be sufficient: 'Consideration also needs to be made for the open spaces at Nine Wells that could be negatively impacted by increased recreational pressure.'

Nine Wells LNR needs to be expanded to include areas currently in agricultural use around it in order to absorb greater footfall, as well as to safeguard the fragile environment around the springheads.

We have set this out in our Nine Wells Vision document, currently being updated, a copy of which follows this letter. However, although s106 funds were previously assembled for this purpose, the expansion of Nine Wells LNR did not proceed. It is of great importance given the nature of the work that takes place at the hospitals and on the Biomedical Campus, that staff have access to green space nearby where they can find tranquillity and decompress. Nine Wells offers this, complementing Hobson's Park.

In this context, please also see, for example, 'The Nature of Cambridge,' ISBN 978-1-874357-07-5 pages 262 et seq., and <https://johnmeed.net/ecology/nine-wells/>

6. p31 4a.2.1

We would expect to see some recognition of the way in which existing water features and the extensive surface water SUDs arrangements are integrated with Hobson's Brook.

7. p31 4a.2.2

We note the relationship between these increasingly valuable areas of habitat including that offered by the areas of planting along the Addenbrooke's Road bridge embankment. Please see references at point 4. above.

7. p31 4.32

As indicated above, this section should include mention of Nine Wells, Hobson's Brook and the Gog Magogs, and should include wording more compelling and onerous than 'seek opportunities to...'. (4a.3.1) The importance of views into, across and over the Campus and hospital site must receive greater emphasis.

In this context the materials to be used for cladding the new Multi Storey Car Park next to the Abcam Building offer an example of imaginative engagement with the geology of Nine Wells. This is in stark contrast with what we see when looking at other nearby multi-storey car parks (AZ and Car Park 2).

8. p34 4c.2

We believe that this section should reinforce the need to limit the height of buildings on the Campus.

9. P36 4d.2.2

It is very odd that the wording seems to suggest that Cambridge South station is a possibility when in fact it will soon be a reality, open for passengers. East West Rail services may be seen as potentially of future importance, but are not mentioned.

10. p36 4e.1.4

We believe that some reference should be made here to water quality concerns, including where, as in the case of the new Cancer Hospital, it is likely that some rainwater will need to be stored before being sent out into the wider drainage assets in order to keep to site-wide maxima, but so creating the possibility of low oxygenation and higher water temperatures in pulses of water sent out from storage in tanks in the new buildings. Reference could be made to the Trust's legal requirements in relation to new buildings and surface water flows.

11. p37 4.22

Reference should be made to the Trust's legal requirements in relation to new buildings and surface water flows.

12. P38 4e.3.2

A reference to protecting Nine Wells Local Nature Reserve should also be included here alongside Hobson's Brook.

13. Chapter 5

We note that Chapter Five 'sets out a list of questions that developers should consider when preparing a planning application in order to positively plan for wider impacts and mitigation measures beyond the boundary of the individual site.'

We believe that there are various points in Chapter 5 where reference should be made to Nine Wells and Hobson's Brook, and to Hobson's Park.

14. General

Please note that the Trustees strenuously object to the current CSET busway proposals which will cause damage to Nine Wells and Hobson's Brook especially in the context of the proposed CSET Construction Compound 7 right next to Nine Wells, and the massive motorway-style CSET bridge over Hobson's Brook. This transport scheme is portrayed uncritically in the SPD as offering various benefits, and we contend that it will not offer

these, and not as they are set out in the SPD. We favour the alternative A1307 on-road route, which would much better serve the whole hospital and CBC site than CSET, and would avoid Nine Wells and the Brook completely. We note that it is most likely that a Public Inquiry will take place into the draft CSET TWAO later in 2025.

We note that the recent CBC Vision 2050 document, which is inexplicably not mentioned in the SPD, and which is clearly a relevant complementary CBC statement of intent, presently approaching 40 pages, waits until the foot of page 37 to include the following paragraph:

‘Sustainability and biodiversity

As scientists and healthcare professionals, CBC’s occupiers are committed to the highest standards of sustainability, and recognise its significance to human health. As the Campus develops, CBC intends to become an exemplar project in the UK for sustainable development: preserving and enhancing green spaces, ensuring a healthy environment, and increasing local biodiversity.’

This, in the context of the CBC 2050 Vision, is clearly wholly inadequate, and we therefore look to the CBC SPD to play its part in obliging all those who seek to benefit from opportunities represented by the future growth of the Biomedical Campus to embrace those matters whose prioritisation the Trustees regard as the *sine qua non* of further CBC development. As outlined above we want these aspects to be accorded a much higher and more appropriate priority.

Thank you for your kind attention

Yours truly



John A Latham

Chairman, Hobson’s Conduit trust